



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

BAE Systems SDSR
Environmental Manager
2205 E Belt St
Foot of Sampson St
San Diego CA 92113

EQUIPMENT ADDRESS

BAE Systems SDSR
Environmental Manager Lydia Pellecer
2205 E Belt St
Foot of Sampson
San Diego CA 92113

STARTUP AUTHORIZATION

After examination of your Application APCD2022-RRP-990009 for an Air Pollution Control District (hereinafter referred to as "the District") Authority to Construct and Permit to Operate for equipment located at 2205 E Belt St Foot of Sampson San Diego CA 92113 in San Diego County, the District has decided on the following actions:

This Startup Authorization is granted pursuant to Rule 21 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

May operate ship building and repair facility consisting of:

1. Marine coating operations to apply coatings on ships and related structures intended for exposure to a marine environment at BAE Systems San Diego Ship Repair's facility including: 3 piers up to 700 feet in length, one 22,000-ton floating dry dock, one 55,000-ton floating dry dock, various open paint areas and temporary structures of various sizes.
2. Equipment required when spray applying any coatings that contain Cr, Pb, Mn, Ni, Cd, As, or Be: either a structure with a full roof and at least three complete walls or complete side curtains or a mobile ventilated structure as defined in this permit to operate. These structures shall be equipped with high efficiency filters in compliance with this permit and shall ensure that air is drawn into the structure when in use.
3. Welding operations consisting of hot work permit processes including but not limited to GMAW, SMAW, FCAW, Brazing, GTAW, and SAW, Mechanically Attached Fittings (MAF), and indoor welding shop air pollution control devices equipped with HEPA filters.

This Startup Authorization is issued with the following conditions:

1. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall receive prior District approval by applying for and obtaining an Authority to Construct for all such modifications. (Rule 51)
2. All marine coating operations conducted at this stationary marine coating source shall be conducted under a valid stationary Permit to Operate (PTO). For the purposes of this condition, a stationary marine coating source (SIC 3731) is a piece of land or contiguous pieces of land under common ownership or entitlement to use, where the combined usage of marine coatings is greater than 20 gallons in any consecutive 12-month period or the combined VOC emissions from marine coating operations are greater than 150 pounds in any consecutive 12-month period. Portable equipment shall not supplant or supplement the primary activity of a stationary source as described by the source's Standard Industrial Classification Code (SIC).
3. All equipment associated with air contaminant emissions from this operation or that affects the air contaminant emissions shall not deviate from the above equipment description. The permittee shall submit an application to the

COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT**10124 OLD GROVE ROAD, SAN DIEGO, CA 92131****PHONE (858) 586-2600 Fax (858) 586-2601****www.sdapcd.org**

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

District and wait for approval in writing prior to modifying any such equipment. (Rule 10)

4. Permittee shall only apply coatings using one of the following methods: High Volume Low Pressure (HVLV) spray application, airless spray gun, electrostatic spray application, dip coat, roll coat or hand application methods (brushes, rollers, markers, marking pens, etc.). Alternatively, an equivalent application method that has been approved by the District in writing might be used. (Rule 20.2)
5. The total Volatile Organic Compound (VOC) emissions from this operation shall not exceed an average of 3000 pounds per day. The average daily emissions shall be calculated by dividing the total VOC emissions in a calendar month by the number of days on which coating operations are conducted in that calendar month. (Rule 20.3)
6. Total emissions of Volatile Organic Compounds (VOC) from all marine coating equipment operated under this permit to operate shall not exceed 40 tons in any consecutive 12 months (Rule 20.3).
7. Curtains or shroudings shall be used during painting operations when wind speed exceeds 10 miles / hour.
8. Marine coating operations shall comply with all applicable requirements of Rule 67.18. (Rule 67.18)
9. The VOC content of non-specialty coatings for marine coating operations subject to Rule 67.18 shall not contain more than 340 grams per liter VOC for air dried coatings and not more than 275 grams per liter for baked coatings. (Rule 67.18)
10. Marine surface preparation materials shall meet one of the following requirements:
 - a) the VOC content does not exceed 200 grams per liter (1.67 pounds per gallon), as applied; or
 - b) the initial boiling point is at least 190° C (374° F); or
 - c) the total VOC vapor pressure is 45 mm Hg or less at 20° C (68° F).(Rule 67.18)
11. Cleaning of equipment used in marine coating operations shall meet one of the following requirements:
 - a) the application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning materials is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases, or
 - b) a system that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes, or
 - c) a device, approved prior to use by the Air Pollution Control Officer, which has been demonstrated to be as effective as any of the equipment described above in minimizing VOC emissions to the atmosphere.(Rule 67.18 and 20.3)
12. The Permittee shall maintain record keeping for marine coating operations in accordance with Rule 67.18 and this permit to operate. The records shall contain, at a minimum, the following information:
 - a) current list of coatings, coating components (bases, catalysts, thinners, etc.), surface preparation materials and equipment cleaning materials in use. Materials shall be identified as follows:
 1. coatings shall specify category as per Rule 67.18(D)(1) or 67.18(D)(2) manufacturer name, manufacturer identification, VOC content and mix ratio;
 2. coating components shall specify manufacturer name, identification, VOC content and mix ratio;
 3. surface preparation materials and equipment cleaning materials shall specify manufacturer name and manufacturer identification (VOC content, vapor pressure and boiling point shall be listed as applicable);
 - 4) current documentation to demonstrate applicability of any specialty coating category pursuant to Rule 67.18(D)(2);
 - b) current Material Safety Data Sheets (MSDS) or manufacturer's specifications for all materials containing VOCs and/or TACs. MSDS and manufacturer's specifications shall, at minimum, contain the following information: VOC content weight or weight percentage, TAC content weight or weight percentage and material density (weight per volume) or material specific gravity (material density relative to the density of water);
 - c) type of application equipment used;
 - d) daily or monthly usage records shall be kept for all materials containing VOC. If monthly records are maintained, the number of operating days per calendar month shall be recorded; and,
 - e) daily or monthly VOC emissions.
13. All records required by this permit, including emission and usage records, shall be maintained on site for at least

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

five (5) years and made readily available to the District upon request. (MACT HHHHHH)

14. All materials containing Volatile Organic Compounds shall be stored in closed containers in accordance with Rule 67.17 requirements. (Rule 67.17)
15. All chemical strippers that contain methylene chloride (MeCl CAS 75-09-2) shall be stored in closed containers. (MACT HHHHHH)
16. The permittee shall comply with the requirements in conditions 18 through 25 when spray applying any coating containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic. For the purposes of this condition, spray application means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. Spray-applied coatings do not include the following materials or activities: coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters) or surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electro deposition coating, web coating, coil coating, touch-up markers, or marking pens. (MACT HHHHHH).
17. The permittee shall comply with the requirements in conditions 18 and 19 when spray applying any coating containing beryllium (Be) or arsenic (As). For the purposes of this condition spray applied means using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. Spray-applied coatings do not include the following materials or activities: surface coating application using powder coating, hand-held or non-refillable aerosol containers, and non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electro deposition coating, web coating, coil coating, touch-up markers, and marking pens. (Rule 1200)
18. Spray application of materials containing chromium, lead, manganese, nickel, cadmium, beryllium or arsenic shall only occur within a structure that meets the following requirements:
 - a) ventilated so that air is drawn into the structure, and
 - b) equipped with filters that achieve 98% capture efficiency, and
 - c) equipped with full roof and at least three complete walls or complete side curtains, or
 - d) a mobile ventilate structure, which encloses and, if necessary, seals against the surface around the area being coated such that paint overspray is retained within the structure and directed to the filter.(MACT HHHHHH / Rule 1200)
19. The filter used for the coating operation described above shall achieve at least 98% capture efficiency of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method Standard 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". For the purposes of this condition, a test consistent with method 52.1 shall meet all of the following parameters:

The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi); the air flow rate across the filter shall be 150 feet per minute.

Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. (NESHAP HHHHHH)

20. 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 the container that collects used gun cleaning solvent. (MACT HHHHHH)
21. All painters must complete a training course that meets the requirements specified in the following condition within 180 days after hiring or 180 days after the Construction Completion Notice is submitted to the District, whichever is later. This certification will be valid for five (5) years. A refresher course must be completed for re-certification every five (5) years. (MACT HHHHHH)
22. The painters training course shall include at a minimum hands-on demonstration and classroom instruction in:

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

a) selection, set up, and operation of spray gun equipment, including measuring coating viscosity, selecting proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate; and,
b) spray techniques 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 substrate, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke; and,
c) routine spray booth and filter maintenance, including filter selection and installation.
(MACT HHHHHH)

23. The permittee shall submit a report to the District every calendar year in which information previously submitted has changed. This report should include changes associated with the initial notification required by §63.11175(a), or Notification of Compliance, or a previous annual notification of changes report submitted under this condition. This report shall include any deviations from relevant requirements under § 63.11173 (e) - (g), which includes:

a) proper training of all painters;
b) use of proper application equipment (e.g. HVLP);
c) use of spray booth when coatings are applied, with proper ventilation and filters;
d) proper cleaning of application equipment.
(MACT HHHHHH)

24. The annual notification of changes report must be submitted to the District prior to March 1 of each calendar year when reportable changes have occurred and must include the following information:

a) the company's name and the street address (physical location) and the street address where compliance records are maintained, if different;
b) the name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification;
c) a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
(MACT HHHHHH)

25. The permittee shall maintain recordkeeping in accordance with NESHAP HHHHHH. These records shall include the following information:

a) current list of personnel by name and job description that are required to be trained;
b) records describing the methods being used to train the painters including demonstration that the training meets all the requirements specified in this Authority to Construct;
c) type of application equipment used;
d) manufacturer data on the exhaust filter's efficiency;
e) any notifications, initial or compliance status, as required by § 63.11175;
f) any notification of changes reports submitted required by § 63.11176;
g) records of any assessments of source compliance performed in support of the initial notification, notification of compliance status or annual notification of changes report.
(MACT HHHHHH)

26. In addition to all of the conditions in this permit, the following four conditions shall apply when a contractor conducts any marine coating operation under this permit. For the purposes of this permit, a contractor is any person not employed by this stationary source and the permittee is employed by the stationary source.

27. Contractors performing marine coating operations shall be provided a copy of this permit prior to commencing coating operations. (Rule 21)

28. Contractors shall report the following information to the permittee for each marine coating operation conducted under this permit in a format approved by the permittee. The information under items A and B shall be provided to the permittee prior to commencing any marine coating operation.

a) current list of coatings, coating components (bases, catalysts, thinners, etc.), surface preparation materials, and equipment cleaning materials in use. Materials shall be identified as follows:
1. coatings shall specify category as per Rule 67.18(D)(1) or 67.18(D)(2), manufacturer name, manufacturer identification, VOC content, and mix ratio;
2. coating components shall specify manufacturer name, identification, VOC content and mix ratio;

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

3. surface preparation materials and equipment cleaning materials shall specify manufacturer name and manufacturer identification (VOC content, vapor pressure and boiling point shall be listed as applicable), and; 4. current documentation to demonstrate applicability of any specialty coating category pursuant to Rule 67.18(D)(2);

b) current Material Safety Data Sheets (MSDS) or manufacturer's specifications for all materials containing VOCs and/or TACs. MSDS and manufacturer's specifications shall, at minimum, contain the following information: VOC content weight or weight percentage, TAC content weight or weight percentage and material density (weight per volume) or material specific gravity (material density relative to the density of water);

c) type of application equipment used;

d) daily or monthly usage records shall be kept for all materials containing VOC. If monthly records are maintained, the number of operating days per calendar month shall be recorded; and,

e) daily or monthly VOC emissions.

(Rule 67.18 and 21)

29. Contractors shall comply with all conditions in this permit to operate. (Rule 21)
30. The permittee shall ensure the usage and/or emission limitation in this permit is not exceeded based on the usage records obtained from the contractor.
31. The owner or operator shall use Mechanically Attached Fitting (MAF) technology on piping systems that are approved by Southwest Regional Maintenance Center (SWRMC). (Rule 1210)
32. The owner or operator shall maintain records of when the Mechanically Attached Fitting (MAF) technology is utilized. On a calendar year basis, the owner or operator shall determine the percentage of welding operations replaced with MAF technology using summed daily hot welding usages and MAF application records included in that period. (Rule 1210)
33. All welding operations conducted indoors must be vented to air pollution control equipment consisting of exhaust hoods and a baghouse equipped with HEPA filtration.
34. By December of 2025 or sooner, the owner or operator shall demonstrate that, on an annual basis, at least 20% of Nickel based welds are replaced with the use of MAF technology. Alternatively, if the annual usage of MAF Technology is less than 20%, the owner or operator shall comply with the following requirement for Nickel emissions from welding operations:

a. Air emissions of Nickel (CAS #: 7440-02-0) from outdoors welding operations shall not exceed 0.015 pounds (lbs) per hour from all outdoors welding operations; and,

b. Hourly Nickel emissions from outdoors welding operations shall be calculated as follows: $\text{Hourly Emissions} = U / H \times F$

Where U = Welding material usage daily minus waste (lb material/day)

H = Number of hours in a shift (hr/day) estimated as:

4 hours/day for welding material daily usage less than < 11 lbs/day or

8 hours/day for welding material daily usage greater than and equal to ≥ 11 lbs/day

F = Welding emission factors specific to process and material (lb pollutant emitted/lb rod used) where only the latest approved San Diego County Air Pollution Control District emission inventory factors or alternative emission factors approved by the District in writing shall be applied.

35. If by December 2025 the owner or operator does not meet the above specified requirements that at least 20% of nickel based welds are replaced with the use of MAF technology on an annual basis, and alternatively does not meet the above specified total Nickel air emissions from outdoors welding operations of 0.015 lbs per hour, the owner or operator shall submit a revised Risk Reduction and Audit Plan in accordance with Rule 1210(e)(10). The revised risk reduction audit and plan shall include the following:

a. A justification for why the owner or operator has not utilized the MAF technology for at least 20% of the nickel based welds on an annual basis.

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

- b. A justification for why the owner or operator has not complied with the nickel air emissions on an hourly basis.
 - c. A proposal specifically showing how the Acute Health Hazard Index will be below 1 within 5 years from the date this authorization is issued.
36. The owner or operator shall comply will all applicable provisions of Rule 1210.
37. The permittee shall maintain records for the stationary source for the purposes of complying with the approved RRAP and Rule 1210. The records shall include the following information (Rule 1210):
- a. Daily record of Mechanically Attached Fitting (MAF) usage;
 - b. Annual percentage of all welding operations that are replaced with the use of MAF technology;
 - c. Navy Standard Items certifications obtained for MAF technology;
 - d. Daily usage records of all welding consumables in pounds per day (lbs/day), including waste/leftover spools if waste is deducted from usage in emission calculations;
 - e. Type of welding process used per material and location(s);
 - f. Current manufacturer specification sheets, safety data sheets (SDS), product data sheets, or technical bulletins for all materials in use, which shall list all components within each welding material and shall include content weight or weight percentage of Nickel and other toxic air contaminant (TAC) contained in each material;
 - g. Hourly Nickel emissions from outdoors welding operations as calculated and referenced in accordance with the conditions in this permit.
38. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
39. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
40. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT
10124 OLD GROVE ROAD, SAN DIEGO, CA 92131
PHONE (858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

Sectors: 5, P
Site Record ID: APCD1980-SITE-00204
Application Record ID: APCD2022-RRP-990009



Startup Authorization Expires:
March 20, 2024

This authorization is for temporary operation of the above-specified equipment. This temporary Permit to Operate will remain in effect, unless withdrawn or modified by the District or a Permit to Operate is granted or denied.

This Startup Authorization shall be posted on or within 25 feet of the described equipment or maintained readily available at all times on the operating premises.

This Startup Authorization does not relieve the holder from obtaining permits or authorizations, which may be required by other governmental agencies. This Startup Authorization is not an authorization to exceed any applicable emission standard established by this District or any other governmental agency. This authorization is subject to cancellation if any emission standard or condition is violated.

Within 30 days after receipt of this Startup Authorization, the applicant may petition the Hearing Board for a hearing on any conditions imposed herein in accordance with Rule 25.

This Startup Authorization will expire on March 20, 2024, unless an extension is granted in writing.

If you have any questions regarding this action, please contact me at 858-586-2703 or via email at allison.weller@sdapcd.org.

Allison Weller

Sr Air Pollution Control Eng

CC: Compliance Division