



# 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

B012174

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: NOVEMBER 2026**

### OWNER OF OPERATOR (Co. #84)

NTC - Public Works  
Bldg 602, 5th Street  
Fort Irwin, CA 92310

### EQUIPMENT LOCATION (Fac. #589)

NTC Training Mission  
Bldg. 602, 5th street  
Fort Irwin, CA 923105085

#### Description:

NUCLEAR/BIOLOGICAL/CHEMICAL (NBC) TRAINING CHAMBER #2 consisting of: A 20 foot x 40 foot x 12 foot metal building used to expose combat personnel to CS Gas (O-chlorobenzalmalononitrile). The building has no forced air ventilation and is cleared of the irritant gas by natural ventilation. O-chlorobenzalmalononitrile is the only authorized chemical agent to be used in the building. Located at Building "GASCH", near 35.24484 degrees North, 116.652557 degrees West.

#### CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accordance with the recommendations of the chemical agent pellet manufacturer/supplier and/or sound engineering principle which produce the minimum emission 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 Rule 1302]
2. The maximum number of training sessions that can be conducted on any one (1) day (midnight to midnight) is three (3). [District Rule 204]
3. The only chemical agent that can be used in this chamber is "CS Gas" consisting of O-chlorobenzalmalononitrile. [District Rule 1320]

Fee Schedule: 7 (i)

Rating: 1 device

SIC: 9711

SCC: 30125409

Location/UTM(Km):  
529E/3902N

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.

NTC - Public Works  
Attn: Air Resources Manager  
  
Fort Irwin, CA 92310

By: **COPY**  
Eldon Heaston  
Air Pollution Control Officer

4. The maximum amount of chemical agent that can be used per training session is 20 chemical agent pellets with no more than 0.58 grams of CS Gas (O-chlorobenzalmalononitrile) per pellet.

[District Rule 1320]

5. The owner/operator shall maintain an operations log for this unit current and on-site (or at a central location) for a minimum of five (5) years, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below:

- a. Start time and duration of each training session; and,
- b. Quantity of chemical agent (O-chlorobenzalmalononitrile) pellets used.

[District Regulation XIII - NSR]

6. This entire facility (MDAQMD Facility no. 589 - NTC - Dir. of Public Works, Mission Related) shall not emit any regulated air pollutant or any pollutant listed under section 112(b) of the Clean Air Act listed below in excess of the following limits in any consecutive 12 month period to remain below the USEPA's Synthetic Minor - 80% (SM-80) threshold:

- a. Oxides of Nitrogen (NOx): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- b. Oxides of Sulfur (SOx): 20 tons per consecutive twelve (12) month period;
- c. Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- d. Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- e. Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period; and,
- g. Particulate Matter 10 microns and less (PM<sub>10</sub>): 12.0 tons per consecutive twelve (12) month period;
- h. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- i. All HAPs combined: 20 tons per consecutive twelve (12) month period.

For the purposes of implementation of the Title I (Part D) Nonattainment New Source Review (nonattainment NSR), Title I (Part C) Prevention of Significant Deterioration (PSD), and Title V Operating Permit Programs under the Clean Air Act, Facility refers to a stationary source, or group of stationary sources that are located on one or more contiguous or adjacent properties that are owned, operated, supervised, or controlled by one or more Department of Defense (DoD) component(s) that were disaggregated during the course of major source determination(s), based upon appropriate industrial groupings and support facility relationships. Compliance with these limits shall be demonstrated through the submission of an installation-wide Comprehensive Emission Inventory (CEI) for all emitted regulated air pollutants or any pollutant listed under section 112(b) of the Clean Air Act (including 12 month emissions summary). Exceedance of these emission limits may trigger offsets, BACT, and/or require submission of a Title V permit application. [District Rules 1302 and 1303, 40 CFR 51.165, 40 CFR 52.21(b), 40 CFR 70.2 and "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act," memorandum from John S. Seitz, Director, Office of Air Quality Planning and Standards, (Aug. 2, 1996)]

7. This entire facility (MDAQMD Facility no. 589 - NTC - Dir. of Public Works, Mission Related) shall not emit any Hazardous Air Pollutants (HAP) listed in or pursuant to Section 112(b) of the Clean Air Act in excess of the following limits in any consecutive 12 month period to remain below the USEPA's Synthetic Minor - 80% (SM-80) threshold:

- a. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- b. All HAPs combined: 20 tons per consecutive twelve (12) month period.

For the purposes of determining the applicability of Section 112 air toxics requirements under the Clean Air Act, Facility refers to a stationary source, or group of stationary sources that are located within a contiguous area and under common control. Compliance with these limits shall be demonstrated through the submission of an installation-wide Comprehensive Emission Inventory (CEI) for all emitted pollutants listed under section 112 (b) (including 12 month emissions summary). Exceedance of these emission limits may trigger National Emission Standards for Hazardous Air Pollutants (NESHAP) or Maximum Achievable Control Technology (MACT) standards.

[40 CFR 63.2]

8. A Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants located at this military installation (including, but not limited to, MDAQMD Facility nos. 589, 2806, 3023, 3280, 3534, and 3903) must be submitted to the District, in a format approved by the District, upon District request. For the purposes of CEI, Facility is defined as every structure, appurtenance, installation, and improvement on land which is associated with a source of air releases or potential air releases of a hazardous material.

[District Rule 107(b), H&S Code 39607, 44304 and 44341-44342]