

STATEMENT OF BASIS
Title V Permit Renewal

Facility Name: General Dynamics, NASSCO

Application Number: APCD2020-APP-006308

Title V Permit Number: APCD2003-TVP-960992

Facility ID: APCD1976-SITE-00145

Equipment Address: 2798 E. Harbor Drive
San Diego, CA 92113

Facility Contact: Andrew Aguilar
Contact Phone: 619-544-7780

Permit Engineer: Priscilla Castanon

Date: 04/13/2026

Senior Engineer:

X

Joe Herzig
Senior Air Pollution Control Engineer

1.0 Type of Action and Summary of Changes

This statement of basis reviews the application for renewal of a Title V permit to operate for General Dynamics NASSCO. The current overall Title V permit expired on June 15, 2021. The District received the application for a permit renewal on June 01, 2020, which is in compliance with the requirement for a timely renewal application, at least 12 months, but not more than 18 months, before the expiration of the existing Title V permit. The application was deemed complete on December 22, 2020. Hence, an application shield pursuant to Rule 1410 (a) is in effect for the facility until the District takes action on the renewal application.

To ensure that the permit issued most accurately reflects the current state of the facility, this statement of basis incorporates the changes from the original statement of basis, will address the additional comments from the facility, and will incorporate all other changes up to current date.

As part of the Title V renewal process, the District has also made a preliminary decision to take the following actions, which are further discussed below:

- Incorporate several recently approved District permits for new emission units into the Title V permit with changes as necessary to address Title V requirements,

- Incorporate several recently approved District permits for modified existing emission units into the Title V permit with changes as necessary to address Title V requirements,
- Incorporate Title V actions associated with changes made to permits through non-Title V applications
- Add new applicable requirements to permits where necessary,
- At the applicant's request, change conditions that reflect only state or District requirements for toxic air contaminants from federally enforceable to District-only enforceable,
- Remove retired permits from the Title V permit, and enhance monitoring, reporting, and recordkeeping requirements, clarify permit conditions and their basis, correct and update emission unit descriptions and correct typographical errors.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal

The following tables describe each application for a change to the Title V permit, each application for a new or modified District permit and each permit which has been retired since the last Renewal (the tables include actions that occurred prior to the original noticing of this renewal, and changes since).

The following table summarizes all previous applications at this facility affecting the Title V permit.

Title V Application History Since Initial Title V Permit		
Application Number	Application Description	Approved?
APCD1997-APP-960992	Initial Title V Application	Approved
APCD2002-APP-978091	Title V Modification	Approved
APCD2004-APP-980584	Title V 502(b)(10) Change	Approved
APCD2004-APP-980728	Title V Administrative Amendment	Approved
APCD2005-APP-982348	Title V Modification	Approved
APCD2005-APP-982630	Title V Administrative Amendment	Approved
APCD2005-APP-982347	Title V Administrative Amendment	Approved
APCD2006-APP-984001	Title V Administrative Amendment	Approved
APCD2007-APP-985373	Title V Renewal	Approved

APCD2007-APP-985915	Title V 502(b)(10) Change	Approved
APCD2008-APP-986709	Title V 502(b)(10) Change	Approved
APCD2008-APP-987560	Title V 502(b)(10) Change	Approved
APCD2010-APP-001438	Title V 502(b)(10) Change	Approved
APCD2011-APP-001517	Title V Administrative Amendment	Approved
APCD2011-APP-001761	Title V Modification	Approved
APCD2011-APP-001782	Title V Modification	Approved
APCD2012-APP-002067	Title V Minor Modification	Approved
APCD2012-APP-002316	Title V Administrative Amendment	Approved
APCD2013-APP-002518	Title V Minor Modification	Approved
APCD2013-APP-002519	Title V 502(b)(10) Change	Approved
APCD2013-APP-002713	Title V Minor Modification	Approved
APCD2014-APP-003315	Title V Administrative Amendment	Approved
APCD2014-APP-003490	Title V 502(b)(10) Change	Approved
APCD2014-APP-003602	Title V 502(b)(10) Change	Approved
APCD2015-APP-003929	Title V 502(b)(10) Change	Approved
APCD2015-APP-004059	Title V 502(b)(10) Change	Approved
APCD2015-APP-004079	Title V Renewal	Approved
APCD2015-APP-004065	Title V Minor Modification	Approved

APCD2015-APP-004229	Title V 502(b)(10) Change	Approved
APCD2017-APP-004891	Title V Administrative Amendment	Approved
APCD2017-APP-004925	Title V Minor Permit Modification	Approved
APCD2017-APP-005013	Title V Minor Permit Modification	Open – Included in this action
APCD2018-APP-005393	Title V Minor Modification	Open – Included in this action
APCD2019-APP-005991	Title V Minor Modification	Open – Included in this action
APCD2020-APP-006212	Title V Administrative Amendment & 502(b)(10)	Approved
APCD2020-APP-006308	Title V Renewal TVP-960992	This application
APCD2021-APP-006729	Title V 502(b)(10) Change	Open – Included in this action
APCD2021-APP-006917	Title V Minor Modification	Open – Included in this action
APCD2022-APP-007281	Title V 502(b)(10) Change	Open – Included in this action
APCD2022-APP-007345	Title V Minor Modification	Open – Included in this action
APCD2022-APP-007476	Title V 502(b)(10) Change	Open – Included in this action
APCD2023-APP-007711	Title V Minor Modification	Open – Included in this action
APCD2024-APP-008307	Title V Administrative Amendment	Open – Included in this action
APCD2024-APP-008323	Title V Minor Modification	Open – Included in this action
APCD2024-APP-008520	Title V Minor Modification	Open
APCD2025-APP-008618	Title V 502(b)(10) Change	Open – Included in this action
APCD2025-APP-008803	Title V 502(b)(10) Change	Open – Included in this action
APCD2026-APP-009022	Title V 502(b)(10) Change	Open

Since the previous renewal, the District has received applications from this facility as shown in the following table. These applications are submitted under the District’s local permitting program and typically are associated with a corresponding Title V application to implement the same change to the Title V permit once the modified local permit is issued (see appendix A of the permit). Of note is that NASSCO did not file Title V applications for equipment inactivations and in only some cases filed applications for like kind replacements (LKR) which are equipment replacements typically categorized as 502(b)(10) changes.

Application History for Facility Since Recent Renewal				
Application Number	Affected Permit to Operate(s)	Description	Outcome	Related Title V App
APCD2015-APP-003908	APCD2008-PTO-007657, APCD2004-PTO-972497	Replacement of Thermal Oxidizer	Approved	APCD2015-APP-004059
APCD2015-APP-003919	APCD2015-PTO-002467	New Thermal Oxidizer for Control of Emissions	Approved	APCD2015-APP-004065
APCD2015-APP-004024	APCD2004-PTO-972497	Primeline I Replacements	Approved	APCD2015-APP-004229
APCD2015-APP-004025	APCD2009-PTO-860526	Primeline I Replacements	Approved	APCD2015-APP-004229
APCD2017-APP-005014	APCD2020-PTO-003440	New Abrasive Blast System	Approved	APCD2017-APP-005013
APCD2017-APP-005015	APCD2020-PTO-003459	New Abrasive Blast System	Approved	APCD2017-APP-005013
APCD2017-APP-005016	APCD2020-PTO-003460	New Plasma Cutter	Approved	APCD2017-APP-005013
APCD2017-APP-005017	APCD2020-PTO-003461	New Plasma Cutter	Approved	APCD2017-APP-005013
APCD2018-APP-005392	APCD2021-PTO-003682	Misc. Sitewide Engine Permit	Approved	APCD2018-APP-005393
APCD2018-APP-005601	APCD2019-PTO-003295	New Abrasive Blast System	Approved	None
APCD2019-APP-005992	APCD2011-PTO-000878, 001047, 001048, 001049, 001050	Condition Change Request – Source Test Frequency	Approved	APCD2019-APP-005991
APCD2020-APP-006282	APCD2005-PTO-	Replacement of Abrasive Blast Pots	Approved	APCD2020-APP-006212

	000610, 000616, 002690			
APCD2020-APP-006421	APCD2005-PTO-002690	Replacement of Abrasive Blast Pot	Approved	APCD2021-APP-006729
APCD2020-APP-006422	APCD2005-PTO-000616	Replacement of Abrasive Blast Pot	Approved	APCD2021-APP-006729
APCD2020-APP-006552	APCD2008-PTO-950704	Replacement of Engine	Approved	None
APCD2020-APP-006553	APCD2008-PTO-950705	Replacement of Engine	Cancelled/Amended	None
APCD2021-APP-006731	APCD2022-PTO-004427	New Abrasive Blast System	Approved	APCD2021-APP-006729
APCD2021-APP-006872	APCD2011-PTO-000802	Replacement of Abrasive Blast Pot	Approved	APCD2022-APP-007281
APCD2021-APP-006873	APCD2011-PTO-000803	Replacement of Abrasive Blast Pot	Approved	APCD2022-APP-007281
APCD2021-APP-006972	APCD2022-PTO-004415	Misc. Sitewide Engine Permit	Approved	None
APCD2021-APP-007075	APCD2008-PTO-950704, PTO-950705	Amendment to APCD2020-APP-006552 & APP-006553	Approved	None
APCD2022-APP-007125	APCD2023-PTO-004785	New Plasma Cutter	Approved	APCD2022-APP-007345
APCD2022-APP-007126	APCD2007-PTO-977754	Replacement of Plasma Cutter	Open – ATC issued	APCD2022-APP-007345
APCD2022-APP-007127	APCD2007-PTO-978048	Replacement of Plasma Cutter	Approved	APCD2022-APP-007345
APCD2022-APP-007392	NA	New Marine Diesel Engine	Open	None
APCD2022-APP-007393	NA	New Marine Diesel Engine	Open	None
APCD2022-APP-007475	APCD2007-PTO-974936	Replacement of Plasma Cutting Equipment	Approved	APCD2022-APP-007476
APCD2023-APP-007712	APCD2007-PTO-974936	Modification to Plasma Cutting Control Equipment	Approved	APCD2023-APP-007711
APCD2023-APP-007713	APCD2008-PTO-979491	Replacement of Plasma Cutting Equipment	Open – ATC issued	APCD2023-APP-007711
APCD2023-APP-007714	APCD2008-PTO-900256	Modification to Fiberglass Machining Control Equipment	Approved	APCD2023-APP-007711

APCD2024-APP-008138	APCD2004-PTO-972497	Replacement of RTO	Open – ATC issued	APCD2025-APP-008618
APCD2024-APP-008504	NA	New Sitewide Abrasive Blasting Permit	Open	APCD2024-APP-008520
APCD2024-APP-008519	NA	New Abrasive Blast System	Open	APCD2024-APP-008520
APCD2025-APP-008617	APCD2004-PTO-972497	Primeline II Replacements	Open – ATC issued	APCD2025-APP-008618
APCD2025-APP-008802	APCD2006-PTO-961422	Control Replacement	Approved	APCD2025-APP-008803
APCD2026-APP-009020	APCD2008-PTO-975360	RRP Modification	Open	APCD2026-APP-009022
APCD2026-APP-009021	APCD2008-PTO-975361	RRP Modification	Open	APCD2026-APP-009022
APCD2026-APP-009023	NA	New Welding School Permit	Open	APCD2026-APP-009022

Additionally, the following permits/emission units have been retired/ceased operation since the previous Title V permit was issued and will no longer be contained in Appendix A of the permit.

Permit Number	Retirement Date	Description
APCD2014-PTO-001908	08/02/2022	Prime Diesel Engine: Cummins, Model QSX15-C550
APCD2006-PTO-973376	10/01/2025	Emergency Diesel Engine: Detroit Diesel, Model 8163-7305

3.0 Facility Description

General Dynamics NASSCO is an industrial full service shipyard. The facility consists of abrasive blasting operations, marine coating, metal parts coating, wood products coating, plasma cutters, internal combustion engines, motive equipment coating, fiberglass machining, and hand layup of polyester resins which aid in the designing and building of Naval and commercial ships.

The primary air quality focus for this facility is the emissions of criteria pollutants and hazardous air pollutants (HAPs) and VOCs from coating operations. For this Title V review, air quality considerations and regulatory applicability are summarized with frequent reference to permit content. Considerations specific to Title V, notably monitoring, record keeping and reporting, are also included.

The site has, at the time of this renewal, approximately 55 active permits. A full listing of permits is contained in Appendix A of the permit. Generally the permits at this facility fit into the following categories:

- (1) Marine Coatings
- (2) Other Coatings (Metal/Automotive/Wood/Adhesive/Resin)

- (3) Solvent Recovery
- (4) Abrasive Blasting
- (5) Plasma Cutter
- (6) Thermal Oxidizer
- (7) Fiberglass Machining
- (8) Diesel Engines

4.0 Compliance History

Overall, the facility has been in generally good compliance since the previous renewal. Since the last Title V renewal application in 2017, the facility has been subject to compliance action on 49 occasions which is a very high compliance rate considering the number of permits, length of time and complexity of the facility. Of these records, 31 have been self reported. These violations have all been addressed and mostly consisted of very minor record keeping/monitoring inconsistencies, open VOC containers and minor exceedances of process parameter or emission limit conditions.

5.0 Title V Applicability

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA).

The District conducted a review of this facility's PTE. The application forms submitted indicate that the facility is a major source of HAP, and the District agrees with this. Furthermore, based on an analysis of each permit, the facility is also a major source of VOC. It is therefore subject to Title V requirements.

Many of the permits reviewed do not have limitations on operation through permit conditions and potential to emit is based on maximum capacity. In some cases this leads to permits with very high potential to emit due to high capacity, or permits are inherently very low emitting so contribution to potential to emit is unknown, but not significant to total facility-wide PTE.

Additionally, since this action incorporates modifications to the Title V permit under applications previously submitted, the ability for each of these changes to qualify as the indicated application type was reviewed. Each application was found to meet the requirements of the indicated application type as described below. Supporting information for each application is contained in the attached documents as indicated which were prepared during initial evaluation of the change under the District/Local applications.

APCD2017-APP-005013 Minor Mod, Plasma Cutter and Abrasive Blast Equipment

This Title V modification application was submitted to incorporate permits for two new abrasive blasting systems and two new plasma cutting machines.

Applications APCD2017-APP-005014 and 005015 evaluated the emissions and applicable rules for the abrasive blasting equipment. Applications APCD2017-APP-005016 and 005017

evaluated the emissions and applicable rules for the plasma cutter equipment. Based on the original engineering evaluations, assuming all permitted emission units operate concurrently at their maximum allowable capacity, the calculated potential to emit remains below the applicable regulatory threshold for classification as a major modification. Furthermore, the processes associated with this project predominantly generate particulate matter (PM). The facility is not currently classified as a major source for particulate matter emissions; therefore, the proposed changes do not alter its major source status

The district agrees that the proposed change is considered a minor modification because it does not trigger a major source new source review or cause any violation. The changes to incorporate the new equipment permits do not relax monitoring, recordkeeping or reporting, nor does it trigger a change in federal emission limits. The facility does not propose changes that would allow exemption from specific rule requirements. In addition, the change is not a Title I modification and does not require MACT.

APCD2018-APP-005393 502(b)(10), Sitewide Portable Diesel Engine

This application was submitted to incorporate a facility-wide permit authorizing the operation of portable, diesel-fired internal combustion engines rated at or above 50 brake horsepower. The submittal was made in response to a Compliance Advisory issued by the San Diego County Air Pollution Control District regarding the allowable use of portable internal combustion engines at boatyards and shipyards.

Application APCD2018-APP-005392 established baseline emissions based on actual emissions from the most representative year within the five-year period preceding receipt of the application, consistent with applicable New Source Review requirements. Because the permit applies facility-wide and governs portable engines used to support stationary-source activities—rather than authorizing a specific emission unit—the NSR evaluation focused on establishing enforceable operational limits to ensure that the project would not constitute a major modification. As part of the original engineering analysis, the facility agreed to limit NOx emissions from portable engine operations to baseline actual emission levels representative of existing background conditions at the site. These limits ensure that no net emissions increase occurs as a result of this permitting action.

Accordingly, the proposed change satisfies the criteria for a Clean Air Act Section 502(b)(10) change, as it does not result in emissions increases or modifications that would trigger major NSR requirements. Incorporation of the associated operating permit into Appendix A is therefore included as part of this permit action.

APCD2019-APP-005991 Minor Mod, Revision to Source Testing Frequency

This application was submitted to incorporate a change to condition #21, regarding the source test frequency, event of a failed source test and the procedures for returning to compliance, in the following Permits to Operate:

APCD2011-PTO-000878

APCD2011-PTO-001047

APCD2011-PTO-001048

APCD2011-PTO-001049

APCD2011-PTO-001050

The proposed changes are administrative and procedural in nature. There is no change to permitted emission limits, potential to emit, or applicable regulatory requirements. Existing conditions remain in effect, and continued compliance with New Source Review requirements is maintained.

The district agrees that the proposed change is considered a minor modification because it does not trigger a major source new source review or cause any violation. The changes to incorporate the new equipment permits do not relax monitoring, recordkeeping or reporting, nor does it trigger a change in federal emission limits. The facility does not propose changes that would allow exemption from specific rule requirements. In addition, the change is not a Title I modification and does not require MACT.

APCD2021-APP-006729 502(b)(10), Abrasive Blast Systems

This application was submitted to include changes to existing abrasive blast systems permitted under APCD2005-PTO-002690 and APCD2005-PTO-000616, and the submission of a new portable skid mounted abrasive blast system.

The changes made to the existing permits were submitted as a Like-Kind Replacement type application and documented under District records APCD2020-APP-006421 and -006422. This type of application requires, per San Diego Air Pollution Control District Rule 11, that the like-kind replacement in whole or part of any article, machine, equipment, or other contrivance where a Permit to Operate has previously been granted for such equipment meets the following requirements:

(A) is identical in function, and

(B) is similar in design, and

(C) the actual air contaminant emissions are the same in nature, and

(D) has a capacity, production rate, and actual air contaminant emissions that are equal to or less than those of the currently permitted equipment.

The replacement of the blast pots did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit.

The new application record APCD2021-APP-006731, as shown in the engineering evaluation, verifies the potential to emit for the unit is below major source thresholds. The installation of this new equipment does not make the facility a major source and in itself does not constitute a major modification under Title I of the CAA. Permit record APCD2022-PTO-004427 for this new unit was created and approved by the District.

For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2021-APP-006917 Minor Mod, Title V Applicable Requirements

This application was submitted to revise Title V Permit No. 960992 to add San Diego County Air Pollution Control District Regulation IV, Rule 67.21 Adhesive Materials Application Operations to the applicable requirements table.

The affected emission units are existing, permitted operations that are already in compliance with Rule 67.21. This action does not authorize any physical or operational changes, does not result in

a violation of applicable requirements, does not relax monitoring, recordkeeping, or reporting provisions, and does not constitute a Title I modification or trigger New Source Review or CAA Section 112(g).

Accordingly, this revision qualifies as a minor permit modification and is incorporated into the Title V permit as part of this permit action.

APCD2022-APP-007281 502(b)(10), Abrasive Blast Systems

This application was submitted to include changes to existing abrasive blast systems permitted under APCD2011-PTO-000802 and APCD2011-PTO-000803.

The changes made to the existing permits were submitted as a Modification type application and documented under District records APCD2021-APP-006872 and -006873 to replace the abrasive blast pots.

The replacement of the blast pots did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit, nor does it result in an emission increase. For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2022-APP-007345 502(b)(10), Plasma Cutters

This application was submitted to include changes to plasma cutters permitted under APCD2007-PTO-977754 and APCD2007-PTO-978048, and the submission of a new plasma cutter. The changes made to the existing permits were submitted as a Modification type application and documented under District records APCD2022-APP-007126 and -007127. The replacement of the plasma cutters did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit, nor does it result in an emission increase.

The new application record APCD2022-APP-007125, as shown in the engineering evaluation, this type of equipment does not result in a VOC increase and verifies the potential to emit for the unit is below major source thresholds. The installation of this new equipment does not make the facility a major source and in itself does not constitute a major modification under Title I of the CAA. Permit record APCD2023-PTO-004785 for this new unit was created and approved by the District.

For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2022-APP-007476 502(b)(10), Plasma Cutter

This application was submitted to include changes to the plasma cutting equipment permitted under APCD2007-PTO-974936.

The changes made to the existing permit were submitted as a Like-Kind Replacement type application and documented under District record APCD2022-APP-007475. This type of application requires, per San Diego Air Pollution Control District Rule 11, that the like-kind replacement in whole or part of any article, machine, equipment, or other contrivance where a Permit to Operate has previously been granted for such equipment meets the following requirements:

- (A) is identical in function, and
- (B) is similar in design, and
- (C) the actual air contaminant emissions are the same in nature, and
- (D) has a capacity, production rate, and actual air contaminant emissions that are equal to or less than those of the currently permitted equipment.

The replacement of the plasma cutting equipment did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit.

For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2023-APP-007711 502(b)(10), Plasma Cutter and Fiberglass Machining

This application was submitted to include changes to permits APCD2008-PTO-900256 (Fiberglass Machining), APCD2008-PTO-979491 (Plasma Cutter), and APCD2007-PTO-974936 (Plasma Cutter).

Application APCD2023-APP-007714 was submitted to modify the collection and air pollution control equipment associated with permit APCD2008-PTO-900256. The engineering evaluation determined that the proposed equipment changes constitute like-kind or functionally equivalent replacements and do not alter the maximum rated capacity, throughput, control efficiency, or potential to emit of the permitted emission unit. The modification does not result in any change to permitted emission limits, applicable requirements, or existing permit conditions.

Applications APCD2023-APP-007712 and APCD2023-APP-007713 were submitted to modify the collection and control equipment associated with permits APCD2007-PTO-974936 and APCD2008-PTO-979491. The engineering analyses for these applications demonstrate that the proposed modifications do not increase emissions. The control devices continue to meet or exceed the originally permitted control efficiencies, and no revisions to emission limits, monitoring, recordkeeping, or reporting requirements are necessary.

In all cases, the modifications do not affect the applicability of any federal, state, or local regulatory requirements, nor do they alter the equipment's compliance status under the rules and regulations cited in the existing permits. Based on the absence of emissions increases and the lack of changes to applicable requirements or permit terms, these applications qualify as changes under Clean Air Act Section 502(b)(10). Accordingly, incorporation of the associated operating permits into Appendix A is included as part of this permit action.

APCD2024-APP-008307 Admin, RO change

The administrative amendment was submitted to change the first alternate contact, permit information contact, and facility contact information. Changes to administrative information such as phone numbers and contact persons are considered an acceptable administrative modification. The updated responsible officials will be noted in the new permit.

APCD2024-APP-008323 Minor Mod, Change of Permit Ownership

This application was submitted to document the change of ownership and acquirement of adhesive application operations permit APCD2002-PTO-975892 from Performance Contracting Inc. to General Dynamics NASSCO.

Under the submitted application and the Title V renewal application, the conditions for the permit were modified to improve record keeping in accordance with Rule 67.21 and establish stationary source emission limits for VOC.

The district agrees that the proposed change is considered a minor modification because it does not trigger a major source New Source Review or cause any violations of applicable rules. Additionally, the change does not relax monitoring, recordkeeping or reporting, nor does it trigger a change in federal emission limits. The facility does not propose changes that would allow exemption from specific rule requirements. In addition, the change is not a Title I modification and does not require MACT. For these reasons, a minor modification designation is appropriate.

APCD2025-APP-008618 502(b)(10), Regenerative Thermal Oxidizer replacement

This application was submitted to include changes to existing marine coating Primeline#2 permitted under APCD2004-PTO-972497.

The changes made to the existing permits were submitted as a Modification type application and documented under District records APCD2025-APP-008617. The evaluation shows that the RTO replacement does not result in any changes to the permit's applicable requirements and does not result in an increase of emissions that would make the facility a major source or constitute a major modification under Title I of the CAA.

For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2025-APP-008803 502(b)(10), Control Replacement

This application was submitted to include changes to an existing engine diesel particulate filter permitted under APCD2006-PTO-961422.

The changes made to the existing permits were submitted as a Like-Kind Replacement type application and documented under District records APCD2025-APP-008802. This type of application requires, per San Diego Air Pollution Control District Rule 11, that the like-kind replacement in whole or part of any article, machine, equipment, or other contrivance where a Permit to Operate has previously been granted for such equipment meets the following requirements:

- (A) is identical in function, and
- (B) is similar in design, and
- (C) the actual air contaminant emissions are the same in nature, and
- (D) has a capacity, production rate, and actual air contaminant emissions that are equal to or less than those of the currently permitted equipment.

The replacement of the diesel particulate filter did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit.

For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2026-APP-009022 502(b)(10), Crane Engine Replacement

This application was submitted to include changes to two existing diesel engines permitted under APCD2008-PTO-975360 and APCD2008-PTO-975361, and to incorporate a new permit for NASSCO's welding school. The new permit for the welding school is not yet completed, therefore the Title V application will remain open to later incorporate this addition. Within this Title V renewal, the permit modifications for the engines will be incorporated into the Title V permit.

The changes made to the existing permits were submitted as a Modification type application and documented under District records APCD2026-APP-009020 and -009021 to replace engines on Cranes #15 and #16 with certified Tier 4 final engines as part of Rule 1210 risk reduction plan. The replacement of the engines did not affect the equipment's status of compliance with the applicable rules and regulations cited in the existing permit, nor does it result in an emission increase. For these reasons, this application meets the requirements of a section 502(b)(10) change and inclusion of the operating permit into appendix A of the permit is included in this permit action.

Additional Modifications Lacking Title V Applications

In addition to the above applications, the following changes were made at the facility but did not have any associated Title V modifications applications filed.

APCD2018-APP-005601 is an application for a new portable abrasive blasting system (PTO-003295). As shown in the attached evaluation, the addition of this equipment would have been considered a minor modification if an application was filed. Presumably the lack of application was an oversight, and therefore the addition of this equipment can be viewed as a minor modification and will be included in this Title V action.

APCD2021-APP-006972 is an application for a facility wide permit for portable emergency use standby diesel engines (PTO-004415). Similar to APP-005393 submitted for the facility wide portable diesel engines, the proposed change satisfies the criteria for a Clean Air Act Section 502(b)(10) change, as it does not result in emissions increases or modifications that would trigger major NSR requirements.

Application APCD2021-APP-007075 was submitted as an amendment to Applications APP-006552 and APP-006553 to authorize replacement of crane engines. The replacement engines are U.S. EPA Tier 4 certified and incorporate more stringent emission standards, resulting in a significant reduction in emissions compared to the previously permitted engines. The engines meet Best Available Control Technology (BACT) requirements. It is unclear from current documentation whether this application included appropriate Title V application forms. However, the engineering evaluation for the application was reviewed and supports that the modification would have been classified as a minor modification as it does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these

reasons, it meets the requirements of a minor modification and applicable requirements are reflected in the operating permit for this equipment in appendix A of the permit

6.0 Site Emissions

The following table shows the actual emissions for the facility that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds with the exception of the volatile organic compounds.

Title V Major Source Determination Tons per Year:			
Pollutant	Thresholds	Facility Actual Emissions	Major Source
Highest Federal HAP	10	>10	Y
Sum of Federal HAPs	25	>25	Y
NOx	25	11.13	N
VOC	25	102.37	Y
PM10	100	12.57	N
SOx	100	0.04	N
CO	100	3.82	N

These emission calculations were obtained from the San Diego Air Pollution Control District’s Emission Inventory records from 2023 and 2024. It is of note that the 2024 emission inventory record is pending revision for some pollutants.

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Compliance assurance monitoring requirements have previously been reviewed for much of the equipment at this facility. However, as part of the review of this application, CAM applicability for each emission unit was revisited and discussed in this section

To be subject to CAM, an emission unit must have uncontrolled emissions above the major source threshold for a pollutant for which the facility is a major source. Additionally, the equipment must utilize a control device in order to meet an emission standard for that pollutant. Finally, if the equipment is subject to a section 111 or 112 requirement pursuant to the Clean Air Act (NSPS or NESHAP) or otherwise is subject to federally enforceable continuous monitoring requirements, CAM does not apply. These applicability criteria mean that the majority of the equipment at this facility is exempt from CAM requirements as follows:

Marine Coating Operations: Marine coating emission units at this facility vary in whether controls or permit conditions limit total VOC emissions for which the facility is a major source. CAM applicability for each unit or group of units that are operated at the stationary source is discussed below:

APCD2004-PTO-972497 – this unit has previously been evaluated for, and complies with CAM. This unit is controlled by thermal oxidizers and has pre-control emissions above 25 TPY VOC.

The permit includes continuous monitoring conditions for the thermal oxidizers' combustion temperature via thermocouples and hourly recordkeeping of the temperature readings. The thermal oxidizers are also source tested annually to verify maintenance, and capture and control efficiency in addition to documenting routine maintenance, repairs, and breakdowns. Additionally, this unit is subject to and complies with the requirements of NESHAP Subpart II without the use of a control device.

APCD2004-PTO-911462 – this unit is not operated at this stationary source and is therefore not subject to CAM. Additionally, this unit is subject to and complies with the requirements of NESHAP Subpart II without the use of a control device.

APCD2008-PTO-007657 – this unit is not equipped with a control device and is therefore not subject to CAM. Additionally, this unit is subject to and complies with the requirements of NESHAP Subpart II without the use of a control device.

APCD2011-PTO-000878 through 001050 –These units are controlled by thermal oxidizers and have pre-control emissions above 25 TPY VOC and therefore are subject to CAM. Similar to the other marine coating permit controlled by thermal oxidizers, these permits include continuous monitoring conditions for the thermal oxidizers' combustion temperature via thermocouples and hourly recordkeeping of the temperature readings. The thermal oxidizers are also source tested annually to verify maintenance and control efficiency in addition to documenting routine maintenance, repairs, and breakdowns. Therefore, these units comply with the requirements of 40 CFR 64 and no additional monitoring or recordkeeping is required. Additionally, this unit is subject to and complies with the requirements of NESHAP Subpart II without the use of a control device.

Solvent Recovery: This unit is not equipped with emission controls for VOC or volatile HAP since each relies only on inherent equipment design to limit emissions. For this reason, it is not subject to CAM.

Adhesive Application: This unit has an emission limit of 2.82 TPY VOC and is not equipped with emission controls for VOC or volatile HAP and. For this reason, it is not subject to CAM.

Polyester Resing Manufacturing: This unit's uncontrolled VOC emissions do not exceed the major source threshold therefore this unit is not subject to CAM.

Wood Coating and Adhesive Application: This unit has an emission limit of 5 TPY VOC and is not equipped with emission controls for VOC or volatile HAP and. For this reason, it is not subject to CAM.

Metal Parts and Automotive Coating: This unit's uncontrolled VOC emissions do not exceed the major source threshold therefore this unit is not subject to CAM.

Diesel Engines: The site operates exclusively Tier 4–certified engines. These engines are required to meet the stringent U.S. EPA emission standards specified in 40 CFR Part 1039, and therefore are exempt from CAM requirements. In addition, Tier 4 engines incorporate integrated emission control technologies as part of their certified design rather than relying on add-on

control devices. Since CAM applies to emission units equipped with add-on control equipment, the use of integrated controls further supports their exemption from CAM applicability.

Abrasive Blasting: This equipment emits both particulate matter (PM) and hazardous air pollutants (HAP); however, it is not subject to NESHAP requirements. In many cases, the only applicable emission limit is the Rule 52 particulate matter concentration standard. The facility is not a major source of PM and therefore is not subject to CAM requirements for this pollutant.

8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide, and permit specific applicable requirements. Additionally for each emission unit, the rule that results in the primary emission limitation is listed.

General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20.1-20.4	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	67.0	Architectural Coatings
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98***	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VIII	132	Traffic Abatement Plan

Facility-wide Prohibitory Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	12**	Registered Equipment
SDCAPCD Reg. IV	12.1**	Portable Registered Equipment
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	66.1	Miscellaneous Surface Coating & Other VOC Emitting Processes
SDCAPCD Reg. IV	67.3	Metal Parts Coating
SDCAPCD Reg. IV	67.11	Wood Products Coating
SDCAPCD Reg. IV	67.12.1	Polyester Resin Operations
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC

SDCAPCD Reg. IV	67.18	Marine Coating Operations
SDCAPCD Reg. IV	67.20.1	Motor Vehicle & Mobile Equipment Coating Operations
SDCAPCD Reg. IV	67.21	Adhesive Material Application Operations
SDCAPCD Reg. IV	69.4.1*	Stationary Reciprocating Internal Combustion Engines
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart IIII	Stationary Compression Ignition Combustion Engines
California ATCM	17 CCR 93115**	Stationary Compression Ignition Engines
California ATCM	17 CCR 93116**	Portable Diesel-Fueled Engines
SDCAPCD Reg. XI	40 CFR 63 Subpart A	NESHAP General Provisions
40 CFR Part 63	Subpart II	Shipbuilding for Ship Repair (Surface Coating)
40 CFR Part 63	Subpart ZZZZ	Stationary Reciprocating Internal Combustion Engines
40 CFR Part 82	Subpart A	Production and Consumption Controls
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Servicing of Other Air Conditioners
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review

**The District has submitted a revised version of Rule 69.4.1 for approval into the SIP which will replace 69.4 which has been repealed by the District. However, because EPA has not acted on this submittal, the current version of Rule 69.4 is still federally enforceable and Rule 69.4.1 is not.*

***Not federally enforceable*

****Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements*

Contractor Owned and other Registered Equipment Requirements (not otherwise listed)

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	12**	Registered Equipment
SDCAPCD Reg. IV	12.1**	Portable Registered Equipment
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	66.1	Miscellaneous Surface Coating & Other VOC Emitting Processes
SDCAPCD Reg. IV	67.3	Metal Parts and Products Coating
SDCAPCD Reg. IV	67.11	Wood Products Coating Operations
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOCs
SDCAPCD Reg. IV	67.18	Marine Coating Operations
SDCAPCD Reg. IV	67.20.1	Motor Vehicle and Mobile Equipment Coating Operations
SDCAPCD Reg. IV	69.4*	Stationary Reciprocating Internal Combustion Engines (Major Sources)
SDCAPCD Reg. IV	69.4.1*	Stationary Reciprocating Internal Combustion Engines

**The District has submitted a revised version of Rule 69.4.1 for approval into the SIP which will replace 69.4 which has been repealed by the District. However, because EPA has not acted on this submittal, the current version of Rule 69.4 is still federally enforceable and Rule 69.4.1 is not.*

New Source Review Requirements

Review of permits and applications shows that the only NSR requirements imposed have been state BACT requirements, which have included use of fundamentally low emitting equipment such as Tier 4 final engines, particulate controls such as baghouses, and various process limits to avoid BACT applicability at 10 lb/day for a specific pollutant. Additionally, equipment installed or modified after November 15, 2000 has been subject to local-only toxics control requirements, and many of these requirements have also been made federally enforceable previously (and continue to be designated as such in this permit) because they serve to make the facility's emissions being below major source thresholds for PM enforceable.

SDAPCD Permit No.	Permit Limit	Source and Explanation
APCD2004-PTO-972497 & APCD2008-PTO-007657	19.4 tpy VOC limit	The two permits have a joint VOC limitation which was imposed to avoid triggering new source review requirements.
APCD2021-PTO-003682	9.38 tpy NOx limit	The permit contains a NOx limit to keep emissions below Best Available Control Technology Levels and no other NSR requirements (see evaluations for APCD2018-APP-005392).

Note that these are not new determinations, but based on applications which have already been approved according to the appropriate provisions.

Permit Specific Applicable Requirements:

This facility includes approximately 55 individual emission units, therefore applicable requirements have been grouped by type of equipment.

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2004-PTO-972497; APCD2004-PTO-911462; APCD2008-PTO-007657; APCD2011-PTO-000878; APCD2011-PTO-001047; APCD2011-PTO-001048; APCD2011-PTO-001049; APCD2011-PTO-001050	Marine Coating	Rules 20.2/20.3, 21, 50, 51, 67.18, 67.17, 1200*, 40 CFR 63 Subpart II**
APCD2002-PTO-975892; APCD2004-PTO-861053; APCD2004-PTO-900255; APCD2008-PTO-911437;	Other Coatings (Metal/Automotive/Wood/Adhesive/Resin)	Rules 20.2/20.3, 21, 50, 51, 66.1, 67.3, 67.11, 67.17, 67.12.1, 67.20.1, 67.21, 1200*, 17 CCR 93112 (Motor Vehicle Refinishing)*
APCD2004-PTO-911128	Solvent Recovery	Rules 20.2/20.3, 51, 67.17
APCD2006-PTO-979955; APCD2006-PTO-979956; APCD2011-PTO-000802;	Abrasive Blasting	Rules 21, 50, 52, 54, 71, 1200*

APCD2011-PTO-000803; APCD2009-PTO-860526; APCD2004-PTO-973122; APCD2020-PTO-003440; APCD2020-PTO-003459; APCD2005-PTO-000610; APCD2005-PTO-000616; APCD2013-PTO-001615; APCD2013-PTO-001617; APCD2005-PTO-002690; APCD2004-PTO-030379; APCD2004-PTO-040695; APCD2019-PTO-003295; APCD2022-PTO-004427		
APCD2010-PTO-000399; APCD2007-PTO-975149; APCD2007-PTO-974936; APCD2007-PTO-977754; APCD2007-PTO-978048; APCD2008-PTO-979491; APCD2008-PTO-984991; APCD2020-PTO-003460; APCD2020-PTO-003461; APCD2023-PTO-004785	Plasma Cutter	Rules 20.2/20.3, 21, 50, 52, 1200*
APCD2015-PTO-002467	Thermal Oxidizer	Rules 20.2/20.3, 21, 50, 52
APCD2008-PTO-900256	Fiberglass Machining	Rules 20.2/20.3, 21, 50, 52
APCD2008-PTO-975360; APCD2008-PTO-975361; APCD2010-PTO-000550; APCD2008-PTO-921303; APCD2008-PTO-950704; APCD2008-PTO-950705; APCD2008-PTO-950706; APCD2006-PTO-961422; APCD2008-PTO-961424; APCD2008-PTO-961425; APCD2006-PTO-973376; APCD2021-PTO-003682; APCD2022-PTO-004415	Diesel Engine	Rules 50, 51, 53, 1200*, 20.2/20.3, 69.4.1, 17 CCR 93115*, 17 CCR 93116*, 40 CFR 63 Subpart ZZZZ, 40 CFR 60 IIII

*Indicated rules are not federally enforceable

**Not all permits are subject to NESHAP Subpart II. Only those operations which conduct marine coating operations are subject to the requirements of this rule as noted in the individual emission unit specific permits in Attachment A

Emission Limitations

This section outlines the source of the primary emission limitation for each pollutant and type of emission unit.

Marine Coating	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rule 67.18, NESHAP Subpart II (VOC content limits), Rule 20.2/20.3 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*, NESHAP Subpart II

Other Coatings (Metal/Automotive/Wood/Adhesive/Resin)	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Coating Rules 67.3, 67.11, 67.12.1, 67.20.1, 67.21, Rule 20.2/20.3 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Solvent Recovery	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rules 20.2/20.3, 51, 67.17
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*

Plasma Cutter	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Thermal Oxidizer	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)

CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Fiberglass Machining	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52, Rule 20.3
Toxic Pollutants/HAP	Rule 1200*

Abrasive Blasting	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52, 71
Toxic Pollutants/HAP	Rule 1200*

Diesel Engine	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.3, Rule 69.4.1*, 40 CFR 60 Subpart III
SO2	Rule 20.3, Rule 62, 40 CFR 60 Subpart III
VOC	Rule 20.3, 40 CFR 60 Subpart III
CO	Rule 20.3 (AQIA only), Rule 69.4.1*, 40 CFR 60 Subpart III
PM10	Rule 20.3, Rule 53, 17 CCR 93115*, 17 CCR 93116*, 40 CFR 60 Subpart III
Toxic Pollutants/HAP	Rule 1200*, 40 CFR 63 Subpart ZZZZ

*Indicates rules which are not federally enforceable.

Basis of Permit Conditions

This section is intended to summarize the applicable requirements for each rule that form the basis for permit conditions in each category of emission unit.

Rule 12 – This rule contains requirements for equipment registered under the District’s registration program. Registrations are similar to operating permits, but are not subject to pre-construction review/NSR and typically are only issued to emission units which are also considered insignificant activities.

Rule 19 - Specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

20.1-20.4 – These are the District’s New Source Review (NSR) rules. 20.1 contains general requirements and definitions and is primarily used to define calculation methodologies, 20.2 contains requirements for non-major sources, 20.3 for major sources, and 20.4 for portable sources. The individual operating permits and any required authority to construct for each emission unit will specify any detailed or specific requirements (e.g. BACT standards, AQIA-imposed requirements, offsets, etc.).

Rule 21 (and 1421) - The requirement of this rule is to establish national emission standards for hazardous air pollutants (HAPs) for existing, new, and reconstructed stationary reciprocating internal combustion engines (RICE). The rule applies to a wide range of engine types and sizes located at both major and area sources of HAPs. Depending on the engine classification (e.g., compression ignition vs. spark ignition, emergency vs. non-emergency use), the regulation sets limits on emissions such as formaldehyde, carbon monoxide, and other toxic pollutants. Compliance is typically achieved through the use of control technologies, work practice standards, and performance testing or monitoring. Specific requirements are outlined based on engine type, size, fuel, and installation date, and may be further enforced through permit conditions where applicable.

Rule 50 – The only requirement of this rule is setting a maximum emission opacity standard that applies to all equipment. All sources of emissions from permitted operations are subject to Rule 50. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that emission opacity cannot be exceeded and are specified in permit conditions as necessary.

Rule 51 – The requirement of this rule is to prohibit the discharge of air contaminants or other materials in amounts that may cause harm or nuisance to people, property, or the public. This applies to all sources of emissions and is intended to protect public health, comfort, safety, and business interests. Compliance is typically ensured through proper operation and maintenance of equipment, emission controls, and process limits that prevent emissions from reaching levels that could result in nuisance or adverse impacts.

Rule 52 – The only requirement of this rule is setting a maximum particulate emission standard that applies to all equipment. Except for some equipment which is subject to Rule 53 (combustion particulate emission standards) and a few minor exceptions, all sources of particulate matter from permitted operations are subject to Rule 52. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that the emission concentration cannot be exceeded and are specified in permit conditions as necessary.

Rule 1200 – This rule is the District’s toxics new source review program, which requires that projects which increase emissions of toxic air contaminants (including HAPs), do not cause excessive health risks to the surrounding community, as determined by a health risk assessment – including imposing applicable emission limits, monitoring and recordkeeping requirements. While Rule 1200 itself is not federally enforceable, in many cases these limits also result in ensuring that federally applicable requirements are complied with/don’t apply (e.g. ensuring a

facility is not a major source of HAP by limiting emissions, or a condition preventing spray applying metal TACs in a coating booth that also serves to limit NESHAP Subpart HHHHHH applicability). Additionally, these conditions are typically imposed through an Authority to Construct and/or Permit to Operate issued pursuant to Rule 10, which is federally enforceable – and for this reason, some requirements originally imposed through Rule 1200 are also federally enforceable.

Rule 69.4.1 - This rule applies to Stationary Reciprocating Internal Combustion Engines and sets maximum NO_x, VOC, and CO standards for different types of engines, fuel specification requirements, control equipment requirements for some engine types, associated monitoring, inspection and maintenance frequency, and recordkeeping. The applicable requirement(s) per engine type are listed in each permit with the rule as the basis.

17 CCR 93115 - Applicable requirements of the Stationary ATCM include purchasing an engine certified to EPA standards and meeting specified emission standards of the rule, installing an hour meter, conducting maintenance according to a written plan, restrictions on operating the engine for purposes other than emergency use and limited (50 hours/year) use for maintenance and testing, and maintaining records to substantiate compliance with these requirements.

17 CCR 93116 - Portable engines exempt from NSPS and NESHAP requirements are subject to the California ATCM for Portable Engines Rated at 50 bhp and greater. Applicable requirements include fuel and additive standards, operative dates for certified engine types, meeting specified PM emission standards, installing an hour meter, conducting, and maintaining records to substantiate compliance with these requirements.

40 CFR 60 Subpart IIII - This rule applies stationary compression ignition (CI) and internal combustion engines (ICE) with requirements including purchasing a certified engine, operating it as directed by the manufacturer, and maintaining records to substantiate compliance. These requirements closely mirror the ATCM requirements, except that the NSPS is somewhat less stringent on allowable PM emission rate and contains some allowance for other types of operation not allowed by the Stationary Engine ATCM (17 CCR 93115). Permits that are used for operations subject to this rule have the more stringent ATCM applicable conditions applied.

40 CFR 63 Subpart ZZZZ - The requirement of this rule is to establish national emission standards for hazardous air pollutants (HAPs) for existing, new, and reconstructed stationary reciprocating internal combustion engines (RICE). The rule applies to a wide range of engine types and sizes located at both major and area sources of HAPs. Depending on the engine classification (e.g., compression ignition vs. spark ignition, emergency vs. non-emergency use), the regulation sets limits on emissions such as formaldehyde, carbon monoxide, and other toxic pollutants. Compliance is typically achieved through the use of control technologies, work practice standards, and performance testing or monitoring. Specific requirements are outlined based on engine type, size, fuel, and installation date, and may be further enforced through permit conditions where applicable.

Rule 71 - Defines requirements for temporary abrasive blasting not conducted in a booth or enclosure, so would apply to activities such as facility maintenance not covered by the operating permits under appendix A.

Coating Rules (67.3, 67.11, 67.12.1, 67.18, 67.20.1, 67.21) – These rules all apply to coating operations and differ based on the category of coating (i.e. marine, metal, automotive, etc.), but overall have similar requirements. These requirements include meeting specified VOC content limits based on the type of substrate/coating, need to use an approved application method, control equipment requirements for some equipment categories, and associated monitoring, recordkeeping and test methods. The applicable requirement(s) of each rule are listed in each permit with the rule as the basis.

40 CFR 63 Subpart II - This rule applies to shipbuilding and repair operations applying surface (marine) coatings, and includes requirements related to “VOHAP” including VOC listed as HAP and exempt compounds listed as HAP. Permits that are used for operations subject to this rule have applicable limits, recordkeeping, and reporting conditions applied.

9.0 Permit Shield

In accordance with District Rule 1410(p) and 40 CFR 70.6(f), a Title V permit may include a permit shield provision that protects the permittee from enforcement for specific requirements determined to be inapplicable or superseded by other applicable requirements, as expressly identified in the permit. Any permit shield granted is limited in scope and effect to the extent allowed under these regulations.

As part of the Title V renewal application, the applicant requested permit shields for certain identified requirements for the facility as listed in the renewal application. The request and the supporting applicability analyses were reviewed. Based on this review, the District determined that the applicant did not provide sufficient technical or regulatory justification to demonstrate that the referenced requirements are inapplicable.

Accordingly, the requested permit shields are denied. The identified requirements remain applicable and federally enforceable, and no permit shield is granted for those provisions.

10.0 Streamlining

This permit does not contain any streamlining. However, some permits contain conditions which ensure compliance with multiple rules when the underlying requirements can be fulfilled by the same condition. In all cases, the equipment is still subject to requirements of both rules, and is not granted a permit shield from any applicable requirements. This section highlights key areas where a certain permit contains such conditions.

Since streamlining was not conducted, equipment specific permits which are subject to multiple rules which have identical or similar requirements contain permit conditions to encompass each applicable requirement.

11.0 Updates to the Title V Permit Incorporated into this Action

The following changes are being made to the emission unit specific permits as indicated below:

Coatings – Some significant changes were made to these permits. As discussed previously in this report, the permits were revised to remove permit shields and add additional requirements (primarily VOC-content requirements and recordkeeping/reporting requirements) from NESHAPs II, along with correct rule references.

Solvent Recovery – Rule references were added to the permits to clarify the basis of requirements which typically are either Rule 20.3 or 1421. There were minor changes made with the addition of rule 51 for Nuisance, and the inclusion of proper storage of materials containing VOCs under Rule 67.17

Plasma Cutters – Rule references were added to the permits to clarify the basis of requirements which typically are either Rule 20.3, 50, 52, or general operating requirements to minimize potential for nuisance and excess fugitive emissions. No additional permit requirements were added under this Title V renewal.

Abrasive Blasting – Rule references were added to the permits to clarify the basis of requirements which typically are either Rule 50, 52, or general operating requirements to minimize potential for nuisance and excess fugitive emissions. No additional permit requirements were added under this Title V renewal.

Thermal Oxidizer – No permit actions under this Title V renewal.

Fiberglass Machining– Rule references were added to the permit to clarify the basis of requirements which typically are either Rule 20.3, 50, 52 or general operating requirements to minimize potential for nuisance and excess fugitive emissions. No additional permit requirements were added under this Title V renewal.

Diesel Engines – Previous engine permits did not include Prohibitory Rules 50 and 51. These rules apply to all engines, as they establish general operating requirements intended to minimize nuisance conditions and excess visible emissions. The applicable rules have been incorporated into permits where they were previously omitted, and rule references were added to permits to better clarify the basis of the requirement.

12.0 Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, The District will provide the opportunity for review by EPA and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice will be published in a newspaper. The public notice contains information on how to petition EPA for review of a proposed action.

If no comments or objections are received, the District intends to promptly issue the Title V permit after conclusion of the review period. If comments are received the District will review

and respond to the comments as necessary. If comments identify issues which require modification to the permit, revisions will be made and the permit either issued if the changes do not require re-review by EPA or the public, or will be re-noticed if changes are made which do require review.

13.0 Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA review, and response to any comments.

14.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice
- Engineering Evaluations