STATEMENT OF BASIS
Initial Title V Permit

Facility Name: Naval Base San Diego; Functional Group: Ship Construction & Repairs

Title V Application Number: APCD2024-APP-008133

Title V Permit Number: APCD2025-TVP-00057

Facility ID: APCD1981-SITE-02798; APCD1980-SITE-002799

Equipment Address: 32nd St. & Harbor Dr.
San Diego, CA 92136

Facility Contact: Nick Critti, Air Quality Program Lead
Contact Phone: 619-556-5418

Permit Engineer: John Lee

Date: 9/3/2025

Senior Engineer:

X

Allison Weller
Senior Air Pollution Control Engineer

1.0 Type of Action and Summary of Changes

This Statement of Basis reviews an application for an initial Title V permit for Naval Base San Diego (NBSD), Ship Construction & Repairs Functional Group, located at 32nd St. & Harbor Dr., San Diego, CA 92136. The District received the application on February 20, 2024, which is compliant with the requirement for a timely submittal, at least 12 months after the effective date of revised District Rule 1401, which was February 21, 2023. The application was deemed complete on April 22, 2024, hence, an application shield pursuant to Rule 1410 (a) is in effect for the facility until the District takes action on the initial application.

As part of the initial Title V process, the District has also made a preliminary decision to take the following actions, which are further discussed in Section 9.0:

- Add new applicable requirements to permits where necessary
- Enhance monitoring, reporting, and recordkeeping requirements
- Clarify permit conditions and their basis
- Correct typographical errors.

2.0 History of Title V:

The facility received a Compliance Advisory on April 6, 2023, to inform them that they may be subject to the Title V Program in accordance with the revised District Rule 1401, effective February 21, 2023. The facility was already in operation and is required to obtain a permit based on the District's redesignation to severe ozone nonattainment. The facility is expected to be a new major stationary source of VOC based on its potential to emit (PTE) exceeding 25 tons per year. There are no previously approved Title V applications for this facility.

The following table summarizes active permits and relevant applications submitted under the District's local permitting program that establishes or estimates emissions of criteria pollutants and precursor air contaminants. These emissions are used to estimate the facility's PTE. Permits retired prior to the Title V application submittal are not included in this review.

Permit ID and Corresponding Application that Establishes/Estimates Emissions

Site ID	Permit ID	Relevant Application	Application Description	Affected Emission Units	Outcome
APCD1981-SITE-02798	APCD1995-PTO-005686	-	Initial application does not exist.	Fiberglass lagging cutting area	-
	APCD1999-PTO-880723	APCD1995-APP-941123	Permit Condition Change – 0.5 tons VOC per year	Adhesive application	Approved
	APCD2000-PTO-007163	APCD1989-APP-890462	Initial Application – Estimated max VOC, 14.4 lbs per day	Marine coating operation	Approved
	APCD2001-PTO-890036	APCD2020-APP-006201	Modification – nozzle size; control efficiency 99.7%	Abrasive Blast Booth	Approved
	APCD2001-PTO-940175	APCD2001-APP-940175	Initial Application	Controlled Pyrolysis Cleaning Furnace	Approved
	APCD2002-PTO-976823	APCD2001-APP-976823	Initial Application	Pyrolysis Cleaning Furnace	Approved
	APCD2005-PTO-890037	APCD2020-APP-006201	Modification – nozzle size; control efficiency 99.7%	Abrasive Blast Booth	Approved
	APCD2006-PTO-976309	APCD2020-APP-006201	Modification - nozzle size; control efficiency 99.7%	Abrasive Blast Booth	Approved
	APCD2011-PTO-001055	APCD2009-APP-988056	Initial Application	Abrasive Blast Room	Approved
	APCD2014-PTO-001976	APCD2010-APP-000944	Initial Application – <10 lbs VOC per day	Metal and marine coating operation	Approved
	APCD2018-PTO-002995	APCD2012-APP-002184	Initial Application	Stripping tank	Approved

	APCD2021-PTO-003676	APCD2018-APP-005514	Initial Application	Site-Wide ATCM-Portable Engine	Approved
	APCD2023-PTO-004619	APCD2022-APP-007447	Initial Application	Burnout oven	Approved
	APCD2023-PTO-004796	APCD2023-	Initial Application; VOC limit, 9.6 lbs per day	Coating of electric motor windings	Approved
APCD1980-SITE-02799	APCD2007-PTO-890100	APCD1989-APP-890100	Initial Application	Fire Fighter Training Facility #1 Combustion of Liquid Fuels.	Approved
	APCD2007-PTO-891224	APCD1989-APP-891224	Initial Application	Fire Fighter Training Facility #2; Combustion of Liquid Fuels.	Approved
	APCD2016-PTO-002498	APCD2014-APP-003575	Initial Application; VOC limit, 17.1 tons per year	Marine coating	Approved
	APCD2021-PTO-004125	APCD2020-APP-006186	Initial Application	Gasoline dispensing facility	Approved

3.0 Facility Description

The facility consists of a Ship Construction & Repairs Functional Group with permits for various equipment including solvent cleaners, abrasive blasting booths, grinding booths, paint booths, and various other miscellaneous operations that are all located on a portion of Naval Base San Diego on 32nd Street and Harbor Drive. The naval base is affected by disaggregation for military facilities and this facility command covers operations related to the ship construction & repairs. They have 18 active permits as shown in the following table and Appendix A of the permit.

Equipment Type	Permit Number	Permit Description
Coatings (Marine & Metal)	APCD2023-PTO-004796	Coating of electric motor windings via a dip tank impregnation system with recirculating pump and curing oven: Dip tank: Manufacturer: HeatTek Capacity: 900 gallons Dimensions (approximately): 7ft x 6.5ft x 6ft Recirculating Pump: Manufacturer: Wilden Model: 13mm Pro-Flo Shift Max Flow Rate: 15.8 gpm Curing Oven Sahara Industrial Ovens

		Model: SW6-500-66 Max Temp: 500 F 86”x100”x103.5” Not for surface preparation or cleaning of parts prior to coating The electric motor windings are treated by a related, permitted burnoff oven prior to treatment from this dip coating operation.
	APCD2014-PTO-001976	Metal and marine coating operation consisting of: One (1) enclosed paint spray booth; Manufacturer: Ameri-Cure, Inc Model: Custom Dimensions: 15'L X 13'9"W X 12'H Heater: 1.375 MM BTU/hr Two (2) Exhaust Stacks Stack Parameters: Stack Height: 32 feet aboveground Stack Diameter: 2 feet Stack Obstructions: unobstructed Stack Orientation: vertical Exhaust Flow Rate: 6,500-8,000 CFM, per fan Functional Group: Ship Construction and Repairs.
	APCD2000-PTO-007163	Marine coating operation: one custom-made fully enclosed paint spray booth, equipped with exhaust fan and dry filters Dimensions: 45'L x 17'W x 15'H Exhaust Flow Rate: 300 cfm Located in Building 3338 Functional Group: Ship Construction and Repairs
	APCD2016-PTO-002498	Marine coating operations to apply coatings on ships at USN Naval Station 4. Functional Group: Ship Construction and Repair Stationary marine coating source shall be the Functional Group
Burnout Furnaces/Ovens	APCD2023-PTO-004619	Burnout oven: Manufacturer: Pollution Control Products Co., Model: VRC-390S, S/N: 7120, Primary (oven) chamber dimensions: 84”W x 88”L x 96”H (inside dimensions) with 325,000 Btu/hour natural gas burner. Secondary (afterburner) chamber dimensions: (18” ID x 66”L) and (16” ID x 180”L) with 625,000 Btu/hour natural gas burner.

	APCD2002-PTO-976823	PYROLYSIS CLEANING FURNACE: POLLUTION CONTROL PRODUCTS, MODEL PRC-680, 96" X 102" X 124", NATURAL GAS FIRED, WITH A 400,000 BTU/HR PRIMARY BURNER AND A 550,000 BTU/HR AFTERBURNER, S/N 5038.
	APCD2001-PTO-940175	CONTROLLED PYROLYSIS CLEANING FURNACE, MANUFACTURED BY POLLUTION CONTROL PRODUCTS CO., MODEL PTR-640, S/N 3698, 20 LBS/HOUR CAPACITY, NATURAL GAS FIRED WITH 390,000 BTU/HOUR PRIMARY BURNER, 560,000 BTU/HOUR SECONDARY BURNER, WATER SPRAY SMOKE CONTROL AND EXHAUST STACK WITH NO RAIN CAP. (940175-CCN-5/94)(960761-CCN-2/98)
Tier 4 Engines	APCD2021-PTO-003676	Engines subject to the California Code of Regulations, 17 CCR 93116 rated at or above 50 bhp and supporting the stationary source.
Stripping Tank	APCD2018-PTO-002995	Greensolve Stripping tank (110” long x 57.25” wide x 34” high) using MIL-PRF-83936 and approved solvents that do not contain material listed in Rule 1200 and mineral oil sealant. Functional Group: Ship Construction and Repairs
Abrasive Blasting	APCD2011-PTO-001055	An Abrasive Blast Room: 14' x 7' x 8' Quantum Blast Solution down flow, Model PABR-1, S/N 05100010, with recycling system and one Pirate Blast Machine Model SPR-6.5, using plastic media abrasive, controlled by Air Cleaning Tech. Inc. Model ATC2-8 dust control equipment, S/N 15170 with 99.97% control efficiency @ 0.5 micron.
	APCD2001-PTO-890036	Abrasive Blast Booth (2000 CU FT): BCP WHEELABRATOR BOOTH 10' X 20' X 10' USING CROSS SCREW CONVEYOR TYPE GRIT RECLAMATION SYSTEM.
	APCD2006-PTO-976309	Abrasive Blast Booth: Clemco, Model 10X20X10 BR BELT REC, S/N PRJ10765; Blast Machine: Clemco, Model 2024FLG, S/N 66597; Dust Collector: Clemco, Model CDF-8, 7100 cfm with 16 Clemco cartridge filters, Model 23744, 99.7% control efficiency; aluminum oxide abrasive blast media with abrasive recycling system.
	APCD2005-PTO-890037	Abrasive Blast Booth: Clemco, Model 10X20X10 BR BELT REC, S/N PRJ10764; Blast Machine: Clemco, Model 2024FLG, S/N 66598; Dust Collector: Clemco, Model CDF-8, 7100 cfm with 16 Clemco cartridge filters, Model 23744, 99.7% control efficiency; aluminum oxide abrasive blast media with abrasive recycling system.
Adhesive	APCD1999-PTO-880723	ADHESIVE MATERIALS OPERATION: SEVERAL TABLES WHERE ADHESIVE IS BRUSHED ONTO FRP SHEETS AND CALCIUM SILICATE PIPE

		INSULATION. FIBERGLASS LAGGING SHOP 57A, BLDG 3338. NO APP 941123/ATS/NO APP(0496)
Fiberglass Grinding	APCD1995-PTO-005686	Fiberglass Sanding / Preparation room with MicroAir Clean Air Booth (CAB) units, Model CAB8-881, equipped with RedMax (TM) filters. Serial # (both units) is 60827. Room located in Building 3338, Corrosion Control Shop.
External Combustion	APCD2007-PTO-890100	ADVANCED FIRE FIGHTER TRAINER FACILITY (FFT-19F1B, 19F3-B1, B2, B3, & B4) 890100 AFS 1 JUNE 1998
	APCD2007-PTO-891224	ADVANCED FIRE FIGHTER TRAINER FACILITY (FFT-19F4), CARRIER DECK SIMULATION 891224 AFS 1 JUNE 1998 972140 AFS23SEP1998 CHANGE CONDITION
Gasoline Dispensing	APCD2021-PTO-004125	Gasoline Dispensing Facility (Non-Retail): Phase II: not subject per Rule 61.4 (b)(4); Phase I EVR: OPW per ARB E.O. VR 401 Tank: One (1) 4000-gallon aboveground storage tank per ARB E.O. VR-302; Paint Finish: exempt from certified coatings specified in ARB E.O. VR-302.

Other insignificant units at this facility include:

- Stationary and portable internal combustion engines with <= 50 bhp output rating. [Reg XIV, Appendix A, (d)(1)(iii)]
- Fuel burning equipment: (i) fuel-burning equipment, except internal combustion engines, with a maximum gross heat input < 1 MMBtu/hr when not part of a process, process line, line, equipment, article, machine, or other contrivance for which a permit is required; and (ii) fuel burning equipment, except steam boilers, process heaters, steam generators, and internal combustion engines, with a maximum gross heat input rate < 20 MMBtu/hr, and fired exclusively on natural gas, LPG, or a combination of the two. [Reg XIV, Appendix A, (d)(4)(i) and (ii)]
- Abrasive blasting equipment with a manufacturer-rated sand capacity <100 pounds or <1 cubic foot. [Reg XIV, Appendix A, (d)(34)]
- Paper shredders and paper disintegrators which have a capacity <600 lb/hr, and associated conveying systems and baling equipment. [Reg XIV, Appendix A, (d)(41)]
- Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks (i) with a liquid surface area of 1.0 square foot (0.09 square meter) or less, or (ii) which have a maximum capacity of one gallon or less. [Reg XIV, Appendix A, (d)(61)(i) and (ii)]
- Stationary organic compound storage tanks <250 gallons. [Reg XIV, Appendix A, (e)(1)]
- Liquid surface coating application operations using air brushes with a coating capacity < 2 oz. for application of a stencil coating [Reg. XIV, Appendix A, (h)(6)].
- Fire extinguishing equipment, using halons with a charge of < 50 lbs. of Class I or Class II ozone depleting compound. [Reg XIV, Appendix A, (d)(31)]
- Stationary storage tanks (excluding tanks subject to Rule 61.9) used exclusively for the storage of liquid organic solvents used as dissolvers, viscosity reducers, reactants, extractants, cleaning agents or thinners provided that emissions < 15 lbs/day. [Reg XIV, Appendix A, (e)(3)]

- Liquid surface coating application operations exclusively using materials with a VOC content of < 20 g/L where < 30 gal/day of such materials are applied. [Reg XIV, Appendix A, (h)(2)]
- Refrigeration units except those used as, or in conjunction with, air pollution control equipment with a charge < 50 lbs of a Class I or II ozone depleting compounds. [Reg XIV, Appendix A, (o)(18)]
- Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs < 5 tons/yr, or the total purchase of solvents < 1,500 gal/yr, or the total purchase of solvents containing a single HAP < 350 gal/yr. [Reg XIV, Appendix A, (o)(32)]
- Stationary IC engines rated at <= 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr. [Reg XIV, Appendix A, (o)(34)(ii)]

4.0 Compliance History

This is an existing facility which has maintained generally good compliance over time. The facility has received one notice of violation over many years of operation. The notice of violation, which occurred in 2018, involved the use of portable diesel engines without a valid permit or registration. This violation was resolved promptly and there is no on-going non-compliance at this facility.

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. Rule 1401(c)(26) defines "major stationary source" as any stationary source which emits or has the potential to emit one or more air contaminants in amounts equal to or greater than the following emission rates: (i) 10 tons per year of any federal hazardous air pollutant (HAP), including fugitive emissions; (ii) 25 tons per year of any combination of federal HAPs, including fugitive emissions; (iii) emission rates of a "Federal Major Stationary Source" as defined in Rule 20.1 New Source Review – General Provisions.

Rule 20.1(c)(30) defines "Federal Major Stationary Source" as a stationary source which has an aggregate potential to emit one or more air contaminants in amounts equal to or greater than any of the emission rates listed in Table 20.1-5b. These emission rates are: 25 tons per year for NOx and VOC, and 100 tons per year for PM2.5, PM10, SOx, and CO. Rule 20.1(d)(1)(ii) provides guidelines for determining aggregate potential to emit for a stationary source.

The District conducted a review of this facility's PTE in Section 6.0. Based on permit limits and emissions estimates in relevant applications mentioned in Section 2.0, NBSD is a federal major source of VOC and is therefore subject to Title V regulations. Additionally, while the actual HAP emissions do not exceed the thresholds based on their emission inventory reports, there are currently no permit limits to ensure that their HAP PTEs remain below the thresholds. Therefore, facility-wide HAP emission limits will be imposed as follows:

1. Total Federal Hazardous Air Pollutant (HAP) emissions from the stationary source shall not exceed 25 tons per consecutive twelve (12) month period. Additionally, the emissions of any single HAP from the stationary source shall not exceed 10 tons per consecutive twelve (12) month period (40 CFR 63 Subpart A).

2. To demonstrate that HAP emissions from stationary source do not exceed the above limits, the permit holder shall comply with one of the following requirements:

    a. Hazardous air pollutant (HAP) emissions from this stationary source shall be calculated on a monthly basis no later than two months following the end of the month the calculation is for. These calculations shall either be performed according to standard District calculation methods or a protocol approved by the District. Emissions from insignificant units must be included in these calculations. Or,
    b. Maintain documentation to demonstrate that the facility has a potential to emit less than or equal to 25 tons per consecutive twelve (12) month period of combined HAP, and less than or equal to 10 tons per consecutive twelve (12) month period of any single HAP. Calculation of potential to emit shall be based on the provisions described in District Rules 20.1 and Regulation XIV and specifically must be based on equipment's maximum capacity unless enforceable permit conditions otherwise restrict those emissions to a lower level. Emissions from insignificant units must be calculated based on maximum capacity and may not include any control efficiencies not specified by an enforceable permit condition.

    The permit holder shall maintain all records necessary to demonstrate compliance with this condition for at least five (5) years. This includes all data used to calculate actual emissions in accordance with (a), or the calculations used to establish that potential to emit is less than that described in (b). Note that compliance with option (b) does not relieve the owner or operator from the need to ensure that actual emissions do not exceed the limits of the above condition. (Rule 1421)

3. If, for any consecutive 12-month period, the facility is unable to demonstrate that the total or individual Federal HAP emissions from the stationary source do not exceed the above limits, it shall be considered a violation of the terms of this permit and the permit holder shall comply with all applicable requirements of 40 CFR Subpart 63, including, but not limited to, a timely submittal of all required applications to modify all applicable District and Title V permits, as necessary. (40 CFR 63 Subpart A)

6.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V.

Title V Major Source Determination Tons per Year:				
Pollutant	Thresholds	Facility Actual Emissions*	Facility Potential to Emit**	Major Source
Highest Federal HAP	10	<10	< 10***	No
Sum of Federal HAPs	25	< 25	< 25***	No
NOx	25	1.6	7.9	No
VOC	25	3.6	26.3	Yes
PM10	100	0.3	0.7	No
SOx	100	< 0.2	0.3	No

CO	100	0.8	2.7	No

*Actual emissions are based on facility's 2021 annual emissions inventory.

** Potential to Emit emission calculations were obtained from a variety of sources. For some equipment, a potential to emit was calculated as part of the original application or was able to be determined from permit limits or technical data. These calculations are detailed in the emission calculations appendix and attachments. Additionally, some equipment such as the fiberglass sanding had no established emission factors or enforceable emission limits but inherently generates very low emissions. Finally, the facility's major source status for VOC is almost entirely due to their marine coating permits that collectively have a PTE of 21.6 tons per year.

*** Conditions have been added to the permit to limit facility-wide HAP emissions below major source thresholds.

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

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:

Abrasive Blasting: This equipment emits both particulate matter (PM) and hazardous air pollutants (HAPs). However, since the facility is not a major source of HAPs or PM, it is not subject to CAM requirements.

Adhesive Operations: This operation emits VOCs but does not utilize any emission controls and is therefore not subject to CAM.

Burnout Ovens: The burnout ovens are air pollution control devices themselves, do not utilize any add-on emission controls, and are not a significant source of VOCs, per 40 CFR Part 64.2(a)(3), therefore they are not subject to CAM requirements.

Fiberglass Machining: This equipment emits only PM; however, the facility is not a major source of PM, it is not subject to CAM requirements.

Fire Fighter Training Facility / Propane Burner: The burners emit VOCs but do not utilize any emission controls and are therefore not subject to CAM.

Gasoline Dispensing Facility: The gasoline dispensing equipment is subject to NESHAP Subpart CCCCCC and is therefore exempt per 40 CFR Part 64.2(b)(1)(i).

Stripping Tank: The stripping tank emits VOCs but does not utilize any emission controls and is therefore not subject to CAM.

Surface/Marine Coating Operations: The marine coating operations at this facility do result in uncontrolled emissions of VOC's in excess of major source thresholds but are exempt from Compliance Assurance Monitoring through CFR 64.2(b)(1)(vi) which states that an emission unit is exempt if "Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1." In the permit conditions for the marine coating operations, the yearly VOC emissions are defined, and compliance is determined through the following records: specifications for all materials used in the coating operation including safety data sheets, daily or monthly usage records for all materials, and daily or monthly VOC emissions – calculated from usage records and VOC content of materials.

Portable Engines: The portable engines operated at this facility are not equipped with emission controls for VOCs and therefore not subject to CAM.

8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. This includes facility-wide requirements, those pertaining to the permitting program in general and those pertaining to equipment on a facility-wide basis, and permit-specific requirements for each permit/equipment type. Additionally, there are tables which present the primary limiting regulations that apply to each permit and/or equipment type.

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	71	Abrasive Blasting
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
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	Recycling and Emissions Reducing

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

Facility-wide Prohibitory Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions

SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	54	Dust and Fumes
SDCAPCD Reg. IV	61.3	Transfer of Volatile Organic Compounds into Stationary Storage Tanks
SDCAPCD Reg. IV	61.7	Spillage & Leakage of Volatile Organic Compounds
SDCAPCD Reg. IV	61.8	Certification Requirements for Vapor Control Equipment
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	66.1	Miscellaneous Surface Coating Operations and Other Processes Emitting VOCs
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	67.18	Marine Coating Operations
SDCAPCD Reg. IV	67.21	Adhesive Material Application Operations
SDCAPCD Reg. IV	67.3	Metal Parts and Products Coating Operations
SDCAPCD Reg. IV	67.6.1	Cold Solvent Cleaning and Stripping Operations
SDCAPCD Reg. IV	69.4*	Stationary Reciprocating Internal Combustion Engines (Major Sources)
SDCAPCD Reg. IV	69.4.1*	Stationary Reciprocating Internal Combustion Engines
SDCAPCD Reg. X	40 CFR 60 Subpart A	NSPS General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart A	NESHAP General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart CCCCCC	NESHAP for Gasoline Dispensing Facilities
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
40 CFR Part 61	Subpart M***	NESHAP – Asbestos
SDCAPCD Reg. XII	1206***	Asbestos Removal, Demolition and Renovation
California Code of Regulations (CCR) Title 17	93116.1**	Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater (ATCM)

**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*

****The District issued its own Asbestos Rule 1206 intended to be as stringent as Subpart M. The facility is subject to the most stringent requirements of either rule, which at the time of this report is ensured by compliance with Rule 1206.*

New Source Review Requirements

This facility has historically not been a major source of any criteria pollutants but based on the determination that San Diego County is in severe nonattainment by the EPA, the threshold for

VOC and NOx was reduced to 25 tons per year, therefore, the facility was required to obtain a Title V permit. This permit has not had significant new source review decisions associated with the facility. Review of permits and applications shows that the only NSR requirements imposed have include the BACT analysis.

SDAPCD Permit No.	Permit Limit	Source and Explanation
APCD2016-PTO-002498	17.1 tons/yr VOC limit	This permit and its limits come from Initial Application APCD2014-APP-003575 (see attachment). During the engineering evaluation, BACT analysis was conducted and determined that it was not feasible to install VOC collection and control equipment for the operations. Therefore, the permit has a limit of 17.1 tons/yr VOC in lieu of BACT. Compliance is ensured by the applicant tracking and keeping records of monthly material use and VOC content for each material.

Note that this is not a new determination but based on applications which have already been approved according to the appropriate provisions.

Permit Specific Applicable Requirements:

SDAPCD Permit Nos.	Permit Description	Applicable Rules
APCD2023-PTO-004796, APCD2014-PTO-001976, APCD2000-PTO-007163, APCD2016-PTO-002498	Coatings (Marine & Metal)	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 51 SDCAPCD Reg. IV Rule 67.17 SDCAPCD Reg. IV Rule 67.18 SDCAPCD Reg. IV Rule 67.3 SDCAPCD Reg. XII Rule 1200*
APCD2023-PTO-004619, APCD2002-PTO-976823, APCD2001-PTO-940175	Burnout Furnace/Oven	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 50 SDCAPCD Reg. IV Rule 62 SDCAPCD Reg. XII Rule 1200*
APCD2021-PTO-003676	Portable Diesel Engines, > 50 hp	SDCAPCD Reg. II Rule 12 SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 69.4.1 SDCAPCD Reg. XII Rule 1200* 17 CCR 93116*
APCD2018-PTO-002995	Stripping Tank	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 67.6.1 SDCAPCD Reg. XII Rule 1200*
APCD2011-PTO-001055, APCD2001-PTO-890036,	Abrasive Blasting	SDCAPCD Reg. II Rule 10 SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21

APCD2006-PTO-976309, APCD2005-PTO-890037		SDCAPCD Reg. IV Rule 50 SDCAPCD Reg. IV Rule 52 SDCAPCD Reg. IV Rule 71
APCD1999-PTO-880723	Adhesive	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 67.17 SDCAPCD Reg. IV Rule 67.21
APCD1995-PTO-005686	Fiberglass Grinding	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. IV Rule 50
APCD2007-PTO-890100, APCD2007-PTO-891224	Fire Fighter Training Facility (External Combustion)	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. IV Rule 50 SDCAPCD Reg. IV Rule 51 SDCAPCD Reg. IV Rule 62 SDCAPCD Reg. XII Rule 1200*
APCD2021-PTO-004125	Gasoline Dispensing	SDCAPCD Reg. II Rule 20.3 SDCAPCD Reg. II Rule 21 SDCAPCD Reg. II Rule 61.3 SDCAPCD Reg. II Rule 61.7 SDCAPCD Reg. II Rule 61.8 40 CFR 63 Subpart CCCCCC

**Indicated rules are not federally enforceable*

Emission Limitations

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

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, Rule 20.2/20.3 (Must follow other requirements to be exempt)
Toxic Pollutants/HAP	Rule 1200*

Adhesive Operations	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rule 67.21, Rule 20.2/20.3 (mass emission limits)
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*

Burnout Oven	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2/20.3
SO2	Rule 62
VOC	Rule 20.2/20.3
CO	Rule 20.2/20.3
PM10	Rule 50, Rule 20.2/20.3
Toxic Pollutants/HAP	Rule 1200*

Fiberglass Grinding	
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 50, Rule 20.2/20.3
Toxic Pollutants/HAP	NA (does not emit)

Fire Fighter Training Facility / External Combustion	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.2/20.3
SO2	Rule 62
VOC	Rule 20.2/20.3
CO	Rule 20.2/20.3
PM10	Rule 50, Rule 20.2/20.3
Toxic Pollutants/HAP	Rule 1200*

Gasoline Dispensing	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rule 61.3, Rule 61.4, Rule 20.2/20.3
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*

Metal/Marine Coating	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rule 67.18, Rule 67.3, Rule 20.2/20.3 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 20.2/20.3
Toxic Pollutants/HAP	Rule 1200*

Stripping Tank	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rule 67.6.1 (VOC Content Limits), Rule 20.2/20.3
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*

Portable Engines	
Pollutant	Primary Limiting Regulations**
NOx	Rule 69.4.1, Rule 20.2/20.3
SO2	Rule 53, Rule 62
VOC	Rule 69.4.1
CO	Rule 69.4.1
PM10	Rule 50, 17 CCR 93116 (Portable Engine ATCM)*
Toxic Pollutants/HAP	Rule 1200*

** Indicates rules which are not federally enforceable.*
*** There are certain operating scenarios where a different rule may be the most stringent limitation.*

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.

Rules 10(a)/10(b) – These rules require that the facility operator obtain an Authority Construct and/or modified Permit to Operate prior to installing, modifying or operating equipment which emits air contaminants.

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 – This rule specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

Rule 19.3 – This rule pertains to emission inventory information and specifies what data facilities are required to maintain or provide for the District in order to conduct state and federally required emission inventory analyses. Some of the required information is also required by emission-unit specific permit conditions, but only if necessary to determine compliance with accurate requirements.

Rule 20.1-20.4 – These rules are the District's New Source Review (NSR). 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 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.

Gasoline Dispensing (61.3, 61.7, and 61.8) – These rules apply to the transfer of volatile organic compounds into stationary storage tanks. The requirements include installing state certified control equipment along with associated monitoring, recordkeeping and test methods. The applicable requirement(s) of each rule are listed in each permit with the rule as the basis.

Rule 62 – This rule applies to all combustion sources, except sewage treatment plant digestor gases and gases emitted from solid waste disposal landfill sites, and limits emissions of sulfur compounds. The sources subject to this rule and Engine NSPS, NESHAPs, or ATCMs standards comply with the requirements under normal operation without any restrictions.

Coating/adhesive Rules (67.3, 67.18, and 67.21) – These rules all apply to coating/adhesive operations and differ based on the category of coating (i.e. metal, marine, adhesive), 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.

Rule 71 – This rule defines requirements for temporary abrasive blasting not conducted in a booth or enclosure, so it applies to activities such as facility maintenance not covered by the operating permits under appendix A.

Degreasing Rules (67.6.1 and 67.6.2) – These rules apply to degreasing operations and differ based on the method of degreasing (i.e., cold solvent or vapor), but overall have similar requirements. These requirements include meeting specified VOC content limits of degreasing fluid, needing to use an approved device/system, 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.

Rule 69.4.1 – This rule applies to Stationary Reciprocating Internal Combustion Engines and sets maximum NOx, 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. Although Rule 69.4.1 is not yet approved in the SIP, its implemented conditions are more stringent than those of 69.4.

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. 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.

17 CCR 93116 (Portable Engine ATCM) – 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. ATCM requirements are not federally enforceable.

9.0 Monitoring, Record-Keeping, and Reporting

Permit enforceability is dependent largely on sufficient monitoring, record-keeping, and reporting (MRR), all of which must be effectively tied to the emissions limits and other requirements under applicable regulations. The District permits that are incorporated into the Title V permit in Appendix A contain substantial monitoring, record-keeping, and reporting requirements. The body of the Title V permit contains additional MRR pursuant to District Regulation XIV (Title V) to further strengthen the permit. Below is a discussion of the more notable MRR.

All permits: Rule references were added, where applicable, to clarify the basis of requirements.

Adhesive Operation Permit – Recordkeeping requirements were reviewed and minor updates made to enhance documentation of the following: (1) category of adhesive material applied, (2) material chemical properties, including but not limited to, VOC content, vapor pressure, and initial boiling point, and (3) SDS or manufacturer's specifications of materials used.

Gasoline Dispensing Facility – Reference for 40 CFR 63 Subpart CCCCCC was added to permit conditions. All MRR requirements remained unchanged, as the existing requirements under the California State's and local District gasoline dispensing rules are more stringent.
Portable Engines – Reference to 40 CFR 63 Subpart ZZZZ was removed from conditions because the portable diesel engines meet the definition of non-road engines as defined in 40 CFR 1068.30 and are therefore not subject to the NESHAP.

10.0 Permit Shield

Pursuant to District Rule 1410(p) and 40CFR §70.6(f), a Title V permit may include a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the permit issuance date. NBSD Ship Construction & Repairs Functional Group did not request a permit shield, and none is included in the permit; however, the facility-wide Portable Diesel Engines, operating under Permit 003676, which move from location to location within the facility, meet the definition of nonroad, therefore, they are not subject to 40 CFR Part 63 Subpart ZZZZ or 40 CFR Part 60 Subpart IIII and are not included in the Title V permit.

11.0 Streamlining

NBSD Ship Construction & Repairs Functional Group did not request streamlined conditions, and none are included in the permit.

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 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 Conclusions / 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