

**Attachment A**  
 District's Response to Comments Received From  
 United Technologies Corporation (UTC) - Site #: A0710  
 Permit Issuance Year: 2003

Comment #	Issue	UTC Comments on the Draft Permit	Districts Response to UTC Comments on the Draft Permit
<b>Comments Regarding Statement of Basis</b>			
1	Section A – Background	We agree with the District that the San Jose facility is a “major source” solely due to potential emissions of hazardous air pollutants, which under current permit terms, and conditions and equipment design exceed 10 tons per year for a single HAP (hydrogen chloride, or HCl) and 25 tons per year for all HAPs, combined.	No changes made to the Statement of Basis
2	Section C-VI – Permit Conditions	We accept the basis that the District has provided for identifying permit limits for grandfathered sources at the facility provided that, as the District indicates, <i>“exceedance of these limits is not per se a violation of the permit.”</i> (Page 11 SOB, emphasis ours). We understand that failure to report an exceedance would be a violation, but should such an exceedance occur, the facility would have an opportunity to demonstrate that the throughput limit did not in fact reflect the appropriate limit for the purposes of Rule 2-1-234.3. Where our review has identified a throughput limit for these grandfathered sources different than that proposed by the District, we provide this alternate value with our justification for its use.	No changes made to the Statement of Basis
3	Section C-VII – Applicable Limits and Compliance Monitoring Requirements	We note that, as part of the SMOP, UTC will propose to limit the sulfur content of diesel fuel used in all of the boilers at the facility to no more than 0.05% (weight), which will reduce facility-wide emission of SO <sub>x</sub> by approximately a factor of ten. We also note that the HCl emission rate associated with solid fuel test firing is based on the conservative engineering assumption that all of the chloride present in the solid fuel will convert to HCl. Should UTC provide the District with more accurate HCl emissions data, these more accurate data should be used to quantify HCl emissions from solid fuel firing. We	No changes made to the Statement of Basis. The District will address the issues relating to the sulfur content in the diesel fuel combusted at the boilers and the Hydrochloric Acid (HCl) emissions resulting from the solid fuel test firing, if and when UTC submits a Synthetic Minor Operating Permit application.

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		<p>also provide alternate parameter monitoring, where appropriate, for such new conditions by specific source, below.</p> <p>UTC also notes that many records required to demonstrate compliance with permit terms and conditions will be maintained in both a log and also on computers. It is our understanding that recording these compliance data in computer database records is an approved recordkeeping method.</p>	
<b>Comments Regarding the Draft MFRP</b>			
<b>Section I – Standard Conditions</b>			
4	Section K – Accidental Release	Delete the provision, as the facility does not manage regulated compounds in excess of the thresholds specified under 40 CFR Part 68.	The Accidental Release provision has been deleted in the Final Major Facility Review Permit.
<b>Section II - Equipment</b>			
5	Facility Boilers	<p>The capacities for the following boilers should be corrected in the permit to match the original nameplate rating:</p> <p>S-21: 6.275 MMBtu/hr (permit lists 6.57 MMBtu/hr, see p. 7)</p> <p>S-34: 8.369 MMBtu/hr (permit lists 8.76 MMBtu/hr, see p. 7)</p> <p>S-108: 1.275 MMBtu/hr (permit lists 1.02 MMBtu/hr, see p. 12)</p>	Ratings to boilers have been changed in the Final Major Facility Review Permit.
6	S-68 (Rocket Motor Test Stand 1317AB)	Unit description should be changed to indicate: Rocket Motor Test Stand 1318	Unit description for Source 68 has been changed in the Final Major Facility Review Permit.
7	S-69 (Rocket Motor Test Stand 1320B1; Firing Solid Fuel)	The District should amend the heat of explosion value for all propellants to 2,704 Btu/pound, which is correct value as opposed to the 1,800 Btu/pound currently reported in	Maximum Firing Rate's in the Final Major Facility Review Permit for:

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8	S-70 (Rocket Motor Test Stand, Station 1717 Pad 3; Firing Solid Fuel)	the Draft MFRP. To ensure compliance with District opacity requirements, all tests will be limited to less than <b>3 minutes</b> . Corresponding changes should be made to Condition No. 20675 for S-70, S-71 and S-72.	S-69 has been changed to 13.52 MM BTU/hr S-70 has been changed to 0.032 MM BTU/hr S-71 has been changed to 0.016 MM BTU/hr S-72 has been changed to 1.082 MM BTU/hr A line item indicating the heat of explosion value of 2,704 BTU/pound of explosive exploded under each of the above sources has been added in the "Capacity" column in Table II A in the Final Major Facility Review Permit. Permit Condition 20675 has been revised in the Final Major Facility Review Permit to incorporate part 6 which will limit the duration of the tests at the above sources to less than 3 minutes and will help ensure compliance with the Ringelmann No. 1 limitation in Regulation 6-301.
9	S-71 (Test Stand – 2"x4" Motor Testing; Station 1718J1; Firing Solid Fuel)		
10	S-72 (Test Stand, Station 1760J1; Firing solid Fuel)		
11	S-115 (Abrasive Blaster)	This unit is exempt per 2-1-118.1, as the internal volume of this blast cabinet is 80 cubic feet and is abated by a particulate filter integral to the unit. In reviewing this exemption for similar equipment at the facility, the District issued a letter of exemption dated February 3, 2000.	The District has modified the Final Major Facility Review Permit to exclude any references to S-115.
<b>Section II - Equipment</b>			
12	Table IIB – Abatement Devices	We agree with the District's language proposed in your email dated September 10, 2003 to provide for additional time to install the monitoring systems required by the District to demonstrate compliance with particulate control system efficiency. Therefore, we request that the following language be added to abatement devices A-51, 52, 53 (S-502), A-115 (S-115), A-506 (S-506), A-512 (S-7), and A-516 (S-516): "Within 3 months from the date of the final issuance of the Major Facility Review permit, the owner/operator shall	The entries for the affected abatement devices in the "Operating Parameters" column as it relates to the corresponding entries in the "Applicable Requirement" column to demonstrate compliance with Regulations 6-301, 6-310 and 6-311 in the Final Major Facility Review Permit have been modified as follows:  Pressure Drop – To Be Determined. A footnote has been added to the above entry which states the following:

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		<p>install a District-approved manometer or other District-approved device that measures the pressure drop across A-XX. Within 6 months following the date of installation of the District approved measurement devices, the owner/operator shall determine the proper operating range for the above abatement device that assures compliance of emissions from S-XX with parts X and Y of this condition. This range shall be submitted to the Permits Division of the District for inclusion in the permit as a minor permit revision. The owner/operator shall inspect and record the condition of the bags for plugging and/or leaks and/or defects once per XXXX. The owner/operator shall record the type of defect detected, the date and time when the defect was detected, and the date and time when the defect was rectified in a repair log. The owner/operator shall maintain records of the XXXX baghouse inspection logs and baghouse repair logs on-site for five years from the date of last entry and shall make them available for inspection by District staff upon request"</p>	<p>"UTC has requested additional time for the installation of measurement devices on the abatement equipment. In addition, the company has requested additional time from the date of installation of the above devices to determine the proper monitoring ranges."</p> <p>Language similar to that proposed by UTC has been incorporated into Permit Condition's 6797, 13479, 18833 and 20642, that govern the operation of sources 506, 7, 516 and 502, respectively.</p>
<b>Section III – Generally Applicable Requirements</b>			
13	Table III – Generally Applicable Requirements	Insert BAAQMD Regulation 8 Rule 19 – Organic Compounds – Surface Preparation and Coating of Miscellaneous Metal Parts and Products. This rule applies to both permitted and unpermitted operations onsite.	The District is not aware of any unpermitted operations at UTC that are subject to the requirements of Regulation 8-19.
14	Table III – Generally Applicable Requirements	Insert BAAQMD Regulation 8 Rule 29 – Organic Compounds – Aerospace Assembly and Component Coating Operations. This rule applies to both permitted and unpermitted operations onsite.	The District is not aware of any un-permitted operations at UTC that are subject to the requirements of Regulation 8-29.

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<b>Section VII – Applicable Limits and Compliance Monitoring Requirements</b>			
15	Facility Generators	The equipment descriptions should be modified for the following units for make and model: S-518: Cummins, Model No. NT-855-G (currently lists Katolight Model No. D200FRZ4 – this is the genset) S-519: Cummins, Model NT-855-G (currently lists Katolight Model No. D200FRZ4 – this is the genset) S-520: Cummins, Model No. 6CT0097 (currently lists Onan Model No. 125DGEA39290F – this is the genset)	The equipment descriptions in the “Make and Model” column in Table II A – “Permitted Sources” for the affected emergency standby generators have been changed in the Final Major Facility Review Permit as requested.
<b>Section VI – Permit Conditions</b>			
16	Condition 295 (S-69 Rocket Motor Test Stand 1320B1)	The facility uses propellant that may contain <i>de minimis</i> concentrations of beryllium; however, no beryllium is incorporated in the propellant. Therefore, please modify the first sentence to read as follows: “The owner/operator shall ensure that each propellant material combusted/fired at S-69 does not incorporate beryllium ...”	As previously discussed in the beryllium discussion in Section VII – Applicable Limits and Compliance Monitoring Requirements in the Statement of Basis, it is the District’s understanding that the <i>de minimis</i> beryllium concentration in the propellant is due to beryllium’s presence as a trace contaminant of the aluminum component of the rocket motor casing.
17	Condition 675 (S-74 Paint Spray Booth Station 20)	Part 1 should be deleted, as the VOC limit is sufficiently restrictive under Parts 2 and 3. Alternatively, the District should add a new condition as follows: “The owner/operator can use coatings in quantities other than those specified in Part 1 of this condition provided the owner/operator can demonstrate to the satisfaction of the APCO by recordkeeping including emission calculations that the POC emissions at S-74 do not exceed 666 pounds/year.”	As previously discussed in Section VI – Permit Conditions in the Statement of Basis, permit conditions such as Permit Condition 675 with implied coating and clean-up solvent limits were rewritten explicitly in the Draft Major Facility Review Permit. The cumulative increase in emissions information for the plant in the District’s database was constructed using emission contributions from permitted sources such as S-74. In light of the above, Part 1 of Permit Condition 675 cannot be deleted from the Final Major Facility Review Permit.  Part 2 of Permit Condition 675 has been changed to incorporate language similar to that proposed by UTC. In addition, language similar to that which

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			appears in part 2 of Permit Condition 19165 has been incorporated into part 2 of Permit Condition 675 to ensure the Toxic Air Contaminant (TAC) Trigger levels outlined in Table 2-1-316 in Regulation 2-1 are not exceeded.
18	Condition 738 (S-75 Paint Spray Booth)	<p>Part 1 should be deleted, as the VOC limit is sufficiently restrictive under Parts 2 and 3. Alternatively, the District should add a new condition as follows:</p> <p>“The owner/operator can use coatings in quantities other than those specified in Part 1 of this condition provided the owner/operator can demonstrate to the satisfaction of the APCO by recordkeeping including emission calculations that the POC emissions at S-75 do not exceed 433 pounds/year”</p>	<p>As previously discussed in Section VI – Permit Conditions in the Statement of Basis, permit conditions such as Permit Condition 738 with implied coating limits were rewritten explicitly in the Draft Major Facility Review Permit. The cumulative increase in emissions information for the plant in the District's database was constructed using emission contributions from permitted sources such as S-75. In light of the above, Part 1 of Permit Condition 738 cannot be deleted from the Final Major Facility Review Permit.</p> <p>Part 2 of Permit Condition 738 has been changed to incorporate language similar to that proposed by UTC. In addition, language similar to that which appears in part 2 of Permit Condition 19165 has been incorporated into part 2 of Permit Condition 738 to ensure the TAC Trigger levels outlined in Table 2-1-316 in Regulation 2-1 are not exceeded.</p>
19	Condition 1747 (S-81 Paint Spray Booth Bldg. 1715)	<p>Part 1 should be deleted, as the VOC limit is sufficiently restrictive under Parts 2 and 3. Alternatively, the District should add a new condition as follows:</p> <p>“The owner/operator can use coatings in quantities other than those specified in Part 1 of this condition provided the owner/operator can demonstrate to the satisfaction of the APCO by recordkeeping including emission calculations that the POC emissions at S-81 do not exceed 247 pounds/year.”</p>	<p>As previously discussed in Section VI – Permit Conditions in the Statement of Basis, permit conditions such as Permit Condition 1747 with implied coating and clean-up solvent limits were rewritten explicitly in the Draft Major Facility Review Permit. The cumulative increase in emissions information for the plant in the District's database was constructed using emission contributions from permitted sources such as S-81. In light of the above, Part 1 of Permit Condition 1747 cannot be deleted from the Final</p>

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			<p>Major Facility Review Permit.</p> <p>Part 2 of Permit Condition 1747 has been modified to incorporate language similar to that proposed by UTC. In addition, language similar to that which appears in part 2 of Permit Condition 19165 has been incorporated into part 2 of Permit Condition 1747 to ensure the TAC Trigger levels outlined in Table 2-1-316 in Regulation 2-1 are not exceeded.</p>
20	Condition 2611 (S-89 0485J01 Paint Spray Booth)	<p>The District should add a new Part 2 to this condition as follows:</p> <p>“The owner/operator can use coatings in quantities other than those specified in Part 1 of this condition provided the owner/operator can demonstrate to the satisfaction of the APCO by recordkeeping including emission calculations that the POC emissions at S-89 do not exceed 800 pounds/year.”</p> <p>The value of 800 pounds is based on the use of compliant solvents and coatings in quantities identified in Part 1.</p>	<p>It is the District's understanding that S-89 is subject to the requirements of Regulation 8-29 and that Methyl Ethyl Ketone (MEK) is used as the clean-up solvent at the spray booth. Further, it is the District's understanding that none of the emissions resulting from the coating and/or solvent wipe cleaning operations at the spray booth are abated.</p> <p>If so, per Section 8-29-302.1 the Volatile Organic Compound (VOC) content of the primer “as applied”, excluding water, cannot exceed 2.9 lbs/gallon. Part 1 of Permit Condition 2611 limits the annual primer usage at S-89 to 25 gallons. This implies that the maximum amount of unabated VOC emissions resulting from the use of a Regulation 8-29 compliant primer at the spray booth is equal to <u>72.5</u> lbs/yr i.e. 2.9 lbs/gallon x 25 gallons/yr.</p> <p>Part 1 of Permit Condition 2611 limits the MEK usage to 75 gallons/yr. The density of MEK is equal to 6.72 lbs/gal. Therefore, the maximum uncontrolled VOC emissions resulting from the use of MEK as the clean-up solvent at the spray booth is equal to <u>504</u> lbs/yr i.e. 6.72 lbs/gal x 75 gal/yr.</p> <p>In light of the above information, the sum total of VOC emissions resulting from the use of the Regulation 8-29 compliant primer and MEK at the spray booth is</p>

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			<p>equal to 576.5 lbs/yr            i.e. 72.5 lbs/yr + 504 lbs/yr.</p> <p>UTC requested the District to add a new subpart to Permit Condition 2611 that would limit the Precursor Organic Compound (POC) emissions to 800 lbs/yr. As discussed in the preceding paragraph, the VOC emissions resulting from the use of the Regulation 8-29 compliant primer and MEK at S-89 is equal to 576.5 lbs/yr. This implies that 223.5 lbs/yr of VOC emissions can be attributed to the use of a compliant paint at S-89 i.e. 800 lbs/yr – 576.5 lbs/yr. Part 1 of Permit Condition 2611 limits the annual usage of paint at the spray booth to 25 gallons. This would imply that the VOC of the paint used at S-89 is equal to 8.94 lbs/gal i.e. (223.5 lbs/yr / 25 gal/yr). This VOC content of the paint is well above the coating limitations outlined under Section 8-29-302.</p> <p>In light of the above, Part 2 of Permit Condition has not been modified in the Final Major Facility Review Permit.</p>
21	Condition 3143 (S-90 Air Stripper, Contaminated Groundwater)	<p>As currently drafted, this condition assumes that all POC/NPOC present in contaminated groundwater are stripped by this unit, and emitted into the atmosphere. UTC wishes to add a new part to allow it to subtract that portion of POC/NPOC that remain in the treated groundwater. Therefore, the District should add the following language at the end of Part 2.b.:</p> <p>“The owner/operator may subtract the amount of VOCs that remain in the treated groundwater if laboratory data are available to support this calculation.”</p> <p>Correct the typographical error in Part 4 referencing standard conditions to read “I.F.”</p>	<p>The District has modified Part 2.b of Permit Condition 3143 to incorporate language similar to that proposed by UTC.</p> <p>Typographical error has been corrected in the Final Major Facility Review Permit.</p>

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22	Condition 5097 (S-101 Paint Spray Booth 1810J01)	<p>The District should add a new Part 5 to this condition as follows:</p> <p>“The owner/operator can use coatings in quantities other than those specified in Parts 1 and 3 of this condition provided the owner/operator can demonstrate to the satisfaction of the APCO by recordkeeping including emission calculations that the POC emissions at S-101 do not exceed 326 pounds/year.”</p>	<p>It is the District's understanding that S-101 is subject to the requirements of Regulation 8-29 and that MEK is used as the clean-up solvent at the spray booth. Further, it is the District's understanding that none of the emissions resulting from the coating and/or solvent wipe cleaning operations at the spray booth are abated.</p> <p>Emission calculations previously accounted for towards the cumulative increase at UTC under Application 5181 assumed the following:</p> <ul style="list-style-type: none"> <li>• 19 gallons of a high solids gloss polyurethane Cardinal paint with a POC content as applied equal to 2.83 lbs/gal would be used per year</li> <li>• 15 gallons of a military spec polyurethane coating with a POC content as applied equal to 2.87 lbs/gal would be used per year</li> <li>• 25 gallons of MEK with a POC content of 6.72 lbs/gal would be used annually</li> </ul> <p>The sum total of POC emissions from the use of the above coatings and cleanup solvent is equal to:</p> <p>(19 gal/yr x 2.83 lbs/gal) +                      (15 gal/yr x 2.87 lbs/gal) +                      (25 gal/yr x 6.72 lbs/gal) = 264.82 lbs/yr.</p> <p>In light of the above, Permit Condition 5097 has not been modified in the Final Major Facility Review Permit.</p>
23	Condition 5544 (S-85 (Site-wide Wipe Cleaning))	<p>Modify Part 1 to state that non-POC solvent used shall not exceed 6,960 gallons in a consecutive 12-month period. Modify Part 2 to state that POC solvent used shall not exceed 690 gallons in a consecutive 12-month period. Modify Part 3 to state that non-POC solvent used shall</p>	<p>UTC modified S-85 under Application 5720 in 1991 by increasing the clean-up solvent usage at the source from 5,300 gal/yr to 7,650 gal/yr. Since the site-wide wipe cleaning operations at UTC existed either before or since 1970, emissions resulting from the use of</p>

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		<p>not exceed 585 gallons per calendar month. Modify Part 4 to state that POC solvent used shall not exceed 65 gallons per calendar month. Delete weekly restrictions.</p>	<p>5,300 gal/yr clean-up solvent for site-wide wipe cleaning operations at the plant was not counted toward the cumulative increase in plant emissions. However, the net increase in emissions associated with the increase in 2,350 gal/yr i.e. 7,650 gal/yr – 5,300 gal/yr, of clean-up solvent usage was evaluated in light of the prevailing Best Available Control Technology (BACT) trigger levels and the resulting emissions were counted toward the cumulative increase in plant emissions. The BACT trigger levels for sources such as S-85 in 1991 was 150 lbs of VOC per day and/or 25 tons of VOC per year. The cumulative increase in NPOC (Non-Precursor Organic Compound) and POC emissions at the plant as a result of the increase in clean-up solvent use was 23,444 lbs/yr (64.2 lbs/day) and 1,456 lbs/yr (4 lbs/day), respectively. This increase in emissions was below the prevailing VOC BACT trigger in 1991.</p> <p>VOC = POC + NPOC      Daily: 4 + 64.2 = 66.2 lbs/day ≤ 150 lbs/day      Annual: 1,456 + 23,444 = 24,900 lbs/yr = 12.45 TPY ≤ 25 TPY</p> <p>In light of the above, the District has modified Permit Condition 5544 as follows:</p> <p><u>Parts 1 and 2</u>      Existing: 52-week period      Proposed: 12-month period</p> <p><u>Part 3</u>      Existing: NPOC ≤ 135 gal/calendar wk      Proposed: NPOC ≤ 19 gal/calendar day</p> <p><u>Part 4</u></p>

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			Existing: POC ≤ 15 gal/calendar wk Proposed: POC ≤ 2 gal/calendar day The District has incorporated a new Part 5 into Permit Condition 5544 which states the following: The owner/operator shall ensure that the total daily VOC emissions resulting from the use of the NPOC and POC clean-up solvents at S-85 is less than 150 pounds per calendar day. (Basis: Cumulative Increase) The District has re-numbered the Part 5 in the Draft Major Facility Review Permit to Part 6 in the Final Major Facility Review Permit.
24	Condition 6797 (S-506 Hammer Grinder)	As currently drafted, Part 2 requires that this operation be shutdown immediately upon detection of any defect at the particulate control system (baghouse). Part 2 should be amended as follows: "...detected during the weekly inspections. The owner/operator shall discontinue use of S-506 within 8 hours of discovery of a defect, unless that defect has been rectified."	In order to ensure compliance with the particulate matter and visible emissions standards in Regulation 6, Part 2 of Permit Condition 6797 cannot be amended as requested by UTC.
25	Condition 9098 (S-115 Sandblast Cabinet No. 1, Station 20)	As currently drafted, Part 2 requires that this operation be shutdown immediately upon detection of any defect at the particulate control system (baghouse). Part 2 should be amended as follows: "...detected during the weekly inspections. The owner/operator shall discontinue use of S-506 within 8 hours of discovery of a defect, unless that defect has been rectified."	In order to ensure compliance with the particulate matter and visible emissions standards in Regulation 6, Part 2 of Permit Condition 9098 cannot be amended as requested by UTC if the District determines S-115 is not exempt from Regulation 2-1-118.1.
26	Condition 10746 and 20435 (S-509 & S-510 Soil Vapor Extraction Operations)	As currently drafted, the VOC monitoring of effluent gas from the carbon control system is required to be reported as C1. The portable HC sampling system employed by the facility is calibrated using isobutylene, and all HC data is reported as n-hexane. Therefore, consistent with	The District has recommended UTC to discuss this issue with personnel in the Source Test Section that is part of the District's Technical Services Division. In order to evaluate whether such a change is warranted, UTC will have to apply for a permit

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		condition 6005, we request that Part 4b should be amended to read: 6 ppmv (measured as n-hexane, C6).	modification.
27	Condition 13479 (S-7 0210W04 Sandblasting Room)	As currently drafted, Part 2 requires that this operation be shutdown immediately upon detection of any defect at the particulate control system (baghouse). Part 2 should be amended as follows: "...detected during the weekly inspections. The owner/operator shall discontinue use of S-7 within 8 hours of discovery of a defect, unless that defect has been rectified."	In order to ensure compliance with the particulate matter and visible emissions standards in Regulation 6, Part 2 of Permit Condition 13479 cannot be amended as requested by UTC.
28	Condition 15069 (S-83 Spray Booth and Curing Ovens)	Delete Parts 1 and 2, as the VOC restrictions in Parts 3-6 are sufficient. Modify Parts 3-6 as necessary to indicate VOC restrictions only.  Insert the effective date for Table 2-1-316 in Part 4 applicable to the permit application for this permit unit. Without this date restriction, the facility would be faced with a "moving target" for compliance with local air toxic requirements even though the operations have not been modified.	Parts 1 and 2 of Permit Condition 15069 are explicit conditions that were written when S-83 was modified under Application 13998 in 1994. The cumulative increase in emissions information for the plant in the District's database was constructed using emissions contributions from permitted sources such as S-83. In light of the above, Parts and 2 of Permit Condition 15069 cannot be deleted from the Final Major Facility Review Permit.  The District refers UTC to Section V – Schedule of Compliance in the Final Major Facility Review Permit. In light of the above, an effective date for Table 2-1-316 has not been incorporated into the Parts 3 and 4 of Permit Condition 15069.
29	Condition 15641 (S-125 (Fungicide Application Operation)	The District proposes to add a new Part 3, which will limit POC content to less than 29% by weight. Given that Parts 1 and 4 limit total fungicidal use and total POC emissions, this new condition is not necessary, and should be deleted.	The District is not aware of a POC limit that was incorporated into Permit Condition 15641 when it was non-administratively modified under Application 8189 on 9/18/03.
30	Condition 18833 (S-516 Sand Blast Machine)	Part 2 should be amended as follows: "...detected during the weekly inspections. The owner/operator shall discontinue use of S-516 within 8 hours of discovery of a defect, unless that defect has been rectified." As currently	In order to ensure compliance with the particulate matter and visible emissions standards in Regulation 6, Part 2 of Permit Condition 18833 cannot be

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		drafted, even minor defects, such small tears in the collar to the collection bin, would require the unit be shut down.	amended as requested by UTC.
31	Condition 19165 (S-521 Enclosed coating operation)	Insert the effective date for Table 2-1-316 in Part 2 applicable to the permit application for this permit unit. Without this date restriction, the facility would be faced with a "moving target" for compliance with local air toxic requirements even though the operation has not been modified.	The District refers UTC to Section V – Schedule of Compliance in the Final Major Facility Review Permit. In light of the above, an effective date for Table 2-1-316 has not been incorporated into the Part 2 of Permit Condition 19165.
32	Condition 20642 (S-502 Ammonium perchlorate milling)	We ask that the District provide the basis for the 365-day rolling average production limit of 252.25 tons ammonium perchlorate milled. Please note that S-502 is one of four mills used to process ammonium perchlorate; the other three mills are sealed units, which unlike S-502, do not vent to the atmosphere.  Additionally, Part 2 should be amended as follows: "...detected during the weekly inspections. The owner/operator shall discontinue use of S-502 within 8 hours of discovery of a defect, unless that defect has been rectified."	UTC had indicated under Application 1957 that they intended to process up to 504,500 lbs of AP annually. Hence the 252.25 ton limit.  In order to ensure compliance with the particulate matter and visible emissions standards in Regulation 6, Part 2 of Permit Condition 20642 cannot be amended as requested by UTC.
33	Condition 20663 (S-41 1810D1 Ram Jet Test Stand)	The facility uses propellant that may contain <i>de minimis</i> concentrations of beryllium; however, no beryllium is incorporated in the propellant. Therefore, please modify the first sentence to read as follows: "The owner/operator shall ensure that each propellant material combusted/fired at S-41 does not incorporate beryllium ..."	As previously discussed in the beryllium discussion in Section VII – Applicable Limits and Compliance Monitoring Requirements in the Statement of Basis, it is the District's understanding that the <i>de minimis</i> beryllium concentration in the propellant is due to beryllium's presence as a trace contaminant of the aluminum component of the rocket motor casing.
34	Condition 20675 (S-70, S-71 and S-72 Test Stands)	The facility uses propellant that may contain <i>de minimis</i> concentrations of beryllium; however, no beryllium is incorporated in the propellant. Therefore, please modify the first sentence to read as follows: "The owner/operator shall ensure that each propellant material	As previously discussed in the beryllium discussion in Section VII – Applicable Limits and Compliance Monitoring Requirements in the Statement of Basis, it is the District's understanding that the <i>de minimis</i> beryllium concentration in the propellant is due to

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<b>Comment #</b>	<b>Issue</b>	<b>UTC Comments on the Draft Permit</b>	<b>Districts Response to UTC Comments on the Draft Permit</b>
		combusted/fired at S-70, S-71 and S-72 do not incorporate beryllium ...”	beryllium’s presence as a trace contaminant of the aluminum component of the rocket motor casing.