



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

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

AUTHORITY TO CONSTRUCT

P015675

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

EXPIRES LAST DAY OF: AUGUST 2027

OWNER OF OPERATOR (Co. #3232)

American Equipment Systems, LLC
310 East 4500 South, Suite 320
Murray, UT 84107-4306

EQUIPMENT LOCATION (Fac. #4715)

American Equipment Systems, LLC
13290 Sabre Blvd., Suite 200
Victorville, CA 92394-7943

Description:

SPRAY GUN, INDUSTRIAL METAL COATING consisting of: One (1) Magnum ProX19 Airless sprayer, manufactured by GRACO, Serial Number TBD. Spray gun operated in an open booth having dimensions of 15' W x 20' H x 180' L with one (1) 30", 1 HP exhaust fan. Facility elevation is 2905 feet above sea level.

CONDITIONS:

1. This spray gun and associated equipment shall be operated and maintained in strict accord with manufacturer's/supplier's recommendations and/or sound engineering principles which produce the minimum emissions of contaminants. 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.

[District Rule 204]

2. All Coatings Operations, Solvents, Application Methods, Surface Preparation and Clean-up Operations, and record keeping, shall comply with District Rules 442, 1115, 1303, and 1320 as applicable. These rules pertain to Usage of Solvents, Metal Parts and Products Coating Operations, New Source Review Requirements, and New Source Review for Toxic Air Contaminants, respectively.

[District Rule 204]

Fee Schedule: 7 (c)

Rating: 1 device

SIC: 3531

SCC: 40200201

Location/UTM(Km):
465E/3826N

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
Executive Director

3. A daily log shall be maintained, by Permit Unit, of the Coatings and VOCs used and/or emitted from this Facility. This log shall be kept current and on-site for a minimum of five (5) years and contain at least the following:

- a. Coating used (including manufacturer of material, manufacturer product name, and/or code number and corresponding Safety Data Sheet (SDS));
- b. VOC content of Coating as applied;
- c. Quantity of each coating, thinner, and solvent used. (Note: Units must be consistent). If quantity used is in gallons (or liters), the VOC must be in pounds per gallon (or grams per liter). Units used in all logs must be the same; and,
- d. Type and amount of Solvent used for cleanup, Surface Preparation, or paint removal.

NOTE: The daily log information provides a basis for the Toxic Emission Inventory required by AB 2588 and Title III requirements [District Rule 204; District Rule 442; District Rule 1115(F)(1); 40 CFR 63, Subpart HHHHHH - Record retention]

4. Pursuant to Rule 1115, the owner/operator shall not apply any Metal Parts or Product Coating unless one of the following methods is used:

- a. Electrostatic Application equipment, operated in accordance with the manufacturer's recommendations;
- b. High Volume Low Pressure (HVLV) Spray equipment, operated in accordance with the manufacturer's recommendations;
- c. Dip coat (including electrodeposition), operated in accordance with the manufacturer's recommendations;
- d. Flow coat, operated in accordance with the manufacturer's recommendations;
- e. Roller Coat, operated in accordance with the manufacturer's recommendations;
- f. Airless spray, operated in accordance with the manufacturer's recommendations;
- g. Air-assisted airless spray, operated in accordance with the manufacturer's recommendations; or,
- h. Hand Application Methods, operated in accordance with the manufacturer's recommendations;

Any alternative application method must be demonstrated to reduce emissions to a level equivalent to the above methods and to the satisfaction of the APCO, pursuant to Rule 1115(C)(1)(ix-x), and written approval by the APCO must be obtained prior to using the alternative equipment.

[District Rule 1115]

5. Total VOC emissions from this Spray Gun shall be less than 25 pounds per day. The total VOC emissions from this Facility shall be less than 19.9 tons per year. The total Hazardous Air Pollutant (HAP) emissions from this Facility shall be less than 9.9 tons for single HAP and less than 24.9 tons of combined HAP. To ensure that emissions remain below these thresholds, the following coating throughput limits shall apply and be shared across both spray guns, under District Permits P015675 and P015676:

- a. 600 gallons per calendar year of primer;
- b. 600 gallons per calendar year of enamel/paint; and,
- d. 600 gallons per calendar year of clean-up solvents (excluding VOC-Exempt Compounds such as acetone).

NOTE: The annual coatings volume of (a) and (b) combined is limited to 1,200 gallons per year. Exceeding a limit from (a) or (b) does not constitute a violation unless the combined annual coatings volume also exceeds 1,200 gallons per year.

[District Rule 204; District Rule 1303; District Rule 1320; District Rule 1520; 40 CFR 63.3881(b) - Exemption for Non-Major Source]

6. Each individual spray gun under District Permits P015675 and P015676 shall not use more than the following volumes per calendar day:

- a. 12 gallons per calendar day of primer;
- b. 12 gallons per calendar day of enamel/paint; and,
- d. 3.25 gallons per calendar day of clean-up solvents (excluding VOC-Exempt Compounds such as acetone).

[District Rule 204; District Rule 1303; District Rule 1320; District Rule 1520]

7. The total quantity of all combined coating materials used at this Facility under District Permits P015675 and P015676 shall not exceed 1,200 gallons per year. Before this annual usage can be increased, the Facility is required to submit an application to modify the permit, which may require a Health Risk Assessment (HRA). Based on the results of the HRA, public notice and/or a commenting period may be required prior to permit issuance.

[District Rule 204; District Rule 1320; District Rule 1520]

8. Pursuant to District Rule 1115, the owner/operator shall carry out all Application Equipment Cleaning Processes in accordance with the following:

- a. Application Equipment cleaning Equipment requirements:
 - i. The application Equipment is disassembled and cleaned in an enclosed system during the washing, rinsing and draining processes; or
 - ii. The application Equipment or Equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned Equipment or Equipment

parts are drained to the container until dripping ceases; or

iii. Other application Equipment cleaning methods that are demonstrated to be as effective as the Equipment described above in minimizing emissions of VOC to the atmosphere are used, provided that the device has been approved in writing prior to use by the APCO, CARB and USEPA.

b. Closed containers or pipes to store and convey VOC-containing cleaning and cleaning waste materials are used;

c. Spills of VOC-containing cleaning and cleaning waste materials are minimized; and

d. VOC emissions are minimized during cleaning operations.

[District Rule 204; District Rule 1115(C)(5)(b)]

9. Pursuant to District Rule 1115, the owner/operator shall carry out all Surface Preparation and Clean-up Operations in accordance with the following:

a. No organic compound(s), or mixture thereof with a VOC content in excess of twenty-five (25) grams per liter (0.21 pounds per gallon) of material (excluding VOC-Exempt Compounds) shall be used for Surface Preparation; or,

b. The material has an initial boiling point of 190°C (374°F) or greater; or,

c. The material has a total VOC vapor pressure of 8 mm Hg or less, at 20 °C (68 °F).

[District Rule 204; District Rule 1115(C)(5)(c)]

10. Pursuant to District Rule 1115, the owner/operator shall not use a Stripper on miscellaneous metal parts and products unless the material contains 200 grams or less of VOC per liter of material (1.7 pounds per gallon).

[District Rule 204; District Rule 1115(C)(5)(d)]

11. Pursuant to District Rule 1115, the owner/operator shall use closed, nonabsorbent containers for the storage or disposal of cloth, paper, or any other absorbent material used for Solvent Surface Preparation and cleanup.

[District Rule 204; District Rule 1115(C)(5)(e)]

12. Pursuant to District Rule 1115, the owner/operator shall not:

a. Specify the use in the District of any Coating to be applied to any metal parts and products subject to the provisions of this Rule that does not meet the limits and requirements of District Rule 1115; and,

b. Offer for sale or sell within the District any Coating, if such product is prohibited by any provisions of this Rule. The prohibition of this section shall apply to the sale of any Coating which will be applied at any physical location within the District.

[District Rule 204; District Rule 1115(C)(6) and (C)(7)]

13. The owner/operator shall not use or possess any metal parts coating that contains hexavalent chromium or cadmium. Compliance with this condition shall be verified by retention of SDS sheets (or equivalent documentation of chemical content) for applicable coatings used at the Facility for five (5) years, and shall be made available to District, State, or Federal personnel upon request.

[District Rule 204; 40 CFR 63, Subpart HHHHHH - Record retention]

14. This Facility is exempt from the requirements of 40 CFR 63, Subpart HHHHHH, provided that this Facility does not conduct the following activities:

a. Apply coatings to metal surfaces that contain Target HAPs; and,

b. Perform paint stripping using Methylene Chloride (MeCl) for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates;

NOTE: Target HAPs are defined in 40 CFR 63.11180 as compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Contact the MDAQMD if this Facility will use coatings containing these compounds and/or MeCl. Additional permit conditions will be required; the permit must be amended and reissued before use of the above compounds commences.

[District Rule 204; 40 CFR 63, Subpart HHHHHH]

15. 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; 17 CCR 93400 et seq.; 40 CFR 51, Subpart A]