



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

PERMIT TO OPERATE

S012903

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

EXPIRES LAST DAY OF: JANUARY 2025

OWNER OF OPERATOR (Co.#2022)

Nordam Repair
13644 George Blvd. #13
Victorville, CA 92392

EQUIPMENT LOCATION (Fac.#3332)

Nordam Repair
13644 George Blvd. #13
Victorville, CA 92392

Description:

SPRAY BOOTH, AEROSPACE COATING consisting of: Bleeker, Aerospace Spray Booth, heated open face type with attached paint mix room, Model SPF-16-10-32, Serial TBD, with a 20 hp motor and 36" fan, producing 24,000 cfm. Booth dimensions are 36' X 16' X 10' equipped with NESHAP (Stage I & II) and HEPA (Stage III) exhaust filtration system. Stage I exhaust filtration consists of forty-two (42) exhaust filters all measuring 20" X 20" X 1" atop a grid-paneled wall of forty-two (42) 20" X 20" X 15" pleated bags (Stage II). Stage III exhaust (HEPA) filtration consists of a grid-paneled wall of twelve (12) 24" X 24" X 11.5" HEPA DOP tested, high capacity (2,000 cfm) filters with a control efficiency of 99.97 percent at 0.3 microns. This booth includes a pressure differential gauge at the following filtration stages. Stage I and II Filtration range: 0.22" to 0.50" W.G. Stage III Filtration Range: 1.25" to 2.5" W.G. An exempt Solvent Recycler, model URS 500 will be used to reclaim used acetone.

CONDITIONS:

1. This aerospace spray booth and associated equipment shall only be operated and maintained in strict accord with manufacturer's/supplier's recommendations and/or sound engineering principles. Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. Stage I pre-filter shall be installed so that the more open fiber structure is on the air entering side and the finer fiber structure is on the air leaving side, or as otherwise instructed by the filter media manufacturer.

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 3721

SCC: 40202402

Location/UTM(Km):
465E/3828N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

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By: **COPY**
Brad Poiriez
Air Pollution Control Officer

3. All coatings, diluents, thinners, solvents, application methods, and record keeping, shall comply with District Rules 442, 1118, 1303 and 1320 in their entirety. These rules pertain to Usage of Solvents, Aerospace Vehicle Parts and Products Coating Operations, New Source Review Requirements, and New Source Review for Toxic Air Contaminants, respectively.

4. Discharge filters shall be installed and maintained in a tightly mounted and dimensionally stable condition, free from excessive deposits or interference with airflow passages. Differential pressure drops across the discharge filters shall be maintained with the recommendations by the manufacturer.

5. All spray-applied coatings must be applied with the following technologies:

- a. High volume, low pressure (HVLP) spray gun
- b. Electrostatic application
- c. Airless spray gun
- d. Air-assisted spray gun
- e. An equivalent that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of these spray gun technologies listed, and has written approval from the District.

These spray applications do not apply to aerospace vehicles that involve the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces or to the application of coatings that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 inches).

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

6. Non-spray applications may also be used to apply coatings including dip-coat, flow-coat, hand application methods, exempted hand-held aerosols, and touch-ups methods.

[District Rule 1118 - Aerospace Vehicle Parts and Products Coating Operations]

7. Total VOC emissions from this facility shall be less than 25 pounds per day and less than 20 tons per year.

[MD 1303 - New Source Review Requirements]

8. The owner/operator shall maintain a replacement inventory of exhaust filter media, with the efficiencies described above, on-site at all times to ensure compliance with these permit conditions and all applicable rules of District Regulation IV.

9. This facility must submit an initial notification pursuant to 40 CFR 63, Subpart HHHHHH no later than 180 days after initial startup (Initial Notification was submitted to the District on February 20, 2012. See Questys for details).

In addition, the facility must submit, pursuant to 40 CFR 63, Subpart HHHHHH, an 'Annual Notification of Changes Report' in each calendar year in which information previously submitted has changed. The facility must keep copies of all notifications.

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

10. The owner/operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings are trained in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. This training program must, at a minimum, consist of the following:

- a. A list of all current personnel by name and job description whom are required to be trained.
- b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 1. Spray gun selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 2. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and over lap, and reducing lead and lag spraying at the beginning and end of each stroke.
 3. Routine spray booth and filter maintenance, including filter selection and installation.
 4. Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

11. The training program must also consist of a description of the methods used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. In addition, all personnel must be trained no later than 180 days after initial facility startup, or upon hiring.

12. Training and certification will be valid for a period not to exceed five (5) years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of the training program and be re-certified every five (5) years. Employees who transfer within or externally to a position as a painter are subject to these training requirements.

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

13. An operations log shall be maintained for this facility, shall be kept current, on-site and retained for five (5) years, and made available upon federal, state, or District request. The log shall contain at least the following:

- a. Equipment by permitted number, or name of operation for unpermitted equipment, that uses material that contains VOC, on a daily basis.
- b. Application method, on a daily basis.
- c. Type of material and its use, on a daily basis.
- d. Specific mixing ratio, on a daily basis.
- e. Quantity of each coating, solvent used, and its VOC content, on a daily basis. (Note: Units must be consistent).
- f. Annual calendar year total of emitted HAPs recorded in tons.
- g. Copies of the Environmental Data Sheet and/or Material Safety Data Sheet (MSDS) for each coating, diluent, thinner, and solvent used.
- h. Purchase records (does not include products that are transferred from one facility to another).
- i. Certification of painter training, including the dates of initial training and refreshers.
- j. Documentation of the filter efficiency of any and all exhaust filter media.
- k. Any deviations to 40 CFR 63, Subpart HHHHHH, including the date and time, description of deviation and actions taken to obtain compliance.

[District Rule 1118 - Aerospace Vehicle Parts and Products Coatings Operations, District Rule 1320, New Source Review for Toxic Air Contaminants, and 40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

14. This facility shall not conduct any "paint stripping operations" on any substrate that use methylene chloride (MeCl)-containing paint stripping formulations. (Pursuant to 40 CFR 63, Subpart HHHHHH) (Contact the District if this facility will use MeCl for additional permit requirements to maintain compliance.)

15. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun with out atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination or non-atomizing methods may also be used.

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

16. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.

[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]

17. This facility is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) known as a Maximum Achievable Control Technology (MACT) for emissions of Hazardous Air Pollutants (HAP) from Paint Stripping and Miscellaneous Surface Coating Operations at area sources, Title 40 CFR 63 subpart HHHHHH (6Hs). In the event of conflict among these conditions, District Rule and Regulations, and this MACT, the most stringent requirements shall govern.