

TITLE V OPERATING PERMIT STATEMENT OF BASIS

Facility Name: City of San Diego - Point Loma Wastewater Treatment

Title V Application Number: APCD2015-APP-004016

Title V Permit Number: APCD2002-PTO-961008

Facility ID: APCD1976-SITE-02083

Equipment Address: 1902 Gatchell Rd.
San Diego, CA 92106

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Permit Engineer: Doug Erwin
Date Completed: 8/19/16

1.0 Purpose/Introduction

This statement of basis describes the renewal of a Title V permit for the City's Point Loma Wastewater Treatment Plant (PLWWTP).

2.0 Permit History

PLWWTP first obtained District permits in 1992 for wastewater treatment systems including sludge processing and supporting equipment, notably boilers and engines. Though some records indicate earlier permitting, current records confirm air quality permit reviews dating to 1992.

The most recent compliance infraction on record is a notice to comply (NTC) issued in 2012, which appears to have been resolved when the source submitted the required application for unpermitted equipment.

3.0 Facility Description

As indicated above, PLWWTP is a municipal wastewater treatment facility comprising treatment equipment for liquid processes, sludge processing equipment, boilers and engines. Air emissions are limited to gaseous pollutants resulting from wastewater

treatment and related combustion equipment. These are largely comprised of volatile organic compounds (VOC) and hazardous air pollutants (HAP).

4.0 Rule 1401 - Title V Applicability

Based on District emissions inventory and related emissions determinations, PLWWTP is a major source under Title V for carbon monoxide (CO) and HAPs. Specifically, formaldehyde is a federal HAP which is emitted by each of two digester gas fired engines.

5.0 40 CFR 63 Subpart ZZZZ

This rule applies to stationary reciprocating internal combustion engines at area sources and major sources of hazardous air pollutants (HAPs) (§63.6585). Three of the emission units (EUs) in Appendix A of the Title V permit cover portable engines, which fall outside the definition of *stationary* and are therefore not subject to the Rule in accordance with §63.6585(a).

The two remaining engines are *existing* engines located at a major source of HAP and are therefore exempt from all rule requirements pursuant §63.6590(b)(3)(v).

7.0 Monitoring, Record-keeping and Reporting (MRR)

MRR is incorporated into each emission unit (District PTOs in Appendix A of the Title V permit) to ensure enforceability for all standards and other requirements.

Compliance Assurance Monitoring (CAM)

A review of emission units (EUs) at PLWWTP was conducted at the last renewal to determine CAM applicability under 40 CFR Part 64. No EUs were determined to be subject to CAM.

Since the last Title V renewal, no changes have triggered CAM applicability. Three applications were received for Administrative Amendments (apps 2677, 3592, and 4510), one application for an operational flexibility change (app 3707). None of these affect emissions and therefore do not necessitate CAM review. Two engines were installed (pto's 2649, 2650) which are exempt pursuant §64.2(b)(2) because they qualify as backup utility power emissions units. The last change that was considered for this evaluation was the installation of 5 portable diesel engines (pto 2381). These engines, as well as the other two, are not equipped with a control device as defined in Part 64, and therefore they are not subject to CAM.

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 District permits (Appendix A of the Title V permit) as well as those under District Rule 1401 and Title V. The Title V renewal permit is expected to be issued following public notice, EPA review, and response to comments, if received.