



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

B008803

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: JULY 2026

OWNER OF OPERATOR (Co.#681)

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

EQUIPMENT LOCATION (Fac.#1367)

G A Aeronautical Sys - Adelanto Yucca
9779 Yucca Road
Adelanto, CA 92301

Description:

REINFORCED COMPOSITE OPERATIONS consisting of: A Composite Batch Hand Lay-up line, including a Large Gas Oven, W. Miller Co., S/N 00-143, 1.6 MM Btu, a Medium Gas Oven, W. Miller Co., S/N 3-4808, 1.6 MM Btu, and an exempt Small Electric Oven, Grieve Co., Model No. AG-850, S/N 39014; 18 kW.

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(s) for this permit.

[District Rule 1302(C)(2)(a)]

2. This facility shall be operated and maintained in compliance with all applicable District Rules, including but not limited to, District Rules 442 - Usage of Solvents, 1115 - Metal Parts & Products Coating Operations, 1118 - Aerospace Assembly, Rework and Component Manufacturing Operations and 1162 - Polyester Resin Operations.

[District Rules 442, 1115, 1118 and 1162]

3. The natural gas-fired ovens under this permit are limited to using only PUC-Regulated pipeline quality natural gas for fuel.

[District Rule 431]

Fee Schedule: 2 (c)

Rating: 3200000 Btu

SIC: 3728

SCC: 30501299

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**
Eldon Heaston
Air Pollution Control Officer

4. Fuel consumption shall be monitored using fuel meter or calculated based on equipment annual average operation, and reported in standard cubic feet or therms.

[District Rule 431 and 1302]

5. All application of resins shall be limited to one of the following methods:

- a. Non-atomizing spray;
- b. Flow coaters;
- c. Pressure-fed rollers;
- d. Resin impregnators;
- e. Hand lay-up; or,
- f. Other non-atomizing techniques which have transfer efficiencies at least equal to one of the above methods and which are tested in a manner that the parameters under which they were tested are permanent features of the method. Prior to their use, such application shall be approved in writing by the APCO, CARB, and the USEPA.

[District Rule 1162(C)(2)(a)]

6. All application of gel coats shall be limited to one of the following methods:

- a. Any non-atomizing application technique listed in District Rule 1162(C)(2)(a);
- b. Airless;
- c. Air-Assisted Airless Spray;
- d. Electrostatic Attraction; or
- e. High volume, Low Pressure (HVLP) Spray:
 - i. HVLP spray equipment shall be operated in accordance with the manufacturer's recommendations.
 - ii. HVLP spray guns shall have the maximum inlet air pressure in pounds per square inch (psig) at which the gun will operate within the parameters specified in District Rule 102 - Definition of Terms, indicated on the spray gun.

[District Rule 1162(C)(2)(b)]

7. This facility shall only use gel coats, resins and other materials that comply with the VOC limits in Table 1 to District Rule 1162. In addition to complying with the Table 1 limits, the non-Monomer VOC content shall not exceed more than 5% by weight of the resin or gel coat.

[District Rule 1162(C)(1)(a)]

8. The owner/operator shall maintain a log for the facility, which, at a minimum, contains the information specified below:

- a. Annual fuel consumption, calculated on a calendar month basis and totaled for each twelve-month rolling average (reported in standard cubic feet or therms);
- b. Records of all maintenance and repair actions performed on the ovens by nature and date;
- c. Current list of manufacturer, type, and quantity (in pounds, gallons, etc.) of all materials used in composite operations (preparation, production, thinning, cleanup or other), including the weight percentage of monomer and overall VOC content for all polyester resin materials and fillers used;
- d. Records of all solvent usage, including type, quantity, and VOC content of all cleaning material used and stored;
- e. Volatile Organic Compound (VOC), Hazardous Air Pollutant (HAP), and Toxic Air Contaminant (TAC) contents of each type of resin, gel coat, coating and solvent in pounds per gallon, grams per liter, percent (weight/weight), etc.;
- f. Calculated monthly criteria pollutant, HAP, and TAC emissions from the transfer, storage and usage of materials employed in the manufacture of products at this facility;
- g. Daily records of the total consumption of solvents subject to District Rule 442 and resins and gelcoats subject to District Rule 1162, in gallons or pounds, used to determine monthly criteria, HAP and TAC emissions;
- h. Safety Data Sheets (SDS) for all materials used at this facility; and,
- i. Verification that the total emissions during the twelve (12) month consecutive period are below the facility limits found within condition 15.

These records shall be retained on-site for a minimum period of five (5) years and be made available for review upon request by District, State or Federal personnel.

[District Rules 431, 442, 1162, 1302 and 1303]

9. This facility shall not use cleaning solvents that contain HAPs, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The provisions of this condition do not apply to mold sealing and release agents, or mold stripping and cleaning solvents.

[District Rule 1162(C)(6)]

10. This facility must keep containers that store VOC and/or HAP-containing materials closed or covered except during the addition or removal of materials. Bulk VOC and/or HAP-containing material storage tanks may be vented as necessary for safety.

[District Rule 1162(C)(5)]

11. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, coating, adhesive catalyst and thinners shall be stored or disposed of in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is emptied.

[District Rules 442 and 1162(C)(7)(a)]

12. This facility must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

[District Rule 1162(C)(5)]

13. The facility shall not discharge VOCs into the atmosphere from all VOC containing materials, Emissions Units, equipment or processes that are not subject to District Rule 1162, in excess of 1190 pounds per month. Furthermore, 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, coatings, modifiers, sealants, release agents, polymerization initiators, pure monomers, and catalysts.

[District Rule 442(C)(1)]

14. 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]

15. 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 (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 (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): 12 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), 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production, and/or require submission of a Title V permit application.

[District Rules 1302 and 1303]

16. 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]