

Public Utilities Department Wastewater Treatment and Disposal Division

October 15, 2020

Mr. Nick Horres Senior Air Pollution Control Engineer San Diego Air Pollution Control District 10124 Old Grove Road San Diego, CA 92131

Subject:

Title V Renewal Application for City of San Diego, Public Utilities Department

Point Loma Wastewater Treatment Plant

Dear Mr. Horres:

The City of San Diego (City), Public Utilities Department is submitting to the San Diego Air Pollution Control District (SDAPCD) the enclosed Title V Permit Application for renewal of the Point Loma Wastewater Treatment Plant (PLWTP) Title V Permit (Permit #961008), which expires on October 17, 2021. The application processing check for the amount of \$8,354 was submitted separately to the SDAPCD on October 14, 2020.

In addition to the District's general permit application form, this application package includes the required forms and supporting documentation, specified in SDAPD Regulation XIV, Title V Operating Permits, and summarized below.

APCD Form	Form/Attachment Title	Notes
1401-A1	Stationary Source Summary	Includes attachment regarding Responsible Official information.
1401-A2	Stationary Source Summary	Includes attachment regarding significant change in facility's
		formaldehyde emissions due to one SDAPCD source test. The City
		is requesting collaboration with the SDAPCD to explore strategies
	· · · · ·	to maintain formaldehyde emissions below 10 tons per year.
1401-G	Insignificant Activity List	44
1401-H1	Applicable Requirements	Major source NESHAP requirements are checked for
	Summary Check List	completeness, pending the resolution of the formaldehyde issues referenced above.
1401-H2	List of Permits by	Includes attachment regarding PLWTP's open application.
	Equipment Category	
1401-l	Certification Statement	1227
1401-K	Compliance Certification	#
	Schedule	
1401- L	Schedule of Compliance	Included for completeness. The emission units are in compliance
	1	with all applicable requirements.
1401-M	Abatement Devices	
1401-Q	Permit Shield	Includes attachment for requesting a shield for NESHAP and NSPS requirements for portable internal combustion engines.

If you have any questions, please feel free to contact me at (619) 758-2371 or BBowman@sandiego.gov.

Sincerely

Brent Bowman

Senior Chemist, Public Utilities Department

Enclosure:

Title V Renewal Application Package

Internal Use Only			
APP ID: APCD20 20	-APP-	006484	
SITE ID: APCD20 1970	⁶ -SITE-	02083	

RNP:

EMF:

GENERAL PERMIT OR REGISTRATION APPLICATION FORM



GEN_APP_Form_Rev Date: Feb. 2015

Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c) or (d) REASON FOR SUBMITTAL OF APPLICATION: Existing Unpermitted Equipment Modification of Existing New Installation or Rule 11 Change Permitted Equipment Change of Equipment Ownership Amendment to Existing Authority to Change of Equipment Location Construct or Application (please provide proof of ownership) Change Permit to Operate Status Change of Permit Conditions Banking Emissions to Inactive Registration of Portable Equipment Other (Specify) Title V Permit Renewal List affected APP/PTO Record ID(s): Title V Permit to Operate No. 961008 APPLICANT INFORMATION Name of Business (DBA) City of San Diego Public Utilities Department (PUD) Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations? If yes, list assigned Site Record IDs listed on your Permits APCD1976-SITE-02083 Name of Legal Owner (if different from DBA) **Authority to Construct Mailing Address Equipment Owner** Name: City of San Diego - PUD Name: Mailing Address: 2392 Kincaid Rd Mailing Address: City: San Diego Zip: 92101 City: Zip: State: CA State: E-Mail Address: Bbowman@sandiego.gov E-Mail Address: Permit To Operate Mailing Address **Invoice Mailing Address** Name: Same as Equipment Owner Name: Mailing Address: Mailing Address: City: City: State: Zip: State: Zip: E-Mail Address: E-Mail Address: EQUIPMENT/PROCESS INFORMATION: Type of Equipment: Stationary Portable, if portable please enter below the equipment storage address. If portable, will operation exceed 12 consecutive months at the same location Yes No Equipment Location Address 1902 Gatchell Rd City San Diego State: CA Parcel No. Zip 92106 Phone (619) 221-8728 E-mail: DMarlow@sandiego.gov Phone (619) 221-8728 Site Contact David Marlow General Description of Equipment/Process Wastewater treatment and disposal; sludge processing Application Submitted by Owner Operator Contractor Consultant Affiliation EXPEDITED APPLICATION PROCESSING:

I hereby request Expedited Application Processing and understand that: a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval. I hereby certify that all information provided on this application is true and correct. SIGNATURE & VINSCOPPEN Print Name Brent Bowman Company City of San Diego - PUD E-mail Address Bbowman@sandiego.gov Phone (619) 758-2371 **Internal Use Only** Amt Rec'd \$ 8354 TIV = 8280 ETM10/15/2020 Staff Initials: cm Date Fee Schedule ____

NBF: 74 TA: 0

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT APPLICATION FEE ESTIMATE

Applicant Site ID/PTO Number:	APCD1976-SITE-02083	AP	CD2002-TVP-9	61008	_
Applicant DBA:	City of San Diego Metro Wastewater Dept. (PLWTP)	F	ee Schedule:	TV	
		Reason f	for Submittal:	Other	
		E	Existing Site?	Yes	='
APCD Engineer:	Nicholas Horres	E	stimate Date:	8/13/2020	-
Equipment Description:	To renew a Title V permit				
					- -
	EMPLOYEE	LABOR			
ACTIVITY	CLASSIFICATION	HOURS	COST	SUBTOTAL	=
Initial Evaluation Fee - T&M (Ru	le 40(d)(3)(i))				
Authority to Construct	Project Engineer		\$0.00		
	Senior Engineer		\$0.00	\$0.00	ETM
Permit to Operate	Project Engineer		\$0.00		
	Senior Engineer		\$0.00	\$0.00	ETM
T&M Application - No Fixed Fee	, see above				_
Authority to Construct/Permit to O	perate	N/A	T+M	\$0.00	ETM
Additional Evaluation and Proc	essing Fees (Rule 40(d)(5))				
New Source Review	Project Engineer		\$0.00		NSR
	Meteorologist		\$0.00	\$0.00	AQI
Prev. Significant Deterioration	Project Engineer		\$0.00	\$0.00	PSD
Toxics New Source Review	Project Engineer		\$0.00		
(Health Risk Assessment)	Meteorologist		\$0.00		
	Air Resources Specialist		\$0.00		
	HRA Base Estimate	N/A	\$0.00	\$0.00	TNS
Title V	Project Engineer		\$0.00		1
	Senior Engineer	40.0	\$8,280.00	\$8,280.00	TIV
NESHAPS/ATCM/NSPS	Project Engineer		\$0.00	\$0.00	HAP
CEQA	Project Engineer		\$0.00	\$0.00	CEQ
AB 3205 Notice	Project Engineer		\$0.00		1
	Public Notice Costs		\$0.00	\$0.00	AB3
Equipment subject to	Project Engineer		\$0.00		1
Rule 11(a)(3)	Senior Engineer		\$0.00	\$0.00	R51
H&SC 42301(e)	Project Engineer		\$0.00		1
`,	Senior Engineer		\$0.00	\$0.00	HSC
Testing or Test Witness	Project Engineer		\$0.00		STF
	Senior Chemist		\$0.00		ad-hoc
	Associate Chemist		\$0.00		ad-hoc
	Source Test Technician		\$0.00		ad-hoc
Fixed Test Fee Sched.	NA Fixed Testing Fees		\$0.00	\$0.00	ad-hoc
Miscellaneous Fees			.		,
Processing Fee (Rule 40(d)(1)(ii))		1.0	\$74		EFX
Renewal Fee (Rule 40(e)(2)(ii))		N/A	N/A	\$0.00	REN
Emissions Fee (Rule 40(e)(2)(iv))			N/A	\$0.00	EMF

ESTIMATE TOTAL: \$8,354.00

NOTES:

 $^{(1) \ \} To \ avoid \ possible \ processing \ delays, \ this \ document \ should \ be \ submitted \ with \ your \ application \ forms.$

⁽²⁾ The fees contained in this estimate are are based on APCD Rule 40. Final fee may be more or less than this estimate (see Rule 40(d)(1)(iii)).

⁽³⁾ Emissions determined to be greater than 5 tons per year will be charged a emission fee on a ton per year basis. (see Rule 40 (e)(2)(iv)(A))

⁽⁴⁾ Fees paid by credit card will be assessed a 2.19% processing fee (see Rule 40(c)(5))

⁽⁵⁾ Federal government payments made through DFAS: Please reference the above listed Site ID Record number in your DFAS submittal.

⁽⁶⁾ This estimate is valid only for applications received by the District by December 31, 2020

	Company Name City of San Diego - Public Utilities Dept - PLWTP			District NEDS # SITE ID #	Use Only
]	FACILITY IDENTIFICATION				
1.) \ 1 \ / -	<u>Point Loma Wastev</u>	<u>water Treatme</u>	<u>nt Plant (PLW</u>	/TP)
2.					
3.					
4.	-				
	City San Diego	State <u>CA</u>		Zip <u>92101</u>	
5.		Rd			
	City San Diego	State <u>CA</u>		Zip <u>92106</u>	
6.		orthing			
7.		🛚 Yes	☐ No (All	sources are w	rithin 50 miles)
8.	Source Located within 1000 feet of a school:	Yes	No `		,
9.	Type of Organization: Corporation	Sole Own	ership	⊠ Gov	ernment
	Partnership Utility Company	_	1	_	
10.		Utilities Departme	nt		
11.					
12.	• • • • • • • • • • • • • • • • • • • •				
13.	<u> </u>		±· (619) 221-8	728 FAX#	•
1.5.					
14.	Application Contact: Brent Bowman (619) 758-23				
14. 15.	Application Contact: <u>Brent Bowman (619) 758-23</u> Type of Facility: <u>Wastewater Treatment Plant</u>	371			
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14. 15.	Application Contact: Brent Bowman (619) 758-23 Type of Facility: Wastewater Treatment Plant General description of processes/products: Advanusing digester gas. Is a Federal Risk Management Plan (RMP) pursuar	ced primary treatm	nent with sludgorequired?	ge disgestion a	and co-generation
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SDAPCD – Rev. 01.06 Page 1 of 2

TITLE V APPLICA	TION
Stationary Source Summary	(FORM 1401-A2)

	Stationary Source Summary (FORM 1401-A2)			
	Company Name		District Use O	nly
City of Sa	n Diego - Public Utilities Dept - PLV	VIP	EDS #	
Check appropria	SOURCE APPLICABILITY te pollutant(s) for which you are a Major s necessary, use additional forms. Plea		s based on potentia	l to emit.
	POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)	

POLLUTANT	MAJOR SOURCE THRESHOLD	(check if
POLLUTANT	TOTAL EMISSIONS, TPY	appropriate)
VOC	100	
PM ₁₀	100	
SO ₂	100	
NOx	100	
CO	100	\square
ODC	100	
LEAD COMPOUNDS	10	
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	
COMBINATION HAP	25	

Attach all necessary calculations to this form as applicable. NOTE: Calculations are only needed if no Emission Inventory is on file with the District

Reference Emissions Inventory Report	Inventory Year 2019
Ind asa	10/14/20
Signature of Responsible Official	Date
	(858) 292-6418 Telephone No. of Responsible Official
Title of Responsible Official	
II. EMISSIONS CALCULATIONS ATTACHED (as needed)	Yes No
DISTRICT U	USE ONLY
Date Application Received:	Application #
Application Filing Fee:	District Received Stamp:
Receipt #:	Fee Code:

Page 2 of 2 SDAPCD - Rev. 01.06

Attachment to 1401-A1

Responsible Officials:

Shauna Lorance, Director, Public Utilities Department

Juan Guerreiro, Interim Executive Assistant Director, Public Utilities Department

Thomas Rosales, Interim Water Resources Recovery Branch Assistant Director

Craig Boyd, Interim Wastewater Treatment and Disposal Deputy Director

Facility Contact:

David Marlow, Wastewater Treatment Superintendent, Public Utilities Department;

Permit Information Contact:

Brent Bowman, Senior Chemist, Public Utilities Department

Attachment to 1401-A2

In August 2019, the San Diego Air Pollution Control District (SDAPCD or District) announced a drastic increase in emission factors (EFs) for uncontrolled formaldehyde and arsenic emissions from combustion of landfill gas (LFG) or anaerobic digester gas (DG). The new EFs significantly increase the emissions and estimated health risks from existing uncontrolled engines utilizing LFG and/or DG at City of San Diego facilities, including those operated at the Public Utilities Department's (PUD) Point Loma Wastewater Treatment Plant (PLWTP).

Beginning in 2015, the SDAPCD, using internal funds, initiated a series of source tests to verify formaldehyde emissions from uncontrolled combustion of LFG/DG engines. The DG-fueled engines at PLWTP were source tested in July 2015.

On August 9, 2019, the District held a workshop for affected parties to present the revised formaldehyde EFs based on the new data. The District indicated that the new EFs would be used in the pending 2015 emissions inventory. PUD responded with concerns and questions in a letter to the District on August 27, 2019; no response to the letter was provided by the District.

On September 23, 2019, PUD received the 2015 emissions inventory for PLWTP where the new factors were applied and resulted in emissions of formaldehyde and arsenic increasing exponentially. For example, formaldehyde emissions at PLWTP increased from 967 lb/yr (2014) to 27,420 lb/year (2015), representing a 28-fold increase. 2017 and 2019 approved emission inventories also reflect this significant increase in formaldehyde emissions (28,700 lb/yr and 22,270 lb/yr, respectively).

Since formaldehyde is a federal Hazardous Air Pollutant (HAP), emissions of greater than 10 tons/year of formaldehyde would designate PLWTP as a major HAP source. This designation triggers substantial new regulatory requirements for PLWTP engines and boilers under the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations, codified in 40 CFR, Part 63. To date, PUD has received no communication from the SDAPCD regarding new requirements or modifications to the permits, which would be affected by the new NESHAP requirements.

For the purpose of this Title V renewal application, PUD is presenting PLWTP as a major source of HAPs.

However, given the significant regulatory impacts to PLWTP, PUD requests that the District retract the new formaldehyde emission factors for PLWTP DG engines. PUD requests the District collaborate with the California Air Pollution Control Officers Association (CAPCOA), and other CA air districts with affected facilities, to develop a sampling strategy and conduct a more comprehensive test program, which will lead to consistent and representative revised EFs.

Affected facilities, including PLWTP, need time to plan for any regulatory impacts, including potentially developing source specific EFs, implementing strategies to reduce emissions, planning for funding to procure emission controls, etc. For example, PUD can manage the distribution of formaldehyde and NO_x emissions from PLWTP DG engines to reduce formaldehyde emissions while remaining in compliance with the applicable NO_x limits. These strategies could bring the formaldehyde emissions below major source HAP threshold(s) and eliminate additional significant regulatory requirements for the facility. PUD and other facilities need time and collaboration with the SDAPCD to explore and implement these options.

TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)

Company Name	District Use Only
City of San Diego - Public Utilities Dept PLWTP	NEDS #
Facility Address: 1902 Gatchell Rd., San Diego, CA 92106	SITE ID #

LIST OF EQUIPMENT – INSIGNIFICANT ACTIVITIES

Place a check mark in the appropriate box for equipment that is considered an insignificant activity based on throughput or equipment capacity.

Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A Citation
\boxtimes	Stationary & portable internal combustion engines with ≤ 50 bhp output rating	(d)(1)(iii)
	Stationary gas turbines with a power rating of < 0.3 megawatt (MW) or a maximum gross heat input rating of 1 million BTUs per hour	(d)(1)(iv)
	Water cooling towers & ponds with a capacity < 10,000 gal/min not used for evaporative cooling of process water or not used for evaporative cooling of water, contaminated water or industrial waste water from barometric jets or from barometric condensers.	(d)(2)
	Fuel-burning equipment with a maximum gross heat input rate of < 1 million Btu/hour when not part of a process, process line, line, equipment, article, machine or other contrivance for which a permit to operate is required by these Rules and Regulations	(d)(4)(i)
	Fuel burning equipment with a maximum gross heat input of < 20 million Btu/hour, and fired exclusively with natural gas and/or liquefied petroleum gas	(d)(4)(ii)
	Steam boilers, process heaters, and steam generators with a maximum gross heat input of < 5 million Btu/hour	(d)(4)(iii)
	Crucible-type or pot-type furnaces with a brimful capacity of < 450 in ³ of any molten metal	(d)(12)
	Crucible, pot or induction furnaces with a capacity of \leq 2500 in ³ , in which no sweating or distilling is conducted and from which only non-ferrous metals except yellow brass, are poured or non-ferrous metals are held in a molten state	(d)(13)
	Dry batch mixers with ≤ 0.5 cubic yards rated working capacity	(d)(27)
	Batch mixers (wet) with ≤ 1 cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
	Roofing kettles (used to heat asphalt) with a capacity of ≤ 85 gallons	(d)(33)
\boxtimes	Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft ³	(d)(34)
	Paper shredders and paper disintegrators that have a capacity of 600 pounds per hour or less, and the	
	associated conveying systems and baling equipment.	(d)(41)
	Ovens having an internal volume of \leq 27 ft ³ in which organic solvents or materials containing organic solvents are charged	(d)(59)
	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of $\leq 1.0 \text{ ft}^2$	(d)(61)(i)
	Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of ≤ 1 gallon	(d)(61)(ii)

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TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)

Continued - Exemptions based on Size (Capacity)

	(Condensed Language of Rule)	Appendix A <u>Citation</u>
	Stationary organic compound storage tanks with a capacity of \leq 250 gallons	(e)(1)
	Liquid surface coating application operations using hand-held brushes for application of a primer coating from containers of \leq eight (8) ounces in size, to fasteners to be installed on aerospace parts	(h)(5)
	Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(h)(6)
	Metal inspection tanks that: a) do not utilize a suspension of magnetic or fluorescent dye particles in volatile organic solvent, and b) have a liquid surface area $< 5 \text{ ft}^2$ and c) are not equipped with spray type flow or a means of solvent agitation	(o)(5)
	Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is ≤ 2 million Btu/hr	(o)(37)
Exem	aptions based on Production Rates (Emission Limits)	
	Printing or graphic arts presses located at a stationary source which emits a total of <15 lbs/day of VOC's subject to Rule 67.16, on each day of operation	(d)(7)
	Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use < 10 lbs/day of any material containing VOCs	(d)(23)
	Fire extinguishing equipment, using halons with a charge of < 50 lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
	Coffee roasting equipment with a manufacturer's rating of \leq 15 lbs/hr Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and /or Cal-EPA approval, provided the uncontrolled emissions of VOCs from all such operations \leq 5 ton/yr.	(d)(45) (d)(49)(iii)
	Oil quenching tanks which use < 20 gal/yr of make-up oil	(d)(56)
	Equipment that is used to conduct research and develop new or improved processes/products, and is operated by technically trained personnel under the supervision of a research director, and is not used in the manufacture of products for sale or exchange for commercial profit, and all emissions are < 15 lbs/day.	(1) (10)
	Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent	(d)(48) (d)(62)
	usage is < 0.5 gal/day	
	Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers < 60,000 gal/yr.	(f)(2)
	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.	(e)(3)
	Liquid surface coating or adhesive application operations (portable or stationary) where not more than 20 gallons per year of material containing organic compounds are applied	(h)(1)
	Liquid surface coating application operations exclusively using materials with a VOC content of $< 20 \text{ g/L}$ where $< 30 \text{ gal/day}$ of such materials are applied.	(h)(2)
	Foam manufacturing or application operations which emit < 5 lbs/day of VOCs	(i)(1)
	Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit < 5 lbs/day of VOCs	(i)(2)
	Plastics manufacturing or fabrication operations which emit < 5 lbs/day of VOCs	(i)(3)
	Cold solvent degreasers used for educational purpose and which emit < 5 lbs/day of VOCs	(i)(4)

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TITLE V APPLICATION Insignificant Activity List (FORM 1401-G)			
	Golf grip application stations which exclusively use liquid materials with an initial boiling point of 450°F (232°C), or greater and which emit < 5 lbs/day of VOCs.	(i)(5)	
	Batch-type waste-solvent recovery stills with batch capacity of \leq 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are \leq 5 lbs/day	(i)(6)	
	Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs	(i)(7)	
	Equipment used for washing or drying articles fabricated from metal, cloth, fabric or glass, provided that no organic solvent is employed in the process and that no oil or solid fuel is burned and none of the products being cleaned has residues of organic solvent and VOC emissions are <5 lbs/day	(i)(8)	
	Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.	(i)(9)	
	Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.	(o)(9)	
	Any operation producing materials for use in cosmetic or pharmaceutical products and/or manufacturing cosmetic or pharmaceutical products by chemical processes, which emit < 15 lbs/day of VOCs	(o)(12)	
	Refrigeration units except those used as, or with, air pollution control equipment with a charge of < 50 lbs of a Class I or II ozone depleting compound.	(o)(18)	
	Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr	(o)(28)	
\boxtimes	Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed.	(o)(29)(ii)	
	Solvent wipe cleaning operations using a container applicator that minimizes emissions to the air where the uncontrolled emissions of VOCs $<$ 5 ton/yr, or the total purchase of solvents $<$ 1,500 gal/yr, or the total purchase of solvents containing a single HAP $<$ 350 gal/yr.	(o)(32)	
	Equipment approved for use by the EPA for recovering and/or recycling CFCs provided such equipment is charged with < 50 lbs. of a Class I or II ozone depleting compound.	(o)(33)	
	Stationary IC engines rated at \leq 200 bhp installed and operated before November 15, 2000, which operate $<$ 200 hr/yr.	(o)(34)(ii)	

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San Diego County Air Pollution Control District 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649 (858) 586-2600 FAX (858) 586-2601

TITLE V APPLICATION Applicable Requirements Summary Checklist (FORM 1401-H1)

Company Name	District Use Only
City of San Diego - Public Utilities Dept - PLWTP	NEDS # SITE ID #

APPLICABLE REQUIREMENTS: Applicable requirements which apply to an entire facility are listed first. The applicant should check appropriate boxes on the form and attach emission unit specific permit number lists where necessary. Where streamlining is employed, note on this form. If information does not fit in the space allotted, attach documentation and reference it on this form. **Type or print legibly**.

on un	is form. Type or print legil	oiy.																
RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381						Future Effective Date
Facility A	Applicable Requirement D	escription																
10(a)	Permits Required – (a) Authority to Construct			X														
10(b)	Permits Required – (b) Permit to Operate			X														
19	Provision of Sampling & Testing Facilities			X														
19.2	Continuous Emission Monitoring Requirements																	
19.3	Emission Information			X														
NSR	New Source Review			X														
PSD	Prevention of Significant Deterioration																	
21	Permit Conditions			X														
50	Visible Emissions			X														
51	Nuisance			X														

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60	Circumvention			X														
67.0.1	Architectural Coatings	(g)		X														
67.17	Storage of Materials Containing VOC	(e)		X														
71	Abrasive Blasting			X														
98	Breakdown Conditions: Emergency Variance (not in the SIP)			X														
101	Burning Control			X														
131	Stationary Source Curtailment Plan																	
132	Traffic Abatement Plan																	
	ent Specific Applicable Rec	quirement	Description		1				1									
50	Visible Emissions				X	X	X	X	X	X	X	X						
51	Nuisance	26.1.1			X	X	X	X	X	X	X	X						
52	Particulate Matter	Method 5 Method				X	X											
53	Specific Contaminants	5			X			X		X	X	X						
53.1	Scavenger Plants																	
54	Dust and Fumes	Method 5																
55	Fugitive Dust Control																	
58	Incinerator Burning																_	
59	Control of Waste Disposal – Site Emissions	(e)	(e) & (f)															

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59.1	Municipal Solid Waste Landfills																	
60	Circumvention																	
61.0	Definitions Pertaining to the Storage and Handling of Organic Compounds																	
61.1	Receiving & Storing VOCs at Bulk Plants & Terminals	(d)	(c)(7)															
61.2	Transfer of VOCs into Mobil Transport Tanks	(c)(10)																
61.3	Transfer of VOCs into Stationary Storage Tanks		(c)(2)(iii)															
61.3.1	Transfer of Gasoline into Stationary Underground Storage Tanks																	
61.4	Transfer of VOCs into Vehicle Fuel Tanks																	
61.4.1	Transfer of Gasoline from Stationary Underground Storage Tanks into Vehicle Fuel Tanks																	
61.5	Visible Emissions Standards for Vapor Control Systems		VE															

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61.7	Spillage & Leakage of VOCs																	
61.8	Certification Requirements for Vapor Control Equip.																	
62	Sulfur Content of Fuels				X				X	X								
64	Reduction of Animal Matter																	
66	Organic Solvents (Rule rescinded 8/4/2010)	(p)	(o)															
66.1	Misc. Surface Coating Operations & other Processes Emitting VOC (not in SIP)	(h)	(f)															
67.0.01	Architectural Coatings																	
67.1	Alternative Emission Control Plans (AECP)	(c)	(d)															
67.2	Dry Cleaning - Petroleum Solvent	(f)	(e)															
67.3	Metal Parts Coating	(g)	(f)															
67.4	Can & Coil Coating	(g)	(f)															
67.5	Paper, Film and Fabric Coating	(f)	(e)															
67.6	Solvent Cleaning Operation (Rule rescinded 5/23/2007)	(f)																

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67.6.1	Cold Solvent Cleaning and Stripping Operations	(g)	(f)															
67.6.2	Transfer of Gasoline from Stationary Underground Storage Tanks into Vehicle Fuel Tanks																	
67.7	Cutback & Emulsified Asphalt	(f)	(e)															
67.9	Aerospace Coating Operations	(g)	(f)															
67.10	Kelp Processing and Bio-Polymer Mfg.	(f)	(e)															
67.11	Wood Products Coating																	
67.12.1	Polyester Resin Operations	(g)	(f)															
67.15	Pharmaceutical & Cosmetic Manufacturing	(e)																
67.16	Graphic Arts Operations	(g)	(f)															
67.17	Storage of Materials Containing VOC	(e)																
67.18	Marine Coating Operations	(g)	(f)															
67.19	Coating and Printing Inks Mfg. Operations	(g)	(f)															
67.20.1	Motor Vehicle & Mobile Equipment Coating Operations																	

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67.21	Adhesive Material Application Operations																	
67.22	Expandable Polystyrene Foam Products Manufacturing Operations (not in SIP)																	
67.24	Bakery Ovens	(f)	(e)															
68	Fuel Burning Equipment - NOx																	
69	Electrical Generating Steam Boilers, Replacement Units and New Units																	
69.2	Industrial and Commercial Boilers, Process Heaters and Steam Generators	(f)	(e) & (g)		X													
69.2.1	Small Boilers, Process Heaters and Steam Generators (effective until 06/30/21)																	
69.2.1	Small Boilers, Process Heaters and Steam Generators (effective 07/01/21)																	
69.2.2	Medium Boilers, Process Heaters and Steam Generators (effective 07/01/21)																	

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69.3	Stationary Gas Turbine Engines - RACT	(f)	(e) & (g)															
69.3.1	Stationary Gas Turbine Engines – BARCT (not in SIP)	(f)	(e) & (g)															
69.4	Stationary Internal Combustion Engines – RACT (9/27/94) - Rescinded	(f)	(e)															
69.4.1	Stationary Reciprocating Internal Combustion Engines-BARCT	(f)	(e)					X	X	Х		X						
69.5.1	Natural Gas-Fired Water Heaters																	
69.6	Natural Gas Fired Fan- Type Central Furnaces																	
70	Orchard Heaters																	
71	Abrasive Blasting																	
20.1	NSR - General Provisions			X														
20.2	NSR – Non-major Stationary Sources																	
20.3	NSR – Major Stationary Sources and Prevention of Significant Deterioration (PSD) Stationary Sources			Х														
20.4	NSR – Portable Emission Units																	

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20.5	Power Plants (SIP Version 7/5/79)																	
20.6	Standards for Permit to Operate Air Quality Analysis																	
20.9	New Source Review - Major Stationary Sources and Provisions for Meeting the Federal Clean Air Act Requirements (5/17/94) - Rescinded																	
20.10	New Source Review - Portable Emission Units to be Located at Federal Major Stationary Sources (5/17/94) - Rescinded																	
Subpart	Regulation X - Standards of Performance for New Stationary Sources	Rule #	Rule#															
A	General Provisions		260.7 260.13	_														
D	Standards of Performance for Fossil- Fuel Fired Steam Generators	260.46	260.45															

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Da	Standards of Performance for Electric Utility Steam Generating Units Constructed After		260.47a 260.48a 260.49a															
Db	Standards of Performance for Industrial-Commercial- Institutional Steam Generating	260.45b 260.46b	260.47b 260.48b 260.49b															
Е	Standards of Performance for Incinerators	260.54	260.53															
I	Standards of Performance for Asphalt Concrete Plants	260.93																
K	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after June 11, 1973 and Prior to May 19, 1978		260.113															
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids Constructed after May 18, 1978	260.113 a	260.115a															

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Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984	260.113 b	260.115b 260.116b															
L	Standards of Performance for Secondary Lead Smelters	260.123																
М	Standards of Performance for Secondary Brass and Bronze Ingot Production Plants	260.133																
О	Standards of Performance for Sewage Treatment Plants	260.154	260.153															
DD	Standards of Performance for Grain	260.303																
EE	Standards of Performance for Surface Coating Metal Furniture	260.313 260.316	260.314 260.315															
GG	Standards of Performance for Stationary Gas Turbines	260.335	260.334															

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QQ	Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing	260.433 260.435	260.434															
RR	Standards of Performance for the Pressure Sensitive Tape and Label Surface Coating Operations	260.444 260.446	260.445 260.447															
SS	Standard of Performance for the Industrial Surface Coating Large Appliances	260.453 260.456	260.454 260.455															
TT	Standards of Performance for Metal Coil Surface Coating	260.463 260.466	260.464 260.465															
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	260.543 260.547	260.544 260.545 260.546															
FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	260.583	260.584 260.585															
JJJ	Standards of Performance for Petroleum Dry Cleaners																	
SUBPART	New Source Performance	e Standard	s (40 CFR 6	0)														
Cb, F	Portland Cement Plants																	

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Dc	Small Industrial - Commercial - Institutional Steam Generators >10 but <100 MM Btu.																	
Ea	Municipal Waste Combustors																	
G	Nitric Acid Plants																	
H & Cb	Sulfuric Acid Plants																	
N	Oxygen Process Furnaces																	
Na	Oxygen Process Steelmaking Facilities																	
P	Primary Copper Smelters																	
Q	Primary Zinc Smelters																	
R	Primary Lead Smelters																	
S	Primary Aluminum Reduction Plants																	
T & U	Phosphate Fertilizer																	
V, W, X	Phosphate Fertilizer Industry																	
Y	Coal Preparation Plants										\exists	T						
Z	Ferroalloy Production Facilities				_					_								
AA, AAa	Steel Plants																	
BB	Kraft Pulp Mills																	
CC	Glass Manufacturing																	

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НН	Lime Manufacturing																	
KK	Lead-Acid Battery Manufacturing Plants																	
LL	Metallic Mineral																	
MM	Automobile and Light-																	
NN	Phosphate Rock Plants																	
PP	Ammonium Sulfate Manufacture																	
UU	Asphalt Processing and Asphalt Roofing Manufacture																	
VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.																	
WW	Beverage Can Surface Coating Industry																	
XX	Bulk Gasoline Terminals																	
AAA	New Residential Wood Heaters																	
DDD	VOC Emissions from the Polymer Mfg. Ind.																	
GGG	Equipment Leaks of VOC in Petroleum Refineries																	
ННН	Synthetic Fiber Production Facilities																	

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KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO ₂ Emissions																	
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations																	
000	Standard of Performance for Nonmetallic Mineral Processing Plants																	
PPP	Wool Fiberglass Insulation Mfg. Plants																	
QQQ	VOC Emissions from Petroleum Refinery Wastewater Systems																	
RRR	VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor																	
SSS	Magnetic Tape Coating Facilities																	
TTT	Industrial Surface Coating Surface, Surface Coating of Plastic Parts for Business Machines																	
UUU	Calciners and Dryers in Mineral Industries																	

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VVV	Polymeric Coating of Supporting Substances Facilities																	
www	Standards of Performance for Municipal Solid Waste Facilities																	
IIII	Stationary Compression Ignition Internal Combustion Engines NSPS																	
11111	Stationary Spark Ignition Internal Combustion Engines NSPS																	
SUBPART	REGULATION XI - NATION	NAL EMISSI	ON STANDAR	DS FO	R HAZA	ARDOUS	AIR PO	DLLUTA	NTS (NI	ESHAP	S)							
A	General Provisions			X														
C, D	Beryllium Extraction Plants; Ceramic Plants, Foundries, Incinerators, Propellant Plants, and Machine Shops that Process Beryllium Containing Material; and Rocket Motor Firing Test Sites																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381						Future Effective Date
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali																	
F	Ethylene Dichloride Mfg. Via Oxygen, HCI and Ethylene; Vinyl Chloride Mfg.; and Polyvinyl Chloride Mfg.																	
M	Asbestos Mills; Roadway Surfacing with Asbestos Tailings; Manufacture of Products Containing Asbestos; Demolition; Renovation; and Spraying and Disposal of Asbestos Waste																	
B, Q, R T, W	Underground Uranium Mines; Dept. of Energy Facilities; Phosphorus Fertilizer Plants; & Facilities Processing or Disposing of Uranium Ore & Tailings																	

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381						Future Effective Date
Н, І, К	Dept. of Energy; Nuclear Regulatory Commission Licensed Facilities; Other Federal Facilities; and Elemental Phosphorus Plants. (Radionuclide)																	
J, L, Y, BB, FF	Fugitive Process, Storage, and Transfer Equipment Leaks; Coke By-Product Recovery Plants; Benzene Storage Vessels; Benzene Transfer Operations; and Benzene Waste																	
N, O, P	Glass Manufacturer; Primary Copper Smelter; Arsenic Trioxide and Metallic Arsenic Production																	
V	Pumps, Compressors, Pressure Relief Devices, Connections, Valves, Lines, Flanges, Product Accumulator Vessels, etc. in VHAP Service																	
SUBPART	MACT Standards (40 CF	FR 63)											 	 				
A	General Provisions			X														

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381							Future Effective Date
F, G, H, I	Amendment: Reopening, Averaging Issue																		
L	Coke Ovens																		
N	Chromium Electroplating and Anodizing	63.344	63.346, 63.347																
О	Ethylene Oxide Sterilizers																		
Q	Industrial Process Cooling Towers																		
R	Gasoline Distribution Facilities																		
T	Halogenated Solvent Cleaning Degreasing																		
X	Secondary Lead Smelters																		
Y	Marine Tank Loading/Unloading																		
CC	Petroleum Refineries																		
DD	Off-Site Waste and Recovery Operations																		
EE	Magnetic Tape																	Ī	
GG	Aerospace (Coatings)																		
II	Shipbuilding for Ship Repair (Surface																		
JJ	Wood Furniture Industry (Coatings)																		

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381								Future Effective Date
KK	Printing and Publishing																			
AAAA	Municipal Solid Waste Landfills																			
DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters																			
MMMM	Surface Coating of Miscellaneous Metal Parts and Products																			
PPPP	Surface Coating of Plastic Parts																			
ZZZZ	Reciprocating Internal Combustion Engines								X	X										
YYYY	Stationary Combustion Turbines																			
	40 CFR Part 64 Compliance Assurance Monitoring																			
	40 CFR Part 68 RMP																			
	Title IV - Acid Rain (40 CFR 72)																			
Title VI-	Ozone Depleting Compoun	nds (40 CF	R 82)					Г		- 1	1		1		, ı	-	ı	,	1	
A	Production and Consumption Controls																			
В	Servicing of Motor Vehicle Air Conditioners																			

RULE	RULE DESCRIPTION	Test Method or Rule Section	Monitoring, Records, Reports, Rule Section	Facility	Digester Gas Fired Boilers PTOs 960190 - 960193	Sludge Screening Facility with ORS PTO 940189	Treatment Plant with ORS PTO 930297	Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650	IC Engine, Emergency Generator PTO 961215	Gas Engines 1 and 2 PTOs 961168 - 961169	Sludge Digesters and Flares 950315	Flex Permit – Max 5 Prime Diesel Engines PTO 002381						Future Effective Date
F	Servicing of Other Air Conditioners			X														
Californ	ia Airborne Toxic Control	Measures	(ATCM) 17	CCF	₹										•			
§93102	Hexavalent Chromium ATCM for Chrome Plating and Chromic Acid Anodizing Operations																	
§93109	ATCM for Emissions of Perchloroethylene from Dry Cleaning Operations																	
17 CCR 93115	ATCM for Stationary Compression Ignition Engines								X									
17 CCR 93116	ATCM for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater							X				X						

TITLE V APPLICATION LIST OF PERMITS BY EQUIPMENT CATEGORY (FORM 1401-H2)

Company Name	District Use Only
City of San Diego - Public Utilities Dept - PLWTP	NEDS #
Facility Address: 1902 Gatchell Rd San Diego, CA 92106	SITE ID #

PERMITTED EMISSION UNITS BY EQUIPMENT CATEGORY

In the emission unit (equipment) category order entered on Form 1401-H1, Applicable Requirements Summary Checklist, list emission units by permit number for the specific emission unit (equipment) category. Under the column labeled status place an "O" if operational, "N" if non-operational, or "S" if the equipment is new and currently operating under a startup authorization. **If more space is required, use additional forms. Please type or print legibly.**

Emission Unit Category	Application/ Permit No.	Status of Emission Unit
Digester Gas Fired Boilers (4)	960190 - 960193	0
Flex Permit - Max 5 Prime Diesel Engines	002381	0
Sludge Screening Facility with ORS	940189	0
Treatment Plant with ORS	930297	0
Dewatering Pump Prime Diesel Engines (2)	002649 - 002650	0
IC Engine, Emergency Generator- R12 Reg.	961215	0
Gas Engine 1 (South)	961168	0
Gas Engine 2 (North)	961169	О
Sludge Disgesters and Flares	950315	0

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Attachment to 1401-H2

City of San Diego Public Utilities Department has submitted an application for permit condition changes to Permit to Operate No. 950315, Sludge Digesters and Flares, for PLWTP. The application was submitted to the San Diego Air Pollution Control District on June 5, 2020 and deemed complete on July 8, 2020. This is the only application currently open for PLWTP. Any permit revisions that result from this permit modification should be reflected in the Title V Permit Renewal.

TITLE V APPLICATION
Certification Statement (FORM 1401-I)

Certification Statement (FORM 1401-I)			
	Company Name	District Use Only	
City of San Diego	- PUD - PLWTP	NEDS #	
Facility Address: 1	902 Gatchell Rd, San Diego, CA 92106	SITE ID #	
Under penalty of perjucteck each box for con	ry, identify the following: (Read each statement careful	ally and	
Applicable Applicable			
	Based on information and belief formed after reasonal identified in this application will continue to comply w with which the source is in compliance. The applicable source(s) is/are not in compliance is/are identified in I Compliance.	ith the applicable requirement requirement the	
	Based on information and belief formed after reasonal identified in this application will comply with the futur requirement(s) on a timely basis.		
	Based on information and belief formed after reasonal identified in the Schedule of Compliance application for with the applicable requirement(s), will comply in accompliance plan schedule.	orm that is/are not in compliance	
	Based on information and belief formed after reasonal application forms, referenced documents, all accomparequired certifications are true, accurate, and complete	nying reports, and other	
	All fees required by Regulation III, Rule 40 have been	paid.	
Signature of Responsib	ole Official Date	10/14/20	
Thomas Rosales Print Name of Respons		epone No. of Responsible Official	

__Interim Water Resources Recovery Branch Assistant Director___ Title of Responsible Official

TITLE V APPLICATION Compliance Certification Schedule (FORM 1401-K)

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Company Name	District Use Only
City of San Diego - Public Utilities Dept - PLWTP	NEDS #
Facility Address: 1902 Gatchell Rd San Diego, CA 92106	SITE ID #

In numerical order, list all sources that have federally enforceable requirements for compliance certification on a more frequent basis than once per year. If more space is required, use additional forms. Please type or print legibly.

Permit No.	Emission Unit Name	Applicable Requirements	Frequency
	Not applicable		

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TITLE V APPLICATION Schedule of Compliance (FORM 1401-L)			
Company Name District Use Only			
City of San Diego - Public Utilities Dept - PLWTP	NEDS #		

SOURCES NOT IN COMPLIANCE

Facility Address: 1902 Gatchell Rd San Diego, CA 92106

SITE ID#

In numerical order, list all emission units by permit number that do not comply with a federally enforceable requirement. Describe how the source will achieve compliance. Propose a schedule to correct the deficiencies, and include a schedule for progress reports. Reports must be submitted at least every six months. If the source is operating under a judicial consent decree or administrative order, the Schedule of Compliance must be at least as stringent. If more space is required, use additional forms. Please type or print legibly.

Permit No.	Emission Unit Name	Applicable Requirements	Compliance Schedule Attachment
None	None	None	Not appl.

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TITLE V APPLICATION	
Abatement Devices (FORM 1401-M)	
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Company Name	District Use Only
City of San Diego - Public Utilites Dept PLWTP	NEDS #
Facility Address: 1902 Gatchell Rd., San Diego, CA 92106	SITE ID #

LIST OF ABATEMENT DEVICES

In numerical order, list all abatement devices, the abatement device, name or description, and the emission unit or operation abated. If more space is required, use additional forms. Please type or print legibly.

Permit No(s)	Abatement Device Name or Description	Emission Unit(s) or Operation(s) Abated
930297	Odor Reduction System (ORS)	Treatment Plant with ORS
940189	Odor Reduction System (ORS)	Raw Sludge Screening Facility with ORS
950315	Flares	Sludge Disgesters and Flares

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TITLE V APPLICATION	
Permit Shield (FORM 1401-Q)	

Company Name	District Use Only	
City of San Diego - Public Utilities Dept - PLWTP	NEDS #	
Facility Address: 1902 Gatchell Rd San Diego, CA 92106	SITE ID#	

$\begin{tabular}{l} \textbf{REQUEST FOR PERMIT SHIELD} \\ \textbf{If more space is required, use additional forms.} \end{tabular} \begin{tabular}{l} \textbf{Please type or print legibly.} \\ \end{tabular}$

Application No(s) Permit No(s)	Requirements to be Shielded	Basis	Attachment Number
002381	40 CFR Part 63 Subpart ZZZZ 40 CFR Part 60 Subpart IIII	Engine meets definition of "nonroad engine" in 40 CFR 1068.3	Q1
002649	40 CFR Part 63 Subpart ZZZZ 40 CFR Part 60 Subpart IIII	Engine meets definition of "nonroad engine" in 40 CFR 1068.3	Q1
002650	40 CFR Part 63 Subpart ZZZZ 40 CFR Part 60 Subpart IIII	Engine meets definition of "nonroad engine" in 40 CFR 1068.3	Q1

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Attachment to Form 1401-Q

Q1: 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, and 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The City of San Diego (City), Public Utilities Department is requesting a permit shield from the above regulation for the internal combustion (IC) engines powering the facility's five (5) prime, portable diesel engines, covered under Flex Permit 002381, and two Dewatering Pump Prime Diesel Engines, operating under Permits 002649 and 002650. These portable engines, which move from location to location within the facility, meet the definition of nonroad. As such, they are not subject to the above regulations, which are applicable to stationary IC engines.