



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA92392-2310
760.245.1661 -- 800.635.4617 -- FAX760.245.2022

AUTHORITY TO CONSTRUCT

S014281

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: JUNE 2025

OWNER OF OPERATOR (Co. #2676)

AeroPro Corporation
255 S. Leland Norton Way, Suite 4
San Bernardino, CA92408

EQUIPMENT LOCATION (Fac. #2547)

AeroPro Corporation
13516 Phantom Rd, Hangar 756
Victorville, CA92394

Description:

PAINT BOOTH COMPLEX, AEROSPACE (HANGAR 756) consisting of: An aircraft painting facility within Hangar 756 comprised of the entire interior of the building (two sides, A East and B West). Each side is ventilated using a side downdraft system through dual identical 20' W by 18' H by 7' deep filter chambers (four total) equipped with three stage Aerospace NESHAP filter systems, a manometer to measure pressure differential across each of the 4 exhaust filter banks, and two 30 hp motors powering exhaust fans (operating flow is expected to be approximately 70,000 acfm through each filter chamber).

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).

[40 CFR 63, Subpart HHHHHH - NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources]
[District Rules 1118 and 1303]

Fee Schedule: 7 (j)

Rating: 1 device

SIC: 4581

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.

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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 maintained less than 3.0 inches of water column. Filters shall be changed once pressure drop reaches 3.0 inches of water column.
[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. Coating operations shall not recommence until the differential reading is at least the manufacturer's stated minimum reading of 3 inches of water column.
[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 three-stage 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 19.9 tons per year (12 month rolling sum) of VOC.
[District Rules 1302 and 1303]

9. This facility shall not emit more than 7.9 tons of any one Hazardous Air Pollutant (HAP) nor more than 19.9 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 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]

13. In addition to the daily recordkeeping requirements in Condition 11, 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]

14. VOC-containing materials shall not exceed the following;

- a) Cleaning or clean-up, excluding Coating stripping and equipment cleaning, unless:
 - (i) The VOC composite partial pressure is 45 mm Hg or less at a temperature of 20 C (68 F), or
 - (ii) The material contains 200 grams or less of VOC per liter of material, as applied.
 - b) Stripper
 - (i) The Stripper contains less than 300 grams per liter (2.5 lbs per gal) of VOC content; or
 - (ii) The VOC composite partial pressure is 9.5 mm Hg (0.18 psia) or less at 20 C (68 F).
 - c) Cleaning solvents used in Hand-Wipe Cleaning Operations shall:
 - (i) Meet the definition of Aqueous Cleaning Solvent; or
 - (ii) Have a VOC composite pressure less than or equal to 45 mm Hg at 20 C (68 F).
- [District Rule 1118]

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]

21. This facility is subject to, and shall comply with, the requirements of District Rule 1118 - Aerospace Assembly, Rework and Component Manufacturing Operations.

22. The owner/operator shall not possess or spray apply coatings containing hexavalent chromium or cadmium. [District Rule 204 and 1320]

23. This facility shall not use more than 1368 gallons per year of JET GLO Express Hardener (contains Hexamethylene Diisocyanate (CAS 822-06-0)). Usage records shall be kept on site and available to District personnel upon request. Before this annual usage limit can be increased and before the release of other substances containing potential emissions of Diisocyanates, the facility is required to submit to the District a site specific Health Risk Assessment (HRA) in accord with a District approved plan. In addition, a public notice and/or comment period may be required.
[District Rule 1320]

24. 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]