



**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	--
1401-H1	Applicable Requirements Summary Check List	Major source NESHAP requirements are checked for completeness, pending the resolution of the formaldehyde issues referenced above.
1401-H2	List of Permits by Equipment Category	Includes attachment regarding PLWTP's open application.
1401-I	Certification Statement	--
1401-K	Compliance Certification Schedule	--
1401- L	Schedule of Compliance	Included for completeness. The emission units are in compliance 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 1976	-SITE-	02083

## GENERAL PERMIT OR REGISTRATION APPLICATION FORM



**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:

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> New Installation  | <input type="checkbox"/> Existing Unpermitted Equipment or Rule 11 Change         | <input type="checkbox"/> Modification of Existing Permitted Equipment                      |
| <input type="checkbox"/> Amendment to Existing Authority to Construct or Application | <input type="checkbox"/> Change of Equipment Location                             | <input type="checkbox"/> Change of Equipment Ownership (please provide proof of ownership) |
| <input type="checkbox"/> Change of Permit Conditions                                 | <input type="checkbox"/> Change Permit to Operate Status to Inactive              | <input type="checkbox"/> Banking Emissions   |
| <input type="checkbox"/> Registration of Portable Equipment                          | <input checked="" type="checkbox"/> Other (Specify) <u>Title V Permit Renewal</u> |  |

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? ☒ Yes ☐ No

If yes, list assigned Site Record IDs listed on your Permits APCD1976-SITE-02083

Name of Legal Owner (if different from DBA) \_\_\_\_\_

Equipment Owner		Authority to Construct Mailing Address	
Name: City of San Diego - PUD		Name:	
Mailing Address: 2392 Kincaid Rd		Mailing Address:	
City: San Diego	State: CA Zip: 92101	City:	State: Zip:
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:	State: Zip:	City:	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

Site Contact David Marlow Phone (619) 221- 8728

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 Brent Bowman Date 10/15/2020  
 Print Name Brent Bowman Company City of San Diego - PUD  
 Phone (619) 758-2371 E-mail Address Bbowman@sandiego.gov

### Internal Use Only

Date	<u>10/15/2020</u>	Staff Initials:	<u>cm</u>	Amt Rec'd \$	<u>8354</u>	Fee Schedule	<u>TIV = 8280 ETM</u>
RNP:	<u>0</u>	EMF:	<u>0</u>	NBF:	<u>74</u>	TA:	<u>0</u>

GEN\_APP\_Form\_Rev Date: Feb. 2015

**SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT  
APPLICATION FEE ESTIMATE**

Applicant Site ID/PTO Number:	APCD1976-SITE-02083	APCD2002-TVP-961008
Applicant DBA:	City of San Diego Metro Wastewater Dept. (PLWTP)	Fee Schedule: TV
		Reason for Submittal: Other
		Existing Site? Yes
APCD Engineer:	Nicholas Horres	Estimate Date: 8/13/2020
Equipment Description:	To renew a Title V permit	

ACTIVITY	EMPLOYEE CLASSIFICATION	LABOR HOURS	COST	SUBTOTAL
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**Initial Evaluation Fee - T&M (Rule 40(d)(3)(i))**

Authority to Construct	Project Engineer		\$0.00	\$0.00	ETM
	Senior Engineer		\$0.00		
Permit to Operate	Project Engineer		\$0.00	\$0.00	ETM
	Senior Engineer		\$0.00		

**T&M Application - No Fixed Fee, see above**

Authority to Construct/Permit to Operate	N/A	T+M	\$0.00	ETM
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**Additional Evaluation and Processing Fees (Rule 40(d)(5))**

New Source Review	Project Engineer		\$0.00	\$0.00	NSR AQI
	Meteorologist		\$0.00		
Prev. Significant Deterioration	Project Engineer		\$0.00	\$0.00	PSD
Toxics New Source Review (Health Risk Assessment)	Project Engineer		\$0.00	\$0.00	TNS
	Meteorologist		\$0.00		
	Air Resources Specialist		\$0.00		
	HRA Base Estimate	N/A	\$0.00		
Title V	Project Engineer		\$0.00	\$8,280.00	TIV
	Senior Engineer	40.0	\$8,280.00		
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	\$0.00	AB3
	Public Notice Costs		\$0.00		
Equipment subject to Rule 11(a)(3)	Project Engineer		\$0.00	\$0.00	R51
	Senior Engineer		\$0.00		
H&SC 42301(e)	Project Engineer		\$0.00	\$0.00	HSC
	Senior Engineer		\$0.00		
Testing or Test Witness	Project Engineer		\$0.00		STF ad-hoc ad-hoc ad-hoc ad-hoc
	Senior Chemist		\$0.00		
	Associate Chemist		\$0.00		
	Source Test Technician		\$0.00		
Fixed Test Fee Sched.	NA	Fixed Testing Fees	\$0.00	\$0.00	

**Miscellaneous Fees**

Processing Fee (Rule 40(d)(1)(ii))	1.0	\$74	\$74.00	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

**NOTES:**

**ESTIMATE TOTAL: \$8,354.00**

- (1) To avoid possible processing delays, this document should be submitted with your application forms.
- (2) The fees contained in this estimate 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

**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**  
**Stationary Source Summary (FORM 1401-A1)**

<b>Company Name</b>	<b>District Use Only</b>
<u>City of San Diego - Public Utilities Dept - PLWTP</u>	NEDS # _____
	SITE ID # _____

**I. FACILITY IDENTIFICATION**

1. Facility Name (if different than company name): Point Loma Wastewater Treatment Plant (PLWTP)
2. Four digit SIC Code: 4952
3. Parent Company (if different than Company Name): City of San Diego
4. Mailing Address: 2392 Kincaid Rd  
City San Diego State CA Zip 92101
5. Street Address or Source Location: 1902 Gatchell Rd  
City San Diego State CA Zip 92106
6. UTM Coordinates: 476,800 Easting; 3,616,000 Northing
7. Source Located within 50 miles of a state line: ☒ Yes ☐ No (All sources **are** within 50 miles)
8. Source Located within 1000 feet of a school: ☐ Yes ☒ No
9. Type of Organization: ☐ Corporation ☐ Sole Ownership ☒ Government  
☐ Partnership ☐ Utility Company
10. Legal Owner's Name: City of San Diego - Public Utilities Department
11. Owner's Agent name (if any): \_\_\_\_\_
12. Responsible Official: Please see attached.
13. Plant Site Manager/Contact: David Marlow Phone #: (619) 221-8728 FAX #: \_\_\_\_\_
14. Application Contact: Brent Bowman (619) 758-2371
15. Type of Facility: Wastewater Treatment Plant
16. General description of processes/products: Advanced primary treatment with sludge digestion and co-generation using digester gas.
17. Is a Federal Risk Management Plan (RMP) pursuant to Section 112(r) required? ☐ Yes ☒ No  
(If application is submitted after RMP due date, attach verification that plan is registered with the appropriate agency.)

II. TYPE OF PERMIT ACTION (check)	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial Title V Application	N/A	N/A
<input checked="" type="checkbox"/> Permit Renewal	961008	10/17/2021
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

**III. DESCRIPTION OF PERMIT ACTION**

1. Does the permit action requested involve:  

☐ Acid Rain Source  
☐ CEMs  
☐ Outdated SIP Requirement Streamlining  
☒ Source Subject to MACT Requirements [Section 112]  
☐ Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]

☐ Temporary Source  
☐ Alternative Operating Scenarios  
☒ Permit Shield  
☐ Multiple Applicable Requirement Streamlining

☐ Voluntary Emissions Caps  
☒ Abatement Devices
2. Is source operating under a Compliance Schedule? ☐ Yes ☒ No ☐ Proposed
3. Is source operating under a Variance ☐ Yes ☒ No (If Yes, please attach variance information)
4. For permit modification, provide a general description of the proposed permit modification:  
\_\_\_\_\_

**IV. SUPPLEMENTAL ATTACHMENTS\*:** Cover Letter, Forms 1401-A1, 1401A2, 1401-H2, and 1401-Q attachments

\* Means all attachments to the complete application.



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**  
**Stationary Source Summary (FORM 1401-A2)**


<b>Company Name</b>  <u>City of San Diego - Public Utilities Dept - PLWTP</u>	<b>District Use Only</b>  NEDS # _____ SITE ID # _____
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**I. MAJOR SOURCE APPLICABILITY**

Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit. If more space is necessary, use additional forms. Please type or print legibly.

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	<input type="checkbox"/>
PM <sub>10</sub>	100	<input type="checkbox"/>
SO <sub>2</sub>	100	<input type="checkbox"/>
NO <sub>x</sub>	100	<input type="checkbox"/>
CO	100	<input checked="" type="checkbox"/>
ODC	100	<input type="checkbox"/>
LEAD COMPOUNDS	10	<input type="checkbox"/>
<b>HAZARDOUS AIR POLLUTANTS</b>		
SINGLE HAP	10	<input checked="" type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
COMBINATION HAP	25	<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

**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  
  
 \_\_\_\_\_  
 Signature of Responsible Official

Inventory Year 2019  
10/14/20  
 \_\_\_\_\_  
 Date

Thomas Rosales  
 \_\_\_\_\_  
 Print Name of Responsible Official  
Interim Water Resources Recovery Branch Assistant Director  
 \_\_\_\_\_  
 Title of Responsible Official

(858) 292-6418  
 \_\_\_\_\_  
 Telephone No. of Responsible Official

**II. EMISSIONS CALCULATIONS ATTACHED (as needed)**

☐ Yes ☒ No

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**DISTRICT USE ONLY**

Date Application Received: _____	Application # _____
Application Filing Fee: _____	District Received Stamp: _____
Receipt #: _____	Fee Code: _____

**Attachment to 1401-A1**

Responsible Officials:

Shauna Lorange, 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<sub>x</sub> emissions from PLWTP DG engines to reduce formaldehyde emissions while remaining in compliance with the applicable NO<sub>x</sub> 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.

**San Diego County Air Pollution Control District**  
**10124 Old Grove Rd., San Diego, CA 92131**  
**(858) 586-2600 FAX (858) 586-2601**

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

<b>Company Name</b> <u>City of San Diego - Public Utilities Dept. - PLWTP</u>  Facility Address: <u>1902 Gatchell Rd., San Diego, CA 92106</u>	<b style="color: red;">District Use Only</b>  <b>NEDS #</b> _____ <b>SITE ID #</b> _____
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## 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)

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input checked="" type="checkbox"/> Stationary & portable internal combustion engines with $\leq 50$ bhp output rating	(d)(1)(iii)
<input type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input checked="" type="checkbox"/> 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)
<input type="checkbox"/> 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)
<input type="checkbox"/> Steam boilers, process heaters, and steam generators with a maximum gross heat input of $< 5$ million Btu/hour	(d)(4)(iii)
<input type="checkbox"/> Crucible-type or pot-type furnaces with a brimful capacity of $< 450$ in <sup>3</sup> of any molten metal	(d)(12)
<input type="checkbox"/> Crucible, pot or induction furnaces with a capacity of $\leq 2500$ in <sup>3</sup> , 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)
<input type="checkbox"/> Dry batch mixers with $\leq 0.5$ cubic yards rated working capacity	(d)(27)
<input type="checkbox"/> Batch mixers (wet) with $\leq 1$ cubic yard capacity where no organic solvents, diluents or thinners are used.	(d)(28)
<input type="checkbox"/> Roofing kettles (used to heat asphalt) with a capacity of $\leq 85$ gallons	(d)(33)
<input checked="" type="checkbox"/> Abrasive blasting equipment with a manufacturer's-rated sand capacity of $< 100$ lbs or $< 1$ ft <sup>3</sup>	(d)(34)
<input type="checkbox"/> 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)
<input type="checkbox"/> Ovens having an internal volume of $\leq 27$ ft <sup>3</sup> in which organic solvents or materials containing organic solvents are charged	(d)(59)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks with a liquid surface area of $\leq 1.0$ ft <sup>2</sup>	(d)(61)(i)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of $\leq 1$ gallon	(d)(61)(ii)



<b>TITLE V APPLICATION</b> <b>Insignificant Activity List (FORM 1401-G)</b>
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**Continued - Exemptions based on Size (Capacity)**

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input type="checkbox"/> Stationary organic compound storage tanks with a capacity of $\leq 250$ gallons	(e)(1)
<input type="checkbox"/> 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)
<input type="checkbox"/> Liquid surface coating application operations using air brushes with a coating capacity of $\leq 2$ ounces for the application of a stencil coating	(h)(6)
<input type="checkbox"/> 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)
<input type="checkbox"/> Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is $< 2$ million Btu/hr	(o)(37)

**Exemptions based on Production Rates (Emission Limits)**

<input type="checkbox"/> 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)
<input type="checkbox"/> Solder levelers, hydrosqueegees, wave solder machines, and drag solder machines which use $< 10$ lbs/day of any material containing VOCs	(d)(23)
<input checked="" type="checkbox"/> Fire extinguishing equipment, using halons with a charge of $< 50$ lbs. of a Class I or Class II ozone depleting compound.	(d)(31)
<input type="checkbox"/> Coffee roasting equipment with a manufacturer's rating of $\leq 15$ lbs/hr	(d)(45)
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 $< 5$ ton/yr.	(d)(49)(iii)
<input type="checkbox"/> Oil quenching tanks which use $< 20$ gal/yr of make-up oil	(d)(56)
<input type="checkbox"/> 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.	(d)(48)
<input type="checkbox"/> Powder coating operations, except metalizing gun operations, where surface preparation or cleaning solvent usage is $< 0.5$ gal/day	(d)(62)
<input type="checkbox"/> Equipment used to transfer fuel to & from amphibious ships for maintenance purposes, provided total annual transfers $< 60,000$ gal/yr.	(f)(2)
<input type="checkbox"/> 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)
<input checked="" type="checkbox"/> 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)
<input type="checkbox"/> 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.	(h)(2)
<input type="checkbox"/> Foam manufacturing or application operations which emit $< 5$ lbs/day of VOCs	(i)(1)
<input type="checkbox"/> Reinforced plastic fabrication operations using resins such as epoxy and/or polyester which emit $< 5$ lbs/day of VOCs	(i)(2)
<input type="checkbox"/> Plastics manufacturing or fabrication operations which emit $< 5$ lbs/day of VOCs	(i)(3)
<input type="checkbox"/> Cold solvent degreasers used for educational purpose and which emit $< 5$ lbs/day of VOCs	(i)(4)

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

- |                                     |  |             |
|-------------------------------------|--|-------------|
| <input type="checkbox"/>            | 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)      |
| <input type="checkbox"/>            | Batch-type waste-solvent recovery stills with batch capacity of ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 5 lbs/day  | (i)(6)      |
| <input type="checkbox"/>            | Peptide and DNA synthesis operations which emit < 5 lbs/day of VOCs  | (i)(7)      |
| <input type="checkbox"/>            | 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)      |
| <input type="checkbox"/>            | Hot wire cutting of expanded polystyrene foam which emit < 5 lbs/day of VOCs.  | (i)(9)      |
| <input type="checkbox"/>            | Any coating and/or ink manufacturing operations located at a stationary source, which emit < 15 lbs/day of VOCs.   | (o)(9)      |
| <input type="checkbox"/>            | 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)     |
| <input type="checkbox"/>            | 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)     |
| <input type="checkbox"/>            | Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr  | (o)(28)     |
| <input checked="" type="checkbox"/> | 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) |
| <input type="checkbox"/>            | 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)     |
| <input type="checkbox"/>            | 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)     |
| <input type="checkbox"/>            | Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr.   | (o)(34)(ii) |

**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)**

<p align="center"><b>Company Name</b></p> <p><u>City of San Diego - Public Utilities Dept - PLWTP</u></p>	<p align="center"><b>District Use Only</b></p> <p><b>NEDS #</b> _____</p> <p><b>SITE ID #</b> _____</p>
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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.**

[illegible]

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]



<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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**TITLE V APPLICATION**  
**Applicable Requirements Summary Checklist (FORM 1401-H1) - continued**

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
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	<b>Regulation X - Standards of Performance for New Stationary Sources</b>	<b>Rule #</b>	<b>Rule #</b>																							
A	General Provisions		260.7 260.13																							
D	Standards of Performance for Fossil-Fuel Fired Steam Generators	260.46	260.45																							



<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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**TITLE V APPLICATION**  
**Applicable Requirements Summary Checklist (FORM 1401-H1) - continued**

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Reports, Rule Section</b>	<b>Facility</b>	<b>Digester Gas Fired Boilers PTOs 960190 - 960193</b>	<b>Sludge Screening Facility with ORS PTO 940189</b>	<b>Treatment Plant with ORS PTO 930297</b>	<b>Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650</b>	<b>IC Engine, Emergency Generator PTO 961215</b>	<b>Gas Engines 1 and 2 PTOs 961168 - 961169</b>	<b>Sludge Digesters and Flares 950315</b>	<b>Flex Permit – Max 5 Prime Diesel Engines PTO 002381</b>												<b>Future Effective Date</b>
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																							
Z	Ferroalloy Production Facilities																							
AA, AAa	Steel Plants																							
BB	Kraft Pulp Mills																							
CC	Glass Manufacturing																							

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]



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

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Reports, Rule Section</b>	<b>Facility</b>	<b>Digester Gas Fired Boilers PTOs 960190 - 960193</b>	<b>Sludge Screening Facility with ORS PTO 940189</b>	<b>Treatment Plant with ORS PTO 930297</b>	<b>Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650</b>	<b>IC Engine, Emergency Generator PTO 961215</b>	<b>Gas Engines 1 and 2 PTOs 961168 - 961169</b>	<b>Sludge Digesters and Flares 950315</b>	<b>Flex Permit – Max 5 Prime Diesel Engines PTO 002381</b>											<b>Future Effective Date</b>
KKK, LLL	Onshore Natural Gas Processing: VOC Equipment Leaks and SO <sub>2</sub> Emissions																						
NNN	VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations																						
OOO	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																						

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

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

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Reports, Rule Section</b>	<b>Facility</b>	<b>Digester Gas Fired Boilers PTOs 960190 - 960193</b>	<b>Sludge Screening Facility with ORS PTO 940189</b>	<b>Treatment Plant with ORS PTO 930297</b>	<b>Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650</b>	<b>IC Engine, Emergency Generator PTO 961215</b>	<b>Gas Engines 1 and 2 PTOs 961168 - 961169</b>	<b>Sludge Digesters and Flares 950315</b>	<b>Flex Permit – Max 5 Prime Diesel Engines PTO 002381</b>												<b>Future Effective Date</b>
E	Mercury Ore Processing; Manufacturing Processes Using Mercury Chloralkali																							
F	Ethylene Dichloride Mfg. Via Oxygen, HCl 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																							

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

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

<b>RULE</b>	<b>RULE DESCRIPTION</b>	<b>Test Method or Rule Section</b>	<b>Monitoring, Records, Reports, Rule Section</b>	<b>Facility</b>	<b>Digester Gas Fired Boilers PTOs 960190 - 960193</b>	<b>Sludge Screening Facility with ORS PTO 940189</b>	<b>Treatment Plant with ORS PTO 930297</b>	<b>Dewatering Pump Prime Diesel Engines PTOs 002649 - 002650</b>	<b>IC Engine, Emergency Generator PTO 961215</b>	<b>Gas Engines 1 and 2 PTOs 961168 - 961169</b>	<b>Sludge Digesters and Flares 950315</b>	<b>Flex Permit – Max 5 Prime Diesel Engines PTO 002381</b>												<b>Future Effective Date</b>
F, G, H, I	Amendment: Reopening, Averaging Issue																							
L	Coke Ovens																							
N	Chromium Electroplating and Anodizing	63.344	63.346, 63.347																					
O	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																							
GG	Aerospace (Coatings)																							
II	Shipbuilding for Ship Repair (Surface																							
JJ	Wood Furniture Industry (Coatings)																							

<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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<p align="center"><b>TITLE V APPLICATION</b></p> <p align="center"><b>Applicable Requirements Summary Checklist (FORM 1401-H1) - continued</b></p>	
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[illegible]

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

## 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.**

[illegible]



**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.

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**  
**Certification Statement (FORM 1401-I)**

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

*Under penalty of perjury, identify the following: (Read each statement carefully and check each box for confirmation.)*

Applicable      Not  
                            Applicable

☒☐

*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will continue to comply with the applicable requirement with which the source is in compliance. The applicable requirement(s) with which the source(s) is/are not in compliance is/are identified in Form 1401-L, Schedule of Compliance.*

☒☐

*Based on information and belief formed after reasonable inquiry, the source(s) identified in this application will comply with the future-effective applicable requirement(s) on a timely basis.*

☐☒


*Based on information and belief formed after reasonable inquiry, the source(s) identified in the Schedule of Compliance application form that is/are not in compliance with the applicable requirement(s), will comply in accordance with the attached compliance plan schedule.*

☒☐

*Based on information and belief formed after reasonable inquiry, information on application forms, referenced documents, all accompanying reports, and other required certifications are true, accurate, and complete.*

☒☐

*All fees required by Regulation III, Rule 40 have been paid.*

  
\_\_\_\_\_  
Signature of Responsible Official

\_\_\_\_\_  
Date

Thomas Rosales  
\_\_\_\_\_  
Print Name of Responsible Official

10/14/20  
\_\_\_\_\_  
(858) 292-6418  
Telephone No. of Responsible Official

Interim Water Resources Recovery Branch Assistant Director  
\_\_\_\_\_  
Title of Responsible Official

**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**  
**Compliance Certification Schedule (FORM 1401-K)**

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

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		

**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**  
**Schedule of Compliance (FORM 1401-L)**

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

**SOURCES NOT IN COMPLIANCE**

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.

**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**  
**Abatement Devices (FORM 1401-M)**

<b>Company Name</b>  City of San Diego - Public Utilities Dept. - PLWTP  Facility Address: 1902 Gatchell Rd., San Diego, CA 92106	<b>District Use Only</b>  NEDS # _____ SITE ID # _____
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**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 Digesters and Flares

**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**  
**Permit Shield (FORM 1401-Q)**

<b>Company Name</b>  City of San Diego - Public Utilities Dept - PLWTP  Facility Address: 1902 Gatchell Rd San Diego, CA 92106	<b>District Use Only</b>  NEDS # _____  SITE ID # _____
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**REQUEST FOR PERMIT SHIELD**

If more space is required, use additional forms. Please type or print legibly.

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

### **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.