

PERMIT / REGISTRATION APPLICATION

SUBMITTAL OF THIS APPLICATION DOES NOT GRANT PERMISSION TO CONSTRUCT OR TO OPERATE EQUIPMENT EXCEPT AS SPECIFIED IN RULE 24(d)

IMPORTANT REMINDERS: Read instructions on the reverse side of this form prior to completing this application. Please ensure that all of the following are included before you submit the application:

- Appropriate Permit Fee
- Completed Supplemental Form(s)
- Signature on Application

REASON FOR SUBMITTAL OF APPLICATION: (check the appropriate item and enter Application (AP) or Permit to Operate (PO) number if required)

- 1. New Installation
- 2. Existing Unpermitted Equipment or Rule 11 Change
- 3. Modification of Existing Permitted Equipment
- 4. Amendment to Existing Authority to Construct or AP
- 5. Change of Equipment Location
- 6. Change of Equipment Ownership
- 7. Change of Permit Conditions
- 8. Change Permit to Operate Status to Inactive
- 9. Banking Emissions
- 10. Registration of Portable Equipment
- 11. Other (Specify) _____
- 12. List affected AP/PO#(s): _____

APPLICANT INFORMATION

- 13. Name of Business (DBA) OTAY LANDFILL
- 14. Nature of Business _____
- 15. Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations in San Diego County? Yes No
If yes, list assigned location ID's listed on your PO's _____
- 16. Type of Ownership Corporation Partnership Individual Owner Government Agency Other _____
- 17. Name of Legal Owner (if different from DBA) _____

A. Equipment Owner

B. Authority to Construct (if different from A)

- 18. Name _____
- 19. Mailing Address _____
- 20. City _____
- 21. State _____ Zip _____
- 22. Phone () _____ FAX () _____

C. Permit to Operate (if different from A)

D. Billing Information (if different from A)

- 23. Name _____
- 24. Mailing Address _____
- 25. City _____
- 26. State _____ Zip _____
- 27. Phone () _____ FAX () _____

EQUIPMENT/PROCESS INFORMATION: Type of Equipment: Stationary Portable.

If portable, will operation exceed 12 consecutive months at the same location Yes No

- 28. Equipment Location Address 1600 MAXWELL RD City ONALA VISTA Parcel No. _____
- 29. State _____ Zip 91911 Phone () _____ FAX () _____
- 30. Site Contact _____ Title _____ Phone () _____
- 31. General Description of Equipment/Process _____

- 32. Application Submitted by Owner Operator Contractor Consultant Affiliation _____

EXPEDITED APPLICATION PROCESSING: I hereby request Expedited Application Processing and understand that:

- 33. a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 9(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.

- 34. SIGNATURE _____ Date _____
- 35. Print Name _____ Title _____
- 36. Company _____ Phone () _____ E-mail Address _____

APCD USE ONLY

AP # <u>2012-TIV-002026</u>	Cust. No. _____	Sector: <u>R</u>	UTM's X _____	Y _____	SIC <u>4911</u>
Receipt # <u>CK 1164</u>	Date <u>3-8-12</u>	Amt Rec'd \$ <u>2997</u>	Fee Code <u>TIV</u>		
Engineering Contact _____	Fee Code _____	AP Fee \$ _____	T&M Renewal Fee \$ _____		
Refund Claim # _____	Date _____	Amt \$ _____			
Application Generated By <u>NV#</u>	NC # _____	Other _____	Date _____	Inspector _____	

TIV \$ 2760 - -1- MPF \$ 95 EMF \$ 116
ITA \$ 13 ITP \$ 13

**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)**

Company Name <u>Otay Landfill Gas, LLC</u>	District Use Only NEDS # _____ SITE ID # <u>2012-00990</u>
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I. FACILITY IDENTIFICATION

- Facility Name (if different than company name): Otay Landfill Gas, LLC
- Four digit SIC Code: 4911
- Parent Company (if different than Company Name): Toro Energy of California, LLC
- Mailing Address: 6380 LBJ Freeway, Suite 294
City Dallas State TX Zip 75240
- Street Address or Source Location: 1600 Maxwell Road
City Chula Vista State CA Zip 91911
- UTM Coordinates: _____
- Source Located within 50 miles of a state line: Yes No (All sources **are** within 50 miles)
- Source Located within 1000 feet of a school: Yes No
- Type of Organization: Corporation Sole Ownership Government
 Partnership Utility Company
- Legal Owner's Name: Otay Landfill Gas, LLC
- Owner's Agent name (if any): _____
- Responsible Official: Paul Kaden
- Plant Site Manager/Contact: Bob Burdett Phone #: 619-421-5945 FAX #: 619-482-4910
- Application Contact: Dr. Ted Guth (619-987-1111)
- Type of Facility: Electric Power Generating Facility
- General description of processes/products: Landfill Gas Combustion Engines/Generators
- 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 checked="" type="checkbox"/> Initial Title V Application	N/A	N/A
<input type="checkbox"/> Permit Renewal		
<input type="checkbox"/> Significant Permit Modification		
<input type="checkbox"/> Minor Permit Modification		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

- Does the permit action requested involve: Temporary Source Voluntary Emissions Caps
 Acid Rain Source Alternative Operating Scenarios Abatement Devices
 CEMs Permit Shield
 Outdated SIP Requirement Streamlining Multiple Applicable Requirement Streamlining
 Source Subject to MACT Requirements [Section 112]
 Source Subject to Enhanced Monitoring (40CFR64) [Compliance Assurance Monitoring]
- Is source operating under a Compliance Schedule? Yes No Proposed
- Is source operating under a Variance Yes No (If Yes, please attach variance information)
- For permit modification, provide a general description of the proposed permit modification:

IV. SUPPLEMENTAL ATTACHMENTS*: Permits to Operate & PTO Renewal Notice; Attachment1-State-Only Req.

* 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)**

Company Name <u>Otay Landfill Gas, LLC</u>	District Use Only NEDS # SITE ID # <u>2012-00990</u>
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I. MAJOR SOURCE APPLICABILITY

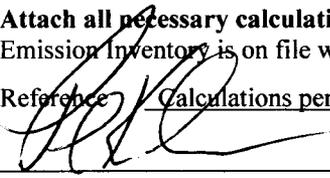
Check appropriate pollutant(s) for which you are a Major Source under Title V. Applicability is based on potential to emit. If more space is necessary, use additional forms. Please type or print legibly.

POLLUTANT	MAJOR SOURCE THRESHOLD TOTAL EMISSIONS, TPY	(check if appropriate)
VOC	100	<input type="checkbox"/>
PM ₁₀	100	<input type="checkbox"/>
SO ₂	100	<input type="checkbox"/>
NO _x	100	<input type="checkbox"/>
CO	100	<input checked="" type="checkbox"/>
ODC	100	<input type="checkbox"/>
LEAD COMPOUNDS	10	<input type="checkbox"/>
HAZARDOUS AIR POLLUTANTS		
SINGLE HAP	10	<input 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: Calculations per District Emission Inventory

Inventory Year 2010


Signature of Responsible Official

1-25-12
Date

Paul Kaden
Print Name of Responsible Official

(512) 858-0193
Telephone No. of Responsible Official

President
Title of Responsible Official

II. EMISSIONS CALCULATIONS ATTACHED (as needed)

Yes No

DISTRICT USE ONLY

Date Application Received: 3-5-12

Application # 2012-002026

Application Filing Fee: \$ 2997. -

District Received Stamp: _____

Receipt #: CK 1164

Fee Code: TIY

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)

Company Name OLAY LANDI LLC	District Use Only NEDS # _____ SITE ID # _____
Facility Address: 1600 MAXWELL RD. CHULA VISTA, CA 91911	

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 type="checkbox"/> Stationary & portable internal combustion engines with ≤ 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 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 ³ of any molten metal	(d)(12)
<input type="checkbox"/> Crucible, pot or induction furnaces with a capacity of ≤ 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)
<input type="checkbox"/> Dry batch mixers with < 0.5 cubic yards rated working capacity	(d)(27)
<input type="checkbox"/> Batch mixers (wet) with ≤ 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 ≤ 85 gallons	(d)(33)
<input type="checkbox"/> Abrasive blasting equipment with a manufacturer's-rated sand capacity of < 100 lbs or < 1 ft ³	(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 ≤ 27 ft ³ 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 ≤ 10 ft ²	(d)(61)(i)
<input type="checkbox"/> Cold solvent cleaning tanks, vapor degreasers, and paint stripping tanks which have a maximum capacity of 1 gallon	(d)(61)(ii)

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

Continued - Exemptions based on Size (Capacity)

<u>(Condensed Language of Rule)</u>	<u>Appendix A Citation</u>
<input checked="" type="checkbox"/> Stationary organic compound storage tanks with a capacity of ≤ 250 gallons	(c)(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	(b)(5)
<input type="checkbox"/> Liquid surface coating application operations using air brushes with a coating capacity of ≤ 2 ounces for the application of a stencil coating	(b)(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 ft ² and c) are not equipped with spray type flow or a means of solvent agitation	(a) 5
<input type="checkbox"/> Bakery ovens used for baking yeast leavened products where the combined rated heat input capacity is ≤ 2 million Btu/hr	(c)(37)

Exemptions based on Production Rates (Emission Limits)

<input type="checkbox"/> Printing or other activities processes located at a stationary source which emits a total of ≤ 15 lbs/day of VOC's subject to Rule 7.101 each day of operation	(d)(7)
<input type="checkbox"/> Solder leveling, reflow processes, wave solder machines, and drag solder machines which use ≤ 10 lbs/day of any material containing VOC's	(d)(2)
<input checked="" type="checkbox"/> Fire extinguishers, 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 or instant beverage with a manufacturer's rating of ≤ 15 lbs/hr	(d)(45)
<input type="checkbox"/> Equipment used to manufacture bio-agricultural products for exclusive use in field testing required to obtain FDA, EPA, USDA and local-EPA approval, provided the uncontrolled emissions of VOC's from all such operation ≤ 5 lbs/day.	(c)(49)(ii)
<input type="checkbox"/> Oil quenching tanks which use ≤ 20 gal/yr of make-up oil	(c)(46)
<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 $\leq 60,000$ gal/yr.	(i)(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 solvents, viscosity reducers, reactants, extractants, cleaning agents or thinner provided that emissions ≤ 15 lbs/day.	(c)(3)
<input 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	(c)(4)
<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.	(c)(5)
<input type="checkbox"/> Foam manufacturing or application operations which emit ≤ 5 lbs/day of VOC's	(c)(6)
<input type="checkbox"/> Reinforced plastic fabrication operations using resins such as epoxy or polyester which emit ≤ 5 lbs/day of VOC's	(c)(7)
<input type="checkbox"/> Plastics manufacturing or fabrication operations which emit ≤ 5 lbs/day of VOC's	(c)(8)
<input type="checkbox"/> Cold solvent degreasers used for educational purpose and which emit ≤ 5 lbs/day of VOC's	(c)(9)

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

- 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 ≤ 7.5 gallons for onsite recovery provided the still is equipped with a safety device & VOC emissions are < 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. (i)(10)
- 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 (i)(11)
- 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. (i)(18)
- Atmospheric organic gas sterilizer cabinets where ethylene oxide emissions are < 5 lbs/yr (i)(28)
- Aerosol can puncturing/crushing operations which vents all emissions through a properly operated/maintained carbon canister, provided < 500 cans/day are processed. (i)(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. (i)(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. (i)(33)
- Stationary IC engines rated at ≤ 200 bhp installed and operated before November 15, 2000, which operate < 200 hr/yr. (i)(34)(i)

Otay Landfill Gas, LLC
6380 LBJ Freeway, Suite 294
Dallas, Texas 75240

February 23, 2012

Mr. Steve Moore
San Diego County Air Pollution Control District
10124 Old Grove Road
San Diego CA 92131-1649

Subject: Otay Landfill Gas LLC; Title V Permit Application

Dear Mr. Moore:

Thank you for the guidance you have provided to our consultant, Dr. Ted Guth, for the Otay Landfill Gas, LLC project. Per your directions enclosed is a check for \$2,997.00 to cover the filing fee for this application (this value represents the portion of the originally submitted (by Covanta) filing fee the APCD has already expended in its initial application review).

Additionally, and per your suggestion, no Permit Shield form is included. Otay Landfill Gas, LLC is not seeking a permit shield for the time period associated with the review of this application.

Lastly, and also per your request, a Form 1401-M; Abatement Devices has been included in this filing. The instructions for Title V Application Package, under Form 1401-M; state:

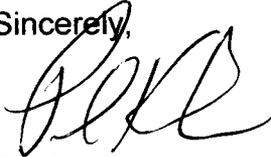
-Abatement devices should be listed which are associated with processes subject to applicable requirements such as a scrubber or thermal oxidizer installed on a process....

-Some equipment should not be listed as abatement devices on this form. Some examples are a mist eliminator installed on a tank containing water to eliminate, for safety purposes, water droplets generated or a muffler on a lawn mower which abates noise but also reduces particulate matter emission. Control equipment installed on insignificant activities such as welding operations should not be listed. Measures such as low NO_x burners, injection timing retard, and the use of high volume low pressure coating application equipment should also not be listed.

The Otay Landfill IC engines are lean burn engines with turbochargers and pre-combustion chambers, and are equipped with in-line oxygen analyzers. The landfill gas is gathered in leak-proof collection systems with shut-off valves maintained at each wellhead. Per the instructions it appears that none of these features qualify as a Form 1401-M abatement device; hence under "Name or Description" Otay Landfill Gas, LLC lists NA. If the APCD believes this is not the case, Otay Landfill Gas, LLC will expeditiously submit a revised Form 1401-M.

Please refer any questions to Dr. Ted Guth at 619-987-1111. We look forward to receiving notification that this application has been deemed complete. Otay Landfill Gas, LLC appreciates the APCD's continued support and guidance.

Sincerely,

A handwritten signature in black ink, appearing to read 'PK', written over the word 'Sincerely,'.

Paul Kaden
President

Cc Trond Aschehoug
Dr. Ted Guth