



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

P014448

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: NOVEMBER 2025

OWNER OF OPERATOR (Co. #681)

General Atomics - LSNC
3550 General Atomics Court
San Diego, CA 92121-1194

EQUIPMENT LOCATION (Fac. #1648)

G A Aeronautical Sys - El Mirage Rd
73 El Mirage Airport Road
Adelanto, CA 92301

Description:

MAINTENANCE AND REPAIR HANGAR, AEROSPACE consisting of: Aircraft maintenance and repair facility (320' x 210') of consisting of: Manual application of epoxy resin and adhesive mixtures; Pressure-fed application of coatings via HVLP spray gun; Cutting, machining, grinding, sanding and other mechanical finishing operations on composite parts; and, One (1) ACT dust collection unit, model no. 2-8, serial no. 16646, employed in the capture of Particulate Matter (PM) generated by mechanical finishing operations. Equipment dimensions of 127" x 40" x 87", equipped with a quantity of 8 DCF22611 cellulose/poly-blend nano-web filters with an initial Merv 15 efficiency rating and one (1) differential pressure gauge.

CONDITIONS:

1. This aerospace repair/machining booth and associated equipment shall only 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 1302(C)(2)(a)]

2. 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 Assembly, Rework, and Component Manufacturing Operations, New Source Review Requirements, and New Source Review for Toxic Air Contaminants, respectively.

[District Rules 442, 1118, 1303 and 1320]

3. When particulate matter generating machining operations controlled by this permit unit are in process, this dust collection system must

Fee Schedule: 7 (c) Rating: 1 device SIC: 3721 SCC: 40202499 Location/UTM(Km): 459E/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.

General Atomics - LSNC
ATTN: LSNC

San Diego, CA 92186-5608

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

be operated concurrently.
[District Rules 1303 and 1320]

4. This dust collection system shall not discharge into the atmosphere an exhaust stream that exhibits greater than twenty (20) percent opacity for a period or periods aggregating more than three minutes in any one hour.
[District Rule 401]

5. The owner/operator shall install, calibrate (if applicable), and maintain a differential pressure gauge to monitor pressure drop across the dust collection unit. The monitoring device that requires calibration shall be calibrated at least annually in accordance with the manufacturer's specifications and shall be accurate to within a range of ± 0.5 inch water gauge pressure (± 125 pascals) or a span of ± 3 percent. The monitoring device that only requires to be zeroed shall be zeroed at least once a week. Furthermore, the filter media differential pressure shall be maintained within the manufacturer's defined range. Filters shall be replaced whenever the pressure drop across the filter media no longer meets the manufacturer recommended operating range. The owner/operator shall maintain on-site a minimum inventory of replacement filters that assures compliance with this condition.
[District Rule 1303(A)]

6. In the event of a malfunction of any portion of this control equipment, all machining operations must be shut down as soon as safely possible and shall not be restarted until all malfunctions have been corrected. Equipment breakdowns shall be reported to the District in accordance with District Rule 430.
[District Rules 430 and 1302]

7. Pursuant to Rule 1118, all Aerospace Material must be applied by use of one of the following methods:

- a. Electrostatic application;
- b. Flow/curtain coater application;
- c. Roll coater;
- d. Dip coater;
- e. High-Volume, Low-Pressure (HVLP) Spray;
- f. Electrodeposition;
- g. Cotton tipped swab application;
- h. Hand Application Methods, or
- i. Such other alternative application methods as are demonstrated, using District-approved procedures, to be capable of achieving a Transfer Efficiency at least equivalent to the High-Volume, Low-Pressure (HVLP) Spray application method. Such alternative application techniques shall be approved in writing by the District, prior to use.
- j. Approved air pollution control equipment, as defined in District Rule 1118, subsection (C)(5).
[District Rule 1118 - Aerospace Assembly, Rework and Component Manufacturing Operations]

8. Pursuant to Rule 1118, all spray guns must be cleaned by one or more of the following methods:

- a. Enclosed spray gun cleaning system that is kept closed when not in use;
- b. Unatomized discharge of cleaning solvent into a waste container that is kept closed when not in use;
- c. Disassembled spray gun that is cleaned in a vat and kept closed when not in use; or
- d. Atomized spray into a waste container that is fitted with a device designed to capture atomized cleaning solvent emissions.
[District Rule 1118 - Aerospace Assembly, Rework, and Component Manufacturing Operations]

9. The owner/operator shall maintain an operational log for this equipment, which, at a minimum, contains the information specified below. This log shall be maintained current and on-site for a minimum of five (5) years and shall be provided to District, State or Federal personnel upon request:

- a. A current listing of all VOC-containing materials in use at this Facility. This listing shall include:
 - (i) Material name and manufacturer identification;
 - (ii) Application method;
 - (iii) Material category and specific use instructions;
 - (iv) Specific mixing ratio; and,
 - (v) Maximum VOC content as applied (including thinning solvents).
- b. Current Coating manufacturer specification sheets, Safety Data Sheets (SDS) or current air quality data sheets, which list the VOC content of each material in use at the facility, shall be available for review on site.

- c. Purchase records identifying the type or name and the volume of material purchased for each VOC-containing material.
 - d. A daily basis record of the volume, VOC content, and resulting VOC emissions of each VOC-containing material used. These records shall be summarized cumulatively on a monthly basis and for each calendar year, and shall include:
 - (i) The daily VOC emissions, calculated in pounds to verify compliance with condition 7;
 - (ii) The annual VOC emissions, calculated on a calendar month basis and totaled for each twelve-month rolling average to verify compliance with condition 8; and,
 - (iii) The annual HAP emissions, calculated on a calendar month basis and totaled for each twelve-month rolling average to verify compliance with condition 8. If the Facility uses, exclusively, Coatings formulations compliant with District Rule 1118, Section C, these records may be maintained on a monthly basis.
 - e. Cleaning Solvents:
 - (i) For Aqueous and Semiaqueous Cleaning Solvents, maintain a list of materials used with corresponding water contents.
 - (ii) For vapor pressure compliant Hand-Wipe cleaning solvents, maintain a current list of cleaning solvents in use with their respective vapor pressures or, for blended solvents, VOC composite vapor pressure. All vapor pressure compliant Hand-Wipe cleaning solvent usage shall be recorded on a monthly basis.
 - (iii) For cleaning solvents with a vapor pressure greater than 45 mm Hg used in exempt Hand-Wipe Cleaning Operations, maintain a list of exempt Hand-Wipe Cleaning Operations. All exempt Hand-Wipe cleaning solvent usage shall be recorded on a monthly basis.
 - f. Dust Collection System:
 - (i) Monthly operational logs, including total monthly hours of operation;
 - (ii) Monthly records of pressure drop reading, including date and value;
 - (iii) Date of filter replacement(s);
 - (iv) Annual inspection of integrity of dust collection unit, including hatches, seals and filters, date and result;
 - (v) Records of repairs/maintenance performed on any portion of this collection system;
 - (vi) Records of malfunctions, including dates and durations, a description of each malfunction, and the corrective action taken for each malfunction; and,
 - (vii) Records of the calibration of all monitoring devices (if applicable).
- [District Rules 1118 - Aerospace Assembly, Rework and Component Manufacturing Operations and 1303]

10. The total VOC and PM10 emissions from this Permit Unit shall be less than 25 lbs/day. Emissions in excess of these limitations will initiate BACT review.
[District Rules 1303 and 1320]

11. Pursuant to 40 CFR 63 subpart HHHHHH, this facility shall not spray apply coatings to metal and plastic surfaces that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd); nor, conduct any paint stripping operations on any substrate that use methylene chloride (MeCl)-containing paint stripping formulations. Contact the MDAQMD for conditions if this facility will use coatings containing these compounds and/or MeCl for additional permits requirements.
[Title 40 CFR 63, Subpart HHHHHH - NESHAP for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]

12. The entire facility shall not emit any of the Regulated Pollutants 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 NO₂;
- b. Oxides of Sulfur (SO_x): 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 (H₂S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- g. Particulate Matter 10 microns and less (PM₁₀): 14.5 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.

Compliance with these limits shall be demonstrated through the submission of a facility-wide Comprehensive Emission Inventory (CEI) for all emitted Regulated Air Pollutants. Exceedance of these emission limits may trigger offsets, BACT, National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or require submission of a Title V permit application.
[District Rules 1302 and 1303]

13.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]