



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

S015680

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.#1782)

Milspray, LLC
845 Towbin Avenue
Lakewood, NJ 08701

EQUIPMENT LOCATION (Fac.#3466)

Milspray - USMC AGCC
Military Base Twentynine Palms
Twentynine Palms, CA 92278

Description:

SPRAY BOOTH, MOBILE CORROSION REPAIR FACILITY consisting of: A Custom Designed Mobile Corrosion Repair Facility (MCRF), manufactured by Milspray; Width 30 feet, Length 60 feet and Height 15 feet; two 1.5 hp fans, each with a 6,562 cfm flowrate and HVLP sprayguns. Equipped with 16 total Paint Pocket Green/Polyester inlet filters measuring 20" W x 20" L x 1" thick and 16 pleated carbon impregnated exhaust filters measuring 20" W x 20" L x 1" thick.

CONDITIONS:

1. This spray booth 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 Automotive Refinishing Operations, Automotive Coatings (including diluents, thinners, etc.), Solvents, Application Methods, Surface Preparation and Cleaning Operations, and record keeping, shall comply with District Rules 442, 1116, 1303, and 1320 as applicable. These rules pertain to Usage of Solvents, Automotive Refinishing Operations, New Source Review Requirements, and New Source Review for Toxic Air Contaminants, respectively.

[District Rule 204]

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 7532

SCC: 40201606

Location/UTM(Km):
586E/3778N

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.

Milspray, LLC
845 Towbin Avenue
Lakewood, NJ 08701

By: **COPY**
Brad Poiriez
Executive Director

3. The filtration modules employed within this booth shall be equipped with a fully functioning pressure differential gauge to indicate, in inches of water, the static pressure differential across the exhaust filters. Exhaust filters shall be installed and maintained in a tightly mounted and dimensionally stable condition, free from excessive deposits or interference with airflow passages. In operation, the pressure differential shall be maintained within the manufacturer's defined range, in accordance with the manufacturer recommendations for this Permit Unit. The owner/operator shall maintain a replacement inventory of exhaust filter media on-site at all times to ensure compliance with these permit conditions.

[District Rule 204]

4. Pursuant to Rule 1116, the owner/operator shall not apply any Automotive Coating to Motor Vehicles or Mobile Equipment or their Associated Parts and Components unless one of the following methods is used:

- a. Electrostatic Application equipment, operated with the manufacturer's recommendations; or,
- b. High Volume Low Pressure (HVLP) Spray equipment, 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 1116, and written approval by the APCO must be obtained prior to using the alternative equipment.

[District Rule 1116]

5. Total VOC emissions from this Spray Booth shall be less than 25 pounds per day. The total VOC emissions from this Facility shall be less than 20 tons per year. To ensure that emissions remain below these thresholds and that the health impacts from this facility's operations remain below those assessed during the initial permitting process, the following coating throughput limits shall apply:

- a. Not more than 5 gallons per day, nor more than 100 gallons per calendar year of 917A Waterborne 2K CARC Component B;
- b. Not more than 5 gallons per day, nor more than 130 gallons per calendar year of LSA-GREEN0222-0719; and,
- c. Not more than 5 gallons per day, nor more than 70 gallons per calendar year of TAL-GREEN0222-0917.

[District Rules 204, 1303, 1320 and 1520]

6. Pursuant to District Rule 1116, the owner/operator shall carry out all surface preparation and cleaning 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 Exempt Compounds) shall be used for Surface Preparation;
- b. Only closed, non-absorbent containers shall be used for the storage or disposal of any solvent applicator used during Surface Preparation or Cleaning Operations (including brushes, swabs, cloth or paper);
- c. Fresh and spent solvent shall be stored in vapor tight and closed containers; and
- d. Organic compounds shall not be used for cleaning of spray equipment, including paint liners, unless an enclosed system is used. The system shall enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures. Equipment used shall minimize the evaporation of organic compounds to the atmosphere.

[District Rules 204 and 1116]

7. A daily log shall be maintained of the 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. Type of Automotive Coating or Solvent to demonstrate compliance with Condition #5;
- b. Mix ratio of components used in the Automotive Coating;
- c. Category of material (Coating, Solvent, etc.), its use, and its applicable VOC limit in pounds per gallon (or grams per liter), by District Rule or Rules;
- d. Manufacturer of material, manufacturer product name, and/or code number and corresponding Safety Data Sheet (SDS);
- e. Quantity of each Automotive Coating or Solvent used, and its VOC content. (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 items (c) and (e) must be the same;
- f. Quantity of acetone usage in gallons (or liters) per day; and,
- g. Weekly differential pressure reading across outlet filters.

[District Rules 204, 442, and 1116]

8. The daily VOC log shall be kept current and on-site for a minimum of five (5) years, and provided to District personnel upon request. (NOTE: The daily log information provides a basis for the Toxic Emission Inventory required by AB 2588 and Title III requirements)

[District Rules 204 and 1116]

9. The owner/operator shall not use or possess any Motor Vehicle Coating or Mobile Equipment 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; 17 CCR 93112]

10. The exhaust filters employed to control particulate matter within this booth must have a minimum control efficiency of 98.6%. Compliance with this condition shall be demonstrated with manufacturer's specification sheets, which must be made available upon request to District, State, or Federal personnel.

[District Rules 1320 and 1520]

11. This facility shall not discharge into the atmosphere a non-VOC organic solvent in excess of 600 pounds per day, as calculated on a thirty (30) day rolling average. This includes, but is not limited to, cleanup solvents, coatings, modifiers, sealants, release agents, polymerization initiators, pure monomers, and catalysts.

[District Rule 442(C)(1)]

12. All doors and openings must be fully closed to the shelter while coating operations are in progress.

[District Rules 204, 1320 and 1520]

13. This equipment may only be operated at either the 1st Street and Brown Road operational location or the 12th Street and E. Dunham Street operational location at the Marine Air Ground Task Force Training Command and Marine Corps Air Ground Combat Center (MAGTFTC and MCAGCC). Operation elsewhere within the MAGTFTC and MCAGCC is strictly prohibited.

[District Rule 1520]

14. 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]