



Sectors: 5, S
Site Record: APCD2021-SITE-03766

Application Record: APCD2023-APP-008026



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AUTHORITY TO CONSTRUCT (Draft Version)

EXPIRES:

After examination of your Application for an Air Pollution Control District (hereinafter referred to as "the District") Authority to Construct and Permit to Operate for equipment located at the above location, the District has decided on the following actions:

Authority to Construct is granted pursuant to Rule 20 of the Air Pollution Control District Rules and Regulations for equipment to consist of:

Adhesive material application operation consisting of:

Spray Booth –
 Manufacturer: Bleeker MFG
 Model: SEP-25-18
 Dimensions: 18'L x 14'W x 12'H
 Exhaust: One (1) fan, 16,800 cfm

Using mechanically atomized spray equipment to apply Rule 67.21 compliant adhesive materials.

This Authority to Construct is issued with the following conditions:

1. Total emissions of volatile organic compounds (VOC) from the above operation shall be less than ten (10) pounds per day. (Rule 20.2)
2. Total emissions of volatile organic compounds (VOC) and toxic air contaminants (TAC) from the above operation shall be documented. These records shall be made available to the District upon request. (NSR, Rules 1200 and 21)
3. Annual emissions of toxic air contaminants (TACs), as defined in District Rule 1200 (Revisions Effective 09/19/23), shall be limited to the following, per twelve (12) consecutive month period:

1-Chloro-4-(trifluoromethyl)benzine (PCBTF, CAS #: 98-56-6): 62 lbs/year

Compliance with these limits shall be demonstrated through record keeping and District defined emissions calculation method established in the conditions of this Permit. (Rule 1200 and 21)

4. 1-Chloro-4-(trifluoromethyl)benzine (PCBTF) emissions shall be calculated as follows:
 Emissions/Day = U x D x Ci
 Where U = Daily usage of materials containing PCBTF (gallons/day)
 D = Density of material per SDS (pounds/gallon)
 Ci = Weight fraction of PCBTF in material per SDS (%)

Emissions for each 12-month period shall be calculated by summing the daily emissions for each month included in that period. (Rule 1200)

5. All equipment and/or materials associated with air contaminant emissions from this operation or that affects the air contaminant emissions shall not deviate from the above equipment description. The permittee shall submit an application to the District and wait for approval in writing prior to modifying any such equipment. (Rule 10)

6. Adhesive materials, adhesive bonding agents, stripping, surface preparation, and cleaning materials used in this adhesive materials application operation shall comply with Rule 67.21 requirements. (Rule 67.21)
7. All materials containing volatile organic compounds shall be stored in closed containers in accordance with Rule 67.17 requirements. (Rule 67.17)
8. The permittee shall not use more than a total of 55 gallons of non compliant materials in a calendar year at a stationary source. These materials include: adhesive materials, surface preparation, stripping, cleanup materials, and adhesive bonding agents. In order to claim this exemption, the permittee shall comply with the recordkeeping standards of Rule 67.21.
9. VOC containing materials used for surface preparation, stripping, cleanup or used as an adhesive bonding agent shall meet one of the following requirements:
 - a. the VOC content does not exceed 70 grams per liter (0.58 pounds per gallon) of material; or
 - b. the initial boiling point is at least 190° C (374° F); or
 - c. the total VOC vapor pressure is 45 mm Hg or less at 20° C (68° F). (Rule 67.21)
10. VOC containing materials used to clean application equipment shall meet one of the following requirements:
 - a. the VOC content does not exceed 70 grams per liter (0.58 pounds per gallon), as applied; or
 - b. the initial boiling point is at least 190° C (374° F); or
 - c. the total VOC vapor pressure is 45 mm Hg or less at 20° C (68° F); or
 - d. the cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation to the atmosphere, or
 - e. the application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning materials are being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases, or
 - f. a system that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes, or
 - g. other application equipment cleaning methods are used that are demonstrated to be as effective as any of the equipment described above in minimizing the VOC emissions to the atmosphere, provided that the method has been tested and approved in writing by the Air Pollution Control Officer prior to use. (Rule 67.21)
11. Permittee shall maintain records in accordance with Rule 67.21. The records shall contain, at minimum, the following information:
 - a. current list of all materials containing VOCs, including all adhesive materials, stripping, surface preparation and cleaning materials. The materials shall be identified as follows:
 - i. the category of adhesive material as specified in Rule 67.21(d), including manufacturer name and identification, VOC content, and mix ratios; and,
 - ii. VOC content, vapor pressure and/or initial boiling point, as applicable to demonstrate compliance with Rule 67.21, for each adhesive bonding agent, stripping, surface preparation and cleaning material;
 - b. daily usage records of all materials used, including location of material use;
 - c. current material safety data sheets (SDS) or manufacturer's specifications for all materials used. SDS and manufacturer's specifications shall, at a minimum, contain the following information: VOC content weight or weight percentage, TAC content weight or weight percentage and material density (weight per volume) or material specific gravity (material density relative to the density of water) for all materials used. (Rules 67.21 and 21)
12. All records shall be retained on site for at least three (3) years and made readily available to the District upon request.
13. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
14. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
15. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

This Authority to Construct does not authorize operation of the above-specified equipment until written notification has been provided to the District indicating that construction (or modification) has been completed in accordance with this Authority to Construct. Upon submission of this notification, temporary Permit to Operate shall take effect and will remain in effect, unless withdrawn or modified by the District, until the equipment is inspected by the District and a revised temporary permit (Startup Authorization) is issued or a Permit to Operate is granted or denied.

This Authority to Construct shall be posted on or within 25 feet of the above described equipment or maintained readily available at all times on the operating premises.

Upon completion of construction (or modification) in accordance with this Authority to Construct, and prior to commencing operation, the applicant must complete and mail, deliver or email to apcdpermits@sdapcd.org the enclosed Construction Completion Notice to the District. After mailing, delivering or emailing the notice, the applicant may commence operation of the equipment. Operation must be in compliance with all the conditions of this Authority to Construct and applicable District Rules.

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

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

This Authority to Construct will expire on unless an extension is granted in writing.

This is not a Permit to Operate. Please be advised that installation or operation of this process or equipment without written authorization may be a misdemeanor subject to fines and penalties.

If you have any questions regarding this action, please contact me at (858) 688-7142 or via email at John.Lee@sdapcd.org.

John Lee
Asst APC Engineer

CC: Compliance Division