



March 28, 2022

Ms. Donna Ogilvie NAS Lemoore 750 Enterprise Ave. Lemoore, CA 93245

Final - Authorities to Construct / Certificates of Conformity (Significant Re:

Mod)

Facility Number: C-2106 Project Number: C-1212200

Dear Ms. Ogilvie:

The Air Pollution Control Officer has issued Authorities to Construct (ATCs) C-2106-195-0, '-197-0, '-198-0, and '-199-0 with Certificates of Conformity to NAS Lemoore at Hangar 6 of the Naval Air Station at 700 Avenger Ave., in Lemoore, CA. The project is for the installation of a new squadron aircraft corrosion control and maintenance coating operation at Hangar 6. Enclosed are the ATCs and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the ATCs was posted on February 9, 2022. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on February 9, 2022. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Prior to operating with the modifications authorized by the ATCs, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at www.valleyair.org/permits/TVforms.

> Samir Sheikh Executive Director/Air Pollution Control Officer

Ms. Donna Ogilvie Page 2

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

**Brian Clements** 

**Director of Permit Services** 

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email cc: Laura Yannayon, EPA (w/enclosure) via EPS





Facility # C-2106 NAS LEMOORE 750 ENTERPRISE AVE. RM 107 LEMOORE, CA 93246-5001

# **AUTHORITY TO CONSTRUCT (ATC)**

### **QUICK START GUIDE**

- 1. Pay Invoice: Please pay enclosed invoice before due date.
- 2. Modify Your Title V Permit. Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at http://www.valleyair.org/permits/TVforms.
- 3. Fully Understand ATC: Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
- 4. **Follow ATC**: You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
- 5. **Notify District**: You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
- 6. Source Test: Schedule and perform any required source testing. See http://www.valleyair.org/busind/comply/source testing.htm for source testing resources.
- 7. **Maintain Records**: Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at http://www.valleyair.org/busind/comply/compliance\_forms.htm.

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

For assistance, please contact District Compliance staff at any of the telephone numbers listed below.

> Samir Sheikh **Executive Director/Air Pollution Control Officer**

**Northern Region** 4800 Enterprise Way Modesto, CA 95356-8718 Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)** 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region** 34946 Flyover Court Bakersfield, CA 93308-9725 Tel: (661) 392-5500 FAX: (661) 392-5585





**PERMIT NO:** C-2106-195-0 **ISSUANCE DATE:** 03/28/2022

**LEGAL OWNER OR OPERATOR: NAS LEMOORE** 

**MAILING ADDRESS:** 750 ENTERPRISE AVE. RM 107

LEMOORE, CA 93246-5001

**LOCATION:** NAVAL AIR STATION LEMOORE

750 ENTERPRISE AVE LEMOORE, CA 93246-5001

#### **EQUIPMENT DESCRIPTION:**

SQUADRON AIRCRAFT CORROSION CONTROL AND MAINTENANCE COATING OPERATIONS INCLUDING METAL AND WOOD PARTS AND PRODUCTS; WITH HVLP SPRAY GUN(S) AND OTHER APPROVED APPLICATION METHODS, AND AN ENCLOSED GUN CLEANER (HANGAR 6, MODULE 1)

### **CONDITIONS**

- 1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus VOC emission reduction credits for the following quantity of emissions: 1st quarter 525 lb, 2nd quarter 453 lb, 3rd quarter 1,063 lb, and fourth quarter 59 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. ERC Certificate Number C-1046-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

#### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services C-2106-195-0: Mar 28 2022 8:50AM -- PROCOPIS : Joint Inspection NOT Required

- 5. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus PM10 emission reduction credits for the following quantity of emissions: 1st quarter 144 lb, 2nd quarter 144 lb, 3rd quarter 145 lb, and fourth quarter 145 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. ERC Certificate Number C-1050-4 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- 8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 9. Coating of aerospace parts not attached to the aircraft, metal or wood parts and products shall be done using brush, dip, roll coating application equipment in this module. If spray coating equipment is used for these operations, coating shall be done in the paint spray booths listed on permit units C-2106-39 or '-149. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Solvent-based solid film lubricant coatings shall have a VOC content, as applied, equal to or less than 6.4 lb/gal (767 g/l), excluding water and exempt solvents. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 11. VOC content of coatings as applied, excluding water and exempt compounds, for maintenance and refinishing of metal parts on aircraft shall not exceed any of the following limits: antichafe coatings 420 g/l (3.5 lb/gal), high temperature coatings 420 g/l (2.5 lb/gal), radiation effect coatings 600 g/l (5.0 lb/gal), metalized epoxy coatings 700 g/l (5.8 lb/gal). [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 12. Total PM10 emissions shall not exceed 9.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Total VOC emissions shall not exceed 32.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Total annual PM10 emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 578 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 15. Total annual VOC emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 1,400 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 16. Permittee shall keep daily and annual records of total VOC emissions in lb/day and lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Permittee shall keep daily and annual records of total PM10 emissions (lb/day and lb/year) only for coatings that used an HVLP gun as the application method. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Daily PM10 emissions of each coating and/or primer applied shall be calculated as follows: daily PM10 emissions of each coating and/or primer applied = coating and/or primer density (lb/gallon) x coating and/or primer solids content (% by weight) x usage (gallons/day) x control efficiency factor. Control efficiency factor is 0.25 for primers applied outside the booth, and 0.0125 for coating and/or primers applied inside the booth. Total daily PM10 emissions is the sum of PM10 emissions from all coating and/or primers applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Architectural coating shall be performed using only aerosol coating products. [District Rule 4601] Federally Enforceable Through Title V Permit

- 21. For metal parts and products, VOC content of air-dried coatings as applied, excluding water and exempt compounds, shall not exceed 2.8 lb/gal (340 g/l). For specialty coatings, the VOC content shall not exceed the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), and solar absorbent: 420 g/l (3.5 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- 22. For wood products, VOC content of coatings as applied, excluding water and exempt compounds, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), low-solids stain 120 g/l (1.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), water-based pigmented primers 0.68 lb/gal, water-based pigmented topcoats 1.62 lb/gal, sanding sealer 275 g/l (2.3 lb/gallon), and stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 23. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 24. VOC content of aerospace coatings as applied, excluding water and exempt compounds, used for aerospace components shall not exceed any of the limits listed in section 5.1, Table 1 of Rule 4605 (6/16/2011), unless otherwise allowed in this permit. [District Rule 4605] Federally Enforceable Through Title V Permit
- 25. For solvent cleaning operations of metal and wood parts and products, VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 26. For aerospace surface cleaning, cleanup, or jet engine or rocket engine gas path cleaning or flushing, excluding stripping coatings or cleaning coating application equipment, permittee shall not use solvents with a VOC content greater than or equal to 200 g/l (1.67 lb/gal) as applied or with a VOC composite vapor pressure greater than 45 mmHg (0.87 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 27. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, sealants, catalysts, thinners, or any unused VOC-containing materials in closed, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers shall be self-closing. [District Rules 4603, 4605, 4606, and 4653] Federally Enforceable Through Title V Permit
- 28. For the coating of metal and wood parts and products, only dip, roller, or brush shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201, 4603, and 4606] Federally Enforceable Through Title V Permit
- 29. For coating of aircraft, HVLP, electrostatic, electrodeposition, flow, roll, dip, or brush coating application equipment shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 30. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 31. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit

- 32. Each container or accompanying data sheet of any coating shall display; 1) a statement of the manufacturer's recommendation regarding thinning of the coating excluding the thinning of coatings with water, and 2) the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using approved test methods. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 33. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 34. Permittee shall not use or specify for use within the District an aerospace coating stripper with a VOC content greater than or equal to 300 g/l (2.5 lb/gal) as applied or with a VOC composite vapor pressure of greater than 9.5 mmHg (0.18 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 35. VOC content of coatings and solvents shall be analyzed by EPA Method 24 or its constituents methods; and analysis of halogenated exempt compounds shall be analyzed by ARB Method 432 or SCAQMD Method 303 (Determination of Exempt Compounds). [District Rule 4605] Federally Enforceable Through Title V Permit
- 36. The solid content of pretreatment coatings shall be determined by EPA Method 24. Measurement of acid content of pre-treatment coatings shall be determined using ASTM Method D1613-06, Standard Test for Acidity of Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and Related products. [District Rules 4603 and 4605] Federally Enforceable Through Title V Permit
- 37. The fire resistance of an interior coating shall be determined by the Federal Aviation Administration-required Ohio State University Heat Release, Fire, and Burn Tests. [District Rule 4605] Federally Enforceable Through Title V Permit
- 38. The VOC composite vapor pressure of a blended solvent shall be determined by quantifying the amount of each organic compound using gas chromatographic analysis SCAQMD Test Method 308. [District Rule 4605] Federally Enforceable Through Title V Permit
- 39. VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 40. Emissions of VOC shall be measured by EPA Method 25, 25A or 25B, as applicable, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 41. The viscosity of coatings used for dip coating of steel joists shall be determined by using ASTM D5478-98 or ASTM D5125-97. [District Rule 4603] Federally Enforceable Through Title V Permit
- 42. The quantification of coating as a metallic/iridescent topcoat shall be determined by SCAQMD Method 318 (Determination of Weight Percent of Elemental Metal in Coatings by X-ray Diffraction Method), July 1996. [District Rule 4603] Federally Enforceable Through Title V Permit
- 43. VOC emissions from enclosed systems used to clean coating application equipment shall be determined by the manufacturer using the SCAQMD General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems. [District Rule 4605] Federally Enforceable Through Title V Permit
- 44. Cleaning activities that use solvents shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

- 45. Permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 46. The permittee shall minimize spills of VOC-containing adhesive products, cleaning products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 47. The permittee shall convey VOC-containing adhesive products, cleaning materials, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 48. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, solvents used for surface preparation and cleanup, thinners, reducers, and strippers, in use and in storage. The file shall include the following information: material safety data sheet (MSDS) or product data sheet showing material name, manufacturer's name, VOC content as applied (lb/gal or g/l), mixing instructions, and density; volume of coating/solvent mix ratio; volume of each coating used (gal), quantity of cleanup solvent used (gal), specific chemical constituents of coatings and solvents used for surface preparation and cleanup; and vapor pressure of solvents used. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 49. Permittee shall maintain records to support that the following aerospace coatings have been specified for their intended application: adhesion promoter, antichafe coating, electric/radiation effect, fuel tank adhesive, high temperature coating, impact resistant coating, optical anti-reflective coating, rain erosion resistant wing coating. [District Rule 4605] Federally Enforceable Through Title V Permit
- 50. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit





**PERMIT NO:** C-2106-197-0 **ISSUANCE DATE:** 03/28/2022

**LEGAL OWNER OR OPERATOR: NAS LEMOORE** 

**MAILING ADDRESS:** 750 ENTERPRISE AVE. RM 107

LEMOORE, CA 93246-5001

**LOCATION:** NAVAL AIR STATION LEMOORE

750 ENTERPRISE AVE LEMOORE, CA 93246-5001

#### **EQUIPMENT DESCRIPTION:**

SQUADRON AIRCRAFT CORROSION CONTROL AND MAINTENANCE COATING OPERATIONS INCLUDING METAL AND WOOD PARTS AND PRODUCTS; WITH HVLP SPRAY GUN(S) AND OTHER APPROVED APPLICATION METHODS, AND AN ENCLOSED GUN CLEANER (HANGAR 6, MODULE 2)

### **CONDITIONS**

- 1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
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Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services C-2106-197-0: Mar 28 2022 8:51AM -- PROCOPIS : Joint Inspection NOT Required

- 5. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus PM10 emission reduction credits for the following quantity of emissions: 1st quarter 144 lb, 2nd quarter 144 lb, 3rd quarter 145 lb, and fourth quarter 145 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
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- 19. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Architectural coating shall be performed using only aerosol coating products. [District Rule 4601] Federally Enforceable Through Title V Permit

- 21. For metal parts and products, VOC content of air-dried coatings as applied, excluding water and exempt compounds, shall not exceed 2.8 lb/gal (340 g/l). For specialty coatings, the VOC content shall not exceed the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), and solar absorbent: 420 g/l (3.5 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- 22. For wood products, VOC content of coatings as applied, excluding water and exempt compounds, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), low-solids stain 120 g/l (1.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), water-based pigmented primers 0.68 lb/gal, water-based pigmented topcoats 1.62 lb/gal, sanding sealer 275 g/l (2.3 lb/gallon), and stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 23. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 24. VOC content of aerospace coatings as applied, excluding water and exempt compounds, used for aerospace components shall not exceed any of the limits listed in section 5.1, Table 1 of Rule 4605 (6/16/2011), unless otherwise allowed in this permit. [District Rule 4605] Federally Enforceable Through Title V Permit
- 25. For solvent cleaning operations of metal and wood parts and products, VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 26. For aerospace surface cleaning, cleanup, or jet engine or rocket engine gas path cleaning or flushing, excluding stripping coatings or cleaning coating application equipment, permittee shall not use solvents with a VOC content greater than or equal to 200 g/l (1.67 lb/gal) as applied or with a VOC composite vapor pressure greater than 45 mmHg (0.87 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 27. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, sealants, catalysts, thinners, or any unused VOC-containing materials in closed, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers shall be self-closing. [District Rules 4603, 4605, 4606, and 4653] Federally Enforceable Through Title V Permit
- 28. For the coating of metal and wood parts and products, only dip, roller, or brush shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201, 4603, and 4606] Federally Enforceable Through Title V Permit
- 29. For coating of aircraft, HVLP, electrostatic, electrodeposition, flow, roll, dip, or brush coating application equipment shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 30. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 31. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit

- 32. Each container or accompanying data sheet of any coating shall display; 1) a statement of the manufacturer's recommendation regarding thinning of the coating excluding the thinning of coatings with water, and 2) the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using approved test methods. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 33. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 34. Permittee shall not use or specify for use within the District an aerospace coating stripper with a VOC content greater than or equal to 300 g/l (2.5 lb/gal) as applied or with a VOC composite vapor pressure of greater than 9.5 mmHg (0.18 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 35. VOC content of coatings and solvents shall be analyzed by EPA Method 24 or its constituents methods; and analysis of halogenated exempt compounds shall be analyzed by ARB Method 432 or SCAQMD Method 303 (Determination of Exempt Compounds). [District Rule 4605] Federally Enforceable Through Title V Permit
- 36. The solid content of pretreatment coatings shall be determined by EPA Method 24. Measurement of acid content of pre-treatment coatings shall be determined using ASTM Method D1613-06, Standard Test for Acidity of Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and Related products. [District Rules 4603 and 4605] Federally Enforceable Through Title V Permit
- 37. The fire resistance of an interior coating shall be determined by the Federal Aviation Administration-required Ohio State University Heat Release, Fire, and Burn Tests. [District Rule 4605] Federally Enforceable Through Title V Permit
- 38. The VOC composite vapor pressure of a blended solvent shall be determined by quantifying the amount of each organic compound using gas chromatographic analysis SCAQMD Test Method 308. [District Rule 4605] Federally Enforceable Through Title V Permit
- 39. VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 40. Emissions of VOC shall be measured by EPA Method 25, 25A or 25B, as applicable, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 41. The viscosity of coatings used for dip coating of steel joists shall be determined by using ASTM D5478-98 or ASTM D5125-97. [District Rule 4603] Federally Enforceable Through Title V Permit
- 42. The quantification of coating as a metallic/iridescent topcoat shall be determined by SCAQMD Method 318 (Determination of Weight Percent of Elemental Metal in Coatings by X-ray Diffraction Method), July 1996. [District Rule 4603] Federally Enforceable Through Title V Permit
- 43. VOC emissions from enclosed systems used to clean coating application equipment shall be determined by the manufacturer using the SCAQMD General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems. [District Rule 4605] Federally Enforceable Through Title V Permit
- 44. Cleaning activities that use solvents shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

- 45. Permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 46. The permittee shall minimize spills of VOC-containing adhesive products, cleaning products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 47. The permittee shall convey VOC-containing adhesive products, cleaning materials, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 48. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, solvents used for surface preparation and cleanup, thinners, reducers, and strippers, in use and in storage. The file shall include the following information: material safety data sheet (MSDS) or product data sheet showing material name, manufacturer's name, VOC content as applied (lb/gal or g/l), mixing instructions, and density; volume of coating/solvent mix ratio; volume of each coating used (gal), quantity of cleanup solvent used (gal), specific chemical constituents of coatings and solvents used for surface preparation and cleanup; and vapor pressure of solvents used. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 49. Permittee shall maintain records to support that the following aerospace coatings have been specified for their intended application: adhesion promoter, antichafe coating, electric/radiation effect, fuel tank adhesive, high temperature coating, impact resistant coating, optical anti-reflective coating, rain erosion resistant wing coating. [District Rule 4605] Federally Enforceable Through Title V Permit
- 50. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit





**PERMIT NO:** C-2106-198-0 **ISSUANCE DATE:** 03/28/2022

**LEGAL OWNER OR OPERATOR: NAS LEMOORE** 

**MAILING ADDRESS:** 750 ENTERPRISE AVE. RM 107

LEMOORE, CA 93246-5001

**LOCATION:** NAVAL AIR STATION LEMOORE

750 ENTERPRISE AVE LEMOORE, CA 93246-5001

#### **EQUIPMENT DESCRIPTION:**

SQUADRON AIRCRAFT CORROSION CONTROL AND MAINTENANCE COATING OPERATIONS INCLUDING METAL AND WOOD PARTS AND PRODUCTS; WITH HVLP SPRAY GUN(S) AND OTHER APPROVED APPLICATION METHODS, AND AN ENCLOSED GUN CLEANER (HANGAR 6, MODULE 3)

### **CONDITIONS**

- 1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus VOC emission reduction credits for the following quantity of emissions: 1st quarter 525 lb, 2nd quarter 453 lb, 3rd quarter 1,063 lb, and fourth quarter 59 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. ERC Certificate Number C-1046-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

#### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services C-2106-198-0: Mar 28 2022 8:51AM -- PROCOPIS : Joint Inspection NOT Required

- 5. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus PM10 emission reduction credits for the following quantity of emissions: 1st quarter 144 lb, 2nd quarter 144 lb, 3rd quarter 145 lb, and fourth quarter 145 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. ERC Certificate Number C-1050-4 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- 8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 9. Coating of aerospace parts not attached to the aircraft, metal or wood parts and products shall be done using brush, dip, roll coating application equipment in this module. If spray coating equipment is used for these operations, coating shall be done in the paint spray booths listed on permit units C-2106-39 or '-149. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Solvent-based solid film lubricant coatings shall have a VOC content, as applied, equal to or less than 6.4 lb/gal (767 g/l), excluding water and exempt solvents. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 11. VOC content of coatings as applied, excluding water and exempt compounds, for maintenance and refinishing of metal parts on aircraft shall not exceed any of the following limits: antichafe coatings 420 g/l (3.5 lb/gal), high temperature coatings 420 g/l (2.5 lb/gal), radiation effect coatings 600 g/l (5.0 lb/gal), metalized epoxy coatings 700 g/l (5.8 lb/gal). [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 12. Total PM10 emissions shall not exceed 9.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Total VOC emissions shall not exceed 32.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Total annual PM10 emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 578 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 15. Total annual VOC emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 1,400 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 16. Permittee shall keep daily and annual records of total VOC emissions in lb/day and lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Permittee shall keep daily and annual records of total PM10 emissions (lb/day and lb/year) only for coatings that used an HVLP gun as the application method. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Daily PM10 emissions of each coating and/or primer applied shall be calculated as follows: daily PM10 emissions of each coating and/or primer applied = coating and/or primer density (lb/gallon) x coating and/or primer solids content (% by weight) x usage (gallons/day) x control efficiency factor. Control efficiency factor is 0.25 for primers applied outside the booth, and 0.0125 for coating and/or primers applied inside the booth. Total daily PM10 emissions is the sum of PM10 emissions from all coating and/or primers applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Architectural coating shall be performed using only aerosol coating products. [District Rule 4601] Federally Enforceable Through Title V Permit

- 21. For metal parts and products, VOC content of air-dried coatings as applied, excluding water and exempt compounds, shall not exceed 2.8 lb/gal (340 g/l). For specialty coatings, the VOC content shall not exceed the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), and solar absorbent: 420 g/l (3.5 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- 22. For wood products, VOC content of coatings as applied, excluding water and exempt compounds, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), low-solids stain 120 g/l (1.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), water-based pigmented primers 0.68 lb/gal, water-based pigmented topcoats 1.62 lb/gal, sanding sealer 275 g/l (2.3 lb/gallon), and stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 23. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 24. VOC content of aerospace coatings as applied, excluding water and exempt compounds, used for aerospace components shall not exceed any of the limits listed in section 5.1, Table 1 of Rule 4605 (6/16/2011), unless otherwise allowed in this permit. [District Rule 4605] Federally Enforceable Through Title V Permit
- 25. For solvent cleaning operations of metal and wood parts and products, VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 26. For aerospace surface cleaning, cleanup, or jet engine or rocket engine gas path cleaning or flushing, excluding stripping coatings or cleaning coating application equipment, permittee shall not use solvents with a VOC content greater than or equal to 200 g/l (1.67 lb/gal) as applied or with a VOC composite vapor pressure greater than 45 mmHg (0.87 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 27. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, sealants, catalysts, thinners, or any unused VOC-containing materials in closed, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers shall be self-closing. [District Rules 4603, 4605, 4606, and 4653] Federally Enforceable Through Title V Permit
- 28. For the coating of metal and wood parts and products, only dip, roller, or brush shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201, 4603, and 4606] Federally Enforceable Through Title V Permit
- 29. For coating of aircraft, HVLP, electrostatic, electrodeposition, flow, roll, dip, or brush coating application equipment shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 30. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 31. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit

- 32. Each container or accompanying data sheet of any coating shall display; 1) a statement of the manufacturer's recommendation regarding thinning of the coating excluding the thinning of coatings with water, and 2) the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using approved test methods. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 33. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 34. Permittee shall not use or specify for use within the District an aerospace coating stripper with a VOC content greater than or equal to 300 g/l (2.5 lb/gal) as applied or with a VOC composite vapor pressure of greater than 9.5 mmHg (0.18 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 35. VOC content of coatings and solvents shall be analyzed by EPA Method 24 or its constituents methods; and analysis of halogenated exempt compounds shall be analyzed by ARB Method 432 or SCAQMD Method 303 (Determination of Exempt Compounds). [District Rule 4605] Federally Enforceable Through Title V Permit
- 36. The solid content of pretreatment coatings shall be determined by EPA Method 24. Measurement of acid content of pre-treatment coatings shall be determined using ASTM Method D1613-06, Standard Test for Acidity of Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and Related products. [District Rules 4603 and 4605] Federally Enforceable Through Title V Permit
- 37. The fire resistance of an interior coating shall be determined by the Federal Aviation Administration-required Ohio State University Heat Release, Fire, and Burn Tests. [District Rule 4605] Federally Enforceable Through Title V Permit
- 38. The VOC composite vapor pressure of a blended solvent shall be determined by quantifying the amount of each organic compound using gas chromatographic analysis SCAQMD Test Method 308. [District Rule 4605] Federally Enforceable Through Title V Permit
- 39. VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 40. Emissions of VOC shall be measured by EPA Method 25, 25A or 25B, as applicable, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 41. The viscosity of coatings used for dip coating of steel joists shall be determined by using ASTM D5478-98 or ASTM D5125-97. [District Rule 4603] Federally Enforceable Through Title V Permit
- 42. The quantification of coating as a metallic/iridescent topcoat shall be determined by SCAQMD Method 318 (Determination of Weight Percent of Elemental Metal in Coatings by X-ray Diffraction Method), July 1996. [District Rule 4603] Federally Enforceable Through Title V Permit
- 43. VOC emissions from enclosed systems used to clean coating application equipment shall be determined by the manufacturer using the SCAQMD General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems. [District Rule 4605] Federally Enforceable Through Title V Permit
- 44. Cleaning activities that use solvents shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

- 45. Permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 46. The permittee shall minimize spills of VOC-containing adhesive products, cleaning products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 47. The permittee shall convey VOC-containing adhesive products, cleaning materials, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 48. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, solvents used for surface preparation and cleanup, thinners, reducers, and strippers, in use and in storage. The file shall include the following information: material safety data sheet (MSDS) or product data sheet showing material name, manufacturer's name, VOC content as applied (lb/gal or g/l), mixing instructions, and density; volume of coating/solvent mix ratio; volume of each coating used (gal), quantity of cleanup solvent used (gal), specific chemical constituents of coatings and solvents used for surface preparation and cleanup; and vapor pressure of solvents used. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 49. Permittee shall maintain records to support that the following aerospace coatings have been specified for their intended application: adhesion promoter, antichafe coating, electric/radiation effect, fuel tank adhesive, high temperature coating, impact resistant coating, optical anti-reflective coating, rain erosion resistant wing coating. [District Rule 4605] Federally Enforceable Through Title V Permit
- 50. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit





**PERMIT NO:** C-2106-199-0 **ISSUANCE DATE:** 03/28/2022

**LEGAL OWNER OR OPERATOR: NAS LEMOORE** 

**MAILING ADDRESS:** 750 ENTERPRISE AVE. RM 107

LEMOORE, CA 93246-5001

**LOCATION:** NAVAL AIR STATION LEMOORE

750 ENTERPRISE AVE LEMOORE, CA 93246-5001

#### **EQUIPMENT DESCRIPTION:**

SQUADRON AIRCRAFT CORROSION CONTROL AND MAINTENANCE COATING OPERATIONS INCLUDING METAL AND WOOD PARTS AND PRODUCTS; WITH HVLP SPRAY GUN(S) AND OTHER APPROVED APPLICATION METHODS, AND AN ENCLOSED GUN CLEANER (HANGAR 6, MODULE 4)

### **CONDITIONS**

- 1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus VOC emission reduction credits for the following quantity of emissions: 1st quarter 525 lb, 2nd quarter 453 lb, 3rd quarter 1,063 lb, and fourth quarter 59 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. ERC Certificate Number C-1046-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

#### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

- 5. Prior to operating equipment under any of the following Authorities to Construct: '-195-0, '-197-0, '-198-0, or '-199-0, permittee shall surrender surplus PM10 emission reduction credits for the following quantity of emissions: 1st quarter 144 lb, 2nd quarter 144 lb, 3rd quarter 145 lb, and fourth quarter 145 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. ERC Certificate Number C-1050-4 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- 8. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 9. Coating of aerospace parts not attached to the aircraft, metal or wood parts and products shall be done using brush, dip, roll coating application equipment in this module. If spray coating equipment is used for these operations, coating shall be done in the paint spray booths listed on permit units C-2106-39 or '-149. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Solvent-based solid film lubricant coatings shall have a VOC content, as applied, equal to or less than 6.4 lb/gal (767 g/l), excluding water and exempt solvents. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 11. VOC content of coatings as applied, excluding water and exempt compounds, for maintenance and refinishing of metal parts on aircraft shall not exceed any of the following limits: antichafe coatings 420 g/l (3.5 lb/gal), high temperature coatings 420 g/l (2.5 lb/gal), radiation effect coatings 600 g/l (5.0 lb/gal), metalized epoxy coatings 700 g/l (5.8 lb/gal). [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 12. Total PM10 emissions shall not exceed 9.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Total VOC emissions shall not exceed 32.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Total annual PM10 emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 578 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 15. Total annual VOC emissions for the entire hangar 6, which includes C-2106-195, '-197, '-198, and '-199, shall not exceed 1,400 lb/yr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 16. Permittee shall keep daily and annual records of total VOC emissions in lb/day and lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Permittee shall keep daily and annual records of total PM10 emissions (lb/day and lb/year) only for coatings that used an HVLP gun as the application method. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Daily PM10 emissions of each coating and/or primer applied shall be calculated as follows: daily PM10 emissions of each coating and/or primer applied = coating and/or primer density (lb/gallon) x coating and/or primer solids content (% by weight) x usage (gallons/day) x control efficiency factor. Control efficiency factor is 0.25 for primers applied outside the booth, and 0.0125 for coating and/or primers applied inside the booth. Total daily PM10 emissions is the sum of PM10 emissions from all coating and/or primers applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Architectural coating shall be performed using only aerosol coating products. [District Rule 4601] Federally Enforceable Through Title V Permit

- 21. For metal parts and products, VOC content of air-dried coatings as applied, excluding water and exempt compounds, shall not exceed 2.8 lb/gal (340 g/l). For specialty coatings, the VOC content shall not exceed the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), and solar absorbent: 420 g/l (3.5 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- 22. For wood products, VOC content of coatings as applied, excluding water and exempt compounds, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), low-solids stain 120 g/l (1.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), water-based pigmented primers 0.68 lb/gal, water-based pigmented topcoats 1.62 lb/gal, sanding sealer 275 g/l (2.3 lb/gallon), and stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 23. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 24. VOC content of aerospace coatings as applied, excluding water and exempt compounds, used for aerospace components shall not exceed any of the limits listed in section 5.1, Table 1 of Rule 4605 (6/16/2011), unless otherwise allowed in this permit. [District Rule 4605] Federally Enforceable Through Title V Permit
- 25. For solvent cleaning operations of metal and wood parts and products, VOC content of solvents shall not exceed 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
- 26. For aerospace surface cleaning, cleanup, or jet engine or rocket engine gas path cleaning or flushing, excluding stripping coatings or cleaning coating application equipment, permittee shall not use solvents with a VOC content greater than or equal to 200 g/l (1.67 lb/gal) as applied or with a VOC composite vapor pressure greater than 45 mmHg (0.87 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 27. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, sealants, catalysts, thinners, or any unused VOC-containing materials in closed, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers shall be self-closing. [District Rules 4603, 4605, 4606, and 4653] Federally Enforceable Through Title V Permit
- 28. For the coating of metal and wood parts and products, only dip, roller, or brush shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201, 4603, and 4606] Federally Enforceable Through Title V Permit
- 29. For coating of aircraft, HVLP, electrostatic, electrodeposition, flow, roll, dip, or brush coating application equipment shall be used as coating application methods. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 30. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 31. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit

- 32. Each container or accompanying data sheet of any coating shall display; 1) a statement of the manufacturer's recommendation regarding thinning of the coating excluding the thinning of coatings with water, and 2) the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using approved test methods. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 33. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rules 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 34. Permittee shall not use or specify for use within the District an aerospace coating stripper with a VOC content greater than or equal to 300 g/l (2.5 lb/gal) as applied or with a VOC composite vapor pressure of greater than 9.5 mmHg (0.18 psia) at 68 F. [District Rule 4605] Federally Enforceable Through Title V Permit
- 35. VOC content of coatings and solvents shall be analyzed by EPA Method 24 or its constituents methods; and analysis of halogenated exempt compounds shall be analyzed by ARB Method 432 or SCAQMD Method 303 (Determination of Exempt Compounds). [District Rule 4605] Federally Enforceable Through Title V Permit
- 36. The solid content of pretreatment coatings shall be determined by EPA Method 24. Measurement of acid content of pre-treatment coatings shall be determined using ASTM Method D1613-06, Standard Test for Acidity of Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and Related products. [District Rules 4603 and 4605] Federally Enforceable Through Title V Permit
- 37. The fire resistance of an interior coating shall be determined by the Federal Aviation Administration-required Ohio State University Heat Release, Fire, and Burn Tests. [District Rule 4605] Federally Enforceable Through Title V Permit
- 38. The VOC composite vapor pressure of a blended solvent shall be determined by quantifying the amount of each organic compound using gas chromatographic analysis SCAQMD Test Method 308. [District Rule 4605] Federally Enforceable Through Title V Permit
- 39. VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 40. Emissions of VOC shall be measured by EPA Method 25, 25A or 25B, as applicable, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422. [District Rule 4603] Federally Enforceable Through Title V Permit
- 41. The viscosity of coatings used for dip coating of steel joists shall be determined by using ASTM D5478-98 or ASTM D5125-97. [District Rule 4603] Federally Enforceable Through Title V Permit
- 42. The quantification of coating as a metallic/iridescent topcoat shall be determined by SCAQMD Method 318 (Determination of Weight Percent of Elemental Metal in Coatings by X-ray Diffraction Method), July 1996. [District Rule 4603] Federally Enforceable Through Title V Permit
- 43. VOC emissions from enclosed systems used to clean coating application equipment shall be determined by the manufacturer using the SCAQMD General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems. [District Rule 4605] Federally Enforceable Through Title V Permit
- 44. Cleaning activities that use solvents shall be performed by one or more of the following methods: (1) wipe cleaning; or (2) application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or (3) non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or (4) solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

- 45. Permittee shall not use VOC-containing material to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing, draining procedures, and it must be used according to manufacturer's recommendations and must be closed when not in use. [District Rules 2201 and 4605] Federally Enforceable Through Title V Permit
- 46. The permittee shall minimize spills of VOC-containing adhesive products, cleaning products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 47. The permittee shall convey VOC-containing adhesive products, cleaning materials, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 48. Permittee shall maintain a current file of coatings, inks, adhesives, fountain solutions, wash primers, solvents used for surface preparation and cleanup, thinners, reducers, and strippers, in use and in storage. The file shall include the following information: material safety data sheet (MSDS) or product data sheet showing material name, manufacturer's name, VOC content as applied (lb/gal or g/l), mixing instructions, and density; volume of coating/solvent mix ratio; volume of each coating used (gal), quantity of cleanup solvent used (gal), specific chemical constituents of coatings and solvents used for surface preparation and cleanup; and vapor pressure of solvents used. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit
- 49. Permittee shall maintain records to support that the following aerospace coatings have been specified for their intended application: adhesion promoter, antichafe coating, electric/radiation effect, fuel tank adhesive, high temperature coating, impact resistant coating, optical anti-reflective coating, rain erosion resistant wing coating. [District Rule 4605] Federally Enforceable Through Title V Permit
- 50. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 4603, 4605, and 4606] Federally Enforceable Through Title V Permit