

Internal Use Only	
APP ID: APCD	-APP/CER-
SITE ID: APCD	-SITE-

**GENERAL PERMIT OR  
REGISTRATION  
APPLICATION FORM**



**Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).**

**REASON FOR SUBMITTAL OF APPLICATION:**

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> New Installation  | <input type="checkbox"/> Existing Unpermitted Equipment or Rule 11 Change | <input type="checkbox"/> Modification of Existing Permitted Equipment                             |
| <input type="checkbox"/> Amendment to Existing Authority to Construct or Application | <input type="checkbox"/> Change of Equipment Location                     | <input type="checkbox"/> Change of Equipment Ownership <i>(please provide proof of ownership)</i> |
| <input type="checkbox"/> Change of Permit Conditions                                 | <input type="checkbox"/> Change Permit to Operate Status to Inactive      | <input type="checkbox"/> Banking Emissions  |
| <input type="checkbox"/> Registration of Portable Equipment                          | <input type="checkbox"/> Other (Specify) _____                            |   |

List affected APP/PTO Record ID(s): \_\_\_\_\_

**APPLICANT INFORMATION**

Name of Business (DBA) \_\_\_\_\_

Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations?  Yes  No

If yes, list assigned Site Record IDs listed on your Permits \_\_\_\_\_

Name of Legal Owner (if different from DBA) \_\_\_\_\_

**Equipment Owner**

**Authority to Construct Mailing Address**

Name:	Name:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone: ( )	Phone: ( )
E-Mail Address:	E-Mail Address:

**Permit To Operate Mailing Address**

**Invoice Mailing Address**

Name:	Name:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone: ( )	Phone: ( )
E-Mail Address:	E-Mail Address:

**EQUIPMENT/PROCESS INFORMATION:** Type of Equipment:  Stationary  Portable, *if portable please enter below the equipment storage address.* If portable, will operation exceed 12 consecutive months at the same location  Yes  No

Equipment Location Address \_\_\_\_\_ City \_\_\_\_\_ State: \_\_\_\_\_

Parcel No. \_\_\_\_\_ Zip \_\_\_\_\_ Phone ( ) \_\_\_\_\_ E-mail: \_\_\_\_\_

Site Contact \_\_\_\_\_ Phone ( ) \_\_\_\_\_

General Description of Equipment/Process \_\_\_\_\_

Application Submitted by  Owner  Operator  Contractor  Consultant Affiliation \_\_\_\_\_

**EXPEDITED APPLICATION PROCESSING:**  I hereby request Expedited Application Processing and understand that:

- a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

**This application contains trade secret or confidential information (see reverse for instructions)**

**I hereby certify that all information provided on this application is true and correct.**

SIGNATURE \_\_\_\_\_ Date \_\_\_\_\_

Print Name \_\_\_\_\_ Company \_\_\_\_\_

Phone ( ) \_\_\_\_\_ E-mail Address \_\_\_\_\_

**Internal Use Only**

Date _____	Staff Initials: _____	Amt Rec'd \$ _____	Fee Schedule _____
RNP: _____	EMF: _____	NBF: _____	TA: _____

GEN\_APP\_Form\_Rev Date: Aug. 2017

Date:	11 JAN 2023
To:	Jim Swaney, P.E., Sr. Air Pollution Control Engineer, Air Quality Specialist AB2588 Hot Spots Program and Health Risk Assessments San Diego Air Pollution Control District
From:	Jess Stengel, EHS MGR, Compucraft Ind. Inc.
Subject:	<b>Compucraft Risk Reduction Audit Plan based on the combined 2015/2019 Health Risk Assessment</b>

## 1.0 INTRODUCTION

Compucraft Industries Inc. received a letter from the San Diego Air Pollution Control District (SDAPCD or District) on July 15, 2022, indicating that the District approved Compucraft’s modified Health Risk Assessment (HRA) for the combined 2015/2019 emissions inventories (herein after referred to as (2015)). During both Hot Spot reporting periods the Health Risk Assessments showed that there were two values which exceeded District limitations. Maximum Residential Acute Non-Cancer Health Hazard Index, and, Maximum Worker Acute Health Hazard Index both exceeded the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively. There were three main contributors to the elevated HRA Priority Scores: a blasting device using aluminum oxide; and, two polymer coatings both containing forms of diisocyanate,

Compucraft has fulfilled the public notification requirements. This document presents the Risk Reduction Audit Plan (RRAP) for the acute noncancer health risk. This RRAP is due to the District on January 11, 2023.

Upon further review of the data from 2015 and 2019, and subsequent to a personnel change at Compucraft, it has been determined that the inventory data submitted to SDAPCD for the Hot Spot years 2015 and 2019 had multiple errors. Regarding the emissions from the blasting operation, the device’s dust collector was omitted from the description reported and simultaneously, the non-volatile control efficiency (manufacturer’s value 99%) was not reported at all. The errors were corrected by resubmitting corrected inventory forms, data and supporting documentation. This resulted in the lowering of the risk score. The blasting operations data referred to here for the 2015 and 2019 Hot Spot years has been reviewed and accepted by SDAPCD inventory.

The data submitted for the spray application of two aerospace coatings containing diisocyanate was also reported in error. In both cases, for both reporting periods, the “Maximum Hourly Usage” was over-reported due to a misunderstanding or misinterpretation about how to derive that value from existing data. The corrected values and supporting data are in the process of being re-submitted to SDAPCD Inventory at the time of this RRAP submission. Therefore, the corrected data has not been reviewed by SDAPCD. It is Compucraft’s observation that the corrected values and supporting documentation will lower the priority scores to less than one for both reporting periods. However, Compucraft was informed that the requirement to complete this RRAP will continue to exist regardless of the lowering of the Priority Scores. Compucraft is now in the process of submitting the corrected inventory data for the combined periods 2015/2019 with the supporting documentation for SDAPCD review.



### 3.0 RISK REDUCTION PLAN ELEMENTS

The following sections present the required elements of the RRAP, as prescribed in SDAPCD Rule 1210. Responses are provided in blue font.

Rule 1210 (e)(2) states: “The risk reduction audit and plan shall comply with the requirements of Subsection (e)(2). Such risk reductions shall be accomplished within five years of the date the plan is approved by the Air Pollution Control Officer, unless an extension has been granted pursuant to Subsections (e)(4) or (e)(5).”

i. The name and location of the stationary source.

Compucraft Industries Inc., 8881 Olive Lane, Santee, CA 92071

ii. A facility risk characterization which includes an updated emissions inventory report and health risk assessment, if the risk due to total facility emissions has increased to above or decreased to below the levels indicated in the previously approved health risk assessment.

The updates to the inventory report are as follows:

#### Under 2015 PAINTING AND SURFACE COATING OPERATIONS

- 1) Correct the Maximum Hourly Usage value reported for BAC 5710 Type 51
  - a. Current, incorrect value: 0.08 gal/hour
  - b. New, correct value calculated from paint logs: 0.00641025 gal/hour
- 2) Correct the Maximum Hourly Usage value reported for BMS 10-86
  - a. Current, incorrect value: 0.125 gal/hour
  - b. New, correct value calculated from paint logs: 0.000171875 gal/hour

#### Under 2019 PAINTING AND SURFACE COATING OPERATIONS

- 3) Correct the Maximum Hourly Usage value reported for BAC 5710 Type 51
  - a. Current, incorrect value: 0.08 gal/hour
  - b. New, correct value calculated from paint logs: 0.00641025 gal/hour
- 4) Correct the Maximum Hourly Usage value reported for BMS 10-86
  - a. Current, incorrect value: 0.125 gal/hour
  - b. New, correct value calculated from paint logs: 0.000171875 gal/hour
- 5) Submit these corrections with supporting documentation (paint logs and MSDS) to SDAPCD Inventory for review.

(iii) The identification of all the emission unit(s) for which the owner or operator proposes to reduce toxic air contaminant emissions and the identification of the airborne toxic risk reduction measures proposed for implementation to reduce such emissions, and the anticipated emission and health risk reductions.

The emission units or operations affected are:

- 1) ABRASIVE BLASTING OPERATIONS where the measures implemented were to correct the reporting of the blasting device by including an existing dust collector and to also properly include the manufacturer's value for Non-Volatile Control Efficiency (%): 99%.
  - a. Reduction in HRA Priority Score was 6.68 for 2015, the exact 2019 figure is unknown by Compucraft and will be requested. It is thought to be a 99% reduction.
- 2) PAINTING AND SURFACE COATING OPERATIONS where the measures currently undergoing implementation are to: a) correct the Maximum Hourly Usage values reported for BAC 5710 Type 51, and BMS 10-86, and to submit these corrections to SDAPCD Inventory for review.
  - a. Reduction in HRA Priority Score is anticipated to be 11.6 for the BMS 10-86, and a reduction of 2.87 for the BAC 5710 Type 51 in 2015
  - b. Reduction in HRA Priority Score is not available to Compucraft since we don't know what it is now. We anticipate the reductions to be slightly less than in 2015 since less material was sprayed in 2019. The value we have calculated. It will be approximately 0.13 for the BMS 10-86, and 0.22 for the BAC 5710 Type 51 in 2019

(iv) A schedule for implementing the proposed airborne toxic risk reduction measures within five years. The schedule shall include specific increments of progress towards implementing the airborne toxic risk reduction measures.

Measures to correct the errors in 2015 and 2016 data submission for the blasting device have already taken place and were accepted by SDAPCD. Compucraft received notice of the 2015 and 2019 Revised Toxic Emissions Reports on November 29, 2022 under Emissions Inventory ID: 200003995.

The Revised 2015 emission inventory resulted in the following prioritization scores:

cancer = 0.30, chronic = 0.01, and acute = 15.29.

The Revised 2019 emission inventory resulted in the following prioritization scores:

cancer = 0.41, chronic = 0.01, and acute = 10.69.

(v) A demonstration, including supporting documentation such as emission calculations, that the proposed airborne toxic risk reduction measures will reduce or eliminate toxic air contaminant emissions from the stationary source. The demonstration shall be made through analogy with the approved health risk assessment for the stationary source or by submission of a revised forecast risk assessment. The demonstration also shall include any foreseeable new or increased emissions of toxic air contaminants from the stationary source and the estimated health risks resulting from such new or increased emissions during the period approved for implementation of the risk reduction audit and plan.

The demonstration is inherent in the mathematics of the corrections to the inventory errors.

(vi) A schedule for providing progress reports on reductions in emissions of toxic air contaminants and estimated health risks achieved under the implemented plan. Progress reports shall include a technology review, as applicable, that provides an update on new emissions reducing technologies, and shall be provided not less frequently than within 12 months from when the plan is approved, and annually thereafter, and may be incorporated into emission inventory report updates required pursuant to Section 44344 of the California Health and Safety Code.

The progress of this RRAP will be directly tied to timetable for communication between Compucraft and SDAPCD. A reasonable estimate at this time is that we will both conclude our communications and calculation reviews by April 1, 2023. There will be no further work to be done as this is merely a correction.



**SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT  
APPLICATION FEE ESTIMATE**

Applicant Site ID/EIF ID:	APCD2000-SITE-03995	Enter PTO/TVP for Modifications
Applicant DBA:	Compucraft Ind Inc	Fee Schedule: RRP
		Reason for Submittal: Modification
APCD Engineer:	Jim Swaney	Existing Site? Yes
Equipment Description:	Risk Reduction Plan for 2015/2019 Hot Spots HRA	Estimate Date: 1/11/2023

ACTIVITY	EMPLOYEE CLASSIFICATION	LABOR HOURS	COST	SUBTOTAL
----------	-------------------------	-------------	------	----------

**Initial Evaluation Fee - T&M (Rule 40(d)(3)(i))**

Authority to Construct	Engineering Services		\$0.00		ETM
Permit to Operate	Engineering Services	10.0	\$2,380.00	\$2,380.00	ETM

**T&M Application - No Fixed Fee, see above**

Authority to Construct/Permit to Operate		N/A	T+M	\$0.00	ETM
--	--	-----	-----	--------	-----

**Additional Evaluation and Processing Fees (Rule 40(d)(5))**

New Source Review	Engineering Services		\$0.00	\$0.00	NSR
	Monitoring Services		\$0.00	\$0.00	AQI
Prev. Significant Deterioration	Engineering Services		\$0.00	\$0.00	PSD
Toxics New Source Review (Health Risk Assessment)	Engineering Services		\$0.00		
	Monitoring Services		\$0.00		
	HRA Base Estimate	Standard	\$2,536.00	\$2,536.00	TNS
Tile V	Engineering Services		\$0.00	\$0.00	TIV
NESHAPS/ATCM/NSPS	Engineering Services		\$0.00	\$0.00	HAP
CEQA	Engineering Services		\$0.00	\$0.00	CEQ
AB 3205 Notice	Engineering Services		\$0.00		
	Public Notice Costs		\$0.00	\$0.00	AB3
Equipment subject to Rule 11(a)(3)	Engineering Services		\$0.00	\$0.00	R51
H&SC 42301(e)	Engineering Services		\$0.00	\$0.00	HSC
Testing or Test Witness	Engineering Services		\$0.00		STF
	Source Testing Services		\$0.00		ad-hoc
Fixed Test Fee Sched.	NA	Fixed Testing Fees	\$0.00	\$0.00	ad-hoc

**Miscellaneous Fees**

Processing Fee (Rule 40(d)(1)(ii))		1.0	\$98	\$98.00	EFX
Renewal Fee (Rule 40(e)(2)(ii))		N/A	N/A	\$0.00	REN
Emissions Fee (Rule 40(e)(2)(iv))			N/A	\$0.00	EMF

**NOTES:**

ESTIMATE TOTAL: \$5,014.00

- (1) To avoid possible processing delays, this document should be submitted with your application forms.
- (2) The fees contained in this estimate are based on APCD Rule 40. Final fee may be more or less than this estimate (see Rule 40(d)(1)(iii)).
- (3) Emissions determined to be greater than 5 tons per year will be charged a emission fee on a ton per year basis. (see Rule 40 (e)(2)(iv)(A))
- (4) Fees paid by credit card will be assessed a 2.19% processing fee (see Rule 40(c)(5))
- (5) Federal government payments made through DFAS: Please reference the above list Site ID Record number in your DFAS submittal.
- (6) This estimate is valid only for applications received by the District by June 30, 2023