

STATEMENT OF BASIS

Title V Permit Renewal

Facility Name: Naval Base San Diego - Southwest Regional Maintenance Center (SWRMC)

Title V Application Number: APCD2024-APP-008130

Title V Permit Number: APCD2025-TVP-00055

Facility ID: APCD2015-SITE-02018

Equipment Address: Ship Construction and Repairs Functional Group – NBSD
32nd St. & Harbor Dr.
San Diego, CA 92136

Facility Contact: Keith Boyer
Contact Phone: (619) 556 – 2948

Permit Engineer: Austin Stein

Date: 8/14/2025

X

Joe Herzig
Senior Engineer

Senior Engineer:

1.0 Type of Action and Summary of Changes

This statement of basis reviews the application for the initial Title V permit to operate for The Navy's Southwest Regional Maintenance Center (SWRMC), Ship Construction & Repairs Functional Group - NBSD, San Diego, CA. The District received the application for an initial permit on February 20, 2024, which is in compliance with the requirement for a timely application within 12 months after the source becomes subject to Rule 1414. The application was deemed complete on April 3, 2024. Hence, an application shield pursuant to Rule 1410 (a) is in effect for the facility until the District takes action on the initial application

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

This is the initial application for a Title V permit so there is no history of modifications/applications.

Since the initial application, the District has received applications from this facility as shown in the following table. These applications are submitted under the District's local permitting program and typically are associated with a corresponding Title V application to implement the same change to the Title V permit; however, since a Title V permit has not been issued no Title V applications have been submitted. (see appendix A of the permit).

Application History for facility since Title V Initial Application				
Application Number	Affected Permit to Operate(s)	Description	Outcome	Related Title V App
APCD2024-APP-008193	APCD2022-PTO-004439	Condition change increase max hourly usage	Startup Authorization Issued	NA
APCD2024-APP-008342	APCD2025-PTO-005223	New IC Engine	Permit to Operate Issued	NA
APCD2024-APP-008501	TBD	Facility wide abrasive blasting permit	Open	NA
APCD2024-APP-008502	TBD	Facility wide adhesive operations permit	Open	NA

Application History for facility				
Application Number	Affected Permit to Operate(s)	Description	Affected Emission Units	Outcome
APCD2000-APP-974998	PCD2006-PTO-974998	Initial Application for marine coating operation with modifications since	Marine Coating Operation	Amended and Approved
APCD2019-APP-005729	PCD2006-PTO-974998	Reactivation application	Marine Coating Operation	Approved
APCD2011-APP-001493	APCD2012-PTO-001154	Initial Application for marine coating operation	Marine Coating Operation	Amended and Approved
APCD2015-OWC-000943	APCD2012-PTO-001154	Ownership change of marine coating operation permit	Marine Coating Operation	Approved
APCD2018-APP-005516	APCD2021-PTO-003677	Initial Site-Wide ATCM portable engine application	Site-Wide ATCM Portable Prime Engines	Approved
APCD2021-APP-007080	APCD2022-PTO-004439	Initial Site-Wide ATCM portable emergency engine application with modifications since	Site-Wide ATCM Portable Emergency Engines	Amended and Approved
APCD2024-APP-008193	APCD2022-PTO-004439	Increase in hourly engine operation	Site-Wide ATCM Portable Emergency Engines	Approved

		allowed under the affected permit		
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3.0 Facility Description

The facility consists of a naval station with permits for marine coating and various engines, and various other miscellaneous operations that are all located on a portion of Naval Base San Diego. The base is affected by disaggregation for military facilities, and this facility includes operations related to Southwest Regional Maintenance Center (SWRMC) which includes primarily marine coating. This site has four (4) active permits.

A full listing of permits is contained in Appendix A of the permit. The following equipment descriptions are used for the four (4) active permits:

APCD2021-PTO-003677

Engines subject to the California Code of Regulations, 17 CCR 93116 rated at or above 50 bhp and supporting the stationary source.

Functional Group: Ship Construction and Repairs

APCD2022-PTO-004439

Emergency engines subject to the California Code of Regulations, 17 CCR 93116, rated at or above 50 bhp and supporting the stationary source, including such engines located on floating dry docks.

APCD2012-PTO-001154

Marine coating operations to apply coatings on ships and related structures intended for exposure to a marine environment at US Naval Station 3 including: docks, various open paint areas, and temporary structures of various sizes.

Functional Group (i.e. stationary source): Ship Construction and Repair

APCD2006-PTO-974998

Marine coating operation to apply coatings on ships and related structures intended for exposure to a marine environment at US Naval Station 32nd St. San Diego, Dry Dock No. 1.

Functional Group: Ship Construction and Repair

4.0 Compliance History

The facility has been subject to compliance action on one (1) occasion in 2023 which is a very high compliance rate considering the length of time and complexity of the facility. This violation has been addressed and was a self-report of operating engines in violation of conditions within their District permit.

5.0 Title V Applicability and Acid Rain

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

Based on District emissions inventory and related emissions determinations, SWRMC is a major source under Title V for nitrogen oxides (NO_x) and volatile organic compounds (VOC).

The Acid Rain program under Title IV of the CAA, codified at 40 CFR §72.6, states that specified “utility units” are subject to acid rain provisions. Per 40 CFR §72.2, a “utility unit” is a fossil fuel-fired combustion device that serves a generator in any State, and that produces electricity for sale. This facility is not subject to this program as it does not produce electricity for sale and therefore does not have any “utility units”.

6.0 Potential to Emit and Actual Emissions

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

Potential to Emit (Tons per year)					
Permit Number	NO _x	CO	VOC	PM	SO _x
APCD2021-PTO-003677	32.1	3.51	1.69	0.71	0.076
APCD2022-PTO-004439	1.54	0.89	0.08	0.051	0.00006
APCD2012-PTO-001154	0	0	32.5	6.5	0
APCD2006-PTO-974998	0	0	1.28	0	0

Title V Major Source Determination Tons per Year:				
Pollutant	Thresholds	Facility Actual Emissions	Facility Potential to Emit	Major Source*
Highest Federal HAP	10	0.37	6.49	N
Sum of Federal HAPs	25	0.5	14.6	N
NO _x	25	4.3	33.64	Y
VOC	25	15	35.55	Y
PM ₁₀	100	6.7	7.261	N
SO _x	100	<0.1	0.1	N
CO	100	1.1	4.4	N

These emission calculations were obtained from a variety of sources including Emissions Inventory reports, recent evaluations, and existing permit conditions. For some equipment, a potential to emit was calculated as part of the original application or was able to be determined from permit limits or technical data.

Actual emissions were sourced from the District’s 2023 emissions inventory data.

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

To be subject to CAM, an emission unit must have uncontrolled emissions above the major source threshold for a pollutant for which the facility is a major source. Additionally, the equipment must

utilize a control device in order to meet an emission standard for that pollutant. Finally, if the equipment is subject to a section 111 or 112 requirement pursuant to the Clean Air Act (NSPS or NESHAP) or otherwise is subject to federally enforceable continuous monitoring requirements, CAM does not apply. These applicability criteria mean the equipment at this facility is exempt from CAM requirements as follows:

ATCM Portable Emergency Engines: The emergency engines operated at this facility do not result in uncontrolled emissions of NO_x or VOC in excess of major source thresholds by themselves, so CAM does not apply.

ATCM Portable Prime Engines: The prime engines operated at this facility do result in uncontrolled emissions of NO_x in excess of major source thresholds but are exempt from Compliance Assurance Monitoring through CFR 64.2(b)(1)(vi) which states that an emission unit is exempt if “Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in § 64.1.” In the permit conditions for the prime engines, the yearly NO_x limit is defined, and compliance is stipulated to be determined by using recorded BHP-hrs/yr for all combined engines and a default NO_x emission factor to determine the actual NO_x emissions for that year.

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

8.0 Applicable Requirements

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

General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	11	Exemptions
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20	Standards for Granting Permits
SDCAPCD Reg. II	20.1	New Source Review

SDCAPCD Reg. II	20.3	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control

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

Facility-wide Prohibitory Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1(g)	Architectural Coatings
SDCAPCD Reg. IV	67.17(e)	Storage of Materials Containing VOC
SDCAPCD Reg. IV	67.18	Marine Coating Operations
SDCAPCD Reg. IV	69.4.1*	Stationary Reciprocating Internal Combustion Engines-Best Available Retrofit Control Technology
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. X	40 CFR 60 Subpart A*	NSPS General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart A*	NESHAP General Provisions
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
40 CFR Part 63	Subpart ZZZZ	Reciprocating Internal Combustion Engines
40 CFR Part 63	Subpart II	Shipbuilding and Ship Repair
40 CFR Part 82	Subpart A	Production and Consumption Controls
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Servicing of Other Air Conditioners
California Code of Regulations (CCR) Title 17	93116**	ATCM for Diesel Particulate Matter from Portable Engines Rated at 50 HP and Greater

**This rule has been adopted by the District and will become federally enforceable once the rule has been noticed/approved by EPA.*

***Not federally enforceable*

Permit Specific Applicable Requirements:

SDAPCD Permit Nos.	Permit Description	Applicable Rules
APCD2021-PTO-003677	Site-Wide Portable ATCM Prime Engines	SDCAPCD Reg. IV, Rule 19, 20.3, 50, 51, 52, 53, 69.4.1 SDCAPCD Reg. XIV, Rule 1421 40 CFR Part 63, Subpart ZZZZ CCR Title 17 93116
APCD2022-PTO-004439	Site-Wide Portable ATCM Emergency Engines	SDCAPCD Reg. IV, Rule 19, 20.3, 50, 51, 52, 53, 69.4.1 SDCAPCD Reg. XIV, Rule 1421 40 CFR Part 63, Subpart ZZZZ CCR Title 17 93116
APCD2012-PTO-001154	Marine Coating Operations	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 50, 51, 52, 67.17, 67.18
APCD2006-PTO-974998	Marine Coating Operations	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 50, 51, 52, 67.17, 67.18

Emission Limitations

ATCM Portable Engines	
Pollutant	Primary Limiting Regulations*
NOx	Rule 20.3 (NSR), Rule 69.4.1
SO2	Rule 20.3 (NSR), Rule 69.4.1, CCR 17 93116*
VOC	Rule 20.3 (NSR)
CO	Rule 20.3 (AQIA Only), Rule 69.4.1
PM10	Rule 20.3 (NSR), CCR 17 93116*
Toxic Pollutants	Rule 1200*, CCR 17 93116*
Federal HAPS	40 CFR 63 Subpart ZZZZ

**Indicates rules which are not federally enforceable.*

Marine Coating Operations	
Pollutant	Primary Limiting Regulations*
NOx	NA (Does not emit)
SO2	NA (Does not emit)
VOC	Rule 67.18, 40 CFR Part 63 Subpart II, Rule 20.2/20.3
CO	NA (Does not emit)
PM10	Rule 52
Toxic Pollutants	Rule 1200*, 40 CFR Part 63 Subpart II
Federal HAPS	40 CFR Part 63 Subpart II

**Indicates rules which are not federally enforceable.*

9.0 Permit Shield

The facility did not request any permit shields as part of the Title V application.

10.0 Streamlining

The facility did not request any streamlining as part of the Title V application

11.0 Updates to the Title V Permit Incorporated into this Action

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

Marine Coating Operations: Rule references were updated to clarify the basis of requirements including rules 11, 19, 67.18, 21, 1200, 1210, 1421, and 17 CCR 93116. This is a site-wide permit which includes references to both owners/permit holders and contractors conducting marine coating operations on-site and therefore some conditions are repeated for each of the two operator types.

ATCM Portable Prime Engines: Rule references were updated to clarify the basis of requirements including rules 11, 12, 19, 69.4.1, 21, 1200, 1210, 1421, and 17 CCR 93116. This is a site-wide permit which includes references to both owners/permit holders and contractors operating engines on-site, therefore clear distinction between what conditions apply to each party is required.

ATCM Portable Emergency Engines: Rule references were updated to clarify the basis of requirements including rules 11, 12, 19, 69.4.1, 21, 1200, 1210, 1421, and 17 CCR 93116. This is a site-wide permit which includes references to both owners/permit holders and contractors operating engines on-site, therefore clear distinction between what conditions apply to each party is required.

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

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

If no comments or objections are received, the District intends to promptly issue the Title V permit after conclusion of the review period. If comments are received the District will review and respond to the comments as necessary. If comments identify issues which require modification to the permit, revisions will be made and the permit either issued if the changes do not require re-review by EPA or the public, or will be re-noticed if changes are made which do require review.

13.0 Recommendations

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

14.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice
- Emissions Calculations