

**STATEMENT OF BASIS
Title V Permit Renewal**

Facility Name: Fleet Readiness Center Southwest (FRCSW)

Title V Application Number: APCD2015-APP-004084

Title V Permit Number: APCD2008-TVP-960383

Facility ID: APCD1978-SITE-02756

Equipment Address: Naval Air Station North Island,
Coronado, CA 92135

Facility Contact: Dr. Shekar Viswanathan
Contact Phone: 619-545-4682

Senior Engineer: Nicholas Horres

Date: April 7, 2026

 Recoverable Signature

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Nicholas Horres
Senior Engineer

Signature: Signed by: e933f2c8-9225-4b84-9a71-81071ff0330b

1.0 Type of Action and Summary of Changes

This statement of basis reviews the application for renewal of a Title V permit to operate for The Navy's Fleet Readiness Center Southwest (FRCSW), Naval Air Station North Island, Coronado, CA. The current overall Title V permit expired on June 15, 2016. The District received the application for a permit renewal on June 15, 2015, which is in compliance with the requirement for a timely renewal application, at least 12 months, but not more than 18 months, before the expiration of the existing Title V permit. The application was deemed complete on June 15, 2015. Hence, an application shield pursuant to Rule 1410 (a) is in effect for the facility until the District takes action on the renewal application.

The renewal permit was initially proposed and sent to EPA for review and concurrent public comment on October 19, 2016. At this time, the facility raised a significant number of comments and the District determined that additional review was necessary to address the comments and that likely the changes would require renoticing. Subsequently, there have been significant changes at the facility along with program changes at the District that delayed the additional review. To ensure that the permit issued most accurately reflects the current state of the facility,

this statement of basis incorporates the changes from the original statement of basis, will address the additional comments from the facility, and will incorporate all other changes up to current date.

As part of the Title V renewal process, the District has also made a preliminary decision to take the following actions, which are further discussed below:

- Incorporate several recently approved District permits for new emission units into the Title V permit with changes as necessary to address Title V requirements,
- Incorporate several recently approved District permits for modified existing emission units into the Title V permit with changes as necessary to address Title V requirements,
- Incorporate Title V actions associated with changes made to permits through non-Title V applications
- Add new applicable requirements to permits where necessary,
- At the applicant’s request, change conditions that reflect only state or District requirements for toxic air contaminants from federally enforceable to District-only enforceable,
- At the applicant’s request, revise the permit conditions for several permits to reflect their nonoperational status under their District permit.
- Remove retired permits from the Title V permit, and

Enhance monitoring, reporting, and recordkeeping requirements, clarify permit conditions and their basis, correct and update emission unit descriptions and correct typographical errors.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal:

The follow tables describe each application for a change to the Title V permit, each application for a new or modified District permit and each permit which has been retired since the last Renewal (the tables include actions that occurred prior to the original noticing of this renewal, and changes since). Additionally, a revised Title V permit incorporating multiple 502(b)(10) changes was issued on July 14, 2014 and the changes included in this revision are also included in the table below for clarity.

The following table summarizes all previous applications at this facility affecting the Title V permit.

Title V Application History Since Initial Title V Permit		
Application Number	Application Description	Approved?
APCD2005-APP-983393	502(b)(10), Modification to Thermal Spraying	Approved
APCD2013-APP-002711	Admin, RO change	Approved
APCD2013-APP-003117	502(b)(10), New Abrasive Blast	Approved

APCD2013-APP-003127	502(b)(10), Degreaser Condition Change	Approved
APCD2014-APP-003372	502(b)(10) Add new 67.11 rule requirements (wood coating)	Approved
APCD2014-APP-003434	Admin, Add non-federally enforceable ATCM conditions	Approved
APCD2014-APP-003578	502(b)(10) Correct inadvertently added conditions	Approved
APCD2014-APP-003698	Admin, Change RO	Approved
APCD2014-APP-003829	502(b)(10) Add new grinding booth	Approved
APCD2015-APP-004003	502(b)(10) Add shared control device for depainting (chemical)	Approved
APCD2015-APP-004033	Minor Mod, Modify Chrome Conversion	Approved
APCD2015-APP-004084	Renewal App	Open – Included in this action
APCD2015-APP-004102	LKR of Abrasive Blasting	Approved
APCD2015-APP-004211	502(b)(10), replacement of Abrasive Blasting	Approved
APCD2016-APP-004546	Admin, Change RO	Approved
APCD2016-APP-004763	Minor Mod, Replace Degreaser	Open – Included in this action
APCD2017-APP-004780	502(b)(10), Modify Chrome Conversion	Approved
APCD2017-APP-005185	Minor Mod, Boiler Installation	Open – Included in this action
APCD2018-APP-005298	502(b)(10), Abrasive Blast Condition Change	Open – Included in this action
APCD2018-APP-005347	Admin, RO change	Open – Included in this action
APCD2018-APP-005519	Minor Mod, Add Chemical Passivation Tank	Open – Included in this action
APCD2020-APP-006230	502(b)(10) Replacement of Abrasive Blasting	Open – Included in this action

APCD2020-APP-006385	502(b)(10) Replacement of Abrasive Blasting	Open – Included in this action
APCD2021-APP-006968	New dip tank/solvent cleaning	Open – Included in this action
APCD2022-APP-007414	Minor mod, new abrasive blast hanger	Open – Included in this action
APCD2022-APP-007415	Minor mod, new aerospace coating operation	Open – Included in this action
APCD2023-APP-007953	502(b)(10) Replacement of Abrasive Blasting	Open – Included in this action
APCD2024-APP-008414	LKR Degreaser Replacement 502(b)(10) change	Open – Included in this action
APCD2025-APP-008643	502(b)(10) Amendment to change chromate conversion tank conditions	Open – Included in this action
APCD2025-APP-008680	Minor Mod, new grinding booth (note: was originally submitted as a 502(b)(10) change, but since a new unit will be processed as a minor mod	Open
APCD2025-APP-008758	502(b)(10) Replacement of Degreaser	Open
APCD2025-APP-008885	Minor Mod, condition change w/ emission increase	Open

Since the previous renewal, the District has received applications from this facility as shown in the following table. These applications are submitted under the District’s local permitting program and typically are associated with a corresponding Title V application to implement the same change to the Title V permit once the modified local permit is issued (see appendix A of the permit). Of note is that the Navy did not file Title V applications for equipment inactivations and in only some cases filed applications for like kind replacements (LKR) which are equipment replacements typically categorized as 502(b)(10) changes.

Application History for facility since most recent renewal				
Application Number	Affected Permit to Operate(s)	Description	Outcome	Related Title V App
APCD2005-APP-983393	APCD2007-PTO-880835	502(b)(10), Modification to Thermal Spraying	Approved	Included in same app
APCD2008-APP-986239	APCD2003-PTO-900053	Modification to Electroplating/Anodizing	Approved	None Filed
APCD2011-APP-001531	APCD2007-PTO-890333	Replacement of Abrasive Blasting	Approved	None Filed

APCD2013-APP-003112	APCD2016-PTO-002579	New Abrasive Blast Equipment	Approved	APCD2013-APP-003117
APCD2013-APP-003226	APCD2015-PTO-002488	New Metal Deposition Process	Approved	Minor Mod Form Included with App
APCD2014-APP-003828	APCD2017-PTO-002799	New Grinding Booth	Approved	APCD2014-APP-003829
APCD2015-APP-003935	APCD2003-PTO-005403	Coating Operation Condition Changes	Approved	APCD2015-APP-004003
APCD2015-APP-003936	APCD2003-PTO-005402	Coating Operation Condition Changes	Approved	APCD2015-APP-004003
APCD2015-APP-004032	APCD2003-PTO-971079	Modify Chromate Conversion Tank	Approved	APCD2015-APP-004033
APCD2015-APP-004094	APCD2008-PTO-910891	LKR Abrasive Blasting	Approved	APCD2015-APP-004211
APCD2015-INA-000161	APCD2009-PTO-020873	Inactivation	Approved	NA
APCD2016-APP-004517	APCD2007-PTO-900204	LKR Cadmium Vapor Deposition	Approved	None Filed
APCD2016-APP-004764	APCD2018-PTO-003021	New Degreaser	Approved	APCD2016-APP-004763
APCD2016-INA-000170	APCD2007-PTO-005808	Inactivation	Approved	NA
APCD2016-INA-000171	APCD2008-PTO-921189	Inactivation	Approved	NA
APCD2016-INA-000182	APCD2008-PTO-910891	Inactivation	Approved	NA
APCD2017-APP-004779	APCD2003-PTO-971082	Modify Chromate Conversion Tank	Approved	APCD2017-APP-004780
APCD2017-APP-004824	APCD2008-PTO-910891	Reactivation, LKR	Approved	APCD2015-APP-004094
APCD2017-APP-005047	APCD2018-PTO-003144	New Boiler	Approved	APCD2017-APP-005185
APCD2017-APP-005048	APCD2018-PTO-003145	New Boiler	Approved	APCD2017-APP-005185
APCD2017-APP-005048	APCD2018-PTO-003146	New Boiler	Approved	APCD2017-APP-005185
APCD2017-APP-005048	APCD2018-PTO-003147	New Boiler	Approved	APCD2017-APP-005185

APCD2017-APP-005048	APCD2018-PTO-003148	New Boiler	Approved	APCD2017-APP-005185
APCD2017-APP-005048	APCD2018-PTO-003149	New Boiler	Approved	APCD2017-APP-005185
APCD2017-INA-000191	APCD2008-PTO-004980	Inactivation	Approved	NA
APCD2017-INA-000192	APCD2008-PTO-985828	Inactivation	Approved	NA
APCD2017-INA-000193	APCD2008-PTO-960858	Inactivation	Approved	NA
APCD2018-APP-005315	APCD2007-PTO-005808	Reactivation of Abrasive Blasting	Approved	None - Reactivation
APCD2018-APP-005348	APCD2008-PTO-005481	Reactivation of Degreaser	Approved	None - Reactivation
APCD2018-APP-005430	APCD2020-PTO-003606	New Passivation Tank	Approved	APCD2018-APP-005519
APCD2018-APP-005541	APCD2008-PTO-860436	LKR Cold Solvent Tank	Approved	None Filed
APCD2018-APP-005578	APCD2003-PTO-005209	LKR Curing Oven	Approved	None Filed
APCD2018-APP-005600	APCD2003-PTO-005213	LKR Curing Oven	Approved	None Filed
APCD2018-INA-000228	APCD2013-PTO-001820	Inactivation	Approved	NA
APCD2019-INA-000238	APCD2008-PTO-921333	Inactivation	Approved	NA
APCD2020-APP-006229	APCD2007-PTO-004966	LKR Abrasive Blast Booth	Approved	APCD2020-APP-006230
APCD2020-APP-006378	APCD2007-PTO-005808	Replacement of Abrasive Blasting	Approved	APCD2020-APP-006385
APCD2020-APP-006379	APCD2007-PTO-005809	Replacement of Abrasive Blasting	Approved	APCD2020-APP-006385
APCD2020-APP-006380	APCD2007-PTO-005810	Replacement of Abrasive Blasting	Approved	APCD2020-APP-006385
APCD2020-APP-006381	APCD2009-PTO-005812	Replacement of Abrasive Blasting	Approved	APCD2020-APP-006385
APCD2021-APP-006969	APCD2022-PTO-004281	New Cold Solvent Degreaser	Approved	APCD2021-APP-006968

APCD2021-APP-006970	APCD2022-PTO-004282	New Cold Solvent Degreaser	Approved	APCD2021-APP-006968
APCD2021-INA-000275	APCD2009-PTO-020872	Inactivation	Approved	NA
APCD2022-APP-007249	APCD2023-PTO-004736	New Boiler	Approved	None
APCD2022-APP-007250	APCD2023-PTO-004737	New Boiler	Approved	None
APCD2022-APP-007412	APCD2024-PTO-004899	New Abrasive Blasting	Approved	APCD2022-APP-007414
APCD2022-APP-007413	APCD2024-PTO-005081, Affecting: APCD2008-PTO-005286 APCD2008-PTO-005287 APCD2008-PTO-005288 APCD2008-PTO-005289 APCD2008-PTO-005290 APCD2008-PTO-005291 APCD2008-PTO-005292 APCD2008-PTO-005293	New Paint Hanger	Approved	APCD2022-APP-007415
APCD2023-APP-007954	APCD2006-PTO-975820	Replacement Grinding Booth	Approved	APCD2023-APP-007953
APCD2024-APP-008409	APCD2024-APP-008409	Replace Degreaser	Approved	APCD2024-APP-008414
APCD2025-APP-008642	APCD2003-PTO-971081	Change Chromate Conversion Coating Conds.	Approved	APCD2025-APP-008643
APCD2025-APP-008681	NA	New Sanding Booth	Open, no ATC Issued	APCD2025-APP-008680
APCD2025-APP-008682	NA	New Grinding Booth	Open, no ATC Issued	APCD2025-APP-008680
APCD2025-APP-008751	NA	New Vapor Degreaser	ATC Issued	APCD2025-APP-008758
APCD2025-APP-008757	APCD2008-PTO-983669	Modify Cold Solvent Degreaser	Open, no ATC Issued	APCD2025-APP-008758
APCD2025-APP-008886 to	APCD2008-PTO-005286	Remove certain emission limits and increase other	Open, no ATC Issued	APCD2025-APP-008885

APCD2025-APP-008894	to 005293, APCD2024-PTO-005081	emission limits for aerospace coating ops		
APCD2025-APP-008730	APCD2003-PTO-900053	Replace Hard Chrome Plating	ATC Issued	None Submitted

The facility has also applied for and obtained registrations for the following registered equipment, which are not included in the Title V permit due to being insignificant units, but will be subject to federal requirements (Rule 69.2.2 enforceable).

Registered Equipment Applications			
Application Number	Registration Number	Description	Outcome
APCD2021-CER-000053	APCD2021-PTO-004116	Registered Boiler	Approved
APCD2021-CER-000053	APCD2021-PTO-004117	Registered Boiler	Approved
APCD2022-CER-000032	APCD2022-PTO-004315	Registered Boiler	Approved
APCD2022-CER-000033	APCD2022-PTO-004316	Registered Boiler	Approved

Additionally, the following permits/emission units have been retired/ceased operation since the previous Title V permit was issued and will no longer be contained in Appendix A of the permit.

Permit Number	Retirement Date	Description
APCD2007-PTO-900205	07/20/2011	Metal Vapor Deposition
APCD2006-PTO-901385	07/19/2012	Emergency Engine
APCD2007-PTO-970032	07/09/2015	Thermal Spray
APCD2007-PTO-977715	01/29/2016	Vacuum Cleaning System
APCD2008-PTO-004972	01/29/2016	Vapor Degreaser
APCD2008-PTO-005332	01/29/2016	Cold Solvent Cleaning
APCD2008-PTO-006249	01/29/2016	Engine Test Cell
APCD2008-PTO-006250	01/29/2016	Engine Test Cell
APCD2008-PTO-006251	01/29/2016	Engine Test Cell
APCD2008-PTO-006414	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-007050	01/29/2016	Engine Test Cell
APCD2008-PTO-860369	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-860370	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-860437	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-890085	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-920085	01/29/2016	Cold Solvent Degreaser
APCD2008-PTO-920086	01/29/2016	Cold Solvent Degreaser

APCD2008-PTO-971306	01/29/2016	Remote Reservoir Cleaner
APCD2009-PTO-860439	01/29/2016	Cold Solvent Degreaser
APCD2010-PTO-000702	04/26/2016	Portable Abrasive Blast Machine
APCD2007-PTO-861019	05/14/2017	Abrasive Blast Cabinet
APCD2008-PTO-004963	05/14/2017	Aerospace Coating
APCD2008-PTO-004970	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-004973	05/14/2017	Solvent Cleaning Booth
APCD2008-PTO-005006	05/14/2017	Aerospace Coating
APCD2008-PTO-005482	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-005483	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-006197	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-006198	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-006408	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-006413	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-860442	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-870136	05/14/2017	Paint Stripping Operation
APCD2008-PTO-880600	05/14/2017	Abrasive Blast Cabinet
APCD2008-PTO-920034	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-920084	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-921290	05/14/2017	Cold Solvent Dip Tank
APCD2008-PTO-921332	05/14/2017	Cold Solvent Dip Tank
APCD2008-PTO-941071	05/14/2017	Vapor Degreaser
APCD2009-PTO-006412	05/14/2017	Cold Solvent Degreaser
APCD2008-PTO-890043	06/13/2017	Aerospace Coating
APCD2008-PTO-970317	06/13/2017	Cold Solvent Degreaser
APCD2008-PTO-004988	04/20/2018	Cold Solvent Degreaser
APCD2003-PTO-900503	07/23/2019	Cold Solvent Degreaser
APCD2008-PTO-006415	07/23/2019	Cold Solvent Degreaser
APCD2008-PTO-920083	07/23/2019	Cold Solvent Degreaser
APCD2003-PTO-900819	04/20/2022	Sand Separator
APCD2009-PTO-000329	04/20/2022	Cold Solvent Degreaser
APCD2008-PTO-004990	04/21/2022	Cold Solvent Degreaser
APCD2008-PTO-006149	04/21/2022	Cold Solvent Degreaser
APCD2008-PTO-960858	04/21/2022	Vapor Degreaser
APCD2008-PTO-921333	06/28/2022	Cold Solvent Degreaser
APCD2008-PTO-004980	08/01/2022	Abrasive Blast Booth
APCD2008-PTO-921333	6/28/2022	Cold Solvent Degreaser
APCD2018-PTO-003021	2/28/2023	Cold Solvent Degreaser
APCD2014-PTO-001928	3/14/2023	Cold Solvent Degreaser
APCD2003-PTO-973828	7/20/2023	Aerospace Coating
APCD2008-PTO-980675	12/15/2023	Aerospace Coating
APCD2009-PTO-020872	1/22/2024	Process Heater
APCD2009-PTO-020873	1/22/2024	Process Heater

APCD2003-PTO-030652	NA (Transferred to new owner)	Aerospace Coating
APCD2008-PTO-005452	9/25/2024	Aerospace Coating
APCD2008-PTO-900725	5/14/2025	Metal Parts Coating
APCD2008-PTO-985828	10/22/2024	Metal Parts Coating

3.0 Facility Description

The facility consists of a naval air station with permits for various equipment including solvent cleaners (degreasers), abrasive blasting booths, grinding booths, paint booths, metal plating/conversion tanks, and various other miscellaneous operations that are all located on a portion of North Island Naval Air Station. The base is affected by disaggregation for military facilities and this facility includes operations related to Fleet Readiness Center SW (FRCSW) which includes primarily aerospace and marine coating. The site has approximately 100 active permits including some which are in nonoperational status.

A full listing of permits is contained in Appendix A of the permit. Generally the permits at this facility fit into the following categories:

- (1) Boilers/Process Heaters
- (2) Chromate Conversion and Hard Chrome Plating Processes
- (3) Surface Coating
- (4) Diesel Emergency Engine
- (5) Machining/Grinding/Abrasive Blasting
- (6) Metal Processing
- (7) Sand Screen
- (8) Solvent Cleaning/Stripping/Surface Prep
- (9) Test Cells (Jet Engine)

4.0 Compliance History

Overall, the facility has been in generally good compliance since the previous renewal. The facility has been subject to compliance action on approximately 22 occasions which is a very high compliance rate considering the number of permits, length of time and complexity of the facility. These violations have almost all been addressed and mostly consisted of very minor record keeping/monitoring inconsistencies, open VOC containers and minor exceedances of process parameter or emission limit conditions. Additionally, the facility received one NOV for beginning construction of a large aerospace paint and abrasive blasting complex without first obtaining an A/C. The application for this equipment has subsequently been approved, meaning there is no ongoing non-compliance.

5.0 Title V Applicability and Acid Rain

The Title V regulation applies to any stationary source that is a major stationary source as defined in Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA).

The District conducted a review of this facility's PTE. The application forms submitted indicate that the facility is a major source of HAP, and the District agrees with this. Furthermore, based on an analysis of each permit, the facility is also a major source of VOC. It is therefore subject to Title V requirements. See the table below for detailed information on PTE.

Potential to Emit for this facility was calculated from existing permit limits and maximum equipment throughputs. Many of the permits reviewed do not have limitations on operation through permit conditions and potential to emit is based on maximum capacity. In some cases this leads to permits with very high potential to emit due to high capacity, or permits are inherently very low emitting so contribution to potential to emit is unknown, but not significant to total facility-wide PTE

Additionally, since this action incorporates modifications to the Title V permit under applications previously submitted, the ability for each of these changes to qualify as the indicated application type was reviewed. Each application was found to meet the requirements of the indicated application type as described below. Supporting information for each application is contained in the attached documents as indicated which were prepared during initial evaluation of the change under the District/Local applications.

APCD2017-APP-005185 Minor Modification New Boiler

Minor modification to install multiple new small boilers. As shown in the engineering evaluations for the authorities to construct for these new boilers (*APCD2017-APP-005047 & APCD2017-APP-005048*), they do not cause a violation of an applicable requirement, do not relax monitoring or recordkeeping requirements, do not affect permit terms which were accepted in order to avoid an applicable requirement, are not a modification under Title I of the Clean Air Act (CAA) and do not trigger federally mandated new source review, and do not trigger any requirements under CAA section 112(g). For these reasons, this application meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2018-APP-005298 (502)(b)(10) Abrasive Blast Condition Change

Permit condition change to alter monitoring requirement for an abrasive blast room filter system to better match an upgraded control system. As shown in the original engineering evaluation Since the change was solely to the phrasing of a condition to require a different filter monitoring pressure, it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2018-APP-005347 Admin, RO change

Changes to responsible official are considered an acceptable administrative modification. The updated responsible official will be noted in the new permit.

APCD2018-APP-005519 Minor Mod, Add Chemical Passivation Tank

Application for a new chemical passivation tank. Based on the original engineering evaluation (APCD2018-APP-005430), the new tank has very low potential to emit and is not subject to any federal rules. Based on this analysis, it qualifies as a minor modification because it does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, it meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2020-APP-006230 502(b)(10) Replacement of Abrasive Blasting

This application replaced an existing blast booth with a similar sized new booth, with no other changes in operation proposed. As demonstrated in the engineering evaluation (APCD2020-APP-006229), it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2021-APP-006968 Minor Mod, New Cold Solvent Degreaser

Installation of two new cold solvent degreasers. The original engineering evaluations (APCD2021-APP-006969 and 006970), demonstrated that addition of the new degreasers qualifies as a minor modification because it does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, it meets the requirements of a minor modification and inclusion of the new operating permit into appendix A of the permit is included in this permit action.

APCD2020-APP-006385 502(b)(10) Replacement of Abrasive Blasting

Replacement of multiple abrasive blast booths with similar under local applications (APCD2020-APP-006378 to 006380). As demonstrated in the engineering evaluations, it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2022-APP-007414 Minor Mod, New Abrasive Blasting Process

Minor modification for a new abrasive blasting hanger, which was processed under local/NSR application *APCD2022-APP-007412* and ultimately issued permit APCD2024-PTO-004899. As shown in the engineering evaluation, this does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, this application meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2022-APP-007415 Minor Mod, Add Alternate Industrial Coating Operation

Minor modification to add alternate paint cells under separate permit to the current industrial coating operations under APCD2008-PTO-005286 – 005293 without an increase in emissions. The additional paint cells will not be used simultaneously with the pre-existing ones: there is a limit on the total paint cells in operation as well as an annual emission limit. As shown in the engineering evaluation (*APCD2022-APP-007413*), this does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, this application meets the requirements of a minor modification and inclusion of the operating permit into appendix A of the permit is included in this permit action.

APCD2023-APP-007953 502(b)(10), Replacement Grinding Booth

This application replaced an existing blast booth with a similar sized new booth, with no other changes in operation proposed under application *APCD2023-APP-007954* which affected permit APCD2006-PTO-975820. As demonstrated in the engineering evaluations, it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2024-APP-008414 502(b)(10), Degreaser Replacement

This application (*APCD2024-APP-008409*) replaced an existing degreaser with a similar sized unit, with no other changes in operation proposed. As demonstrated in the engineering evaluations, it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2023-APP-008643 502(b)(10), Change Chromate Conversion Tank Conditions

This application proposed altering the chemical process used in a chromate conversion tank to reduce emissions by switching to a trivalent form of chromium instead of hexavalent. As demonstrated in the engineering evaluation (*APCD2025-APP-008642*), it meets the requirements of a (502)(b)(10) change since it proposes changes in the operation of physical characteristics of a permit to operate but is not a modification under any provision of Title I of the Clean Air Act (i.e. does not trigger federally mandated NSR), does not cause a violation of an applicable requirement, does not contravene monitoring, recordkeeping, reporting, or compliance certification requirements and does not result in exceedance of emissions allowed under the permit. Changes to this permit made under this application are included in the proposed draft operating permit.

Previously Approved Modifications

The following Title V applications have been approved by the District. However, records indicate that these applications were approved based on the intent to include them in this renewal application, so are reviewed here for context. Since approval of these applications may not have occurred in accordance with applicable requirements of District Rule 1410, each is discussed below and the proposed Title V permit incorporates all changes described.

APCD2005-APP-983393 502(b)(10) – (Will be treated as a minor modification)

This application was to replace the control system for a Thermal Spray operation to comply with requirements of a State Air Toxic Control Measure and the Title V modification was applied for as part of the same application. After review, it was determined that the application did not qualify as a 502(b)(10) change because it changed federally applicable monitoring requirements. However, because the change did not cause a violation of an applicable requirement, relax monitoring or recordkeeping requirements, affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For this reason it can be processed as a minor modification instead and approval is incorporated into this action.

APCD2013-APP-003117 502(b)(10), New Abrasive Blast

Reviewed under application *APCD2013-APP-003112*. This application was for a new abrasive blast pot which was originally registered as a portable emission unit but did not meet the requirements for that program because it was part of the stationary source and therefore required a permit. The engineering evaluation is attached and demonstrates that while the project likely should have been applied for as a minor modification under current guidelines, it did not cause a violation of an applicable requirement, relax monitoring or recordkeeping requirements, affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For this reason it can be processed as a minor modification instead and approval is incorporated into this action with the new permit included in Appendix A.

APCD2014-APP-003829 502(b)(10) Add new small grinding booth

Reviewed under application *APCD2014-APP-003828*. The evaluation (attached) demonstrates that while the project likely should have been applied for as a minor modification under current guidelines, it did not cause a violation of an applicable requirement, relax monitoring or recordkeeping requirements, affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For this reason it can be processed as a minor modification instead and approval is incorporated into this action with the new permit included in Appendix A.

APCD2015-APP-004003 502(b)(10) Add shared control device for depainting

Reviewed under applications *APCD2015-APP-003936* and *APCD2015-APP-003935*. The project involved clarifying the equipment description for depainting operations in two large paint cells that had already been approved and constructed. No increase in emissions or change in operation occurred as part of the depainting operation changes. This change meets the requirements of a (502)(b)(10) change since it contravenes the express terms and conditions of a permit to operate, but does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2015-APP-004033 Minor Mod, Modify Chrome Conversion

Reviewed under application *APCD2015-APP-004032*. This application was to replace a chrome conversion tank with a smaller one. it did not cause a violation of an applicable requirement, relax monitoring or recordkeeping requirements, affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For this reason it can be processed as a minor modification instead and approval is incorporated into this action with the new permit included in Appendix A.

APCD2015-APP-004094 502(b)(10) Reactivation/Replacement of Abrasive Blasting

Reviewed under application *APCD2017-APP-004824*. The application was found to qualify as a like kind replacement which generally also means it meets the requirements for a 502(b)(10) change since it contravenes the express terms and conditions of a permit to operate, but does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2015-APP-004102 Minor Modification, LKR of Abrasive Blasting.

This application proposed a minor modification including replacement of two abrasive blast cells. It is unclear which permits this may have specifically affected, other than one of the replacements appears to have been the same as proposed in *APCD2015-APP-004211*. While it cannot be determined if the change was considered a minor modification as no documentation describing the changes exists, like kind replacements will always almost always constitute 502(b)(10) changes or minor modifications (a significant modification could not qualify as a like

kind replacement). Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2015-APP-004211 (502)(b)(10) LKR of Abrasive Blasting

This application was reviewed under *APCD2015-APP-004094*. The application was found to qualify as a like kind replacement which generally also means it meets the requirements for a 502(b)(10) change since it contravenes the express terms and conditions of a permit to operate, but does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

APCD2017-APP-004780 502(b)(10), Modify Chrome Conversion

Reviewed under application *APCD2017-APP-004779*. The application was found to qualify as a like kind replacement and for a 502(b)(10) change since it contravenes the express terms and conditions of a permit to operate, but does not violate any applicable requirement, and does not affect monitoring requirements. Changes to this permit made under this application are included in the proposed draft operating permit.

Additional Modifications Lacking Title V Applications

In addition to the above applications, the following changes were made at the facility but did not have any associated Title V modifications applications filed. *APCD2022-APP-007249* and *007250* were for two new boilers. As shown in the attached evaluations, the addition of these boilers would have been considered a minor modification if an application was filed. Presumably the lack of application was an oversight, and therefore the addition of this equipment can be viewed as a minor modification and will be included in this Title V action. While the evaluation did not thoroughly review NSR requirements, comparison of the emission increase from the application shows that it would not have triggered federally mandated NSR. For this reason and other information as shown in the original engineering evaluations, it does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, it meets the requirements of a minor modification and inclusion of the new operating permit into appendix A of the permit is included in this permit action.

Additionally, *APCD2008-APP-986239* was approved for replacement of controls for a hard chrome electroplating process in order to comply with CARB ATCM requirements. It is unclear from current documentation whether or not this application included appropriate Title V application forms. However, the engineering evaluation for the application was reviewed and supports that the modification would have been classified as a minor modification as it does not cause a violation of an applicable requirement, does not relax monitoring or recordkeeping requirements, does not affect permit terms which were accepted in order to avoid an applicable requirement, is not a modification under Title I of the Clean Air Act (CAA) and does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, it meets the requirements of a minor modification and

applicable requirements are reflected in the operating permit for this equipment in appendix A of the permit.

Finally, the facility also applied for numerous like-kind-replacements that lacked associated applications for either minor modifications or 502(b)(10) changes. These included applications *APCD2011-APP-001531*, *APCD2016-APP-004517*, *APCD2018-APP-005541*, *APCD2018-APP-005578* and *APCD2018-APP-005600*. The evaluations for these replacements are attached. These show that these applications would not have triggered federal new source review, do not affect monitoring requirements, do not trigger any requirements under CAA section 112(g) and do not cause any violations of applicable requirements. For these reasons, the changes to the related permits will be incorporated into this permit action and are contained in Appendix A.

6.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds.

Title V Major Source Determination Tons per Year:			
Pollutant	Thresholds	Facility Potential to Emit	Major Source*
Highest Federal HAP	10	24.5	Y
Sum of Federal HAPs	25	196.5	Y
NOx	25	47.1	Y
VOC	25	263.1	Y
PM10	100	11.7	N
SOx	100	3	N
CO	100	8.1	N

These emission calculations were obtained from a variety of sources. For some equipment, a potential to emit was calculated as part of the original application, or was able to be determined from permit limits or technical data. These calculations are detailed in the emission calculations appendix and attachments. However, for some equipment, these types of calculations could not be performed – specifically for some of the large coating booths and abrasive blasting operations used for aerospace painting and depainting operations that lack process or operational limits due to never being subject to NSR, and so effectively have unlimited/undefined PTE and potentially could result in very high emissions. Additionally, some equipment such as metal treatment equipment has no established emission factors or enforceable emission limits, but inherently generate very low emissions and include high efficiency controls resulting in very low impact on PTE. Finally, the facility’s major source status for NOx is almost entirely due to two aircraft engine test cells which have no emission or operational limits and potentially could operate at significantly high emission levels. For the above reasons, the values listed above for PTE are minimum values and are potentially higher because of the lack of basis for any emission limitations

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Compliance assurance monitoring requirements have previously been reviewed for much of the equipment at this facility. However, as part of the review of this application, CAM applicability for each emission unit was revisited and discussed in this section

To be subject to CAM, an emission unit must have uncontrolled emissions above the major source threshold for a pollutant for which the facility is a major source. Additionally, the equipment must utilize a control device in order to meet an emission standard for that pollutant. Finally, if the equipment is subject to a section 111 or 112 requirement pursuant to the Clean Air Act (NSPS or NESHAP) or otherwise is subject to federally enforceable continuous monitoring requirements, CAM does not apply. These applicability criteria mean that the majority of the equipment at this facility is exempt from CAM requirements as follows:

Aerospace and Related Coating Operations: All aerospace coating operations at this facility are subject to NESHAP GG which specifies emission standards and monitoring requirements for particulate emissions generated and includes the use of controls for particulate matter and by extension HAP. The equipment also emits volatile organic compounds (VOC) and volatile organic HAP which is uncontrolled. Since the particulate fraction of HAP is subject to federally enforceable monitoring requirements and VOCs and the volatile fraction of HAP is uncontrolled, the equipment is exempt from CAM.

Abrasive Blasting & Grinding Operations: Some abrasive blasting equipment is subject to NESHAP GG and emits only particulate matter and HAP. For such equipment, permit conditions specify applicable monitoring requirements, and therefore the equipment is exempt from CAM. However, some abrasive blasting operations are not subject to NESHAP GG because they are only used for parts which are not subject to NESHAP GG requirements (primarily parts which are removed from the aircraft for depainting). Additionally, sanding and grinding equipment is not subject to NESHAP GG. However, these operations are subject to the Rule 52 particulate matter concentration limit, and Rule 1421 requires the installation of continuous monitoring equipment. For this reason, all permits have been updated to clarify the requirement for continuous differential pressure monitoring of all dust collectors, baghouses and similar equipment, including the need for daily recordkeeping and establishment of an allowable pressure range to demonstrate that the equipment is complying with the particulate matter emission limit. This means that for two reasons this equipment is not subject to CAM: (1) Each permit has a federally enforceable monitoring requirement; and (2) the facility is not a major source of PM.

Boilers: The boilers operated at this facility are not equipped with emission controls and therefore are not subject to CAM.

Chromate Conversion Tanks & Passivation Tank: The chromate conversion tanks are not equipped with emission controls, and therefore are not subject to CAM.

Chrome Electro Stripping Tank & Chrome/Nickel Deposition Process: These utilize emission controls to limit HAP and are therefore possibly subject to CAM. However, it is not expected that uncontrolled emissions from this equipment exceed the major source threshold, and each permit contains specified federally enforceable continuous monitoring requirements regardless, so are not subject to CAM.

Hard Chrome Electroplating: This process is subject to a NESHAP and the permit specifies federally enforceable monitoring requirements to control HAP emissions, and therefore the equipment is not subject to CAM.

Solvent Cleaning and Stripping Processes: None of this equipment is equipped with emission controls for VOC or volatile HAP since each relies only on inherent equipment design to limit emissions. For this

reason, it is not subject to CAM. Additionally, each permit that is subject to NESHAP GG due to being used as a depainting operation contains permit conditions implementing any applicable monitoring.

Jet Engine Test Cells: This equipment does not utilize emission controls and is therefore not subject to CAM.

8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide, and permit specific applicable requirements. Additionally for each emission unit, the rule that results in the primary emission limitation is listed.

General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20.1-20.4	New Source Review
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VIII	132	Traffic Abatement Plan
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emissions Reducing
40 CFR Part 59	Subpart C	VOC Standards for Consumer Products

**Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements*

Facility-wide Prohibitory Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0.1	Architectural Coatings

SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	68	Fuel Burning Equipment – NOx
SDCAPCD Reg. IV	69.2.2	Medium Boilers, Process Heaters and Steam Generators
SDCAPCD Reg. X	40 CFR 60 Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart A	NSPS General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart A	NESHAP General Provisions
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 61	Subpart M	NESHAP – Asbestos
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206*	Asbestos Removal, Demolition and Renovation

** The District issued its own Asbestos Rule 1206 intended to be as stringent as Subpart M. The facility is subject to the most stringent requirements of either rule, which at the time of this report is ensured by compliance with Rule 1206.*

***Not federally enforceable*

Contractor Owned and other Registered Equipment Requirements (not otherwise listed)

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	12	Registered Equipment
SDCAPCD Reg. IV	12.1	Portable Registered Equipment
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	66.1	Miscellaneous Surface Coating & Other VOC Emitting Processes
SDCAPCD Reg. IV	67.3	Metal Parts and Products Coating
SDCAPCD Reg. IV	67.9	Aerospace Coating Operations
SDCAPCD Reg. IV	67.11	Wood Products Coating Operations
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOCs
SDCAPCD Reg. IV	67.18	Marine Coating Operations
SDCAPCD Reg. IV	67.20.1	Motor Vehicle and Mobile Equipment Coating Operations
SDCAPCD Reg. IV	69.4*	Stationary Reciprocating Internal Combustion Engines (Major Sources)
SDCAPCD Reg. IV	69.4.1*	Stationary Reciprocating Internal Combustion Engines

*The District has submitted a revised version of Rule 69.4.1 for approval into the SIP which will replace 69.4 which has been repealed by the District. However, because EPA has not acted on this submittal, the current version of Rule 69.4 is still federally enforceable and Rule 69.4.1 is not.

Rule 10. Permits Required. These rules require that the facility operator obtain an Authority Construct and/or modified Permit to Operate prior to installing, modifying or operating equipment which emits air contaminants.

Rule 19. Provision of Sampling and Testing Facilities. Specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

Rule 19.3. Emission Information. This rule pertains to emission inventory information and specifies what data facilities are required to maintain or provide for the District in order to conduct state and federally required emission inventory analyses. Some of the required information is also required by emission-unit specific permit conditions, but only if necessary to determine compliance with accurate requirements.

Rules 20.1-20.4. New Source Review. These are the District's New Source Review (NSR) rules. 20.1 contains general requirements and definitions and is primarily used to define calculation methodologies, 20.2 contains requirements for non-major sources, 20.3 for major sources, and 20.4 for portable sources. The individual operating permits and any required authority to construct for each emission unit will specify any detailed or specific requirements (e.g. BACT standards, AQIA-imposed requirements, offsets, etc.), which are also discussed in a following subsection of this report.

Rule 21. Permit Conditions. This rule allows the District to impose permit conditions to ensure enforceability of requirements. Rule 1421 mirrors rule 21 but applies specifically to Title V facilities and contains additional requirements related to ensuring continuous compliance with requirements, and forms the basis of some conditions added to the operating permits as part of the Title V renewal.

Rule 24. Temporary Permit to Operate. This rule defines the District's ability to grant temporary authority to operate under the NSR program. A separate rule (1410) covers temporary operating authority under the Title V program.

Rule 25. Appeals. Outlines the requirements and process for appeals to the issuance of authorities to construct, permits to operate and modified permits to operate under the District's NSR permitting program. Decisions on permit appeals are made by the District's Hearing Board.

Rule 60. Circumvention. This rule clarifies that circumvention of applicable requirements is not permissible – such as through piecemealing of projects or similar practices.

Rule 71. Abrasive Blasting. Defines requirements for temporary abrasive blasting not conducted in a booth or enclosure, so would apply to activities such as facility maintenance not covered by the operating permits under appendix A.

Rule 98. Breakdown Conditions/Emergency Variance. Defines emergency breakdown requirements which can grant temporary relief from applicable requirements during breakdowns. **However, this rule is not federally enforceable and does not grant relief from any applicable requirement of the Title V permit.**

Rule 101. Burning Control. Outlines prohibitions on open burning.

Rule 131. Stationary Source Curtailment Plan. Requires that facilities with emissions above certain thresholds have a plan in place to curtail emissions in the unlikely event that SDAPCD declares an emergency air quality episode.

Rule 132. Traffic Abatement Plan. Requires that facilities with a certain number of employees have a plan in place to curtail commuting and minimize emissions in the unlikely event that SDAPCD declares an emergency air quality episode.

40 CFR Part 82 Subpart B & F. Protection of Stratospheric Ozone. Requirements that apply to maintenance of vehicle and stationary air conditioning equipment to minimize release of ozone depleting pollutants.

40 CFR Part 59 Subpart C. VOC Standards for Consumer Products. Federal standards for VOC content of consumer products.

Rule 50. Visible Emissions. The only requirement of this rule is setting a maximum emission opacity standard that applies to all equipment. Except for some equipment which is subject to Rule 71 (abrasive blasting emission standards) and a few minor exceptions, all sources of emissions from permitted operations are subject to Rule 50. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that emission opacity cannot be exceeded and are specified in permit conditions as necessary.

Rule 51. Public Nuisance. The requirement of this rule is to prohibit the discharge of air contaminants or other materials in amounts that may cause harm or nuisance to people, property, or the public. This applies to all sources of emissions and is intended to protect public health, comfort, safety, and business interests. Compliance is typically ensured through proper operation and maintenance of equipment, emission controls, and process limits that prevent emissions from reaching levels that could result in nuisance or adverse impacts.

Rule 52. Particulate Matter. The only requirement of this rule is setting a maximum particulate emission standard that applies to all equipment. Except for some equipment which is subject to Rule 53 (combustion particulate emission standards) and a few minor exceptions, all sources of particulate matter from permitted operations are subject to Rule 52. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that the emission concentration cannot be exceeded and are specified in permit conditions as necessary.

Rule 53. Specific Air Contaminants (PM and Sulfur Compounds). This rule is very similar to Rule 52, except applies to certain combustion sources and includes limits on emissions of sulfur compounds in addition to particulate matter. The only source subject to this rule are the Boilers and Gas Turbine test cells, which comply with the requirements under normal operation without any restrictions.

Rule 62. Sulfur Content of Fuels. This rule applies to all combustion sources, except sewage treatment plant digester gases and gases emitted from solid waste disposal landfill sites, and limits emissions of sulfur compounds. The sources subject to this rule and Engine NSPS,

NESHAPs, or ATCMs comply with the requirements under normal operation without any restrictions.

Rule 67.0.1. Architectural Coatings. Specifies requirements for architectural coatings as used for building construction and maintenance (not part of permitted operations). Applicable requirements primarily include purchasing products which meet specified VOC standards.

Rule 67.17. Storage of Materials Containing VOC. Requirements for storage of VOCs (e.g. need to use closed containers), applies to both

Rule 68. Fuel Burning Equipment: NOx. Contains a general maximum NOx emission concentration limit that applies to most combustion equipment, set at a relatively high baseline level. For this reason, most permitted equipment will be subject to more stringent NOx requirements under an applicable prohibitory rule or a BACT standard.

Rule 69.2.2 Medium Boilers, Process Heaters, Steam Generators. Requires that small boilers, which are below the heat input thresholds where a permit is typically required, comply with various requirements including conducting annual tuning and new boilers must be certified by the manufacturer to achieve certain emission levels.

SDAPCD Regulation X/NSPS Part 60 Subpart A. NSPS General Provisions. Includes any portions of applicable requirements which apply generally to the facility (definitions, test methods, etc.). Any applicable requirements for specified emission units are stated in the permit specific applicable requirements in Appendix A of the Title V Permit.

SDAPCD Regulations XI/NESHAP Part 63 Subpart A. NESHAP General Provisions. Includes any portions of applicable requirements which apply generally to the facility (definitions, test methods, etc.). Any applicable requirements for specified emission units are stated in the permit specific applicable requirements in Appendix A of the Title V Permit.

Rule 1206/40 CFR 61 Subpart M. Asbestos. Specifies requirements for remediation of asbestos containing materials during projects such as demolition. Rule 1206 contains applicable requirements which apply to the facility. This rule is implemented as a Compliance program and requires filing of notifications prior to any demolition involving asbestos, appropriate sampling methodologies, and control requirements when asbestos is identified.

Rule 1200. Toxic Air Contaminants New Source Review. Outlines requirements for the District's toxics new source review program, which requires new equipment and modifications to equipment to be evaluated for increases in air toxics emissions, and if necessary the requirement to conduct a health risk assessment and demonstrate that the projects meets certain limitations on increases in incremental health impacts. This rule is not federally enforceable. Any emission unit requirements issued under this rule will be specified in the individual operating permits in Appendix A.

Rule 12/12.1. Registered Equipment. These rules contain requirements for equipment registered under the District's registration program. Registrations are similar to operating permits, but are not subject to pre-construction review/NSR and typically are only issued to emission units which

are also considered insignificant activities, except that medium boilers are subject to federally applicable requirements and are included in the Title V permit.

Rule 66.1, 67.3, 67.9, 67.11, 67.17, 67.18, 67.20.1. Coating Operations. These rules all apply to coating operations and differ based on the category of coating (i.e. marine, aerospace, metal, automotive, etc.), but overall have similar requirements. These requirements include meeting specified VOC content limits based on the type of substrate/coating, need to use an approved application method, control equipment requirements for some equipment categories, and associated monitoring, recordkeeping and test methods. The applicable requirement(s) of each rule are listed in each permit with the rule as the basis.

Rule 69.4/69.4.1. Internal Combustion Engines. This rule applies to Stationary Reciprocating Internal Combustion Engines and sets maximum NOx, VOC, and CO standards for different types of engines, fuel specification requirements, control equipment requirements for some engine types, associated monitoring, inspection and maintenance frequency, and recordkeeping. The facility currently does not operate any permitted emission units subject to this rule, but has in the past and requirements also may apply to some registered equipment or contractor operations.

New Source Review Requirements

Because this facility has historically not been a major source of any criteria pollutants and much of the highest emitting equipment was installed prior to the implementation of NSR, there have been no significant new source review decisions associated with the facility. Review of permits and applications shows that the only NSR requirements imposed have been state BACT requirements, which have included use of fundamentally low emitting equipment such as low-NOx burners, particulate controls such as baghouses, and various process limits to avoid BACT applicability at 10 lb/day for a specific pollutant. Additionally, equipment installed or modified after November 15, 2000 has been subject to local-only toxics control requirements, and many of these requirements have also been made federally enforceable previously (and continue to be designated as such in this permit) because they serve to make the facility’s emissions being below major source thresholds for PM enforceable.

SDAPCD Permit No.	Permit Limit	Source and Explanation
APCD2003-PTO-971390	29.9 tpy VOC limit	This permit has a VOC limitation which was imposed to avoid triggering new source review requirements.
APCD2018-PTO-003144 to 003149	9 ppmvd NOx, corrected to 3% O ₂	These permits were subject to local/non-federal NSR only. Each permit contains a NOx limit to keep emissions below Best Available Control Technology Levels and no other NSR requirements (see evaluations for APCD2018-APP-005047 and 005048).

Note that these are not new determinations, but based on applications which have already been approved according to the appropriate provisions, including notice to EPA for projects that were new major stationary sources or major modifications.

Permit Specific Applicable Requirements:

Because this facility includes approximately 100 individual emission units, applicable requirements have been grouped by type of equipment. See Appendix A for full list of permits by equipment type

Permit Description	Applicable Rules
Blasting (abrasive)	Rules 50, 51, 52, 71, 1200*, 40 CFR 63 Subpart GG**, 40 CFR 63 Subpart II**
Boilers	Rules 20.2/20.3, 50, 51, , 62, , 69.2, 1200*, 40 CFR 63 Subpart DDDDD
Chrome Conversion	Rules 50, 51, 1200*
Chrome Electro Stripping	Rules 50, 51, 1200*
Metal Deposition	Rules 50, 51, 1200*
Hard Chrome Plating	Rules 50, 51, 52, 1200*, 17 CCR section 93102 (Chrome Plating ATCM)*, 40 CFR 63 Subpart N
Coating Operations	Rules 20.2/20.3, 50, 51, 52, 66.1, 67.3, 67.9, 67.11, 67.18, 67.17, 67.20.1, 67.21, 1200*, 40 CFR 63 Subpart GG**, 40 CFR 63 Subpart II**
Solvent Cleaning, Degreasing, Depainting	Rules 20.2/20.3 50, 51, 66.1, 67.6.1, 67.6.2, 1200*, 40 CFR 63 Subpart GG**, 40 CFR 63 Subpart II**
Grinding/Machining	Rules 20.2/20.3, 50, 51, 52, 1200*, 40 CFR 63 Subpart GG**, 40 CFR 63 Subpart II**
Metal melting/processing	Rules 50, 51, 52, 1200*, 17 CCR 93107 (Metal Melting ATCM)*
Thermal Spray	Rules 20.2/20.3, 50, 51, 52, 1200*, 17 CCR 93101.5 (Flame Spray ATCM)*
Sand Processing	Rules 50, 51, 52, 1200*
Test Cells (Gas Turbine)	Rules 20.2/20.3, 50, 51, 53, 62, 68, 1200*

*Indicated rules are not federally enforceable

**Not all permits are subject to NESHAP GG or II. Only those operations which either conduct marine or aerospace coating operations or that are depainting operations under these subparts are subject to the requirements of these rules as noted in the individual emission unit specific permits in Attachment A

Emission Limitations

This section outlines the source of the primary emission limitation for each pollutant and type of emission unit.

Chromate Conversion	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)

PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Chrome Electrostripping	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200

Hard Chrome Plating	
Pollutant	Primary Limiting Regulations*
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*, 40 CFR 63 Subpart N

Coating Operations	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Coating Rules 66.1, 67.3, 67.11, 67.18 or 67.21 Rule 67.9, 67.18, NESHAP GG or II (VOC content limits), Rule 20.2/20.3 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 52, Rule 67.9 (material application methods)
Toxic Pollutants/HAP	Rule 1200*, NESHAP GG or II

Abrasive Blasting	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52, Rule 20.2/20.3 (Must follow other requirements to be exempt)
Toxic Pollutants/HAP	Rule 1200*, For depainting operations (NESHAP GG or II)

Solvent Cleaning, Degreasing, Depainting	
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Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Rules 67.6.1, 67.6.2 (VOC Content Limits)
CO	NA (does not emit)
PM10	NA (does not emit)
Toxic Pollutants/HAP	Rule 1200*, For depainting operations (NESHAP GG or II)

Grinding	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*, For depainting operations (NESHAP GG or II)

Metal melting/processing	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*, 17 CCR 93107 (Metal Melting ATCM)*

Thermal Spray	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*, 17 CCR 93101.5 (Flame Spray ATCM)*

Metal Deposition	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Sand Processing	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	NA (does not emit)
CO	NA (does not emit)
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*

Boilers	
Pollutant	Primary Limiting Regulations
NOx	Rule 69.2, Rule 20.2/20.3
SO2	Rule 62
VOC	NA (limited through restrictions requiring natural gas as fuel)
CO	Rule 69.2
PM10	Rule 52
Toxic Pollutants/HAP	Rule 1200*, NESHAP DDDDD

Gas Turbine Test Cells	
Pollutant	Primary Limiting Regulations
NOx	NA (not limited)
SO2	NA (not limited)
VOC	NA (not limited)
CO	NA (not limited)
PM10	Rule 53
Toxic Pollutants/HAP	NA (not limited)

*Indicates rules which are not federally enforceable.

Basis of Permit Conditions

This section is intended to summarize the applicable requirements for each rule that form the basis for permit conditions in each category of emission unit.

Rule 52 – The only requirement of this rule is setting a maximum particulate emission standard that applies to all equipment. Except for some equipment which is subject to Rule 53 (combustion particulate emission standards) and a few minor exceptions, all sources of particulate matter from permitted operations are subject to Rule 52. Compliance for all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that the emission concentration cannot be exceeded and are specified in permit conditions as necessary.

Rule 53 – This rule is very similar to Rule 52, except applies to certain combustion sources and includes limits on emissions of sulfur compounds in addition to particulate matter. The only source subject to this rule are the Gas Turbine test cells, which comply with the requirements under normal operation without any restrictions. This rule does not apply to natural gas fired boilers with a maximum heat input rating <50 MMBtu/hr.

Rule 1200 – This rule is the District’s toxics new source review program, which requires that projects which increase emissions of toxic air contaminants (including HAPs), do not cause excessive health risks to the surrounding community, as determined by a health risk assessment – including imposing applicable emission limits, monitoring and recordkeeping requirements. While Rule 1200 itself is not federally enforceable, in many cases these limits also result in ensuring that federally applicable requirements are complied with/don’t apply (e.g. a condition preventing spray applying metal TACs in a coating booth that also serves to limit NESHAP HHHHHH applicability). Additionally, these conditions are typically imposed through an Authority to Construct and/or Permit to Operate issued pursuant to Rule 10, which is federarally enforceable – and for this reason, some requirements originally imposed through Rule 1200 are also federally enforceable.

Coating Rules (66.1, 67.3, 67.9, 67.11, 67.18 and 67.21) – These rules all apply to coating operations and differ based on the category of coating (i.e. marine, aerospace, metal, automotive, etc.), but overall have similar requirements. These requirements include meeting specified VOC content limits based on the type of substrate/coating, need to use an approved application method, control equipment requirements for some equipment categories, and associated monitoring, recordkeeping and test methods. The applicable requirement(s) of each rule are listed in each permit with the rule as the basis.

40 CFR 63 Subpart N – This rule applies to equipment used for hard chromium plating operations, and includes requirements related to control techniques and source testing for total chromium concentration in exhaust streams. Permits that are used for operations subject to this rule have applicable conditions applied, and permits which are not used for these operations contain prohibitions on using them for this purpose.

40 CFR 63 Subpart GG – This rule applies to equipment used for aerospace coating operations, and includes requirements related to “depainting” which includes some abrasive blasting and solvent operations. Permits that are used for operations subject to this rule have applicable conditions applied, and permits which are not used for these operations contain prohibitions on using them for this purpose.

40 CFR 63 Subpart II – This rule applies to shipbuilding and repair operations applying surface (marine) coatings, and includes requirements related to “VOHAP” including VOC listed as HAP and exempt compounds listed as HAP. Permits that are used for operations subject to this rule have applicable limits, recordkeeping, and reporting conditions applied.

40 CFR 63 Subpart DDDDD – This rule applies to the boilers and process heaters at this facility. All of this equipment solely burns natural gas as fuel. The only requirements under this rule that apply to these boilers is for certain sized boilers to conduct a periodic tuning (40 CFR 63.7500(e)). Each of these boilers is required by federally enforceable District rules to conduct an annual tuning which ensures compliance with all requirements of this rule.

17 CCR 93107 (Metal Melting ATCM) – This rule is not federally enforceable. It applies to the metal melting devices and limits the amount of certain types of metals that can be melted, along with various other operating requirements.

17 CCR 93101.5 (Flame Spray ATCM) – This rule applies to equipment used for thermal (flame or plasma) spray operations and requires that operations conducting thermal spray reduce emissions of Nickel and Hexavalent Chromium. This regulation includes requirements for thermal spray enclosure standards, ventilation standards, control efficiency, and emission limits for Nickel and Hex-Chrome. This rule is not federally enforceable; however, requirements applicable to operation and monitoring of the particulate control devices are federally enforceable as they also serve to meet the requirements of Rule 1421 and Rule 52. s.

9.0 Permit Shield

None of the applications included in this renewal propose any new permit shields. However, some coating permits were granted a shield from NESHAP GG and II through previous permit actions, so the existing permit shields were reviewed. After review, it was determined that the permits do not meet the requirements for permit shields, and therefore the permit shields were removed. The basis of the original permit shield had been that requirements of NESHAP GG and II can be subsumed by District prohibitory rules 67.9 and 67.18 respectively along with conditions implementing these requirements. However, recordkeeping and reporting requirements, along with VOC content standards for certain types of coatings were determined to be more stringent in both NESHAP rules. For these reasons, the equipment is not eligible for a permit shield.

10.0 Streamlining

This permit does not contain any streamlining. However, some permits contain conditions which ensure compliance with multiple rules when the underlying requirements can be fulfilled by the same condition. In all cases, the equipment is still subject to requirements of both rules, and is not granted a permit shield from any applicable requirements. This section highlights key areas where a certain permit contains such conditions.

Boilers – The boiler permits do not contain any streamlined requirements with the exception that a more stringent NO_x concentration limit to avoid local BACT applicability was accepted and is the only NO_x limit listed on the permit since it is more stringent than the Rule 69.2 prohibitory rule limit (9 vs 30 ppmvd NO_x at 3% O₂). Also as previously mentioned, annual tuning requirements ensure compliance with the same standards in NESHAP Subpart DDDDD.

Coating Operations – The previous version of these permits included streamlining of requirements and granting of a permit shield for NESHAPs GG and II requirements based on conditions also implementing Rules 67.9 and 67.18. The previous Title V permit considered these conditions satisfactory to fully streamline all requirements of these NESHAPs, but in-depth review as part of this permit action determined that not all requirements in the District rules as implemented through permit conditions are equally or more stringent than the NESHAP requirements. For this reason, the permit shield was removed and additional conditions

implementing just these NESHAP requirements were added to each permit that conducts the corresponding type of coating.

Abrasive Blasting, Grinding, Thermal Spray, and other sources of non-fugitive PM

All sources of stack emissions of PM, except certain combustion equipment, are subject to a PM emission limit under Rule 52. However, this rule does not specify any required monitoring or testing requirements. However, Rule 1421 requires the District to include federally enforceable monitoring, testing and recordkeeping requirements when one is not specified in the underlying rule. Many of the emission units in these categories of equipment are subject to these requirements based on non-federally enforceable rules (local-only toxics rules and State ATCMs). For these permits, the specific monitoring, testing and recordkeeping requirements of these rules are also used to meet this requirement of Rule 1421, and to avoid the need to comply with two sets of requirements, they are also federally enforceable and the permits cite Rule 52 or 1421 as the basis.

11.0 Updates to the Title V Permit Incorporated into this Action

The following changes are being made to the emission unit specific permits as indicated below.

Abrasive Blasting – The abrasive blasting permits were updated for consistency and to include all applicable requirements. Specifically, each permit was reviewed to ensure that applicable requirements for depainting operations subject to NESHAP GG were included in the permit. Additionally, because these permits are subject to Rule 52 and Rule 1421, permits which utilize control equipment for particulate emissions were reviewed and if conditions previously did not specify applicable monitoring and recordkeeping requirements, these were included in the permit.

Chromate Conversion – This facility has five permits for chromate conversion and similar processes. These permits were reviewed and revised to harmonize requirements as much as possible, ensure proper conditions were on each permit and for rule references. Revisions were made to each permit for the above reasons. The principal changes were to including recordkeeping/monitoring of some temperature and operating limits that previously were not on all permits, and to clarify the basis of the requirements. The basis for most conditions was determined to be Rules 21, 1421 and 1200 (instead of generic “NSR”). Each of these conditions was imposed through preconstruction review or at the time initial or modified permits were issued and is intended to either keep the equipment from being considered chrome plating subject to other rules, or to otherwise minimize the formation of chromium emissions.

Chrome Electrostripping – This facility operates one permit for chrome electrostripping. This permit was reviewed and the only changes proposed are to rule references. Similarly to Chromate Conversion permits, the generic “NSR” reference was revised to Rules 21, 1421 and 1200 for the same reasons as discussed under the above section.

Hard Chromium Electroplating – This facility operates one permit for hard chrome plating. This permit was reviewed and updated for ATCM and NESHAP N references on existing conditions including some minor updates for timeline specificity. Conditions were also updated and added to specify NESHAP N surface tension and emission limit requirements that were not

already shared between the NESHAP and ATCM. These updates did not impose any new requirements to the permit and built upon existing conditions to clarify requirement source. Additionally, this permit has an approved application and Authority to Construct issued to modify the equipment per a recent revision to the ATCM. By January 1, 2026, this permit is required to meet enhanced compliance standards, which include complying with building enclosure requirements, adopting new emission limitations, and conducting periodic source tests. The facility will be ceasing operations until these modifications are complete as of December 31, 2025, and have submitted a minor modification of this Title V permit once construction is complete and the new permit is issued. For reference, the Authority to Construct for this modification has been included in Appendix A of this Title V permit.

Boilers – This facility has added six boilers (APCD2018-PTO-003144 through APCD2018-PTO-003149) since the previous renewal. These boilers were installed to replace a central plant operated as part of a separate stationary source. Their installation resulted in an increase of emission at this stationary source, however did not result in a contemporaneous (net) emission increase of any pollutant for which they are a major source, so the major requirements are District prohibitory rule 69.2 (NO_x and CO limits, initial and annual source test and associated recordkeeping) and a voluntary limit accepted to avoid local NSR. Rule 69.2 does include monitoring requirements for boilers subject to the NO_x and CO limits in this rule, including continuous monitoring of operational characteristics of the unit and of the flue-gas NO_x reduction system, as applicable. For this equipment, the relevant operational characteristics are controlled by the boiler’s controller, which is factory tested across the firing range of the unit to determine the optimum ratios needed at various loads to meet the guaranteed NO_x emissions, and the controller is programmed to control operational characteristics according to the optimum ratio curve. Because of this, additional continuous monitoring is not recommended, but maintenance and repairs to the FGR system and/or Low-NO_x burners shall be documented in a maintenance log to ensure proper operation of all NO_x-reducing processes. They are also subject to NESHAP DDDDD which adds a biennial tuneup requirements and reporting and recordkeeping requirements. The engineering evaluation detailing these emission units is attached under the application number, APCD2017-APP-005047. The facility added 2 more boilers subject to these requirements (APCD2023-PTO-004736,-004737), though these boilers comply with Rule 69.2 through a limit on annual fuel usage and annual tuning, instead of through emission limits and source testing. The annual tuning requirement satisfies the NESHAP requirement for biennial tune-ups, but NESHAP reporting and recordkeeping requirements have been added to these permits. Additionally, rule references were updated as follows:

- Condition 1 was revised to include [Rule 20, 21, 1421] references for granting permits, permit conditions, and Title V permit conditions as the basis of the condition; ensuring proper operation of permitted equipment and recordkeeping of manufacturer’s instructions.
- Condition 2 was revised to include [Rule 20.3(d), 40 CFR Part 63 Subpart DDDDD] references as references for the basis of the condition, in order to ensure compliance with the NESHAP for major sources with industrial, commercial, and institutional boilers; ensuring use of only natural gas as the fuel source for BACT compliance.
- Condition 5 was revised to include [Rule 69.2, Rule 20.3(d)] as references for the requirements to conduct annual source testing to ensure emissions standards are met.
- Condition 9 was revised to cite [Rule 19] as the basis for provision of sampling/testing facilities; providing adequate access, facilities, and utilities for testing and inspection at the APCD’s request.

Coatings – Some changes were made to these permits. As discussed previously in this report, the permits were revised to remove permit shields and add additional requirements (primarily VOC-content requirements and recordkeeping/reporting requirements) from NESHAPs GG and II, along with updated SDAPCD rule requirements. This facility has two types of coating permits – multi-substrate and aerospace only. All permits at this facility conduct aerospace coatings and are subject to NESHAP GG. All permits have been revised to comply with all applicable requirements of GG including HAP-content requirements, particulate matter control efficiency, application equipment, and stripping/depainting. Multi-substrate permits that also conduct marine coating are subject to NESHAP II and have been revised to comply with all VOHAP-content requirements.

Degreasers/Solvent Cleaners – This includes cleaning operations which are not subject to NESHAP GG because they do not utilize HAP containing materials. These permits were reviewed and only minor changes made. Some permits had minor discrepancies in condition language which were harmonized, as well as clarifying that the permits cannot be used with any HAP containing solvents (unless modified to add NESHAP GG requirements), and that when using solvents that do not comply with VOC-content requirements of Rule 67.6.1, only components exempt from that rule can be cleaned in each unit.

Stripping – One permit is for a small stripping tank and does not have conditions requiring compliance with NESHAP GG requirements for stripping, so the permit was updated to clarify both that it can only be used for exempt operations under Rule 67.6.1, and that it cannot be used for any operations that would be considered depainting operations under NESHAP GG. Two permits are for depainting operations related to aerospace coating. These permits were revised to remove a permit shield for NESHAP GG which did not apply and to add a few missing requirements. The primary revision to these permits is that they previously did not clearly outline the requirements of NESHAP GG to only use HAP-containing chemical stripping agents for allowable types of operation (spot stripping and decal removal) – the original permit conditions correctly limited the quantity of strippers that could be used for these allowable operations, but did not clarify that HAP-containing materials could not be used for other types of stripping since no VOC controls are used with the equipment. Finally the permit for facility-wide cleaning was reviewed and found to contain all applicable requirements, with one clarification to rule references.

Machining and Grinding – Rule references were added to permits missing them to clarify the basis of requirements which typically are either Rule 52 or general operating requirements to minimize potential for nuisance and excess fugitive emissions. In addition, monitoring and recordkeeping requirements based on Rule 1421 were added to the permits as necessary.

12.0 Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, The District will provide the opportunity for review by EPA and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website and the public notice will be published through an email distribution list. The public notice contains information on how to petition EPA for review of a proposed action.

If no comments or objections are received, the District intends to promptly issue the Title V permit after conclusion of the review period. If comments are received the District will review and respond to the comments as necessary. If comments identify issues which require modification to the permit, revisions will be made and the permit either issued if the changes do not require re-review by EPA or the public, or will be re-noticed if changes are made which do require review.

13.0 Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA review, and response to any comments.

14.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice
- Engineering Evaluations