



SAN DIEGO COUNTY
AIR POLLUTION CONTROL DISTRICT
10124 Old Grove Road, San Diego, CA 92131-1649
Office: (858) 586-2600; www.sdapcd.org

Sectors: 4, N
Site Record: APCD2026-SITE-05086

Application Record: APCD2026-APP-009222



EKI Environment & Water, Inc.
Matt Alkire
17880 Fitch
Irvine, CA 92614

EKI Environment & Water, Inc.
Selena Ellis-Vizcarra
312 Euclid Ave
San Diego, CA 92114

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:

Soil vapor extraction wells vented to a liquid/vapor separator, a blower (500 scfm maximum), various vacuum relief/air dilution valves, an air flow meter, two (2) 2,000-pound carbon adsorbers in series, a vertical exhaust stack at least 15 ft above ground level, and all associated piping, controls, valves, sampling ports, and safety features.

This Authority to Construct is issued with the following conditions:

1. The permittee shall install, maintain, and label a vapor sampling port at both the inlet and the exhaust of the air pollution control device associated with this soil remediation equipment. (District Rule 1200)
2. There shall be no emissions of organic compounds into the atmosphere from the exhaust stack or any other portion of the vapor extraction system, the emission control device, the groundwater extraction system, the groundwater treatment system, or any material storage containers with a concentration equal to or greater than 20 ppmv as VOC. This requirement shall not apply to organic compounds released during sampling, repair, maintenance, waste disposal, and/or equipment installation activities. (District Rule 21)
3. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall apply for and obtain an Authority to Construct for all such modifications. (Rule 51)
4. The permittee shall install, operate, modify, and adjust the soil vapor extraction system such that any automatic air dilution valve installed in the header piping is NOT continuously open to the atmosphere. All required air flow rate measurements, inlet vapor samples, and exhaust gas vapor samples shall be taken during that portion of the vapor extraction cycle when all installed automatic air dilution valves are in the closed position. (District Rule 21)
5. The permittee shall install an air flow meter that continuously measures and displays the total air flow rate (in scfm) through the activated carbon air pollution control device associated with this remediation equipment. If a pressure sensor device is used in place of a flowmeter, a conversion chart shall be made available to indicate the flowrate (in scfm) corresponding to the pressure reading. This air flow meter or pressure sensor shall be operated, calibrated, and maintained in accordance with the manufacturer's specifications. (District Rule 21)
6. The maximum total air flow rate into the air pollution control device shall not exceed 500 scfm during that portion of the vapor extraction cycle when all installed automatic air dilution valves are in the closed position. (District Rules 21 and 1200)
7. The permittee shall measure and record the air flow rate (in scfm) into the air pollution control device associated with this soil remediation equipment at least once every 1000 operating hours. Additionally, the permittee shall also measure and record this air flow rate after any manual air dilution valve installed in the header piping is opened, closed, or otherwise adjusted. Each recorded air flow rate measurement shall be taken during that

portion of the vapor extraction cycle when all installed automatic air dilution valves are in the closed position. (District Rules 21 and 1200)

8. The permittee shall sample, analyze, and record the organic compound concentration (in ppmv as trichloroethene) of the inlet and exhaust vapors at least once every 1000 operating hours. Additionally, the permittee shall sample, analyze, and record the organic compound concentration (in ppmv as trichloroethene) of the inlet and exhaust vapors after any manual air dilution valve installed in the header piping is opened, closed, or otherwise adjusted. Each inlet and exhaust vapor sample shall be collected during that portion of the vapor extraction cycle when all installed automatic air dilution valves are in the closed position. (District Rules 21 and 1200)
9. The permittee shall use EPA Methods 8260, 8260B, TO-15, or a similar equivalent analytical method as approved by the District to quantify the organic compound concentration of the inlet and exhaust vapor samples. All vapor sample analytical results and records shall be retained for at least three years and made available to District personnel upon request. (District Rules 21 and 1200)
10. The maximum temperature of the air and vapors entering the air pollution control device shall not exceed 140°F at any time. The permittee shall install a thermometer that continuously measures and displays the temperature (in °F) entering the activated carbon air pollution control device associated with this remediation equipment. The permittee shall record the temperature (in °F) entering the air pollution control device associated with this soil remediation equipment at least once every 1000 operating hours. These operating records shall be retained for at least three years and made available to District personnel upon request. (Rule 21 and 1200)
11. The permittee shall record the corresponding date and cumulative operating hours of the air pollution control device when each vapor sample is collected and each air flow rate is recorded. These operating records shall be retained for at least three years and made available to District personnel upon request. (District Rules 21 and 1200)
12. Emissions of trichloroethene (TCE) from the exhaust stack of the air pollution control device associated with this soil remediation equipment shall not exceed 98.6 lbs. per calendar year. The permittee shall calculate and record the estimated trichloroethene emission rate from the exhaust stack based upon the measured air flow rates (in scfm) and exhaust stack organic compound concentration results (in ppmv as trichloroethene) at least once every 1000 operating hours. Additionally, the permittee shall calculate and record the estimated trichloroethene emission rate (lbs/hr) from the exhaust stack after any manual air dilution valve installed in the header piping is opened, closed, or otherwise adjusted. These records and all supporting documentation shall be retained for at least three years and made available to District personnel upon request. (District Rule 21)
13. The exhaust flow at the release point shall be vertical. Any obstruction, such as a rain cap, which redirects the flow to any direction other than vertical shall not be allowed. (Rule 1200)
14. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
15. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
16. 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