

June 17, 2025

Via Email Read Receipt Requested

Amy Estrella Lockheed Martin - SB Focalplane 336 Bollay Drive Goleta, CA 93117

Re: Conditional Approval of Risk Reduction Audit and Plan LMC Air Toxics "Hot Spots" Information and Assessment Act (AB 2588)

Dear Amy Estrella:

The Santa Barbara County Air Pollution Control District (District) has reviewed your Risk Reduction Audit and Plan (RRAP) dated March 14, 2025 for the Lockheed Martin Missiles and Fire Control Santa Barbara Focalplane (LMC), as required by the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588). Based on our review, the District conditionally approves the revised RRAP, subject to the condition listed below:

Submit a completed Form-15c with the certification signed by the responsible official for your stationary source within 90 days from the date of this letter.

The following measures are enforceable elements of the RRAP:

- 1. Measure 1 Permanently Remove Unitek Laser Welder. LMC shall permanently remove the Unitek laser welder from their operating permit. The RRAP notes that this laser welder has been out of service since 2022. Submit a complete permit application within 90 days of this letter for the permanent removal of the Unitek laser welder.
- 2. <u>Measure 2 Install Controls on Amada Laser Welder</u>. LMC installed a fume extractor on the Amada laser welder on September 16, 2024. The manufacturer's installation and operation manual (IP Systems USA, Model F1860C) shows that the HEPA removal efficiency is 99.97 percent at 0.3 µm. This fume extractor contains a pre-filter, a HEPA filter, and a high capacity gas-filter, with a 5.5 pound carbon capacity. Submit a complete permit application within 90 days of this letter for the installation and operation of the fume extractor.
- 3. Measure 3 Future Laser Welders Require Controls. Any future laser welders will be required to install a fume extractor. LMC shall submit a permit application and receive a final permit prior to installation of any new laser welders.

Implementation of the measures noted above will reduce your facility's risk below District's significance thresholds based on the 2018 reporting year Air Toxic Emission Inventory Plan (ATEIP) and Report (ATEIR). Specifically, the District confirmed that these risk reduction measures will result in an acute







non-cancer hazard index at the point of maximum impact (PMI) of 0.96 (at UTMN 236433 m, UTME 3813180 m). If future updates to the ATEIP and ATEIR show that the risk has increased and exceeds District's significance thresholds due to throughput changes, process modifications, new equipment, and/or updated emission methodologies, additional risk reduction measures or a revised RRAP may be required.

Please note that failure to implement part or all of the RRAP within the schedule specified in the RRAP is considered a violation of the California Health and Safety Code §44391(a) and may result in enforcement action.

If you have any questions, or require additional information, please contact me at <u>CobbsR@sbcapcd.org</u> or (805) 979-8320.

Sincerely,

Robin Cobbs

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Engineering Division

cc: Lockheed Martin - SB Focalplane Project File

Lockheed Martin - SB Focalplane Toxics File

Toxics Group Engr Chron File Mary Kaplan, AECOM

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