STATEMENT OF BASIS
Initial Title V Permit

Facility Name:	Marine Corps Air Station Miramar (MCAS Miramar)
Title V App. Number:	APCD2024-APP-008136
Title V Permit Number:	APCD2025-TVP-000XX (new)
Facility ID:	APCD1996-SITE-02771
Equipment Address:	MCAS Miramar San Diego, CA 92145
Permitting Contact:	Vanessa Capestany, (619) 556-1537
Site Contact:	Vanessa Capestany, (619) 556-1537
Responsible Official:	Colonel Thomas M. Bedell, Commanding Officer, (858)307-6050
Permit Engineer:	Peter Ossowski
Date:	10/7/2025
Senior Engineer:	Nicholas Horres 10/7/2025

1.0 Type of Action and Summary of Changes

This is an application for a new Title V permit for a functional group (Third Marine Air Wing: Combat Readiness) of an existing military base that operates as an air station to support the Marine Corps. MCAS is affected by disaggregation therefore title v permit only covers stationary source that is only the Third Marine Air Wing: Combat Readiness.

2.0 History of Title V Applications and Modifications/Applications since creation of site:

The application was received on 2/20/2024. The equipment was already in operation and is being required to obtain a permit based on the attainment designation change for San Diego County's air basin. The facility was notified on 4/6/2023 of the deadline to apply by 12/22/23. This initial deadline was extended to 2/24/24 on 9/14/2023. The district considers this application to be timely because it was submitted in accordance with Rule 1414 and advisory deadlines. This section will discuss the facility history.

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

Title V Application History –

Application Number	Title V Permit Number	Application Description	Equipment	Approved
APCD1998-APP-971226	APCD2008-PTO-971226	Initial Title V Application	Air Station	Open

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 (see appendix A of the permit).

Relevant Application History for facility				
Application Number	**Affected Permit to Operate(s)**	**Description**	**Affected Emission Units**	**Outcome**
APCD1984-APP-040490	APCD1999-PTO-040490	Aircraft Engine Test Cell T-10 For High Performance Jet Engines with Afterburners	Turbine Engine Test Cell Stand	Approved
APCD1992-APP-920689	APCD2008-PTO-920689	Cold Solvent Degreaser	Cold Solvent Degreaser	Approved
APCD1992-APP-920690	APCD2008-PTO-920690	Cold Solvent Degreaser	Cold Solvent Degreaser	Approved
APCD1992-APP-920693	APCD2008-PTO-920693	Cold Solvent Degreaser	Cold Solvent Degreaser	Approved
APCD1992-APP-920694	APCD1999-PTO-920694	Metal Inspection Tank	Metal Inspection Tank	Approved
APCD1993-APP-930473	APCD2008-PTO-930473	Cold Solvent Degreaser	Cold Solvent Degreaser	Approved
APCD1996-APP-960118	APCD1998-PTO-960118	Aircraft Engine Test Cell AE37T-26 for Gas Turbines	Turbine Engine Test Cell Stand	Approved
APCD1996-APP-960119	APCD1997-PTO-960119	Aircraft Engine Test Cell AE37T-26 for Gas Turbines	Turbine Engine Test Cell Stand	Approved
APCD1996-APP-960120	APCD1997-PTO-960120	Aircraft Engine Test Cell AE37T-17 for Gas Turbines	Turbine Engine Test Cell Stand	Approved
APCD1996-APP-960121	APCD2000-PTO-960121	Aircraft Engine Test Cell AE37T-24V4 for Gas Turbines	Turbine Engine Test Cell Stand	Approved
APCD1996-APP-960122	APCD2000-PTO-960122	Aircraft Engine Test Cell AE37T-24V2 for Gas Turbines	Turbine Engine Test Cell Stand	Approved
APCD1996-APP-960123	APCD2000-PTO-960123	Aircraft Engine Test Cell for Gas Turbines T58-GE and T64-GE Series	Turbine Engine Test Cell Stand	Approved

APCD1996-APP-960125	APCD2006-PTO-960125	Aerospace Coating and Automotive Refinishing Operations	Paint Spray Booth	Approved
APCD1996-APP-960127	APCD2006-PTO-960127	Aerospace Coating and Automotive Refinishing Operations	Paint Spray Booth	Approved
APCD1997-APP-970080	APCD2008-PTO-970080	Paint Stripping Tank, Cold Solvent	Paint Stripping Tank	Approved
APCD1999-APP-973433	APCD2002-PTO-020143	Aerospace Coating	Paint Spray Booth	Active
APCD1999-APP-973754	APCD2000-PTO-960121	Change engines tested from 100 tests/yr to 300 tests/yr	Turbine Engine Test Cell Stand	Approved
APCD1999-APP-973771	APCD2000-PTO-960122	Change engines tested from 70 tests/yr to 210 tests/yr	Turbine Engine Test Cell Stand	Approved
APCD1999-APP-973992	APCD2008-PTO-973992	Solvent Degreasing: Remote Reservoir	Solvent Degreasing	Approved
APCD2000-APP-974484	APCD2008-PTO-930473	LKR:	Solvent Degreasing	Approved
APCD2000-APP-974498	APCD2000-PTO-960122 APCD2000-PTO-960123	Annual limits are shared between permits	Turbine Engine Test Cell Stand	Approved
APCD2000-APP-975237	APCD2006-PTO-960125	Add mobile equipment	Paint Spray Booth	Approved
APCD2002-APP-978846	APCD2008-PTO-978846	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2004-APP-981359	APCD2008-PTO-981359	Cold Solvent Dip Tank	Cold Solvent Degreaser	Approved
APCD2004-APP-982027	APCD2008-PTO-970080	Increase in throughput for Paint Stripping Tank, Cold Solvent	Paint Stripping Tank	Approved
APCD2005-APP-983707	APCD2006-PTO-960125	Allowed coatings with TACs to be used	Paint Spray Booth	Approved
APCD2005-APP-983708	APCD2006-PTO-960127	Allowed coatings with TACs to be used	Paint Spray Booth	Approved
APCD2007-APP-985803	APCD2008-PTO-985803	Paint stripping operation	Paint Stripping Tank	Approved
APCD2010-APP-001343	APCD2006-PTO-960125	Allow the use of coatings containing hexavalent chromium for aerospace applications but not automotive applications	Paint Spray Booth	Approved

APCD2010-APP-001344	APCD2006-PTO-960127	Allow the use of coatings containing hexavalent chromium for aerospace applications but not automotive applications	Paint Spray Booth	Approved
APCD2011-APP-001853	APCD2012-PTO-001080	Sanding Booth	Grinding booth	Approved
APCD2012-APP-002319	APCD2008-PTO-985803	Change of stripper	Paint Stripping Tank	Approved
APCD2014-APP-003792	APCD2000-PTO-960122	Added additional gas turbine models to be tested	Turbine Engine Test Cell Stand	Approved
APCD2015-APP-004043	APCD2015-PTO-002389	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2015-APP-004044	APCD2016-PTO-002724	Solvent Degreasing: Completely enclosed batch-loaded cold solvent cleaner	Cold Solvent Degreaser	Approved
APCD2015-APP-004045	APCD2015-PTO-002390	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2015-APP-004046	APCD2015-PTO-002391	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2017-APP-004994	APCD2021-PTO-003742	Aerospace Coating and Automotive Refinishing Operations	Paint Spray Booth	Approved
APCD2018-APP-005550	APCD2019-PTO-003275	Emergency Diesel Engine Generator	Emergency Engine	Approved
APCD2018-APP-005591	APCD2019-PTO-003366	Emergency Diesel Engine Generator	Emergency Engine	Approved
APCD2018-APP-005592	APCD2019-PTO-003367	Emergency Diesel Engine Generator	Emergency Engine	Approved
APCD2019-APP-005698	APCD2008-PTO-970080	Replacing stripping tank and using different solvents/seals	Cold Solvent Degreaser	Approved
APCD2019-APP-005987	APCD2021-PTO-003721	Emergency Diesel Engine Generator	Emergency Engine	Approved
APCD2019-APP-006074	APCD2002-PTO-020139	Aerospace Coating: Additional Hangar added for where coating will occur the original hangar will be decommissioned over time	Aerospace Coating	Approved
APCD2020-APP-006351	APCD2020-PTO-003560	Emergency Diesel Engine Generator	Emergency Engine	Approved
APCD2021-APP-006782	APCD2021-PTO-004105	Metal Inspection Tank	Metal Inspection Tank	Approved

APCD2021-APP-006991	APCD2024-PTO-004819	Solvent Degreasing	Cold Solvent Degreaser	Approved
APCD2021-APP-006992	N/A	Aerospace Coating	Aerospace Coating	ATC issued, construction not completed yet
APCD2021-APP-006993	N/A	Aerospace Coating	Aerospace Coating	ATC issued, construction not completed yet
APCD2021-APP-006994	N/A	Solvent Degreasing	Cold Solvent Degreaser	ATC issued, construction not completed yet
APCD2021-APP-006996	APCD2024-PTO-004856	Enclosed Batch Loaded Solvent Degreasing	Cold Solvent Degreaser	Approved
APCD2021-APP-006997	N/A	Solvent Degreasing	Cold Solvent Degreaser	ATC issued, construction not completed yet
APCD2023-APP-008001	APCD2024-PTO-004945	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2024-APP-008136	N/A	Title V Initial	Title V Initial	Open
APCD2024-APP-008153	N/A	Aerospace Coating	Aerospace Coating	ATC issued, construction not completed yet
APCD2024-APP-008367	APCD2024-PTO-005061	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2024-APP-008368	APCD2024-PTO-005064	Solvent Degreasing: Remote Reservoir	Cold Solvent Degreaser	Approved
APCD2024-APP-008393	N/A	Emergency Engine	Emergency Engine	ATC issued, construction not completed yet
APCD2024-APP-008394	N/A	Emergency Engine	Emergency Engine	ATC issued, construction not completed yet
APCD2024-APP-008395	N/A	Emergency Engine	Emergency Engine	ATC issued, construction not completed yet
APCD2024-APP-008396	N/A	Emergency Engine	Emergency Engine	ATC issued, construction not completed yet

3.0 Facility Description

This facility is an existing military base that operates as an air station to support the Marine Corps. This facility has permits for various equipment including solvent cleaners (degreasers), metal inspection tanks, grinding booths, paint booths, test stand/cells, and emergency engines

that are all located on a portion of MCAS. This base is affected by disaggregation for military facilities and this facility includes operations related to 3rd Marine Aircraft Wing Functional Group D.

Active Permits

Equipment Type	Permit Number	Equipment Description
Aircraft Engine Test Cell/Stand	APCD1997-PTO-960119	Check Pad No. 8126, used to stage one expeditionary Test Stand Model No. AE37T-26 to test Garrett Model GTC-36-200 Gas Turbines; operated by Marine Air Logistics Support Eleven (MALS-11); located near Bldg. 8461; check pad is stationary; test stand, associated instrumentation and above ground fuel tank are portable and can be deployed for national defense purposes. (960119AFS24NOV1997)(989244 ALC 07/10)
Aircraft Engine Test Cell/Stand	APCD1997-PTO-960120	Check Pad No. 8127, used to stage one expeditionary Test Stand Model No. AE37T-17 to test General Electric Model T56 Gas Turbines; with associated instrumentation and above ground fuel tank; operated by Marine Air Logistics Support Eleven (MALS-11); located near Bldg. 8461; check pad is stationary; test stand, associated instrumentation and above ground fuel tank are portable and can be deployed for national defense purposes. (960120AFS24NOV1997)(989244 ALC 07/10)
Aircraft Engine Test Cell/Stand	APCD1998-PTO-960118	Check Pad No. 8125, used to stage one expeditionary Test Stand Model No. AE37T-26 to test General Electric Gas Turbine Models T62-11/27, with associated instrumentation and above ground fuel tank, test stand and fuel tank are portable; operated by Marine Air Logistics Support Sixteen (MALS-16); located near Bldg. 8461. (960118AFS04NOV1988)(989244 ALC 07/10)
Aircraft Engine Test Cell/Stand	APCD1999-PTO-008199	Test cell a high performance jet engine with afterburner: acoustic concrete cell; instrumentation; test controls; ferrocene injection smoke controls Bldg 8545 970296 (11/97)
Aircraft Engine Test Cell/Stand	APCD1999-PTO-040490	Test cell T-10 for high performance jet engines with afterburners, (bldg 679): reinforced steel/concrete building for jet engine testing and noise control, 5 to 1 test cell dry augmenter tube with primary and secondary air inlets and short exhaust stack; fuel supply system; engine instrumentation and operator control room. Bldg 8679 970296 (11/97)
Aircraft Engine Test Cell/Stand	APCD2000-PTO-960121	Check Pad No. 8129, used to stage one expeditionary Test Stand Model No. AE37T-24V4 to test General Electric Model T58-16 Gas Turbines; with associated instrumentation and above ground fuel tank; operated by Marine Air Logistics Support Sixteen (MALS-16), Instrumentation Module S/N 4979-003; located near Bldg. 8461; all equipment is portable. (960121AFS27MAY1998)(973754 GDS 9/99)(989244 ALC 07/10)
Aircraft Engine Test Cell/Stand	APCD2000-PTO-960122	Check Pad No. 8128, used to stage one expeditionary Test Stand Model No. AE37T-24V2 to test General Electric Model T64-413/416 Gas Turbines; with associated instrumentation and above ground fuel tank; operated by Marine Air Logistics Support Sixteen (MALS-16), Instrumentation Module S/N 7025-006; located near Bldg. 8461; all equipment is portable. (960122 AFS 27 MAY 1998) (973771 AFS 30 AUG 1999) (974498 AFS 22 FEB 2000) (989244 ALC 07/10)
Aircraft Engine Test Cell/Stand	APCD2000-PTO-960123	Twin Engine Turbo Test Cell to test General Electric Gas Turbine Models T58-GE Series and T64-GE Series. (960123 AFS 21 AUG 2000) (989244 ALC 07/10)
Coating	APCD1999-PTO-005642	AEROSPACE AND/OR METAL PARTS APPLICATION STATION: ONE (1) BINKS PAINT SPRAY BOOTH, 16'W x 16'L x 8'H, EQUIPPED WITH DRY FILTERS AND 5-HP EXHAUST FAN, USING HVLP SPRAY GUNS OR EQUIVALENT. LOCATED INSIDE BLDG 7550 (PAINT SHOP) 970296 (11/97)
Coating	APCD2002-PTO-020133	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS; PAINT STORAGE AREA BLDG 9670 SW OF HANGAR 6 970296 (11/97)

Coating	APCD2002-PTO-020134	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS; PAINT STORAGE AREA BLDG 9570 SW OF HANGAR 5, 970296 (11/97)
Coating	APCD2002-PTO-020135	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS; PAINT STORAGE AREA BLDG 9470 SOUTH OF 4, 970296 (11/97)
Coating	APCD2002-PTO-020136	AIRCRAFT COATING STATION, OUTSIDE: PAINT SPRAY GUNS STORAGE SW OF BLDG 9500 HANGAR 3, 970296 (11/97)
Coating	APCD2002-PTO-020137	AIRCRAFT COATING STATION, OUTSIDE: PAINT SPRAY GUNS STORAGE SE OF BLDG 9500 HANGAR 3, 970296 (11/97)
Coating	APCD2002-PTO-020138	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS, PAINT STORAGE AREA BLDG 9222 WEST OF HANGAR 2, 970296 (11/97)
Coating	APCD2002-PTO-020139	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS, PAINT STORAGE AREA BLDG EAST OF BLDG 9277 HANGAR 1, 970296 (11/97)
Coating	APCD2002-PTO-020143	AIRCRAFT PARTS COATING, OUTSIDE (TOP COATING): PAINT SPRAY GUNS, PAINT STORAGE AREA 970296 (11/97)
Coating	APCD2006-PTO-960125	Aerospace coating and automotive refinishing operations consisting of: One (1) enclosed 42' L x 16' W x 23' H spray booth with 25,000 CFM exhaust. Manufacturer: Bleeker Brothers Model: TA-634-T-LH Functional group: Third Marine Air Wing (3rd MAW Combat Readiness)
Coating	APCD2006-PTO-960127	Aerospace coating operation consisting of: One (1) enclosed 35' L x 17' W x 23' H spray booth with 25,000 CFM exhaust. Manufacturer: Bleeker Brothers Model: TA-634-T-LH Functional group: Third Marine Air Wing (3rd MAW Combat Readiness)
Coating	APCD2021-PTO-003742	Aerospace and ground support equipment coating consisting of: One (1) enclosed paint spray booth Booth Manufacturer: Bleeker Brothers Model: TA-634-LH Internal Dimensions: 36 feet long x 16 feet wide x 23 feet high Number of exhaust stacks: 1 Exhaust flow rate: 25,000 cfm Stack diameter: 3.5 ft Stack height: 30 feet
Grinding Booth	APCD2012-PTO-001080	One (1) Spray System Inc. 42' X 11' X 10'9" Sanding Booth, Model DC-4088, S/N 9824, equipped with vertical mount HEPA filters located at Building 7214.
Metal Inspection Tank	APCD1999-PTO-920694	ONE (1) MAGNAFLUX MODEL H-810-G METAL INSPECTION TANK, 72"L X 31"W X 15"H, INTERNAL DIMENSIONS, S/N: 94064, EQUIPPED WITH GRATED COVER, & SPRAY DEVICE WITH CONTINUOUS LIQUID FLOW AND ONE (1) MAGNAFLUX MODEL ZA-28 PRE-DIP TANK, 33"L X 16"W X 15"H INT. DIM., S/N: MZ-68629, EQUIPPED WITH LID & SPRAY DEVICE WITH CONTINUOUS LIQUID FLOW BOTH OF WHICH USE A SUSPENSION OF MAGNAFLUX POWDER IN NAPHTHA OR MINERAL OIL. 970296 (11/97)

Metal Inspection Tank	APCD2021-PTO-004105	Metal Inspection Tanks Operation (STATIONARY PENETRANT INSPECTION SYSTEM): ONE PENETRANT TANK WITH COVER, 40”L X 20”W X 3’H. RINSE TANK WITH COVER 40”L X 20”W X 3’H. AND DRYING/INSPECTION STATION WITH ELECTRIC OVEN
Solvent Degreasing	APCD2008-PTO-920689	COLD SOLVENT DEGREASING: MANUFACTURER: RAMCO, MODEL NO.: MK24, S/N: JB1538-05-055. SOLVENT: SEE ATTACHMENT AA Legacy System Information NO: APP/970296 (11/97) (MODIFIED 06-08 SRH)
Solvent Degreasing	APCD2008-PTO-920690	COLD SOLVENT DIP TANK (<5 SQ. FT. SURFACE AREA): MANUFACTURER: KLEER-FLO MODEL NO.: PW100G SERIAL NO.: 071 SOLVENT: SEE ATTACHMENT AA970296 (11/97)/NOAPP (MODIFIED 06-08 SRH)
Solvent Degreasing	APCD2008-PTO-920693	COLD SOLVENT DEGREASER: MANUFACTURER: RAMCO, MODEL NO.: MK24, S/N: JB1538-05-058. SOLVENT: SEE ATTACHMENT AA NO: APP/970296 (11/97)(MODIFIED 06-08 SRH)
Solvent Degreasing	APCD2008-PTO-930473	Cold Solvent Degreaser (<5 sq.ft.): Manufacturer: RAMCO Model: MK 24, S/N: JB2170-11-001. Internal Size: 24"L X 23"W X 21"H Solvent: See Attachment AA (NoApp Identical Replacement/JNH/Mar 2010)(974484/LKR/EZI/970296/930473 EZI)(MODIFIED 06-08 SRH)
Solvent Degreasing	APCD2008-PTO-970080	STRIPPING OPERATION: MANUFACTURER: RAMCO CORP MODEL: CM 72 ESS S/N: JB 834-99 DIMENSIONS: 72"L X 48"W X 50"H SOLVENT: TO MEET MIL-PRF-83936 SPECIFICATIONS (NOAPP/JNH/1108) 982027(EZI)970080(RKM,EZI) (MODIFIED 07-08 SRH)
Solvent Degreasing	APCD2008-PTO-973992	REMOTE RESERVOIR: MANUFACTURER: INLAND TECHNOLOGY MODEL IT48C-WC S/N: 49933833 DEGREASING SOLVENT: SEE ATTACHMENT AA 973992 (EZI) (MODIFIED 07-08 SRH)
Solvent Degreasing	APCD2008-PTO-978846	REMOTE RESERVOIR CLEANER: MANUFACTURER: INLAND TECHNOLOGY, INC. MODEL: IT-48C-WC S/N: 402416929 INTERNAL DIMENSIONS: 48 IN.X 28 IN. X 14 IN. H SOLVENT: SEE ATTACHMENT AA(978846/CDB/01-03) (MODIFIED 07-08 SRH)
Solvent Degreasing	APCD2008-PTO-981359	COLD SOLVENT DIP TANK (< 5 SQ.FT.) MANUFACTURER: RAMCO MODEL: MK24CMS, S/N: JB1538-05-050. TANK DIMENSIONS: 23 IN. L X 24 IN. W X 20.5 IN. H SOLVENT: SEE ATTACHMENT AA (981359/CDB/06-04) (MODIFIED 07-08 SRH)
Solvent Degreasing	APCD2008-PTO-985803	Paint stripping operation consisting of the following stripping equipment: One (1) paint stripping tank and one (1) rinse tank Manufacturer: Automated Cleaning Technologies, Inc. Model: STR4H Internal Stripping Tank Dimensions: 32 inches long x 60 inches wide x 40.5 inches deep Internal Rinse Tank Dimensions: 32 inches long x 60 inches wide x 40.5 inches deep Serial No. ACT181807-0360
Solvent Degreasing	APCD2015-PTO-002389	Remote reservoir cleaner: Manufacturer - Graymills Corporation Model - ACU-24/M Serial Number - 239364-048 Internal Dimensions - 28" L x 20" W x 20" H Solvent - PD-680 (CAS # 8052-41-3, 64741-96-4, 64742-88-7, or 64742-48-9) or solvents found in Attachment AA
Solvent Degreasing	APCD2015-PTO-002390	Remote reservoir cleaner: Manufacturer - Graymills Corporation Model - ACU-24/M Serial Number - 239364-040

		Internal Dimensions - 28" L x 20" W x 20" H Solvent - PD-680 (CAS # 8052-41-3, 64741-96-4, 64742-88-7, or 64742-48-9) or solvents found in Attachment AA
Solvent Degreasing	APCD2015-PTO-002391	Remote reservoir cleaner: Manufacturer - Graymills Corporation Model - ACU-24/M Serial Number - 239364-042 Internal Dimensions - 28" L x 20" W x 20" H Solvent - PD-680 (CAS # 8052-41-3, 64741-96-4, 64742-88-7, or 64742-48-9) or solvents found in Attachment AA
Solvent Degreasing	APCD2016-PTO-002724	Batch-loaded cold solvent cleaner, completely enclosed and equipped with a carbon adsorption system using 50 pounds of activated carbon and a 50 cfm fan Manufacturer - Glarus Technologies Model - PCS-1 O/APW-35 Serial Number - SPW-0078 Internal Dimensions - 24" L x 16" W x 18" H Solvent - MIL-PRF-680 (CAS # 8052-41-3, 64741-96-4, 64742-88-7, or 64742-48-9) with a vapor pressure less than 0.5 mmHg at 20 degrees Celsius Functional Group - 3rd Marine Air Wing (3rd MAW)(Combat Readiness)
Solvent Degreasing	APCD2024-PTO-004819	Cold solvent cleaner: Manufacturer: Gray Mills Model: A-42618-A Tank Dimensions: 24 inches Length x 20.5 inches Width x 18 inches Height Solvent: PD-680 or other Attachment AA approved solvent Functional Group: 3rd Marine Air Wind (3rd MAW)(Combat Readiness)
Solvent Degreasing	APCD2024-PTO-004856	Batch-loaded cold solvent cleaner, completely enclosed and equipped with a carbon adsorption system using 50 pounds of activated carbon and a 50 cfm fan Manufacturer: Clarus Technologies Model: PCS-10/APW-35, SN: SPW-0047 Tank Dimensions: 26.5 inches Length x 24 inches Width x 17 inches Height Solvent: PD-680 or other Attachment AA approved solvent Functional Group: 3rd Marine Aie Wind (3rd MAW)(Combat Readiness)
Solvent Degreasing	APCD2024-PTO-004945	Cold Solvent Cleaner (Remote Reservoir Cleaner) Manufacturer: Safety Kleen Model: 81 Serial Number: LKE-22089-003 Internal Size: 45” length X 21” width X 36” height Solvent: ATTACHMENT AA: List of Solvents for Cold Solvent Cleaning Operations
Solvent Degreasing	APCD2024-PTO-005061	Cold Solvent Cleaner (Remote Reservoir Cleaner) Manufacturer: Graymills Corporation Model: A-40455-A Serial Number: 239364-025 Internal Size: 28” length X 20” width X 20” height Solvent: ATTACHMENT AA: List of Solvents for Cold Solvent Cleaning Operations
Solvent Degreasing	APCD2024-PTO-005064	Cold Solvent Cleaner (Remote Reservoir Cleaner) Manufacturer: Graymills Corporation Model: A-40455-A Serial Number: 239364-031

		Internal Size: 28” length X 20” width X 20” height Solvent: ATTACHMENT AA: List of Solvents for Cold Solvent Cleaning Operations
Emergency Engine	APCD2019-PTO-003275	FPT Industrial S.P.A. Model: F3BE9685A-E S/N: TBD 530 BHP Diesel 25.3 GAL/HR Year: 2018 Family: HFPXL12.9IGR
Emergency Engine	APCD2019-PTO-003366	Emergency Diesel Engine Generator: John Deere, Model 6068HF485, S/N PE6068N011676, Model Year 2018, Engine Family JJDXL13.5103, Tier 3 certified, 318 bhp rated, driving a 200 kW emergency electrical generator.
Emergency Engine	APCD2019-PTO-003367	Emergency Diesel Engine Generator: John Deere, Model 6068HF485, S/N PE6068N011958; Model Year 2018; Engine Family JJDXL13.5103; Tier 3 certified; 318 bhp rated; driving a 200 kW emergency electrical generator.
Emergency Engine	APCD2020-PTO-003560	Emergency Diesel Engine Generator: Kukje Machinery, Model D3400T-Gen1, S/N TP9J00706; Model Year 2020; Engine Family KKMCL3.41D43; Tier 3 certified; 85 bhp rated; equipped with a Miratech LTRV2-2-2.5-XR1 DPF; driving a 50 kW emergency electrical generator.
Emergency Engine	APCD2021-PTO-003721	Emergency Diesel Engine: Mitsubishi, Model S16R-Y2PTAW2-1, S/N 23815, rated at 2923 BHP, Model Year 2018, Tier 2 certified of Engine Family Number JMVXL65.4BBA, equipped with a diesel particulate filter: Miratech, Model LTRV64-60-18-HSG, S/N CVF-1410; driving a 2000-kW emergency electrical generator. Functional Group: MCAS Miramar Third Marine Aircraft Wing (3rd MAW)

Non-Operational Permits

Equipment Type	Permit Number	Equipment Description
Aircraft Engine Test Cell/Stand	APCD2007-PTO-960117 Non-Op	ONE (1) EXPEDITIONARY TEST STAND MODEL NO. AE37T-23, TO TEST GENERAL ELECTRIC GAS TURBINE MODELS F404-GE400/402 WITH ASSOCIATED INSTRUMENTATION AND FUEL TANK, OPERATED BY MARINE AIR LOGISTICS SUPPORT ELEVEN (MALS-11), TEST STAND AND FUEL TANK ARE PORTABLE AT MCAS MIRAMAR, USUALLY USED AT HUSH HOUSE BUT MAY BE USED ANYWHERE AT MCAS MIRAMAR. TEST STAND, INSTRUMENTATION AND FUEL TANK ARE PORTABLE AND CAN BE DEPLOYED TO MEET NATIONAL DEFENSE REQUIREMENTS. 960117 AFS 24 NOV 1997 (980379 10956 20B01 11/03)
Coating	APCD2007-PTO-005641 Non-Op	PAINT SPRAY BOOTH(120 CU FT): BINKS, 6' X 4' X 5'H; EXHAUST SYSOF 4 FILTERS EACH 24" X 24" X 1" & 1-HP FAN IN BLDG 7550 PA#018039 (977359 0310A 27J 12/01) 970296 (11/97)
Coating	APCD2007-PTO-005643 Non-Op	PAINT SPRAY BOOTH (3375 CU FT): BINKS-15' X 25' X 9'H; EXHAUST SYS OF 20 FILTERS EACH 20" X 20" X 1" & 1.5-HP FAN IN BLDG 8558 (977360 0310A 27K 12/01) 970296 (11/97)
Coating	APCD2007-PTO-870297 Non-Op	METAL PARTS AND PRODUCTS APPLICATION STATION; BINKS TA-534-T; 17.5' X 34.5' X 16' H WITH ONE SPRAY GUN (982514 0830N 27G01 1/05) (980001 8/03) 950957(0596)
Abrasive Blasting	APCD2007-PTO-005822 Non-Op	ABRASIVE BLAST ROOM (768 CU FT): W W SLY, 12' X 8' X 8'H, WAFFLEFLOOR; SCREW CONVEYOR; WITH CYCLONE IN BLDG 8461 ITEM 8, 970296 (11/97)(977361 0167A 02B01 12/01)
Corrosion Control Cart	APCD2007-PTO-008250 Non-Op	CORROSION CONTROL CART: CUSTOM-MADE, USN P/N 65A102J1-1, 7-GALLON SOLUTION TANK & 26-GALLON WATER TANK, S/N: KFV051 970296 (11/97)

Corrosion Control Cart	APCD2007-PTO-040306 Non-Op	CORROSION CONTROL CART: CUSTOM-MADE, USN P/N 65A102J1-1, 7-GALLON SOLUTION TANK & 26-GALLON WATER TANK, S/N: KFV081 970296 (11/97)

4.0 Compliance History

Overall, the facility has been in generally good compliance since first being permitted. The facility has been subject to compliance action on 6 occasions, which is comparatively good 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 minor record keeping/maintenance inconsistencies. The facility recently was found in violation of a handful of recordkeeping and engine maintenance requirements and the District is currently working with the facility to come into compliance, and is anticipated that most of these will be resolved prior to issuance of the Title V permit. These and previous violations from the facility are shown in the table below:

NOV	Description
APCD2017-NOV-000592	For using a non-compliant stripper as part of their automotive coating operation. Facility has paid fine.
APCD2020-NOV-000445	Failure to maintain records for solvent usage, missing label on or near cleaning tank, and using a non-compliant solvent. Facility has paid fine.
APCD2021-NOV-000547	Failure to maintain records for stripper usage and emergency engine usage. Facility has paid fine.
APCD2022-NOV-000488	Failure to conduct required periodic maintenance and maintain records for engines. Failure to maintain records for solvent usage. Facility has paid fine.
APCD2024-NOV-000675	Operate emergency engine other reasons that T&M and emergencies. Contractors have been trained to only operate for T&M
APCD2025-NOV-000495	Failure to conduct required periodic maintenance on several engines and failing to maintain usage records for coating operations. Facility is currently working to address the violation.
APCD2025-NOV-000632	Failure to maintain usage records of solvent usage. Facility is currently working to address the violation.
APCD2025-NOV-000648	For using a non-compliant stripper as part of their aerospace coating operation. Facility is currently working to address the violation.

5.0 Title V Applicability

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). This facility operates as part of a major stationary source which makes it subject to Title V permitting. Specifically, District Rule 1401 contains the following definition:

(b)(46) "Stationary Source" means an emission unit, or aggregation of emission units which are located on the same or contiguous properties and which units are under common ownership or entitlement to use. Stationary sources also include those emission units or aggregation of emission units located in the California Coastal Waters.

For the purposes of Title V, military bases are permitted to be "disaggregated" based on which group or entity has control over the operations. The intent is to treat military bases the same way that comparable non-military facilities would be and not aggregate operations that are not typically part of the same industrial groupings (e.g. most commercial gas stations are not co-located with aerospace rework facilities). MCAS Miramar has an approved functional group breakdown and the only group subject to Title V permitting is this one, 3rd MAW Combat Readiness.

The facility is a major source for NOx, VOC, and CO as shown in the emissions summary section and subject to Title V permitting for this reason.

Additionally, the functional group breakdown noted above does not apply to HAPs. Review of the facility determined that PTE for HAPs, with no restrictions, exceeds the major source thresholds, primarily due to the fact that many permits do not have functional operating limits which would limit PTE. However, actual emissions from the facility are well below the applicable thresholds, and therefore permit conditions will be included in the Title V permit to limit emissions to less than the major source thresholds for both total HAPs and Single HAPs, and including any associated recordkeeping.

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. Potential to emit is used to establish Title V applicability.

Pollutant	Thresholds (tpy)	**Facility Total Actual Emissions**	**Facility Total PTE**	Major Source
Highest Federal HAP	10	0.45	**<10**	N*
Sum of Federal HAPs	25	1.33	**<25**	N*
NOx	25	14.1	**100**	Y
VOC	25	19.6	**111**	Y
PM10	100	4.6	**9.92**	N
SOx	100	0.7	**5.69**	N
CO	100	13.0	**201**	Y

Actual emissions were obtained from the 2023 emission inventory. Potential to emit for the test cell stands was calculated using estimates and source tests from application APCD1996-APP-960119. PTE for the Coatings was calculated using estimates and permit limits from APCD2024-APP-008153. PTE for the grinding booth permit, metal inspection tanks, and solvent degreasing was calculated using permit limits. PTE for the engines was determined using the original application data.
*PTE for highest federal HAP and sum of federal HAPs are calculated from permit limits that are newly added to the Title V permit

Third Marine Air Wing: Combat Readiness is considered a major source of NOx, VOC, and CO.

7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)

Compliance Assurance Monitoring (CAM) applicability was considered for this application pursuant to 40 CFR Part 64. All EUs were considered for CAM applicability.

CAM does not apply to the test cells because these units do not use a control device to achieve compliance with any such emission limitation or standard.

The coating operations do not have control devices for VOCs, therefore CAM does not apply to these sources.

The sanding booth operations are equipped with filters for PM10 control, but the potential pre-control device emissions (~1 tons PM10 per year) and post control device emissions (~0.002 tons PM10 per year are both below the amount required for a source to be classified as a major source. The facility is not a major source of PM10.

Solvent degreasing and stripping do not have a control device, therefore CAM does not apply to these sources. The emissions are reduced by containment and reuse of the solvents.

The metal inspection tanks do not have control devices for VOCs, therefore CAM does not apply to these sources. The potential emissions are also low (~0.1 tons VOC per year).

The emergency engines are operated for the sole purpose of providing electricity during periods of peak electrical demand or emergency situations and will be operated consistent with that purpose throughout the part 70 or 71 permit term. These sources are subject to NSPS standards for VOCs NOx CO and PM10 that keeps them from being subject to CAM.

Therefore, no units at this facility are 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	11	Exemptions
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20	New Source Review

SDCAPCD Reg. II	20.1	New Source Review
SDCAPCD Reg. II	20.2	New Source Review
SDCAPCD Reg. II	20.3	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. V	98**	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control

Facility-wide/Other Prohibitory & Misc. 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	66.1	Misc. Surface Coating Operations & other Processes Emitting VOC
SDCAPCD Reg. IV	67.0.1	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Organic Materials Containing VOC
SDCAPCD Reg. IV	67.3	Metal Parts Coating
SDCAPCD Reg. IV	67.6.1	Cold Solvent Cleaning and Stripping Operations
SDCAPCD Reg. IV	67.9	Aerospace Coatings
SDCAPCD Reg. IV	67.17	Open VOC Containers
SDCAPCD Reg. IV	67.20.1	Motor Vehicle & Mobile Equipment Coating Operations
SDAPCD Reg. IV	68	Fuel-Burning Equipment-Oxides of Nitrogen
SDCAPCD Reg. IV	69.4.1	Stationary Internal Combustion Engines – BARCT
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. XII	1200*	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206	Asbestos Removal, Renovation, and Demolition
40 CFR Part 60	Subpart A	NSPS General Provisions
40 CFR Part 60	Subpart IIII	Stationary Compression Ignition Internal Combustion Engines NSPS
40 CFR Part 61	Subpart M	NESHAP - Asbestos
40 CFR Part 63	Subpart A	NESHAP General Provisions
40 CFR Part 63	Subpart ZZZZ	Reciprocating Internal Combustion Engines
40 CFR Part 82	Subpart A	Production and Consumption Controls

40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Services of Other Air Conditioners
California Code of Regulations (CCR) Title 17	93115*	ATCM for Stationary Compression Ignition Engines

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

Rules 10(a)/10(b) – 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 11 – This rule contains exemptions from permit requirements, and the facility is responsible for keeping any records necessary to substantiate any claimed exemption.

Rule 19 – Specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

Rule 19.3 – 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.

20.1-20.3 – 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.).

Rule 21 (and 1421) – 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 – 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 – 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 – 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 – 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 – Outlines prohibitions on open burning.

Rule 50 – Visible emission requirements that apply to all source of emissions.

Rule 51 – Public nuisance prohibition.

Rule 52 – Generally applicable particulate matter standard. Some sources may instead comply with Rule 53 (certain combustion sources).

Rule 53 – Specific Air Contaminants: 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.

Rule 62 – Sulfur Content of Fuels: This rule applies to all combustion sources, except sewage treatment plant digestor gases and gases emitted from solid waste disposal landfill sites, and limits emissions of sulfur compounds by setting maximum concentration limits.

Rule 67.0.1 – 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.

NSPS/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.

Rule 1200 – 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 1210 – Requirements of the District's Air Toxics "Hot Spot's" program, which requires assessment of and, if necessary reduction of, air toxics and associated health risk from facilities which have been identified as high priority. This rule is not federally enforceable; however, GKN is subject to this rule and has fully complied with and implemented all requirements.

Rule 1206/40 CFR 61 Subpart M – 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.

NESHAP ZZZZ/NSPS IIII – Specifies requirements for stationary internal combustion engines. Requirements for permitted emission units are contained in the corresponding emission unit specific permits in Appendix A; however, these rules also have some requirements for engines < 50 bhp which the facility is required to comply with.

40 CFR Subpart 82 – Protection of Stratospheric Ozone. Specifies various requirements related to refrigerants used in various processes including vehicle A/Cs and other consumer goods using similar products.

Permit Specific Applicable Requirements:

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD1997-PTO-960119 APCD1997-PTO-960120 APCD1998-PTO-960118 APCD1999-PTO-008199 APCD1999-PTO-040490 APCD2000-PTO-960121 APCD2000-PTO-960122 APCD2000-PTO-960123	Gas Turbine Test Cells	Rules 50, 51, 53, 62, 68
APCD2002-PTO-020133 APCD2002-PTO-020134 APCD2002-PTO-020135 APCD2002-PTO-020136 APCD2002-PTO-020137 APCD2002-PTO-020138 APCD2002-PTO-020139 APCD2002-PTO-020143 APCD2006-PTO-960127	Coating Operations (Aerospace)	Rules 50, 51, 67.17, 67.9, 21, 67.3, 67.18, 67.20

APCD1999-PTO-005642	Coating Operations (Aerospace and Metal Parts)	Rules 50, 51, 67.17, 67.9, 21, 67.3, 67.18, 67.20, 66.1, Rule 1421, Rule 1200
APCD2006-PTO-960125 APCD2021-PTO-003742	Coating Operations (Aerospace and Automotive)	Rules 20.2, 1200*, 50, 51, 67.9, 67.20.1, 67.3, 67.17, Title 17 CCR, Section 93112
APCD2008-PTO-920689 APCD2008-PTO-920690 APCD2008-PTO-920693 APCD2008-PTO-930473 APCD2008-PTO-973992 APCD2008-PTO-978846 APCD2008-PTO-981359 APCD2015-PTO-002389 APCD2015-PTO-002390 APCD2015-PTO-002391 APCD2016-PTO-002724 APCD2024-PTO-004819 APCD2024-PTO-004856 APCD2024-PTO-004945 APCD2024-PTO-005061 APCD2024-PTO-005064	Solvent Cleaning, Degreasing	Rules 67.6.1, California Health and Safety Code Division 20, Chapter 6.3 (beginning at section 25100)
APCD2008-PTO-970080 APCD2008-PTO-985803	Stripping	Rules 52, 67.6.1, 20.2, 1200*, MIL-PRF-83936 Specifications, California Health and Safety Code Division 20, Chapter 6.3 (beginning at section 25100)
APCD2012-PTO-001080	Grinding	Rules 50, 51, 52
APCD1999-PTO-920694 APCD2021-PTO-004105	Metal Inspection Tank	Rules 50, 51, 67.17, 66.1
APCD2019-PTO-003275 APCD2019-PTO-003366 APCD2019-PTO-003367	Emergency Engines	Rule 50, 51, 52, 17 CCR 93115, 1200*, 69.4.1, 40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ

APCD2020-PTO-003560 APCD2021-PTO-003721		

*Indicated rules are not federally enforceable

Emission Limitations

Gas Turbine Test Cells	
Pollutant	Primary Limiting Regulations
NOx	NA
SO2	Rule 62
VOC	NA
CO	NA
PM10	Rule 53
Toxic Pollutants	NA

The gas turbine test cells are used to test engines used in jet fighters and similar aircraft and are subject to particulate matter emission limits under rule 53, and sulfur dioxide (or fuel sulfur) limits under rule 53 and 62. Use of fuel as specified in the emission unit specific permits ensures compliance with these requirements. Some permits also have limitations on fuel use which also limit emissions. The test cells are exempt from many common rules for gas turbines (Rule 69.3.1, NSPS KKKK/GG) because they are solely used as test cells for aircraft engines.

Coating Operations	
Pollutant	Primary Limiting Regulations
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Coating Rules 66.1, 67.3, 67.9 or 67.20.1, (VOC content limits), Rule 20.2 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 52, Rules 66.1, 67.3, 67.9 or 67.20.1 (material application methods)
Toxic Pollutants	Rule 1200*,

*Indicated rules are not federally enforceable

Rules 66.1, 67.3, 67.9 and 67.20.1 – These rules specify prohibitory requirements for coating operations based on the type of coating/substrate. Each coating permit specifies which types of coating (miscellaneous, aerospace, metal parts, automotive), and applicable requirements of each rule 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 52 – Specifies PM concentration limits for all sources with stack emissions of PM. These apply to spray booths, and compliance is ensured through both use of material application methods designed to minimize PM, and some booths also utilize filters to capture PM.

Solvent Cleaning, Degreasing, and Stripping	
Pollutant	Primary Limiting Regulations
NOx	NA (Not emitted)
SO2	NA (Not emitted)
VOC	Rules 67.6.1, , Rule 20.2 (mass emission limits)
CO	NA (Not emitted)
PM10	NA (Not emitted)
Toxic Pollutants	Rule 1200*

*Indicated rules are not federally enforceable

Rule 67.6.1 Applicable requirements related to the cold solvent dip tank are specified in Rule 67.6.1. These requirements include standards for VOC content of the solvent, design specifications for the dip tank including freeboard depth and other dimensional standards, and operating requirements designed to minimize VOC emissions. These requirements are all stated in the emission unit specific operating permit in Appendix A and conditions note Rule 67.6.1 as the basis.

Rule 20.2 – Some solvent operations are permitted with a limit on daily VOC emissions to avoid BACT applicability. On these permits, the applicable limit is specified in permit conditions, along with any associated recordkeeping to establish compliance with the limit.

Grinding	
Pollutant	Primary Limiting Regulations
NOx	NA (Not emitted)
SO2	NA (Not emitted)
VOC	NA (Not emitted)
CO	NA (Not emitted)
PM10	Rule 52
Toxic Pollutants	NA (Not emitted)

The only federally appliable emission requirement for the grinding booth is PM10 emission standards of Rule 52. The booth is equipped with filters to ensure compliance, and the permit specifies this requirement along with associated monitoring and recordkeeping.

Metal Inspection Tank	
Pollutant	Primary Limiting Regulations
NOx	NA (Not emitted)
SO2	NA (Not emitted)
VOC	Rules 66.1, 67.17, (VOC Content Limits)
CO	NA (Not emitted)
PM10	Rule 20.2
Toxic Pollutants	NA

The metal inspection tanks involve a dilute VOC mixture that has the potential to emit low levels of VOC. Applicable requirements include VOC content and mass limits specified by 66.1, VOC-containing material storage requirements of Rule 67.17, and an NSR-based VOC emission limit to avoid applicability. The permit specifies all applicable requirements with the associated rule as basis.

Emergency Engines	
Pollutant	Primary Limiting Regulations
NOx	Rule 69.4.1, Rule 20.2/20.3, 40 CFR 60 Subpart IIII
SO2	Rule 53, Rule 62, 40 CFR 60 Subpart IIII
VOC	Rule 69.4.1, 40 CFR 60 Subpart IIII
CO	Rule 69.4.1, 40 CFR 60 Subpart IIII
PM10	Rule 50, 17 CCR 93115 (Stationary Engine ATCM), 40 CFR 60 Subpart IIII
Toxic Pollutants	Rule 1200, 40 CFR 63 Subpart ZZZZ

9.0 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.

In addition to the issuance of the initial permit, the District permits will be revised to contain HAP limiting and record keeping conditions to ensure the facility will not be a major source of HAPs. The District expects the facility to be able to be in compliance with these conditions as their actual emissions are below the major source thresholds for HAPs.

Coating permit APCD1999-PTO-005642 will be updated to enforce compliance with aerospace coating and metal parts coating regulations. The District added additional requirements (primarily VOC-content requirements and recordkeeping/reporting requirements) from NESHAPs GG and MMMM. The District expects that the facility will continue to be in compliance with the applicable coating regulations as they have been in compliance with their other more recent coating permits.

Recordkeeping and fuel sulfur requirements were also added to the test cell permits that were previously lacking these requirement.

No other significant revisions were made to the permits other than minor revisions to condition wordings and clarifying rule language.

10.0 Permit Shield and Streamlining

The facility did not request any permit shields or streamlining as part of the Title V application.

11.0 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 in a newspaper. The District will incorporate any suggested changes made by EPA or the public if necessary and will re-notice if significant changes are made.

The public and EPA comment periods ran from December 16, 2022 to January 15, 2023 and January 30, 2023 respectively. Comments were received from both the permit holder and EPA. In response, the District has prepared a response to these comments which is attached as an addendum, as well as made minor revisions to the permit and statement of basis as discussed in the comment response.

12.0 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.

13.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice
- Response to Comments