



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

S009811

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: DECEMBER 2025

OWNER OF OPERATOR (Co. #1489)

International Aerospace Coatings, Inc.
13640 Phantom Road
Victorville, CA 92394

EQUIPMENT LOCATION (Fac. #2924)

International Aerospace Coatings - Hangar #746
13596 Phantom Rd East
Victorville, CA 92394

Description:

PAINT BOOTH, AEROSPACE (HANGAR 746) consisting of: An aircraft painting facility within Hangar 746 comprised of the entire interior of the building (a 270' wide by 275' long space with an 85' ceiling). This painting booth is ventilated through 280 2' by 2' by 2" inlet filters located in the booth doors augmented by four supplied air fans each rated at 80,000 CFM, and exhausts through eight filter banks, each bank consisting of a three stage Aerospace NESHAP filter system, driven by eight 40 hp, 60" diameter exhaust fans. The filtration system is equipped with manometers to measure the pressure differential across each of the eight exhaust filter banks. Building 100 psi compressed service air is provided by an exempt electrically-driven 75 hp Ingersoll-Rand SSR-EP75 air compressor. This hangar may be heated by four 850,000 BTU Weatherite comfort heaters (exempt) used to maintain a minimum hangar temperature of 65 degrees Fahrenheit.

CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit. [District Rules 204 and 1303]

2. Only electrostatic application, High Volume Low Pressure (HVLP) spray guns, hand-held aerosol coating products, or hand application methods shall be stored or used in this hangar unless prior written approval is obtained from the District.

The above spray application methods 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).

Fee Schedule: 7 (j)

Rating: 1 device

SIC: 3721

SCC: 40202499

Location/UTM(Km): 473E/3820N

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.

International Aerospace Coatings, Inc.
Attention: Brittnay Frieese

Spokane, WA 99219

By: **COPY**

Brad Poiriez

Air Pollution Control Officer

3. Discharge filters shall meet the specifications described in 40 CFR 63, Subpart GG (the Aerospace NESHAP) and shall be installed and maintained in a tightly mounted and dimensionally stable condition, free of excessive deposits or interference with air flow passages. The pressure drop across the discharge filters shall be within the filter manufacturer's/designer's recommended range.
[40 CFR 60, Subpart GG, District Rule 1118]

4. Each filter bank shall be clearly marked with a unit identification number.
[District Rule 204]

5. Each time all three filter layers are replaced in a filter bank, the pressure differential shall be measured and recorded prior to conducting any stripping, sanding, or coating operations. If this pressure differential reading is different from (either lower than or higher than) the manufacturer's stated minimum reading (in inches of water column), the District shall be notified within 24 hours.
[District Rules 204 and 1118]

6. In addition to measuring the pressure differential across the discharge filters upon complete filter replacement, the pressure differential across the discharge filters of each filter bank shall also be taken and recorded each week this spray booth has operated. If the filter bank is out of service or not otherwise used during any given week, it shall be noted as such. [District Rule 1118]

7. The discharge filtration system shall be in operation during and for at least thirty minutes after all solvent and coating use operations (including but not limited to washing, stripping, solvent wiping, priming and painting) within this hangar.
[District Rules 204 and 1118]

8. This facility shall not emit more than 49,800 pounds of VOC to the atmosphere per year, calculated on a rolling twelve-month basis.
[District Rules 1302 and 1303]

9. This facility shall not emit more than 9.9 tons of any one Hazardous Air Pollutant (HAP) nor more than 24.9 tons of all HAPs combined to the atmosphere per year, calculated on a rolling twelve-month basis.
[District Rules 1302 and 1303]

10. The owner/operator shall maintain a current listing of all VOC and HAP containing materials in use at this facility. This listing shall include, as a minimum, the following:

- a. Material name and manufacturer identification;
- b. Application method;
- c. Material category and specific use instructions (Manufacturer's Technical Data Sheets (TDS) may be used for this requirement if the material is used in strict accordance with the TDS);
- d. Specific mixing ratios;
- e. Actual VOC and HAP content, in pounds per gallon (lbs/gal) as applied (including thinning solvents, activators, curing solutions, etc.); and
- f. Material Safety Data Sheets/Safety Data Sheets (MSDS/SDS) or Air Quality Data Sheets which list the VOC and HAP content of all components used in the material being applied.

[District Rules 1118 and 1520]

11. The owner/operator shall maintain, on a daily basis, a record of the volume (in gallons), the VOC content (in lbs/gal) and the resulting VOC emissions (in pounds), of each VOC-containing material used. These records shall be summarized cumulatively on a monthly basis and for each consecutive 12 month period.
[District Rules 1118 and 1520]

12. The VOC and HAP data used to calculate VOC and HAP emissions must be derived from manufacturer-supplied Material Safety Data Sheets/Safety Data Sheets (MSDS/SDS) or Air Quality Data Sheets for each product unless more specific detailed information from the manufacturer can be provided regarding proprietary formulations.

The only exception to this condition is that the District will authorize the following:

- a. A 0.34 lb/gallon reduction from the 03/12/2018 SDS stated VOC Content of 2.22 lb/gal for CEE BEE 1004J Acid Stripper effective until 12/31/21 (based on March 2020 test). Beginning 1/1/22 the approved reduction is 1.91 lb/gallon from the 03/12/2018 SDS stated VOC Content of 2.22 lb/gal for CEE BEE 1004J Acid Stripper (based on December 2021 test);
- b. A 0.54 lb/gallon reduction from the 12/19/2014 SDS stated VOC Content of 3.51 lb/gal for CEE BEE E-3000 Peroxide Stripper effective until 12/31/21 (based on March 2020 test). Beginning 1/1/22 the approved reduction is 3.02 lb/gallon from the 03/12/2018 SDS stated VOC Content of 3.51 lb/gal for CEE BEE E-3000 Peroxide Stripper (based on December 2021 test);
- c. A 0.45 lb/gallon reduction from the 06/02/2012 SDS stated VOC content of 2.98 lb/gal for PR-5044 stripper (based on February 2018 test);
- d. A 0.51 lb/gallon reduction from the 12/10/2010 SDS stated VOC content of 3.30 lb/gal for Turco 6776 stripper (based on February 2018 test). Beginning 1/1/24 the approved reduction is 2.83 lb/gallon from the 02/20/2023 SDS stated VOC Content of 3.30 lb/gal for Turco 6776-Lo Stripper (based on July 2023 test);

If the formulations of the strippers are changed by the manufacturer which reduce the benzyl alcohol content, then the above reductions become null and void until revised source testing is conducted. No VOC reductions are authorized for any other strippers, paints, thinners, activators, curing solutions, etc., used at this facility.

[District Rules 204, 1303, 1320, and 1520]

13. The owner/operator (o/o) shall maintain current and on-site for a minimum of five (5) years a daily operational log for each day the equipment is in operation. This daily log shall be provided to District, State or Federal personnel upon request and shall include, at a minimum, the following information:

- a. The discharge filter pressure differential readings required by conditions 5 and 6;
- b. The identification numbers and start / stop times for all discharge filter banks;
- c. The daily VOC usage data required by conditions 10 and 11;
- d. The method of application and type of substrate for each use; and
- e. Monthly and rolling twelve-month cumulative VOC emissions in pounds.

[District Rules 1118 and 1302]

14. In addition to the daily recordkeeping requirements in Condition 13, the owner/operator shall maintain, on a monthly basis, a record of the volume (in gallons), the HAP content (in lbs/gal), and resulting HAP emissions (in pounds), of each HAP-containing material used. These records shall be summarized on a monthly basis and for each consecutive 12 month period.

[District Rules 1118 and 1520]

15. 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]

16. 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.

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

17. 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]

18. 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.)

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

19. 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 of non-atomizing methods may also be used.

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

20. 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.

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; District Rules 1115 and 1118]

21. All VOC containing material, used or unused, including but not limited to surface coatings, thinners, cleanup solvents, strippers, or surface preparation materials, and all solvent laden cloth and paper, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except during extraction or introduction of material for mixing, use, storage, or baling of materials for disposal.

[District Rules 442 and 1118]

22. Operations within this hangar shall comply with Rules 1115 - Metal Parts and Products Coating Operations and 1118 - Aerospace Vehicle Parts and Products Coating Operations as appropriate.

[District Rules 1115 and 1118]

23. 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]

24. For purposes of all International Aerospace Coatings, Incorporated permits at Southern California Logistics Airport (SCLA), "facility" is deemed to be all operations by International Aerospace Coatings, Incorporated within the boundaries of SCLA.

[District Rule 1302]