

## TITLE V OPERATING PERMIT STATEMENT OF BASIS

**Facility Name:** San Diego Metro Biosolids Center

**Title V Application Number:** APCD2015-APP-004017

**Title V Permit Number:** APCD2003-PTO-972673

**Facility ID:** APCD1994-SITE-07517

**Equipment Address:** 5240 Convoy Street  
San Diego, CA 92111

**Facility Contact:** Dwight Correia  
**Contact Phone:** (858) 614-5505

**Permit Engineer:** John Semerau  
**Date Completed:** 10/8/15

**Senior Engineer:** Doug Erwin

**Date Reviewed:** 10/8/15

### 1.0 Purpose/Introduction

This statement of basis is for a Title V renewal application and permit for the City of San Diego Metro Biosolids Center (MBC) wastewater solids treatment facility located in San Diego, CA. The current Title V permit expires on 15 June 2016. Due to the application shield, the permittee is covered under the existing permit until issuance of the renewal permit.

### 2.0 Permit History

MBC first obtained district permits in 1994. This site replaced the Fiesta Island City biosolids treatment site which consisted primarily of the drying of collected sewage on the island proper.

### 3.0 Facility Description

The primary function of the City of San Diego MBC is to collect, digest, dewater and dispose of solid sewage waste collected from throughout the City of San Diego.

The primary air quality focus for this facility is the emissions of odorous pollutants from the various digestion processes. MBC is in the Title V program because it is on contiguous property with a Major Stationary Source – the Miramar Landfill site - which is also owned by the City of San Diego.

The criteria pollutant evaluation is based on District rules and NSPS subpart WWW. Additionally, based on District Rule 1200 and NESHAPS Subpart AAAA, toxic pollutants have been evaluated as well.

4.0 Primary Federal Applicability Determination

Rule 1401 - Title V Applicability

4.1 Site Emissions and Title V Applicability:

Table 1 below summarizes criteria and toxic emissions from this facility, while Table 2 compares these emissions to major source permitting thresholds under Title V of the CAA.

<b>Table 1 – Emissions Summary</b> (as reported for 2014)	
<b>Pollutant</b>	<b>ton/year</b>
<b>Criteria Pollutants</b>	
NOx	<0.1
VOC	12.6
PM10	<0.1
SO2	<0.1
CO	<0.1
<b>Federal HAPs</b>	
	<b>lb/yr</b>
1,1,1-Trichloroethane	3.96
Acetaldehyde	0.03
Benzene	4.67
Benzyl Chloride	0.08
Carbon Disulfide	12.00
Carbon Tetrachloride	4.22
Chloroform	14.88
Dichlorobenzene	7.54
Dimethyl Sulfide	0.02
Dioxane,1,4- 6	4.15
Ethyl Benzene	0.05
Ethylene Dichloride	61.67
Formaldehyde	0.71

Hexane	1.52
Hydrogen Chloride	0.30
Hydrogen Sulfide	235.25
Methylene Chloride	32.12
Toluene	45.62
Trichloroethylene	22.93
Xylenes 0.003	7.93
<b>Total HAPs</b>	<b>460 (0.23 tons/yr)</b>

<b>Table 2 Annual Emissions &amp; Title V Major Source Thresholds</b>			
Pollutant	Estimated Actual Emissions (tons/yr)	Title V Thresholds (tons/yr)	Major Source
NOx	<0.1	100	No
VOC	12.6	100	No
PM10	<0.1	100	No
SO2	<0.1	100	No
CO	<0.1	100	No
Single Federal HAP	0.1	10	No
Combined Federal HAPs	0.23	25	No

Based on the emissions comparison of Table 2, the facility is not a major stationary source under District Rule 1401. However the site is in the Title V program because it is a contiguous property with the City's Miramar Landfill site and, when combined, these comprise a single Major Stationary Source under District Rule 1401 and 40 CFR Part 70.

#### 4.1 Title IV (Acid Rain) Applicability:

The facility is not subject to the acid rain provisions under District Rule 1412 and Title IV of the CAA, pursuant to 40 Code of Federal Regulation (CFR) § 72.6(a). Under the acid rain program, an *affected source* (a term defined in Title IV of the CAA,) is subject to Title V permitting pursuant to 40 CFR § 70.3(a)(4). Specifically, the two flares are not an affected source, since they are not utility units and are fired on digester gas rather than fossil fuel.

5.0 Summary of Applicable Requirements

Note:

Facility and Equipment Specific Applicable Requirements

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
<b>Facility</b>		
SDCAPCD Reg. II	10	Permits Required
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDAPCD Reg. X	10	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	67	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98	Breakdown Conditions: Emergency Variance
<b>Equipment</b>		
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	54	Dust and Fumes
SDCAPCD Reg. IV	69.2	Boilers
NSPS	Dc	Steam Generators >10MM BTU<100 MM BTU

6.0 Applicability of Federal and State Requirements

NSPS Subpart Dc Small Industrial-Commercial-Institutional Steam Generators

The provisions of this subpart apply to the boilers which have a BTU rating of greater than 10 MM BTU but less than 100 MM BTU. Permit conditions encompassing NSPS Subpart Dc requirements are in the permit.

## 7.0 Monitoring, Record keeping and Reporting

Compliance Assurance Monitoring (CAM) applicability was considered pursuant to 40 CFR Part 64 for the permitted flare. The site flare is the only emission unit that falls within this consideration because it is the single emission unit that is a “pollutant-specific emissions unit at a major source” in accordance with the applicability section of the rule. CAM does not apply to the flare because there is no emissions control device, which is an applicability criteria given at §64.2(a)(2).

## 8.0 Outside Review

In accordance with District Rule 1415, the District has provided notice to the public, EPA and affected states.

## 9.0 Conclusions / Recommendations

The source 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 Title V. Additionally, the Title V application will be amended to incorporate the deletion of District PTO #972357 Solvent Cleaner (retired), District PTO # 931035 Solid Screening System (retired), District PTO #931026 Lime Storage Unit (retired) and two non-substantive condition changes (PTO #931032 and PTO #931030) which will make the District PTO's and the Title V Permit consistent.

Therefore, the recommendation of this report is for the renewal of the Title V permit, following public notice and comment, if any.