ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name: Axillon Aerospace Inc.

Application Number: APCD2025-APP-008630

Equipment Type: Composite Operations (27N)
Adding new molding machine to a composite manufacturing of aerospace components process line

Facility ID: APCD2017-SITE-02431

Equipment Address: 6650 Top Gun Street
San Diego, CA, 92121

Facility Contact: Sean Albrecq
Facility Affiliation: Site Lead
Contact Phone: 858-349-1605
Email: Sean.Albrecq@parker.com

Permit Engineer: Liliana Jaime

Senior Engineer: Allison Weller

1.0 BACKGROUND

1.1 Type of Application – This application is for adding 2 extra mold press to current approved operation.

1.2 Permit History –

Records	Status	Description
APCD2017-SITE-02431	-	New Site
APCD2017-APP-004945	Initial Application	New application for a Composite manufacturing of aerospace components (EFlaps).
APCD2020-PTO-003565	Active Permit	Composite manufacturing of aerospace components (EFlaps)
APCD2023-APP-007982	Approved	Application for adding an extra mold press.
APCD2025-APP-008630	Current application	Application for adding two extra mold press.

1.3 Facility Description – This facility currently has 9 permits at this location for sheet fed paper printing presses, sheet fed printing press and one emergency engine. The facility was previously named Meggitt. They changed owners but the process is the same.

1.4 Other Background Information – The site has a NOV (APCD2022-NOV-000071) that was issued in 2022 for exceeding daily VOC limits on several days in 2021 and one day going up to 41.18 lb in a day.

2.0 PROCESS DESCRIPTION

2.1 Equipment Description –

Old equipment description:

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

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.

New permit description:

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:

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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.

2.2 Process – APP008630 is a composite operation for aerospace components.

2.3 Emissions Controls – No controls were proposed for VOC emissions.

2.4 Attachments – APP008630_Emissions.

3.0 EMISSIONS

3.1 Emission Estimate Summary – APP-008630 is expected to have a slight increase of emissions but it will still be under the same limit of 10 lb/day for all the process line. There is an increase on annually TACs.

3.2 Emission Estimate Assumptions –
Assume VOC's are emitted uncontrolled.
Assume usage equals emissions.
The facility is proposing to increase their number of starts from 9 to 12 per day for the EFlaps Operation. The emissions are based on doing 10 starts of the CTOL operation and 2 starts of STOVL operation.

3.3 Emission Calculations – APP008630_Emissions.

3.4 Estimated emissions –

Table 1. Potential to Emit - VOC

E Flaps Subtype	Starts per day	VOC per Start (lbs/Start)	VOC per Start (lbs/day)	VOC (lbs/year)	VOC (ton/year)
STOLV	2	0.5472	1.0944	399.44	0.20
CTOL	10	0.5971	5.9713	2179.52	1.09
TOTAL			**7.07**	**2578.96**	**1.29**

Table 2. Summary of post-project Emissions

VOC	lb/day	lb/yr	ton/yr
Pre Project	5.27	1925.10	0.96
Post Project	7.07	2578.96	1.29
Overall	1.79	653.85	0.33

Table 3. Potential to Emit – TACs

Pollutant	Lb/hr	Lb/yr
Xylene	**7.68E-04**	**1.20E+00**
IPA	**5.15E-02**	**8.03E+01**

Table 4. Summary of post-project TACs

TACS		lb/hr	lb/yr	lb/hr	lb/yr
Xylene	Pre Project	7.68E-04	8.98E-01		
	Post Project	7.68E-04	1.20E+00	0.00E+00	2.99E-01
IPA	Pre Project	5.15E-02	6.02E+01		
	Post Project	5.15E-02	6.02E+01	0.00E+00	2.01E+01
				No change in hourly per hr.	Increase on TACs

4.0 APPLICABLE RULES

4.1 Prohibitory Rules

Rule 66.1 – Miscellaneous Surface Coating Operation and other Processes Emitting Volatile Organic Compounds

(a) APPLICABILITY

(1) This rule is applicable to all surface coating, solvent cleaning or other operations or processes that may result in emissions of VOCs and are not subject to or exempt from, the following rules:

67.0.1 - Architectural Coatings;

67.2 - Dry Cleaning Equipment Using Petroleum Based Solvents;

67.3 - Metal Parts and Products Coating Operations;
67.4 - Metal Container, Metal Closure and Metal Coil Coating Operations;
67.5 - Paper, Film and Fabric Coating Operations;
67.6.1 - Cold Solvent Cleaning and Stripping Operations;
67.6.2 - Vapor Degreasing Operations;
67.9 - Aerospace Coating Operations;
67.10 - Kelp Processing and Bio-Polymer Manufacturing Operations;
67.11 - Wood Products Coating Operations;
67.12.1 - Polyester Resin Operations;
67.15 - Pharmaceutical and Cosmetic Manufacturing Operations;
67.16 - Graphic Arts Operations;
67.18 - Marine Coating Operations;
67.19 - Coatings and Printing Inks Manufacturing Operations;
67.20.1 - Motor Vehicle and Mobile Equipment Coating Operations;
67.21 - Adhesive Materials Application Operations;
67.24 - Bakery Ovens;
61.1 through 61.8 – Vapor Recovery Rules;
68 through 69.4.1 – Rules Regulating Combustion Sources.

(2) Section (g) of this rule is applicable to any manufacturer, seller or supplier of any coating, coating component, solvent cleaning material, or any other VOC containing material that is used in an operation that may be subject to this rule.

The facility's aerospace manufacturing operations is subject to Rule 66.1. The fabrication and molding of prepreg material into aerospace components has been evaluated under Rule 66.1.

Rule 67.17 – Storage of Materials Containing Volatile Organic Compounds
Compliance is expected.

Rule 67.21 – Adhesive Material Application Operations
(a) APPLICABILITY
(1) Except as otherwise provided in Section (b), this rule is applicable to all adhesive material application operations. Adhesive material application operations include all steps involved in the application, drying, and/or curing of adhesive materials, and associated surface preparation, stripping, and cleanup materials, and the cleaning of application equipment.
(2) Subsections (d)(4) and (d)(5) and Section (g) of this rule apply to any person who supplies, sells, offers for sale, or specifies the application of adhesive materials.
(3) Rule 66 shall not apply to any adhesive material application operation.
(4) Any adhesive material application operation subject to the requirements of Rules 67.4, 67.5, 67.9, or 67.16 shall not be subject to this rule.
(5) The provisions of Subsection (d)(2) of this rule shall not apply to surface preparation, stripping, or cleaning operations conducted in equipment subject to Rule 67.6.1 or Rule 67.6.2.

(6) Any adhesive material used in the manufacture of aircraft float systems shall be subject to this rule, and not subject to Rule 67.9.

The above rule is not applicable to the facility's application based on subsection (a)(3). The application is categorized as a composite manufacturing operation of aerospace components and the main prohibitory rule will be Rule 66.1 Miscellaneous Surface Coating Operations and other Processes Emitting Volatile Organic Compounds

4.2 New Source Review (NSR)

Rule 20.1 New Source Review – General Provisions

This rule is applicable to any new or modified stationary source or emission unit if the stationary source is not a major stationary source. A federal major stationary source, as defined in Rule 20.1(c)(30), means "any emission unit, project or stationary source which has, or will have after issuance of an Authority to Construct or modified Permit to Operate, an aggregate potential to emit one or more air contaminants in amounts equal to or greater than any of the emission rates listed below in Table 20.1 –5b".

TABLE 20.1 – 5b
Federal Major Stationary Source

Air Contaminant	Emission Rate (Ton/yr)
Fine Particulate Matter ($PM_{2.5}$)	100
Particulate Matter (PM_{10})	100
Oxides of Nitrogen (NOx)*	
marginal or moderate	100
serious	50
severe	25
extreme	10
Volatile Organic Compounds (VOC)*	
marginal or moderate	100
serious	50
severe	25
extreme	10
Oxides of Sulfur (SOx)	100
Carbon Monoxide (CO)	100
Lead (Pb)	100

* based on EPA's ozone nonattainment designation for the San Diego Air Basin in 40 CFR 81.305

This rule is applicable because the existing VOC PTE is less than 25 tons per year for this stationary source.

Rule 20.2 – Non-Major Stationary Sources

4.2.1 *Rule 20.2 (d)(1)(i) BACT for New or Modified Emission units*

Any new or modified emission unit which has any increase in its potential to emit particulate matter (PM10), oxides of nitrogen (NOx), volatile organic compounds (VOC) or oxides of sulfur (SOx) and which unit has a post-project potential to emit of 10 pounds per day or more of PM10, NOx, VOC, or SOx shall be

equipped with Best Available Control Technology (BACT) for each such air contaminant.

Not applicable since the PTE is less than 10 lb per day.

4.2.2 *Rule 20.2(d)(2)-(4) AQIA, PSD & Public Notification for New or Modified Emission Units*

For any project which results in an increase in emissions equal to or greater than any of the amounts listed in Table 20.2-1, the applicant shall perform an AQIA (Air Quality Impact Analysis), install equipment to satisfy PSD (Prevention of Significant Deterioration) and issue a Public Notice and Comment period. A public notice and comment period is also required for any project which results in an emissions increase of VOCs equal to or greater than 250 pounds per day or 40 tons per year.

TABLE 20.2 - 1
AQIA Trigger Levels

Air Contaminant	Emission Rate (lb/hr)	(lb/day)	(tons/yr)
Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	67	10
Oxides of Nitrogen (NOx)	25	250	40
Oxides of Sulfur (SOx)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6

The facility emissions are below the levels listed in Table 20.2-1, therefore an AQIA is not required.

4.3 *Toxic New Source Review- Rule 1200*

Rule 1200 applies to any new, relocated or modified emission unit which results in any increase in emissions of one or more toxic air contaminant(s), and for which an Authority to Construct or Permit to Operate is required. This rule requires health risks be reviewed to ensure the risks are below one in one million for cancer (with T-BACT installed), and that the health hazard index is less than one from chronic non-cancer and acute toxic air contaminants.

This rule apply since the facility will have an increase in annual TACs.

The annual increase on TACs calculated in Section 3 was used to conduct an internal Rule 1200 deminimis screening and the facility passed the screening with an increase of risk of 4.46E-05 which is under the limit of 1 in a million.

See attached APP008630-Rule1200_generictoxics.

4.4 *AB3205*

AB3205 requires a public notice prior to issuing an Authority to Construct for equipment emitting hazardous air contaminants at a facility within 1000 feet of a school.

Applicable, Kinderhouse Montessori School (https://www.kinderhousemontessori.com/) is located within 1,000 feet of the emissions unit. An AB3205 notice is required for this modification since the overall project is increasing emissions.

Figure 1: AB3205 Aerial Map. Kinderhouse Montessori School it is located within 1,000 feet.

4.5 CEQA

CEQA requires government agencies, such as air districts, to consider the environmental consequences of their actions before approving plans and policies or committing to a course of action on a project. This process is intended to: (1) inform government decisionmakers and the public about the potential environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable environmental damage by requiring changes in projects, either by the adoption of alternatives or imposition of mitigation measures; and (4) disclose to the public why a project was approved if that project has significant environmental impacts that cannot be mitigated to a less than significant level.

The project being permitted is exempt from the requirements of the California Environmental Quality Act (CEQA) due to its designation as a ministerial action. Pursuant to CEQA Guidelines Section 15268, ministerial projects are not subject to environmental review because they involve decisions that are guided by fixed standards or regulations, with no allowance for discretionary judgment. The scope of this project falls within routine procedures that are strictly governed by established regulation, thereby precluding any need for subjective evaluation or interpretation. Consequently, the project is exempt from CEQA review

4.6 NSPS, NESHAPS AND ATCMs-

4.6.1 NSPS –

None

4.6.2 NESHAPS –40 CFR Part 63 Subpart HHHHHH (6H) – *Source Category: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

§ 63.11170 ***Am I subject to this subpart?***

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

Not Subject

4.6.3 ATCM - Title 17 CCR, Section 93112 – *Hexavalent Chromium and Cadmium Airborne Toxic Control Measure (ATCM) -- Motor Vehicle and Mobile Equipment Coatings*

(a)(2) This section applies to the owner or operator of any motor vehicle and / or mobile equipment coating facility that uses motor vehicle and / or mobile equipment coatings in California.

(d)(1) Except as provided in subdivision (e), no person shall sell, supply, offer for sale, or manufacture for sale in California any motor vehicle and/or mobile equipment coating that contains hexavalent chromium or cadmium.

Not Subject

4.6. Regulation XIV *Title V Operating Permits*

This regulation shall apply to any stationary source that is a major stationary source as defined in this regulation, subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA), or a solid waste incineration unit subject to Section 129(e) of CAA.

Per Rule 1401(c)(26), a major stationary source means any stationary source, excluding any non-road engines, which emits or has the potential to emit one or more air contaminants in amounts equal to or greater than any of the following emission rates:

(i) 10 tons per year of any federal hazardous air pollutant, including fugitive emissions.

(ii) 25 tons per year of any combination of federal hazardous air pollutants, including fugitive emissions.

(iii) 100 tons per year or more of any regulated air pollutant, excluding fugitive emission of any such pollutant.

*A stationary source may be subject to the acid rain provisions of Title IV of CAA if the source is equipped with a utility unit. Per Title 42, Chapter 85, Subchapter IV-A, §**7651,** a "utility unit" is a fossil fuel-fired combustion device that serves a generator in any State that produces electricity for sale.*

Not applicable, this source is not a major stationary source as defined in Rule 1401(c)(26), is not a utility unit as defined in Title 42, §7651, or a solid waste incineration unit**.**

5.0 RECOMMENDATION

The proposed coating operation at this site is expected to comply with the relevant District, State and Federal rules.

6.0 RECOMMENDED CONDITIONS

The recommended condition set is APCD2018-CON-001471– "27E-Meggitt, 10 lbs/day VOC limit, limited to 3 TAC materials" which was created for this facility.