



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

Sectors: 3, G
Site Record: APCD2017-SITE-02431

Application Record: APCD2025-APP-008630



No Mailing Address on file

Sean Albrech
6650 Top Gun St
San Diego, CA 92121

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:

Composite manufacturing of aerospace components (E Flaps). Eleven (11) press equipment featuring a hood with front and rear ventilation pick up points. The hoods are serviced and vented to exhaust stacks EF-14 and EF-15 at a flow rate of 4,800 CFM each and EF-13 at 1800 CFM and Five (5) Electric ovens:

Equipment:

Presses:

Manufacturer: Serial #., Internal Facility #:
French Oil, Serial #: 21587, Internal Facility #: PF02;
French Oil, Serial #: 031124CB, Internal Facility #: PF03;
West Coast Accudyne, Serial #: 1000, Internal Facility #: PA06;
West Coast Accudyne, Serial #: 17010, Internal Facility #: PA13;
West Coast Accudyne, Serial #: 18002, Internal Facility #: PA15;
West Coast Accudyne, Serial #: 18001, Internal Facility #: PA16;
West Coast Accudyne, Serial #: 19025, Internal Facility #: PA17;
West Coast Accudyne, Serial #: 21015, Internal Facility #: PA18;
West Coast Accudyne, Serial #: 23018, Internal Facility #: PA19;
West Coast Accudyne, Serial #: 23019, Internal Facility #: PA20;
West Coast Accudyne, Serial #: 23020, Internal Facility #: PA21;
West Coast Accudyne, Serial #: TBD, Internal Facility #: PA22;
West Coast Accudyne, Serial #: TBD, Internal Facility #: PA23.

Electric Ovens:

Manufacturer: JPW, Model: HT433TULP480VKWIG, Internal Facility #: OJ04;
Manufacturer: JPW, Model: HT433TULP480VKWIG, Internal Facility #: OJ06;
Manufacturer: JPW, Model: HT433TULP480VKWIG, Serial #: 002409, Internal Facility #: OJ16;
Manufacturer: JPW, Model: HT433TULP480VKWIG, Serial #: 002410, Internal Facility #: OJ17;
Manufacturer: JPW, Model: HT433TULP480VKWIG, Serial #: 002411, Internal Facility #: OJ18.

This Authority to Construct is issued with the following conditions:

1. Total emissions of volatile organic compounds (VOC) from the above operation shall be less than ten (10) pounds per day. (Rule 20.2)
2. Permittee shall not use prepreg materials that contain TACs (toxic air contaminants) per District Rule 1200 (Revision 7/11/2017) other than methyl ethyl ketone (CAS #: 78-93-3), dimethyl formamide (CAS #: 68-12-2)

and methyl alcohol (CAS #: 67-56-1). (Rule 1200)

3. There shall be no open windows, doors, bay doors or any opening during the manufacturing of aerospace composite parts or components. (Rule 1200)
4. VOC emissions from prepreg materials shall be calculated by one of the following methods:
 - a. usage in pounds multiplied by the material VOC content percentage or volatility percentage; or
 - b. usage in linear yards or square feet converted to a mass basis by manufacturer's mass per length multiplied by the material VOC content percentage or volatility percentage; (Rule 20.2)
5. Machining of prepreg shall only be conducted through enclosed wet-jet devices or wet-machining equipment. (Rule 11(d)(10)(ii))
6. The solvent cleaning materials (including wipe cleaning, surface preparation and cleaning of application equipment) shall not use toxic air contaminants (TACs) other than isopropyl alcohol (CAS #: 67-63-0) per Rule 1200 (Revision 7/11/2017). (Rule 1200)
7. Permittee shall only use non-atomizing application techniques including, but not limited to, brushes, rollers, flow coating, dip coating, touch-up markers, marking pens, spatulas, or syringe injectors. This condition shall not apply to coatings applied using non-refillable hand-held aerosol spray containers. (Rule 1200)
8. The use of coatings that are non-compliant with the VOC standards in Rule 67.9(d) shall not exceed 200 gallons per any consecutive twelve (12) month period for this stationary source. (Rule 67.9)
9. Prior to transferring prepreg materials to and from the clean contaminant area(s), all prepreg materials shall be placed in a sealed bag or container. (Rule 1200)
10. All materials containing volatile organic compounds shall be stored in closed containers in accordance with Rule 67.17 requirements. (Rule 67.17)
11. Materials used during the molding and fabrication of prepreg materials into aerospace components shall comply with Rule 66.1 standards and requirements. Additional materials used on the aerospace components post molding and fabrication shall comply with Rule 67.9 standards and requirements where applicable. (Rule 66.1 and 67.9)
12. Aerospace surface preparation or surface cleaning materials shall meet one of the following requirements:
 - a. the VOC content does not exceed 200 grams per liter (1.67 pounds per gallon), as applied; or
 - b. the initial boiling point is at least 190 C (374°F); or
 - c. the total VOC vapor pressure is 45 mm Hg or less at 20 C (68°F); or
 - d. the aerospace component is cleaned in an enclosed cleaning material container which is only opened when accessing parts or adding surface cleaning materials. (Rule 67.9)
13. Surface preparation and solvent cleaning operations subject to Rule 66.1, shall meet one of the following requirements:
 - a. the total VOC vapor pressure of cleaning material must be 8 mm Hg at 20°C (68°F) or less, or
 - b. for aerospace components, not associated with a surface coating operation, total VOC vapor pressure must be 45 mm Hg at 20°C (68°F) or less; or
 - c. the VOC content of cleaning material complies with the following limits expressed as weight of VOC per unit volume (lb/gal), as used:
 1. general: 50 g/L (0.42 lb/gal)
 2. aerospace components: 200 g/L (1.7 lb/gal)
 3. ultra-high purity chemical manufacturing: 840 g/L (7.0 lb/gal)(Rule 66.1)
14. Any cleaning of coating application equipment in the aerospace coating operation shall comply with at least one of the following requirements:
 - a. the VOC content does not exceed 200 grams per liter (1.67 pounds per gallon), as applied; or
 - b. the initial boiling point is at least 190°C (374°F); or
 - c. the total VOC vapor pressure is 20 mm Hg or less at 20°C (68°F); or
 - d. the cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation to the atmosphere; or
 - e. the application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning materials is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
 - f. a system that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or
 - g. a device, approved prior to use by the Air Pollution Control Officer, which has been demonstrated to be as effective as any of the equipment described above in minimizing VOC emissions to the atmosphere. (Rule 67.9)

15. VOC containing materials used for the cleaning of coating application equipment used in this operation shall comply with one of the following requirements:
 - a. the cleaning material shall contain 50 grams or less of VOC per liter of material; or
 - b. the cleaning material shall be flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or
 - c. 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 its parts and provided that the cleaned equipment or its parts are drained to the container until dripping ceases; or
 - d. a system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes. (Rule 66.1)
16. Permittee shall maintain records for this operation in accordance with Rule 66.1 and Rule 67.9. The records shall include the following information:
 - a. current list of all materials used, including manufacturer's name and identification for each material. The list shall include the following information:
 1. the VOC content expressed in grams per liter or pounds per gallon;
 2. type and/or applicable category specified in Subsections (d)(1) of Rule 67.9, as applicable, of each material used;
 3. mix ratios, when applicable;
 4. the weight percent VOC content or percent volatility of prepreg;
 - b. monthly purchasing records of all materials containing VOC and/or TAC;
 - c. daily usage records of all materials containing VOC and/or TAC;
 - d. daily records of the square footage, linear yard or weight of prepreg used;
 - e. safety data sheets (SDS) or manufacturer information for all materials used. The SDS of manufacturer information shall include the manufacturer name and identification, VOC and TAC content, material density (weight per volume) or material specific gravity (material density relative to the density of water), and components for each material. (Rules 66.1 and 67.9)
17. All records shall be retained on site for at least three (3) years and made readily available to the District upon request.
18. 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.
19. Visible emissions shall comply with Rule 50. (Rule 50)
20. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
21. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
22. 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) 414-9090 or via email at Liliana.Jaime@sdapcd.org.

Liliana Jaime
Asst APC Engineer

CC: Compliance Division