



**Sectors:** 3, K  
**Site Record:** APCD2023-SITE-04408

**Application Record:** APCD2023-APP-007986



Woodman Auto Body  
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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:

Automotive refinishing operation, exempt from NESHAP 6H, and consisting of:  
 One (1) enclosed spray booth (Air dried – less than 194°F);

Spray Booth-  
 Manufacturer: RelyOn Technologies  
 Model: RAF-26A  
 Dimensions: 26'L X 14'W X 9'H  
 Exhaust: One (1) fan, 14,430 cfm, equipped with filters

This Authority to Construct is issued with the following conditions:

1. The total usage of coatings and solvents for the above operation shall not exceed one gallon per day and 260 gallons per year (Rules 20.2 and 1200).
2. Total emissions of volatile organic compounds (VOC) from the above operation shall be less than ten (10) pounds per day. (Rule 20.2)
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)benzene (PCBTF, CAS #: 98-56-6): 1,277 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)benzene (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. The exhaust stream shall be vented in a such way that the direction of flow is vertical. Any obstruction, such as a rain cap, which changes the direction of the exhaust flow at the release point to any direction other than vertical shall not be allowed (Rule 1200).
6. The permittee shall not use or possess hexavalent chromium (chromium VI) or cadmium pigmented coatings in any motor vehicle or mobile equipment refinishing operation. [Title 17 CCR, Section 93112 - Hexavalent chromium and Cadmium Air Toxic Control Measure - Motor Vehicle and Mobile Refinishing Coatings.]

7. The permittee shall not use lead pigmented coatings in any motor vehicle or mobile equipment refinishing operation.
8. The permittee shall not use paint stripping solvents that contain methylene chloride (CAS 75-09-2) in paint removal processes. (Rule 1200)
9. All materials containing toxic air contaminants (TACs) shall only be applied in the booth specified above, where the exhaust fans and exhaust filters are installed and operating properly. This condition shall not apply to the following operations: touch-up coatings (as defined by Rule 67.20.1), coatings applied using non-refillable hand-held aerosol spray containers, cleaning operations, and application of body fillers. (Rule 1200)
10. The permittee shall only use non-atomizing application technology including but not limited to brushes, rollers, flow coating, dip coating, touch up markers or marking pens when applying materials containing trivalent chromium, nickel, beryllium, manganese, or arsenic. (Rule 1200 & NESHAP HHHHHH)
11. All materials containing volatile organic compounds shall be stored in closed containers in accordance with Rule 67.17 requirements. (Rule 67.17)
12. This operation shall comply with all applicable requirements in Rule 67.20.1.
13. When conducting any operations subject to Rule 67.20.1, permittee shall not use any material for surface preparation or any other surface cleaning unless its VOC content is 25 grams or less per liter of material (0.21 lbs/gal), as applied. This VOC content limitation shall not apply to any cleaning material used for the removal of dust, wax, grease, tar, or bugs provided that:
  - a. the VOC content of cleaning material does not exceed 780 grams per liter (6.5 lbs/gal), and
  - b. the cleaning material is applied by non-aerosol, hand-held spray container, and
  - c. not more than 20 gallons per calendar year of such cleaning material are used at the stationary source. (Rule 67.20.1)
14. Any cleaning of coating application equipment, used in operations subject to Rule 67.20.1, shall comply with one of the following requirements:
  - a. the VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings; and the application equipment or equipment parts shall be cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
  - b. the VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings; and a system that totally encloses the component parts being cleaned during the washing, rinsing, and draining process shall be used; or
  - c. the cleaning material shall not contain any exempt compounds and the VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings. (Rule 67.20.1)
15. Permittee shall only apply coatings using one of the following methods: High Volume Low Pressure (HVLP) spray application, electrostatic spray application, flow coat application, dip coat, roll coat, or hand application methods (i. e. brushes, rollers, markers, marking pens, etc.). Alternatively, an equivalent application method that has been approved by the District in writing may be used. (Rule 67.20.1/67.3/67.11)
16. Permittee shall operate any coating application equipment subject to Rule 67.20.1(d)(3)(vii) in accordance with written District approval for the application equipment. (Rule 67.20.1)
17. High volume low pressure (HVLP) and electrostatic application equipment shall be operated and maintained in accordance with the manufacturer's instructions. For HVLP equipment, the applicant will have available on site pressure gauge(s) in proper operating condition to measure the air cap pressure or have available manufacturer's technical information showing the correlation between the handle air inlet pressure and the air cap pressure. (Rule 21)
18. If the correlation option specified above is chosen to demonstrate compliance, a handle air inlet pressure gauge will be required on site in proper operating condition to measure the handle air inlet pressure. The applicant shall maintain a permanent air pressure at the air cap of 0.1 to 10 psig. (Rule 21)

19. Permittee shall maintain records in accordance with Rule 67.20.1. These records shall include the following information:
  - a. a current list of coatings, precoat, primers, catalysts, thinners, additives, surface preparation materials, equipment cleaning materials, and stripping materials in use. This list shall include the following information:
    1. material name, manufacturer, manufacturer identification, and density;
    2. type and applicable coating category as specified in Rule 67.20.1(d)(1) for each coating in use and the specific mix ratio;
    3. VOC content (actual and regulatory, as applied) for all materials containing VOC;
    4. p-Chloro-a,a,a-trifluorotoluene weight percentage (also known as PCBTF - CAS # 98-56-6) for all materials containing PCBTF;
  - b. current manufacturer specification sheets, material safety data sheets (MSDS), product data sheets, or technical bulletins for all materials in use, which shall list all components within each coating, precoat, primer, catalyst, thinner, additive, surface preparation, equipment cleaning, and stripping materials in use. The manufacturer specification sheets, material safety data sheets, product data sheets, or technical bulletins shall also include: the VOC content (actual and regulatory), toxic air contaminant (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 in use;
  - c. monthly purchase and daily usage records of each material containing VOCs;
  - d. type of application equipment used; and,
  - e. if applicable, all District approval documentation for coating application equipment, issued in accordance with Rule 67.20.1(d)(3)(vii). (Rules 67.20.1, 21, 1200)
20. All records shall be retained on site for at least three (3) years and made readily available to the District upon request.
21. At no time shall the subject equipment cause or contribute to a public nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the permittee will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment the permittee shall apply for and obtain an Authority to Construct for all such modifications prior to making any physical change. (Rule 51)
22. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
23. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
24. 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](mailto: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](mailto:John.Lee@sdapcd.org).

John Lee  
Asst APC Engineer

CC: Compliance Division