

**TITLE V RENEWAL  
STATEMENT OF BASIS**

**Facility Name:** Naval Air Station North Island (NASNI)

**Title V Application Number:** APCD2020-APP-006345

**Title V Permit Number:** APCD2008-TVP-960380

**Facility ID:** APCD1980-SITE-02754 (Aerospace Coating Operations ONLY)

**Equipment Address:** Naval Air Station North Island  
San Diego, CA 92135

**Facility Contact:** Craig Haverstick  
**Contact Phone:** 619-545-3058

**Permit Engineer:** Victoria Burns

**Date:** 03/25/2026

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Joseph N. Herzig  
Senior Air Pollution Control Engineer

**Senior Engineer:**

## 1.0 Type of Action and Summary of Changes

This application, APCD2020-APP-006345, requests issuance of a renewal Title V permit for the aerospace coating operations conducted by the Navy's Airfield, Waterfront, Facilities and Personnel (AWFP) Administration functional group at Naval Air Station North Island (NASNI) in Coronado, CA. Note that the Fleet Readiness Center Southwest (FRCSW) is also collocated on NASNI and is a major source of HAPs operating under its own Title V permit, APCD2008-TVP-960383.

While the Title V definition of major source allows for separation of operations (i.e., disaggregation) on the basis of industrial groupings (i.e., functional groups for military), the definition of major source under the NESHAP program does not include this distinction. Therefore, the major source criterion for applicability under NESHAPS Subpart GG for aerospace manufacturing is affirmed based on sitewide emissions, triggering a Title V requirement for NASNI's Airfield, Waterfront, Facilities and Personnel Administration functional group's aerospace coating operations, which is by itself a non-major source.

In addition to renewal of the Title V permit, the following Title V actions are also being incorporated into the proposed permit, of which Table 1 presents a summary below:

1. Application APCD2020-APP-006196 is a requested administrative change to the Responsible Officials (RO).
2. Application APCD2019-APP-005964 is a requested administrative change to the Responsible Officials (RO), superseded by the requested RO change of APCD2020-APP-006196.
3. Application APCD2022-APP-007255 is a minor modification to the Title V permit. The modification is to permit a new aerospace coating operation at a new building. For additional information, please see discussion below under Section 4.0, Title V Applicability, and the attached engineering evaluation for the standard District operating permit, APCD2022-APP-007254.

**Table 1**

<b>Applications addressed in this permit action:</b>	<b>Type:</b>
APCD2020-APP-006345	Renewal
APCD2020-APP-006196	Administrative Amendment – Change to RO
APCD2019-APP-005964	Administrative Amendment – Change to RO* <i>*(superseded by APCD2020-APP-006196)</i>
APCD2022-APP-007255	Minor Modification for new aerospace coating operation

## 2.0 History of Title V Applications and Modifications/Applications Since Previous Renewals:

The current Title V permit expired on November 21, 2021. The District received the application for a permit renewal on October 29, 2020, which is in compliance with the requirement for a timely renewal application, as it was submitted 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 November 30, 2021. Hence, an application shield pursuant to Rule 1410 (a) is in effect for the facility until the District acts on the renewal application.

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

**Table 2**

<i>Title V Application History</i>			
<b>Title V Application Number</b>	<b>Application Type</b>	<b>Description</b>	<b>Action</b>
APCD1996-APP-960380	Initial TVP Application	N/A, No documents listed.	Approved
APCD2002-APP-978081	Part I Air Toxic Control Permit Application	N/A, No documents listed.	Approved
APCD2003-APP-980028	Minor Modification	Condition Change to incorporate correct version of APCD2004-PTO-006070 into Title V permit. APCD2004-PTO-006070 issued for industrial application station (aerospace and metal parts).	Approved
APCD2004-APP-982210	Administrative Amendment	Change to Responsible Official.	Approved
APCD2005-APP-982706	Administrative Amendment	Change to Responsible Official.	Approved
APCD2007-APP-985444	Permit Renewal	Permit expired 06/02/2008.	Approved
APCD2008-APP-986075	Administrative Amendment	Change to Responsible Official.	Closed
APCD2012-APP-002326	Administrative Amendment	Removal of cancelled APCD2004-PTO-006070 from Title V Permit.	Approved
APCD2014-APP-003621	Administrative Amendment	Change to Responsible Official.	Approved
APCD2015-APP-004115	Permit Renewal	Issued November 22, 2016 and expired on November 21, 2021.	Approved
APCD2016-APP-004393	Administrative Amendment	Change to Responsible Official. Made 05/2016.	Approved

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).

**Table 3**

<i>Title V Applications Since Most Recent Renewal</i>				
<b>District Application/ Permit Number</b>	<b>TVP Application Number</b>	<b>Type of Change</b>	<b>Description/Emission Unit</b>	<b>Outcome</b>
	APCD2017-APP-	Administrative	Change to Responsible Official.	Approved

	004903	Amendment		
	APCD2018-APP-005317	Administrative Amendment	Change to Responsible Official.	Approved
	APCD2019-APP-005964	Administrative Amendment	Change to Responsible Official. *Superseded by APCD2020-APP-006196 below	Open – Included in this action.
	APCD2020-APP-006196	Administrative Amendment	Change to Responsible Official.	Open – Included in this action.
	APCD2020-APP-006345	Permit Renewal	Renewal. Last renewal expired November 21, 2021.	Open – Included in this action.
APCD2022-APP-007254, approved 04/05/2024.  Permit to operate APCD2024-PTO-004872 issued.	APCD2022-APP-007255	Minor Modification	New aerospace coating operation at a new aircraft hangar onsite.	Open – Included in this action.

### 3.0 Facility Description

This is a functional group at a naval air station and includes operations related to the Airfield, Waterfront, Facilities and Personnel Administration functional group (AWFP), which includes primarily aerospace coating and emergency engines, as shown in the table below. This is part of North Island Naval Air Station (NASNI), which is affected by disaggregation for military facilities.

**Table 4**

Number of Permits	Equipment Type
37	Emergency engines
8	Engines for resetting arresting gear
7	Aerospace coating operations
6	Gasoline/Aviation gasoline dispensing facility or plant
6	Boilers, >5 MMBtu/hr
4	Abrasive blast rooms
4	Test Stands
3	Industrial application station, paint spray booth
1	Marine coating application station
1	Metal and automotive coating operation/paint spray booth
1	Fiberglass Sanding/Grinding Tent
1	Grinding Booth
1	Polyester Resin Manufacturing
1	Pyrolysis Cleaning Furnace
1	Certificate of Exemption for an anti-corrosion application operation

The Fleet Readiness Center Southwest is also collocated on NASNI and is a major source of HAP and VOC operating under its own Title V permit, APCD2008-TVP-960383. The Title V permit evaluated herein is for the Airfield, Waterfront, Facilities and Personnel Administration functional group only, specifically for aerospace coating emission units which fall under 40 CFR 63 Subpart GG – *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities*. This is due to the subpart’s applicability and designation of affected sources as specified in 40 CFR 63.741(a), which applies to facilities that are engaged, either in part or in whole, in the manufacture or rework of commercial, civil, or military aerospace vehicles or components and that are major sources as defined in 40 CFR 63 Subpart A § 63.2 Definitions. Major sources under 40 CFR 63 are any stationary source or group of stationary sources located within a contiguous area and under common control that are exceeding the set thresholds. Because this overall stationary source meets the definition of major source in § 63.2 and conducts the relevant operations, subpart GG applies and permitting under Title V is required for the following affected permits.

**Table 5**

**Permits Subject to NESHAP GG/Title V Action:**

District Permit Number	Equipment Description	Notes
APCD2003-PTO-030652	Aerospace and metal parts mobile coating spray booth.	<p>The facility has stated that this permit does not conduct aerospace coating and that both this permit and APCD1998-PTO-006071 (under FRCSW site) are used by the same personnel, for the same purposes. It is required to be included in this Title V renewal since it was written to include Rule 67.9 coating use. It was recently relocated to this site from another NASNI site.</p> <p><b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b>            Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.</p>
APCD2004-PTO-901110	Aerospace coating application operation.	<p>District Application: APCD2012-APP-002325</p> <p><b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b>            Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.</p>
APCD2004-PTO-901111	Aerospace coating application operation.	<p>District Application: APCD2012-APP-002325</p> <p><b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b>            Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.</p>

APCD2004-PTO-901112	Aerospace coating application operation.	District Application: APCD2012-APP-002325 <b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b> Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.
APCD2004-PTO-901113	Aerospace coating application operation.	District Application: APCD2012-APP-002325 <b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b> Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.
APCD2004-PTO-901114	Aerospace coating application operation.	District Application: APCD2012-APP-002325 <b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b> Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.
APCD2024-PTO-004872	Aerospace coating application operation.	District Application: APCD2022-APP-007254 <b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b> Equipment does pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does apply.

Other open facility applications not included in this Title V permit action are listed below.

**Table 6**

District Application Number	Type	Description	Opened Date	NESHAPS Applicability
APCD2024-APP-008386	New	Portable metal coating operations at various locations onsite.	Status: Open Application Opened:8/30/2024	<b>40 CFR 63 NESHAP GG: Aerospace Manufacturing and Rework Facilities</b> Equipment does not pertain to manufacture or rework of military aerospace vehicles or components; therefore, NESHAP GG does not apply.  <b>40 CFR 63 NESHAP HHHHHH (6H): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources</b> Non-applicable as overall facility is a major source of

				HAPs under NESHAP when taken with the emissions from the Fleet Readiness Center Southwest, which is collocated on this same facility.* As an area source only, this would still be exempt via 63.11169 (d)(1) as a surface coating or paint stripping performed onsite at installations owned or operated by the Armed Forces of the United States.
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\* 63.11170(b) *An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.*

#### **4.0 Compliance History**

There are no open/ongoing compliance actions at this facility that have occurred since the most recent Title V renewal was issued in 2016.

#### **5.0 Title V Applicability & 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).

In 1997, at the Navy’s request, the District recognized the Navy’s management of its operations, specifically at North Island and, with EPA concurrence, agreed to designate six (6) functional groups (i.e., industrial groupings) for the purpose of permitting under Title V and New Source Review under Title I.

Given the above designation of functional groups and separation for the purposes of permitting under the two federal programs, only one of the six groups was found to be a Title V *major source*: Fleet Readiness Center Southwest (FRCSW), which was issued Title V permit APCD2008-TVP-960383. However, the Airfield, Waterfront, Facilities and Personnel Administration functional group (AWFP) was also issued a Title V permit. The basis for the second Title V permit, which is the subject of this report, is a combination of the major source definitions under Title V, the NESHAP program, and the applicability provision of the particular NESHAP being considered, that of 40 CFR 63 Subpart GG, as discussed previously.

Based on the most recent District emissions inventory and related emissions determinations, the NASNI - AWFP functional group is still not a major source (See Section 6.0), while the NASNI -FRCSW group is a major source of multiple hazardous air pollutants (HAPs) and VOC. Due to NESHAP GG applicability, aerospace coating operations at AWFP are subject to Title V permitting, as discussed in Section 3.

This renewal also incorporates a minor modification into its review under APCD2022-APP-007255 to address the addition of an aerospace coating operation under District application APCD2022-APP-007254. The District application was approved, resulting in District permit APCD2024-PTO-004872. As shown in the engineering evaluation for the authority to construct for this equipment, 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), does not trigger federally mandated new source review, and does not trigger any requirements under CAA section 112(g). For these reasons, Title V application APCD2022-APP-007255 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.

**6.0 Potential to Emit and Actual Emissions**

The following table shows the actual emissions for the AAFP functional group that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds; therefore, the site is not subject to Title V permitting as a non-major source, and only the aerospace coating permits subject to NESHAPS GG are required to be included in the Title V permit.

**Table 7**

Pollutant	Thresholds	Facility Actual Emissions	Major Source*
Highest Federal HAP	10	<10*	N
Sum of Federal HAPs	25	<25*	N
NOx	25	4.27	N
VOC	25	5.04	N
PM10	100	0.53	N
SOx	100	0.01	N
CO	100	5.20	N

Actual emissions are from the District’s 2022 emission inventory.

\*The sum of all toxic air contaminants (TACs) is 2.7 tons/year, of which federal HAPs are only a subset.

**7.0 40 CFR Part 64 CAM (Compliance Assurance Monitoring)**

A review of emission units (EUs) under the AAFP group was conducted to determine CAM applicability under 40 CFR Part 64. No emission units were determined to be subject to CAM. Since the last Title V renewal, no changes have triggered CAM applicability. Of the five (5) Title V applications submitted since the last renewal, (4) four were for administrative amendments (APP-004903, APP-005317, APP-005964, and APP-006196) and one (1) was for a minor modification for an additional aerospace coating operation station (APP-007255), which does not have a control device as required for CAM applicability in 40 CFR § 64.2(a)(2) and whose emissions also did not meet the

applicability criteria in 40 CFR § 64.2(a)(3). Therefore, this EU is not subject to CAM requirements.

**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

**Table 8**

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
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	Standards for Granting Permits
SDCAPCD Reg. II	20.1 – 20.4	New Source Review (NSR)
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
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emission Reducing

Facility-wide Prohibitory Requirements

**Table 9**

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
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	67.3	Metal Parts and Products Coating Operations
SDCAPCD Reg. IV	67.9	Aerospace Coating Operations
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	67.20.1	Motor Vehicle and Mobile Equipment Coating Operations
SDCAPCD Reg. IV	67.6.1	Cold Solvent Cleaning and Stripping Operations
SDCAPCD Reg. IV	67.6.2	Vapor Degreasing Operations
SDCAPCD Reg. IV	68	Fuel Burning Equipment - NOx
SDCAPCD Reg. IV	69.2	Industrial and Commercial Boilers, Process Heaters and Steam Generators
SDCAPCD Reg. IV	69.4.1	Stationary Reciprocating Internal Combustion Engines
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. X	40 CFR 60 Subpart A	NSPS - General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart A	NESHAP - General Provisions
SDCAPCD Reg. XI	40 CFR 63 Subpart GG	NESHAP – Aerospace Manufacturing and Rework Facilities
SDCAPCD Reg. XI	Subpart M***	NESHAPS – Asbestos
SDCAPCD Reg. XII	1200*	Toxic Air Contaminant NSR
SDCAPCD Reg. XII	1206***	Asbestos
California Code of Regulations (CCR) Title 17	ATCM 93112, 93115, 93116, 92000-92530*	Emissions of Hex Chrome and Cadmium in Mobile Vehicle and Mobile Equipment Coatings, Stationary and Portable Diesel Airborne Toxic Control Measures, Abrasive Blasting

*\*Not federally enforceable*

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

*\*\*\*\* 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*

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

**Table 10**

<b>Regulation</b>	<b>Rule Citation</b>	<b>Title</b>
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	69.4.1	Stationary Reciprocating Internal Combustion Engines

Permit Specific Applicable Requirements

**Table 11**

<b>SDAPCD Permit No.</b>	<b>Permit Description</b>	<b>Applicable Rules</b>
APCD2024-PTO-004872	Aerospace coating operation/application station. consisting of an application area conducted inside and outside of the hangar at Building 535.	Rules 10, 19.3, 20.1-20.3, 21, 50, 51, 67.9, 67.17, 67.20.1 (030652 only), 67.3, (030652 only), 1200, 1421, 40 CFR 63 Subpart GG, Title 17 CCR 93112 (030652 only)
APCD2003-PTO-030652	Aerospace and metal parts/products/mv mobile coating: JBI model 27dt240 paint spray booth, 27' x 14' x 7'h; exhaust filters & fan, 2-hp; jbi model 27dt-240 drying oven, 23' x 14' x 7'h, gas-fired; HVLP spray guns (Bldg 39r)	
APCD2004-PTO-901110	Aerospace coating application station: coatings and adhesives are applied inside and outside an aircraft hangar to aircraft parts as needed. HVLP spray guns, paint brushes and rollers are used to apply the materials. located at Bldg 370.	
APCD2004-PTO-901111	Aerospace coating application station: coatings and adhesives are applied inside and outside an aircraft hangar to aircraft parts as needed. HVLP spray guns, paint brushes and rollers are used to apply the materials. located at Bldg 340.	

APCD2004-PTO-901112	Aerospace coating application: coatings and adhesives are applied to aircraft parts as needed inside and/or outside hangars; HVLP guns, brushes and rollers are used to apply materials at Buildings 524, 525 and 526.
APCD2004-PTO-901113	Aerospace coating application station: coatings and adhesives are applied inside and outside an aircraft hangar to aircraft parts as needed. HVLP spray guns, paint brushes and rollers are used to apply the materials. located at Buildings 1456 and 1481.
APCD2004-PTO-901114	Aerospace coating application station: coatings and adhesives are applied inside and outside an aircraft hangar to aircraft parts as needed. HVLP spray guns, paint brushes and rollers are used to apply the materials. located at Buildings 1474 and 1477.

Emission Limitations

**Table 12**

<b>Coating Operations (Aerospace, Metal, Automotive)</b>	
<b>Pollutant</b>	<b>Primary Limiting Regulations</b>
NOx	NA (does not emit)
SO2	NA (does not emit)
VOC	Coating Rules 67.3, 67.9, 67.20.1, NESHAP GG (VOC content limits), Rule 20.2 (mass emission limits)
CO	NA (does not emit)
PM10	Rule 52, Rules 67.3, 67.9, 67.20.1 (material application methods)
Toxic Pollutants/HAP	Rule 1200*, NESHAP GG, 17 CCR 93112*

New Source Review Requirements

**Table 13**

<b>SDAPCD Permit No.</b>	<b>Permit Limit</b>	<b>Source and Explanation</b>
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APCD2024-PTO-004872	Annual VOC emissions shall not exceed 3.0 tons per calendar year and daily emissions shall be less than 30 pounds VOC in any calendar day.	APCD2022-APP-007255:  The 3.0 tons per calendar year and 30 lbs/day were proposed by the facility based on the expected number of aircraft in the building as well as previous usage information for similar coating activities. A BACT analysis was performed and it was determined that, given that the raw materials could not be altered, a control device was not cost effective. Therefore, the limit proposed was found to be the top A/P control option for this operation and satisfied BACT requirements. Compliance is ensured through daily recordkeeping of material type and quantity.
APCD2024-PTO-004872	Methylene chloride (CAS # 75-09-2) shall not exceed 45.9 pounds per year.	APCD2022-APP-007255:  This limit was proposed to meet the Rule 1200 standard.

**9.0 Updates to the Title V Permit Incorporated into this Action and Rule Analysis**

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

<b>SDAPCD Permit No.</b>	<b>Permit Updates</b>
APCD2024-PTO-004872  APCD2004-PTO-901110 - 901114  APCD2003-PTO-030652	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, along with correct rule references.

**10.0 Permit Streamlining**

The facility does not request Multiple Applicable Requirements Streamlining.

Note though that each coating operation permit already has multiple streamlined requirements, specifically a significant number of VOC/HAP-content requirements, operation/process limits and recordkeeping requirements of NESHAPs GG which are streamlined into conditions also implementing Rule 67.9. The current 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 so additional conditions implementing just these NESHAP requirements were added to each permit that conducts the corresponding type of coating.

#### **11.0 Permit Shields**

None of the applications included in this renewal propose any new permit shields. However, the coating permits were granted a shield from NESHAP GG 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 can be subsumed by District prohibitory rule 67.9 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.

#### **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 in a newspaper. 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
- District engineering evaluation APCD2022-APP-007254 and associated BACT Cost Effectiveness calculation