

HUNTON
ANDREWS KURTH

HUNTON ANDREWS KURTH LLP
50 CALIFORNIA STREET
SUITE 1700
SAN FRANCISCO, CALIFORNIA 94111

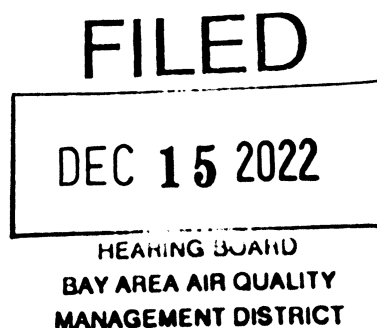
2200 PENNSYLVANIA AVENUE, NW
SUITE 900
WASHINGTON, DC 20037

SHANNON S. BROOME
DIRECT DIAL: 415 • 975 • 3718
Direct Dial: 202 • 955 • 1912
EMAIL: SBroome@HuntonAK.com

December 14, 2022

Via Electronic File Download

Marcy Hiratzka
Clerk of the Hearing Board
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
mhiratzka@baaqmd.gov



Subject: Application for Variance
Facility Location: 45500 Fremont Boulevard, Fremont, CA 94538
Plant Number: 20459/A1438

Dear Ms. Hiratzka:

Please find attached an Application for Variance for Tesla's Fremont Factory related to the North Paint Shop and South Paint Shop Body Line. Tesla submitted under separate cover the applicable filing fee of \$8,049, which we understand was deposited by the District on December 7, 2022.

Because some portions of the application are considered "trade secrets" by Tesla under California Government Code Section 6254.7 and because Tesla wishes to keep this information from being provided as a public record, we have redacted those portions. We have also applied a watermark to each page of the application confirming that it is the public version. We have attached a separate set of pages from the application with the unredacted, confidential information revealed. These pages, which are part of Attachments D and K, are marked as "Trade Secret/Confidential" and should not be provided to the public.

Ms. Marcy Hiratzka
December 14, 2022
Page 2 of 2

As previously discussed, we request that this matter be scheduled for hearing on January 17, 2023, if that date remains available on the Hearing Board's calendar.

Thank you for your attention to this matter. We would appreciate receiving confirmation of your receipt of this application. Also, if you have any questions or if we can provide any further information at this time, please contact me at sbroome@huntonak.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steven S. Broome". The signature is fluid and cursive, with a long horizontal stroke at the end.

Counsel to Tesla Fremont Factory

Attachments:

Petition and Attachments A through L (Public Version)
Attachments D and K (Trade Secret Version)
Trade Secret Statement of Basis

cc: Jimmy Dileo, Manager, Environmental Affairs (Tesla)
Subbarao Nagulapaty, Global Air Quality Program Manager (Tesla)
Hari Krishna Bharadwaj, Staff, Environmental Engineer (Tesla)
Yesenia Villasenor, Senior Counsel (Tesla)

TESLA VARIANCE APPLICATION
12/12/2022

TRADE SECRET STATEMENT OF BASIS

Per California Government Code 6254.7(d): *“Trade secrets,” as used in this section, may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.*

Explanation of Redaction

1. Attachment D (PFD) – Process flow sequence for NPS and SPS which can be used to “fabricate, produce or compound an article of trade.”
2. Attachment K (For both paint shops) – Detailed emissions calculations and material properties include throughput information and production rate, which can be used to derive production data and other information to “fabricate, produce or compound an article of trade.”

BEFORE THE HEARING BOARD
OF THE
BAY AREA AIR QUALITY MANAGEMENT DISTRICT
STATE OF CALIFORNIA

APPLICATION FOR VARIANCE

FILED

DEC 15 2022

HEARING BOARD
BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

In the Matter of the Application of)
Tesla, Inc.)

(Applicant: Insert business or organization)
name above)

For a Variance from Regulation(s):)
BAAQMD Regulation 2-6-307; Regulation 2-1-307)

(Applicant: Insert Regulations in form:)
Regulation ____, Rule ____, Section ____)

DOCKET NO. **3739**
(Assigned by Clerk)

TYPE OF VARIANCE REQUESTED (see Page 3 for further information)

SHORT INTERIM REGULAR GROUP PRODUCT

VARIANCE PERIOD REQUESTED (see Page 10, No. 20):

From: 12/6/2022 to 12/6/2023

TOTAL NUMBER OF (CALENDAR) DAYS IN VARIANCE PERIOD: 365

(Note: Variance relief will not be granted for any period preceding the date of filing of the Application for Variance.)

[ALL DOCUMENTS FILED WITH THE CLERK'S OFFICE BECOME PUBLIC RECORD]

SUMMARY PAGE

NAME OF APPLICANT: Tesla, Inc.

FACILITY ADDRESS: 45500 Fremont Boulevard

City, State, Zip: Fremont, CA, 94538

PLANT # or G #: 20459/A1438

SOURCE

#(S): See attachment A for a list of sources

CONTACT: Name, title, company (if different than Applicant), address, and phone number of persons authorized to receive notices regarding this Applicant (no more than two authorized persons).

Yesenia Villasenor
Associate General Counsel, EHS
45500 Fremont Boulevard
Fremont *Zip* 94538
☎ () *Ext.*
Fax ()
E-mail EHSLegal@tesla.com
California Bar # 804408

Shannon S. Broome
Partner, Hunton Andrews Kurth LLP
50 California Street, Suite 1700
San Francisco *Zip* 94111
☎ (415) 975-3718 *Ext.*
Fax ()
E-mail sbroome@HuntonAK.com
California Bar # 150119

BRIEFLY SUMMARIZE EQUIPMENT/ACTIVITY SUBJECT TO THIS VARIANCE REQUEST:

Tesla Fremont Factory North paint shop (NPS) and South paint shop (SPS) body line booths and ovens, See Attachment A

LIST DISTRICT REGULATIONS, RULES AND PERMIT CONDITIONS SUBJECT TO THIS VARIANCE REQUEST: See Attachment B

SUMMARY OF TOTAL EXCESS EMISSIONS:

Pollutants	Net Emissions After Mitigation (lbs/day or Opacity %)
See Attachment C	

TYPE OF VARIANCE REQUESTED:

NOTE: The date of filing of the Application for Variance is the earliest allowed starting date for a variance. State law [California Health and Safety Code (H&SC)] imposes requirements on the amount of time to be allowed for notification of the public and air quality regulatory agencies before a hearing on a variance request can be held by the Hearing Board. Review the following descriptions of the types of variances, and select that which is most appropriate for your situation:

SHORT: If compliance with the District Rule(s) can be achieved in **90 (calendar) days or less**, request a short-term variance. [*10-day notice required to Bay Area Air Quality Management District's Air Pollution Control Officer (APCO), Applicant, California State Air Resources Board (ARB), Federal Environmental Protection Agency (EPA).*]

INTERIM: If Applicant requires immediate relief for the period between the date of filing of variance application and the date of the decision on the matter by the Hearing Board, request an interim variance. An interim variance is recommended if significant excess emissions will occur between the date of filing and the date of the fully noticed hearing by the Hearing Board. If an interim variance is required, a hearing will be scheduled as soon as possible. The period of an interim variance shall not exceed 90 days. If an interim variance is requested, Applicant must also request a short or a regular variance on the same application.

REGULAR (OR LONG-TERM): If compliance with District Rule(s) will take **more than 90 (calendar) days**, request a regular variance. (*30-day published notice required. 30 days notice to APCO, Applicant, ARB.*)

GROUP: If non-compliance with District Rule(s) by each individual Applicant comprising a group is based on issues of law and fact common to each Applicant, request a group variance. (*Noticing requirements as for Short or Regular variances depending on period of the Group variance.*)

PRODUCT: Any person who manufactures a product may petition the Hearing Board for a product variance from a District Rule or Regulation. A product variance shall be granted only when a variance is necessary for the sale, supply, distribution, or use of the product. (*Noticing requirements as for Short or Regular variances depending on period of the product variance.*)

BAAQMD Regulation 1-402: **“Status of Violation Notices During Variance Proceedings:** Where a person has applied for a variance, no notices shall be issued during the period between the date of filing for the variance application and the date of decision by the Hearing Board for violations covered by the variance application. However, during the period between the date of the filing for a variance and the date of decision by the Hearing Board, evidence of additional violations shall be collected and duly recorded. Where the variance is denied, evidence of violations collected between the filing date and decision date shall be reviewed and a notice of violation issued for violations occurring during that period shall be served upon said person. Where the variance is granted, no notice of violation shall be issued for violations occurring during that period except in extraordinary circumstances as determined by the APCO.”

NOTE: The Environmental Protection Agency (EPA), a federal agency, does not recognize California's variance process, which is established by state law. The EPA considers facilities operating under a variance to be operating in violation of District regulations. Facilities that are in violation and then obtain a variance are advised that the EPA can independently pursue legal action based on federal law against the facility for continuing to be in violation.

1. Briefly describe the type of business and processes at your facility (Attach a map showing location)

Tesla's Fremont Factory is an electric vehicle manufacturing and assembly facility located at 45500 Fremont Boulevard in Fremont, California. Map and further details provided under Attachment D

See Small Business Considerations on Page 12, No. 21 before answering the following question:

Is Applicant a "Small Business" as defined by Health & Safety Code Section 42352.5(b)(1)?
Yes No

Is Applicant a "Major Source" as defined by the applicable provisions of the Federal Clean Air Act, 42 U.S.C. Sec. 7661(2)?
Yes No

Is Applicant a "public agency" as defined in Health & Safety Code Section 42352(b)?
Yes No

2. Describe the equipment/activity for which a Variance is being sought (type of equipment/activity, source numbers, purpose, why is it essential to your business). Attach a copy of the BAAQMD Permit to Operate or Authority to construct for the subject equipment and/or facility so long as such Permit is less than 50 pages. If the Permit is greater than 50 pages, all portions relevant to the Application shall be provided.

See Attachment E

Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If Yes, how often? Varied Schedule based on Mfg recommendations and facility requirements

What was the date of the last maintenance and/or inspection? October 2022

Are maintenance records available? Yes No

Was there any indication of problems? Yes No

APPLICANT’S PETITION FOR REQUIRED FINDINGS

California Health and Safety Code (H&S Code) 42352 requires the Hearing Board to make six findings for a variance to be granted. In this Section, Applicant must provide sufficient information to enable the Hearing Board to make a decision on each of the six findings:

Finding # 1: That the Applicant for a variance is, or will be, in violation of Health and Safety Code Section 41701 or of any rule, regulation or order of the District.

3. List all District Regulations, Rules, and/or Permit Conditions from which Applicant is seeking variance relief. Briefly explain how Applicant is or will be in violation of each rule or condition. If Applicant is requesting relief from Regulation 6, and the excess opacity during the variance period will reach or exceed 40% (Ringelmann 2), Applicant should also request relief from California Health and Safety Code Section 41701.

Regulation, Rules, Permit Conditions	Explanation
See Attachment G	

4. Has the District issued any Notice(s) of Violation (NOVs) to the Applicant concerning the subject of this variance request? Yes No **If “Yes”, please attach copies of the NOVs.** See Attachment F.1
5. Has the equipment in question or any other equipment at this facility been under variance protection during the last year? Yes No

Docket #	Variance Period	Nature of Emission	Regulation/Rule/Section

6. List all NOV(s) issued to equipment at the **entire** facility during the previous 12 months: See Attachment F.2

Date of Notice	NOV #	Nature of Emission	Regulation/Rule/Section

Finding # 2: That, due to conditions beyond the reasonable control of the Applicant, requiring compliance would result in either (A) an arbitrary or unreasonable taking of property, or (B) the practical closing and elimination of a lawful business.

7. Describe, in detail, the event leading to the need for a variance:

See Attachment H

8. Has the Applicant received any complaints from the public regarding the operation of the subject equipment or activity within the last year? Yes No

Date of Complaint	Number of Complaints	Nature of Complaint

9. Explain why it is beyond Applicant's reasonable control to comply with the Regulation(s) and/or Permit Condition(s):

See Attachment I

10. When and how did Applicant first become aware that it was not in compliance with the Rule(s) and/or permit condition(s)?

See Attachment J

11. What actions has Applicant taken since that time to achieve compliance with the Regulation(s) or permit condition(s)?

See Attachment J

12. What would be the harm to Applicant's business if the variance were not granted?

Economic losses: \$ _____

Number of Employees laid off (if any): _____

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs and/or similar impacts).

See Attachment J for further details

Finding # 3: That the closing or taking would be without a corresponding benefit in reducing air contaminants.

13. List the estimated or measured excess emissions or excess opacity, if any, on a daily basis, or over a more appropriate period of time (For example: duration of requested variance period, hourly basis). Also list emissions reductions proposed by Applicant as mitigation. If no excess emissions or opacity are expected during the variance period, go to No. 16.

Pollutant	(A)	(B)	(C)**
	Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
See Attachment C			

**Column A minus Column B = Column C

14. Show the calculations used to determine the excess emissions listed in No. 13. Are the values in No. 13 based on measurements _____ or estimates _____?

See Attachment K. These values are based on emission estimates

15. Do the additional emissions during the variance period contain any Toxic Air Contaminants (TACs) [pursuant to Health and Safety Code Section 39655] or odorous substances? Yes No

If Yes, list the TACs or odorous substances and approximate amounts:

See Attachment C and Attachment K.

16. List measured or estimated annual emissions from entire facility for each pollutant which is the subject of this variance application:

Pollutant	Total Emissions from Entire Facility (tons/year)
POC	462.48

Briefly explain the basis for these facility emission values:

Rolling 12 month emission calculations for prior year 2021

Finding # 4: That the Applicant for the variance has given consideration to curtailing operations of the source in lieu of obtaining a variance.

17. Explain why the Applicant cannot curtail or terminate operations in lieu of obtaining a variance:

See Attachment J for further details

Finding # 5: During the period that the variance is in effect, the Applicant will reduce excess emissions to the maximum extent feasible.

18. Explain how Applicant plans to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible (mitigation may include reductions at other sources):

See Attachment J for further details

Finding # 6: During the period the variance is in effect, the Applicant will monitor or otherwise quantify emission levels from the source, if requested to do so by the District, and report these emissions levels to the District pursuant to a schedule established by the District.

19. Has the District requested that the Applicant monitor or otherwise quantify emissions during the variance period? Yes No

If Yes, please describe how Applicant will do so:

See Attachment K. The calculation methodology has been proposed as a part of the permit modification applications# 31879 and #31706

APPLICANT’S PLAN FOR ACHIEVING COMPLIANCE:

20. How does the Applicant intend to achieve compliance with the Rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed and/or modifications or process changes to be made, a list of the dates by which the actions will be completed, and an estimate of total costs:

Detailed Description:

See Attachment J

Schedule Of Increments Of Progress:

Increment Description	Completion Date
Tentative Timeframe of BAAQMD issuing changes to SPS Body Line Permit Condition 27161	January 2023
Tentative Timeframe of BAAQMD issuing changes to NPS Permit Condition 26027	April 2023

Applicant may propose operating conditions for the variance period which may be considered by the Hearing Board in its evaluation of the variance application.

PROPOSED OPERATING CONDITIONS:

See Attachment L

Variance Period Requested: From: 12/14/2022 To: 12/14/2023

Total Number of (Calendar) Days in Variance Period: 365

(Note: Variance relief will not be granted for any period preceding the date of filing of the Application for Variance.)

Date of Application: 12/14/2022

Completed By: Rob McCafferty Title: Sr. Director, EHS (Tesla)
(Print Name)

The following verification must be signed by the owner, manager, director or other responsible party of the plant, business, factory, or agency requesting the Variance.

VERIFICATION

I, the undersigned, hereby declare under the penalty of perjury, under the laws of the State of California, that I have read the foregoing document, including attachments and the items therein set forth, and that I know its contents, are true.

Dated at 45500 Fremont Boulevard, on 12/14/2022

Signature 

Print Name Rob McCafferty

Title Sr. Director, EHS (Tesla)

SMALL BUSINESS MATTERS

Small Business Assistance: Assistance in completing the Application for Variance and in developing a compliance schedule is available to small businesses. Contact the office of the Hearing Board Clerk at (415) 749-5073 for assistance.

Small Business Considerations in the Granting of Variances by the Hearing Board: California Health & Safety Code Section 42352.5 directs the Hearing Board to consider additional factors when making the required Findings for the granting of a variance to a small business.

21. Definition of Small Business for purposes of special considerations:

Is Applicant a manufacturing or wholesaling business with fewer than 100 employees?
Yes No Number of Employees: _____

OR

Is Applicant a retailing or service business with annual sales under \$5 million?
Yes No Annual Sales: \$ _____

AND

Does Applicant emit 10 tons or less per year of air contaminants? Yes No

If the Applicant satisfies the above conditions, the Hearing Board will consider the following special factors:

- (A) In determining the extent to which the petitioner took timely actions to comply or seek a variance, the Hearing Board shall make specific inquiries into, and shall take into account, the reasons for any claimed ignorance of the requirement from which a variance is sought.
- (B) In determining the extent to which the petitioner took reasonable actions to comply, the Hearing Board shall make specific inquiries into, and shall take into account, the petitioner's financial and other capabilities to comply.
- (C) In determining whether or not the burden of requiring immediate compliance would be unreasonable, the Hearing Board shall make specific inquiries into, and shall consider, the impact on the petitioner's business and the benefit to the environment which would result if the petitioner is required to immediately comply.

Reduced Filing and Excess Emission Fees for Small Businesses:

Bay Area Air Quality Management District Regulation 3 allows reduced filing fees and excess emission fees to be charged to small businesses. The definition of a small business for the purpose of these reduced fees is different than the definition used by the State of California for the special considerations listed above.

22. Definition of Small Business for purposes of reduced filing and excess emission fees (District Regulation 3, Section 209; Both the number of employees AND gross annual income must apply);

Does Applicant have no more than 10 employees?
Yes No Number of Employees: _____

Does Applicant have a gross annual income of no more than \$600,000?
Yes No Gross Annual Income: \$ _____

Is Applicant not affiliated with a non-small business? Yes No

Declaration Regarding Small Business

- 1. I am an officer, partner or owner of the Applicant herein, or a duly authorized agent of the Applicant authorized to make the representations set forth herein.

- 2. The Applicant is a business that meets the following definitions of Small Business (check those that are applicable):

Small Business for Purposes of Special Considerations (No. 21)

Small Business for Purposes of Filing and Excess Emission Fees (No. 22)

I declare under penalty of perjury that the foregoing is true and correct. N/A

Executed on _____, at _____, California

Signature

Print Name

Position with Company

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Revised 4/4/19

ATTACHMENT A – LIST OF SOURCES

FILED

DEC 15 2022

**HEARING BOARD
BAY AREA AIR QUALITY
MANAGEMENT DISTRICT**

The stamp above applies to Applicant
Exhibits A-L (pages 17-136.)
- Clerk of the Hearing Board

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ATTACHMENT A - List of Sources

TABLE 1 - NORTH PAINT SHOP SOURCES

Source ID	Source Description Per Permit	Purpose	Covered under Permit/Condition	Additional Information
S-32006	Oven #1 (Ecoat)	After the Ecoat process (dip tank), the auto body goes through the Ecoat oven which cures the E-coat layer	Condition 26027, Part C (Title V Permit)	Ecoat oven; Alternate/New Source ID (S-4006)
S-3008	Spray Booth #1 (Primer)	The auto body is sprayed with primer, which prepares the auto body for color coating.	Condition 26027, Part E (Title V Permit)	Prime Booth
S-3009	Oven #2 (Primer)	After the prime coating process, the auto body goes through the Prime oven which cures the prime layer	Condition 26027, Part E (Title V Permit)	Prime Oven
S-3014	Spray Booth #2 (Basecoat)	The interior and exterior of the auto body are sprayed with basecoat, which is the primary color of the car	Condition 26027, Part F (Title V Permit)	Basecoat Booth
S-3015	Oven #4 (Basecoat)	This oven flashes off the desired fraction of water before clear coat application	Condition 26027, Part F (Title V Permit)	Basecoat oven
S-3016	Spray Booth #3 (Clear coat)	In the Clearcoat Booth, the interior and exterior of the autobody are sprayed with a clear layer for UV protection.	Condition 26027, Part G (Title V Permit)	Clearcoat Booth
S-32010	Oven #5 (Clear coat)	The clearcoat is cured by the topcoat/clearcoat oven	Condition 26027, Part G (Title V Permit)	Clearcoat Oven; Alternate/New Source ID (S-4010)
A-3008	Regenerative Thermal Oxidizer #1	Abates emissions from the three spray booths (Prime, BC and CC booths) and four ovens (Ecoat, Prime, Basecoat and clearcoat oven)	Condition 26027, Part J (Title V Permit)	The RTO along with Adsorption Concentrator wheel (A-30084) abates emissions from the aforementioned booths and ovens and NPS

TABLE 2 - SOUTH PAINT SHOP BODY LINE SOURCES

Source ID	Source Description Per Permit	Purpose	Covered under Permit/Condition	Additional Information
S-1002	E-Coat Oven	After the Ecoat process (dip tank), the auto body goes through the Ecoat oven which cures the E-coat layer	Condition 27161, Condition 9158	
A-30192	Ecoat Oven TO	Abates POC emissions from the Ecoat oven	Condition 27161, Condition 9159	
S-1007	Sealer Oven	Sealant is applied to the auto body at the four sealing stages prior to the spraying of paint, Sealer Oven is used to cure this sealant application	Condition 27161	
A-1007	Sealer TO	Abates POC emissions from the Sealer Oven	Condition 27161	
S-4036	Prime Booth & Flash Zone with build in Air Supply House (ASU)	The auto body is sprayed with primer, which prepares the auto body for color coating	Condition 27161	Prime section of the 3-wet Booth
A-30180	Primer Thermal Oxidizer	Abates POC emissions from the Prime section of the 3-wet booth	Condition 27161	This TO along with Concentrator wheel (A- 30188) abates emissions from the Prime section of the 3-wet Booth
S-4037	Basecoat Booth & Flash Zone with build in Air Supply House (ASU)	The interior and exterior of the auto body are sprayed with basecoat, which is the primary color of the car	Condition 27161	Basecoat section of the 3-wet Booth
A-30181	Basecoat Thermal Oxidizer	Abates POC emissions from the Basecoat section of the 3-wet booth	Condition 27161	This TO along with Concentrator wheel (A- 30189) abates emissions from the Basecoat section of the 3-wet Booth
S-4038	Clearcoat Booth & Flash Zone with build in Air Supply House (ASU) -	In the Clearcoat Booth, the interior and exterior of the autobody are sprayed with a clear layer for UV protection	Condition 27161	Clearcoat section of the 3-wet Booth
A-30182	Clearcoat Thermal Oxidizer	Abates POC emissions from the Clearcoat section of the 3-wet booth	Condition 27161	This TO along with Concentrator wheel (A- 30190) abates emissions from the Clearcoat section of the 3-wet Booth
S-4039	Primer and Clearcoat Oven	After exiting the Clearcoat Booth, the auto body is conveyed to the Prime and CC Oven, where the two coats are cured	Condition 27161	Also referred to as the "3 wet oven"
A-30183	Primer and Clearcoat Oven Thermal Oxidizer	The Prime and CC TO, abating POC emissions from the Prime and CC oven	Condition 27161	Abates emissions from the Primer and Clearcoat Oven (S-4039)

ATTACHMENT B - LIST OF DISTRICT REGULATIONS, RULES AND PERMIT CONDITIONS
SUBJECT TO THIS VARIANCE REQUEST

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ATTACHMENT B- LIST DISTRICT REGULATIONS, RULES AND PERMIT CONDITIONS SUBJECT TO THIS VARIANCE REQUEST:

Rules/Regulations/Permit Conditions	Covered Sources
BAAQMD Regulation 2-6-307; Regulation 2-1-307 Title V Permit Condition #26027, Parts C.4, E.4, F.4, and G.4.	NPS (North Paint Shop) Sources (See Attachment A)
BAAQMD Regulation 2-6-307; Regulation 2-1-307 Authority to Construct Application #30204, Permit Condition #27161, Part 15.	SPS (South Paint Shop) Body Line Sources (See Attachment A)

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ATTACHMENT C - SUMMARY OF TOTAL EXCESS EMISSIONS

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ATTACHMENT C - SUMMARY OF TOTAL EXCESS EMISSIONS

Table 3 - Worst Case emissions per event for South Paint Shop (Source: Calculations submitted for App # 31706)

CAS #	Parameter	Emissions (lb/event or lb/hr)	Net emissions after mitigation (lbs/day or Opacity %)
50-00-0	Estimated POC Released during an Event	101.3	No Mitigation available/feasible
	Formaldehyde	0	
91-20-3	Naphthalene	0	

Table 4 -Worst Case emissions per event for North Paint Shop (Source: Revised calculations submitted for App # 31879, dated 11/7/2022)

CAS #	Parameter	Emissions (lb/event or lb/hr)	Net emissions after mitigation (lbs/day or Opacity %)
	Estimated POC Released during Event	94.90	No Mitigation available/feasible

1. The above estimates are emissions calculated assuming worst case emissions from all booths and ovens and assuming that a malfunction event has affected every booth and oven at the respective paint shops. These lb/event values are worst case emissions for each individual shop (will not last more than an hour) and can be equated to lb/day.
2. Note that these emissions are residual emissions from the drying of already applied coating and from purging air from ovens and booths; All active production immediately stops when these events happen and can only restart when the fault has been resolved.
3. These events do not emit toxic emissions above any risk screen trigger levels in Table 2-5-1 of Regulation 2-5. Note that for SPS Body Line, the formaldehyde and naphthalene emissions will not exceed 37.8 lbs/year and 457.0 lbs/year, respectively
4. Note that Tesla complies with NESHAP(MACT) IIII for both paint shops by using inherently low HAP coatings.

PUBLIC COMMENT

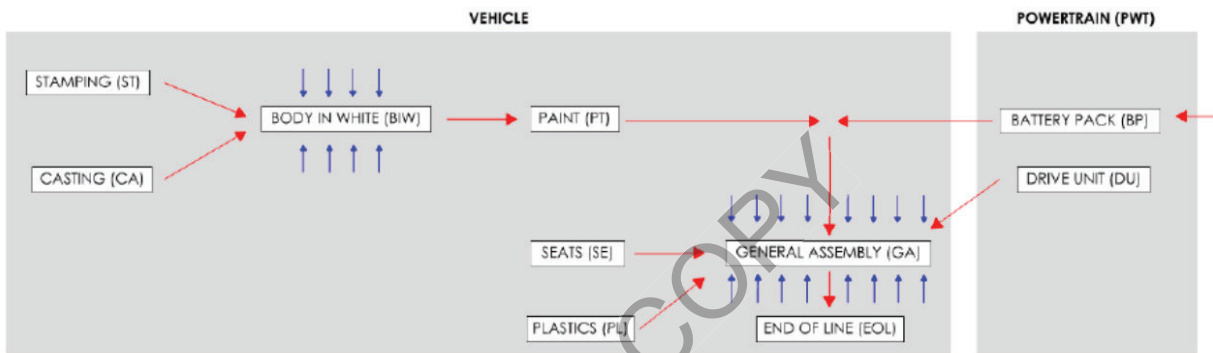
ATTACHMENT D – FACILITY MAP AND PROCESS FLOW DIAGRAM

PUBLIC COPY

ATTACHMENT D

Fremont Factory Description

Tesla is an electric vehicle manufacturing and assembly facility located at 45500 Fremont Boulevard in Fremont, California. Operations at the Fremont facility include several operations including but not limited to casting, painting, stamping of parts and general assembly of the car. Operations include casting with two stack melters, Stamping and Body in White Lines, plastics parts center, three paint shops/lines (North Paint Shop, South Paint Shop Body line and Plastics Paint Line), three assembly lines to assemble the car models, and battery pack assembly.





*Tesla Fremont
South Paint Shop & North Paint Shop
Building Locations
Fremont, California*

North Paint Shop Overall

TRADE SECRET



South Paint Shop Overall

TRADE SECRET



ATTACHMENT E

PUBLIC COPY

Attachment E

Describe the equipment/activity for which a Variance is being sought (type of equipment/activity, source numbers, purpose, why is it essential to your business)

1. Attachment A provides information on the equipment at the North Paint Shop (NPS) and South Paint Shop (SPS) Body Line for which the variance is being sought.
2. The NPS and SPS Body Line are an integral part of the operation of the Fremont Factory, as every single vehicle that is produced at the Fremont Factory is painted at one of these two shops.
3. The NPS performs coating predominantly for the Model 3 and Model Y; the SPS Body Line performs coating predominantly for the Model S and Model X.
4. Failure of these paint shops to operate results in disruptions to overall production of vehicles at the plant. When the paint shops shut down, vehicles and parts from upstream production line equipment back up and downstream production line equipment runs out of vehicles and parts to process. Paint shop downtime results in a reduction in the number of cars produced.
5. For these reasons, the Fremont Factory works diligently to avoid such shutdowns.
6. Note that Tesla's procedure of completely stopping production is more stringent than the typical automotive industry practice, wherein the parts that are in process of being coated when a malfunction occurs are completed.
7. The Variance is being sought for the following permit terms:
 - a. NPS – Relief from requirements of Title V Permit Condition #26027, Parts C.4, E.4, F.4, and G.4 providing that precursor organic compound (POC) emissions must be abated during all times of operation by a regenerative thermal oxidizer (RTO).
 - b. SPS Body Line – Relief from requirements of Authority to Construct #30204, Permit Condition #27161, Part 15 providing that POC emissions must be abated during all times of operation by a thermal oxidizer (TO).

North Paint Shop

Brief History of Permitting for the North Paint Shop

1. In 2015, the Air Pollution Control Officer (APCO) granted the NPS at the Fremont Facility (Facility #A1438/E0459) an Authority to Construct under Application #26812, subject to Permit Condition #26027.
2. The NPS continues to operate subject to the permit conditions contained in the Authority to Construct issued pursuant to Application #26812 and pursuant to its Title V permit.
3. The relevant permit conditions for the NPS can be found in the Title V permit for the Fremont Factory (Facility #A1438/E0459), Condition #26027, pages 196 to 231.
4. In February 2019, Tesla submitted a permit revision application¹ to BAAQMD requesting: (1) the removal of Phase II sources from the NPS' Authority to Construct; (2) an increase of permitted emissions at the existing Phase I operations consistent with production levels previously forecast in Phase II; and (3) clean-up of the permit conditions and clarification of sources. This was designated Application #29768, and it is currently pending processing with BAAQMD.

¹ While the correspondence references a permit modification, the proposed changes to the permit did not trigger New Source Review.

5. On September 1, 2022, Tesla submitted a permit amendment application, #31879, requesting changes to Permit Condition #26027 to provide additional clarity for the following parts: C.4, E.4, F.4, and G.4.

Details on the variance being requested for the NPS sources

Tesla is requesting a regular variance from Title V Permit Condition #26027, Parts C.4, E.4, F.4, and G.4. The variance can expire at such time that permit amendment application #31879 is processed and the corresponding revisions are incorporated into Permit Condition #26027 for the North Paint Shop (NPS).

The application package for #31879 will be provided as supplemental documentation with this variance application (Attachment E.3). In essence, this permit amendment application seeks to establish the following key points:

- The NPS sources are designed with an interlock between production and the NPS sources' RTO abatement system for POC emissions.
- Any unplanned shutdown of abatement device/equipment associated with the abatement device causes all coating applications within the NPS to stop. Specifically:
 - The coating applicators cease applying coating.
 - The conveyor belt stops progressing vehicles and parts through the booths.
 - Parts/vehicles that are in an oven or spray booth at the time of shutdown will not complete the coating process.
- All emissions during a shutdown are strictly evaporative losses associated with the drying of vehicles/parts that have already begun the coating or curing process at the time of the RTO control device shut down and from residual recirculated air in the booths. The unplanned shutdowns can occur when the RTO loses temperature unexpectedly or a system fault shuts down or affects the RTO due to a disruption in airflow, such as an exhaust motor fault, differential pressure sensor fault, or burner safety fault. For example, a malfunction in the pressure switch could cause the system to fault and assume the exhaust motor is off even though it remains on, which is done out of an abundance of caution for safety.
- When the RTO's temperature drops below a set point, destruction efficiency decreases, and all air flow is terminated. The bypass dampers also open if there are faults associated with components associated with the RTO (like an exhaust motor fault, differential pressure sensor fault, or burner safety fault). This is intended to eliminate fire and explosion risks. The airflow to the RTO will only be restarted when the faults that caused the RTO to lose temperature/faults associated with the RTO components are identified and remedied, and all of the air in the system (e.g., the oven) is purged.
- Purging of the oven's air into the atmosphere is appropriate and required per NFPA fire code. This is a standard NFPA requirement for restarted ovens with an exhaust that feeds to an incinerator (e.g., RTO). Specifically, NFPA 86, Section 8.5.1.3 provides:

“A furnace heating system, either alone or as part of multiple furnaces feeding into one fume incinerator, shall not be purged into an operating incinerator unless otherwise permitted by 8.5.1.4².”

- Tesla believes that on balance it is responsible and beneficial to:
 - shut down the system once an RTO loses temperature or has a fault that affects the RTO,
 - have an interlock that automatically stops production when such an event occurs,
 - troubleshoot the root cause, and
 - restart operation.
- The amount of POC emissions from the evaporative emissions during the drying process for the parts/vehicles that were in mid-process can be conservatively estimated, and the format and estimation methodology to calculate these emissions have been discussed and finalized with the BAAQMD’s permitting division.
- Any fugitive emissions that do not pass through the RTO abatement process will be counted in determining compliance with the numerical emission limits in the permit, and the conservative calculations show that this amount of emissions will not impact the source’s ability to comply. Emission compliance reports will include such emissions.
- Note that Tesla has always been proactive/conservative in self-reporting these deviations and has not exceeded the total permitted emission limits for each paint shop, and such emissions would remain compliant with allowed permitted emissions.

Tesla will continue to track unplanned RTO shutdown events, estimate the associated fugitive emissions, and include these emissions as a part of the monthly compliance reports and other applicable reporting requested by BAAQMD. Tesla will also continue to alert the District when an unplanned shutdown event occurs, as it has been doing under the current permit. Furthermore, it is important to note that Tesla has never gone over its total allowable emissions.

SPS Body Line

Brief History of Permitting for the SPS Body Line Paint Shop

1. In November 2019, Tesla applied for an Authority to Construct to re-activate a coating line in the existing SPS Body Line at its facility located in Fremont, California (Application #30204).
2. In June 2020, the District issued the Authority to Construct under Application #30204, subject to Permit Condition #27161.
3. In August 2020, the District revised Permit Condition #27161.
4. There are still conditions in the Authority to Construct issued under Application #30204 that need to be revised and are pending revision by BAAQMD per Application #30204
5. On April 21, 2022, Tesla submitted a permit application (Application #31706) to request a change to Permit Condition #27161, Part 15.

² 8.5.1.4 states – A furnace heating system shall be permitted to be purged into an operating incinerator if it can be demonstrated that the flammable vapor concentration entering the fume incinerator cannot exceed 50 percent of the lower flammability limit (LFL).

Details on the variance being requested for the SPS Body Line sources

Tesla requests a regular variance from Authority to Construct #30204, Condition #27161, Part 15. The variance can expire at such time as Application #31706 is processed for the SPS Body Line.

The application package for #31706 is included with this variance submittal (Attachment E.4). This permit amendment application is based on or seeks to establish the following:

- SPS Body Line sources are designed with an interlock between production and the SPS Body Line sources' TO abatement systems.
- Any unplanned shutdown of a TO abatement device causes all coating application within the SPS Body Line to stop. Specifically:
 - The coating applicators cease applying coating.
 - The conveyor belt stops progressing parts and vehicles through the affected booth.
 - Parts/vehicles that are in an affected oven or spray booth at the time of shutdown will not complete the coating process.
- All emissions during a TO shut down are strictly evaporative losses associated with the drying of vehicles/parts that have already begun the coating or curing process at the time the TO control device shuts down and from residual recirculated air in the booths.
- The SPS Body Line POC emissions are abated by TOs, and all solvent-laden air passes through the TOs. The ovens use TOs for both POC destruction and to assist with heating of the oven zones. The use of TOs for dual purposes avoids the need for additional burners, thereby saving energy and minimizing combustion emissions.
- If an oven or TO experiences a fault that causes either to shut off, the affected system shuts down and production within the SPS Body Line stops immediately. Once any fault is cleared, the oven and TO must purge their air into the atmosphere in order to comply with the safety requirements of NFPA 86, which prohibits a fume incinerator from venting into an operating incinerator. The vendor/operator involved with the SPS Body Line (Durr USA) has stated that this is a standard practice and setup for an oven/TO system and that it is essential from a safety standpoint. NFPA 86, Section 8.5.1.3 provides:

“A furnace heating system, either alone or as part of multiple furnaces feeding into one fume incinerator, shall not be purged into an operating incinerator unless otherwise permitted by 8.5.1.4.”
- The amount of fugitive POC emissions that would occur when the oven/TO system is shut down and during the purging process can be conservatively estimated, and the format and estimation methodology for calculating such emissions have been discussed and finalized with the BAAQMD's permitting division.
- Any fugitive emissions generated during an unplanned shutdown will be counted in determining compliance with the numerical emission limits in the permit and the conservative calculations show that this amount of emissions will not impact the ability to comply. Emission compliance reports will include such emissions.
- Note that Tesla has always been proactive/conservative in self-reporting these deviations and has not exceeded the total permitted emission limits for each paint shop, and such these emissions would stay under the allowed permitted emissions as mandated by the permit.

Tesla will continue to track unplanned shutdown events, estimate emissions, and include these emissions as a part of the monthly compliance reports and other applicable reporting requested by BAAQMD. Tesla will also continue to alert the District when an unplanned shutdown event occurs, as it has been doing under the current permit.

Enclosed Attachments

Attachment E.1: Conditions for NPS (Title V, PC #26027); Title V permit excerpt

Attachment E.2: Conditions for SPS (Authority to Construct #30204, PC #27161), dated August 11, 2020 and dated June 5, 2020 - Relevant Excerpt

PUBLIC COPY

Attachment E.1: Conditions for NPS (Title V, PC #26027); Title V permit excerpt -
Pages 196 to 231 (Note only conditions relevant to variance provided below)

PUBLIC COPY

ATTACHMENT E.1: Excerpts from Title V Permit Condition #26027, Parts C.4, E.4, F.4, and G.4.

4. The owner/operator shall ensure POC emissions from the Ovens #1 and #6 (S-32006 and S-32011) are abated at all times of operation by the properly installed and properly maintained regenerative thermal oxidizers A-3008 (abating S-32006) and A-1008 (abating S-32011). (Basis: Regulation 2-1-403)

4. The owner/operator shall ensure POC emissions from the Spray Booths #1 and #4 (S-3008 and S-1008) and the Ovens #2 and #7 (S-3009 and S-1009) are abated at all times of operation by the properly installed and properly maintained regenerative thermal oxidizers A-3008 (abating S-3008 & S-3009) and A-1008 (abating S-1008 & S-1009). (Basis: Regulation 2-1-403)

4. The owner/operator shall ensure POC emissions from the Basecoat Booths and Basecoat Ovens are abated at all times of operation by the properly installed and properly maintained regenerative thermal oxidizers A-3008 (abating S-3014 & S-3015) and A-1008 (abating S-1014 & S-3017). (Basis: Regulation 2-1-403)

4. The owner/operator shall ensure POC emissions from the Spray Booths #3 and #6 (S-3016 and S-32014) and Ovens #5 and #10 (S-32010 and S-1015) are abated at all times of operation by the properly installed and properly maintained regenerative thermal oxidizers A-1008 (abating S-3016 & S-32010) and A-3008 (abating S-32014 & S-1015). (Basis: Regulation 2-1-403)

Attachment E.2: Conditions for SPS (Authority to Construct #30204, PC #27161), dated August 11, 2020 and dated June 5, 2020 - Note only conditions relevant to variance provided below)

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Attachment E.2: Conditions for SPS (Authority to Construct #30204, PC #27161), dated August 11, 2020 and dated June 5, 2020

Condition for Thermal Oxidizer A-1002, A-1007, A-30180, A-30181, A-30182, and A-30183:

15. The owner/operator of A-1002, A-1007, A-30180, A-30181, A-30182, and A-30183 shall ensure that the POC/NPOC emissions from S-1002, S-1007, S-4036, S-4037, S-4038, S-4039, and S-4041 are abated at all times of operation by the properly installed, properly operated, and properly maintained Thermal Oxidizers A- 1002, A-1007, A-30180, A-30181, A-30182, and A-30183, respectively.
(Basis: Cumulative Increase, Regulation 2-1-403)

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ATTACHMENT F.1 – ISSUED NOVS ON THE SUBJECT OF THIS VARIANCE

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A60216**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime and Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 9/3/21, 9/9/21, 9/10/21, 9/14/21 TIME: -- HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCAs #08B56-57, 08B65-66, 08B68-69, 08B77-78)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 10/7/21 TIME: 1600 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A60217**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4036 NAME: Prime Booth & Flash Zone + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 9/14/21 TIME: 2050 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4036, S-4037, and S-4038 were not abated at all times of operation by the respective TOs (RCA #08B80-81)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 10/12/21 TIME: 1025 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A60223**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 10/11/21 TIME: 0016 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCA #08C28-29)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. **THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY.** YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 12/7/21 TIME: 1500 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

PUBLIC COPY



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A60224**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 11/15/21 TIME: 1240 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCA #08D64-65)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo*

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 12/21/21 TIME: 1400 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61153**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 57-59, 65 NAME: Bumper Booths & Ovens
 EMISSION PT: P# _____ NAME: _____
 DATE: 11/13/21 TIME: 1804 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: Emissions from the bumper booths and ovens not abated (RCA #08D56)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 2/7/22 TIME: 1000 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

PUBLIC COPY



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61154**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 1002 NAME: E-coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 12/20/2021 TIME: 1114 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-1002 was not abated at all times of operation by A-30192 (RCA #08E30-31)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 2/24/22 TIME: 1710 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61155**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 3/8/22 TIME: 1215 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCA #08G03-04)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 4/25/22 TIME: 1130 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

PUBLIC COPY



NOTICE OF VIOLATION

No. **A61156**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 1007 NAME: Sealer Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 3/14/22 TIME: 0208 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-1007 was not abated at all times of operation by A-1007 (RCA #08G20)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 4/25/22 TIME: 1130 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61157**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 3008 NAME: Primer Spray Booth + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 2/21/22 TIME: 1908 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: NPS ovens and booths not abated at all times of operation (RCA #08F57-58)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 4/28/22 TIME: 1050 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61158**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4006 NAME: E-coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 2/24/22 TIME: 0725 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: Oven not abated at all times of operation (RCA #08F69)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. **THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY.** YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 4/28/22 TIME: 1050 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61159**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4006 NAME: E-coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 3/2/22 TIME: 0745 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE

REG _____ RULE _____ SECTION _____ CODE

Details: Oven not abated at all times of operation (RCA #08F78-79)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 4/28/22 TIME: 1050 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61160**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 3008 NAME: Primer Spray Booth + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 4/6/22 TIME: 1019 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: NPS ovens and booths not abated at all times of operation (RCA #08G83-84)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 5/12/22 TIME: 1000 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61161**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 1002 NAME: E-coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 5/8/22-5/9/22 TIME: -- HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE

REG _____ RULE _____ SECTION _____ CODE

Details: S-1002 was not abated at all times of operation (RCA #08H45-46)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 6/1/22 TIME: 1100 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61162**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4036 NAME: Prime Booth & Flash Zone + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 5/11/22 TIME: 0713 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4036, S-4037, and S-4038 were not abated at all times of operation by the respective TOs (RCA #08H52-53)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 6/1/22 TIME: 1100 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61163**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 5/6/22 TIME: 1329 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCA #08H37-38)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 6/16/22 TIME: 1115 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

PUBLIC COPY



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61164**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 5/13/22 TIME: 1714 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation by A-30183 (RCA #08H64-65)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 6/16/22 TIME: 1115 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61166**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 5/28/22, 6/3/22, 6/8/22 TIME: -- HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: S-4039 was not abated at all times of operation (RCA #08H95-96, #08J13-14, #08J25-26)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 6/27/22 TIME: 1515 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61167**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/4/22, 6/14/22-6/15/22 TIME: -- HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-4039 was not abated at all times of operation (RCA #08J15-16 & #08J35-36)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 7/12/22 TIME: 0915 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61168**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 3008 NAME: Primer Spray Booth + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/9/22, 6/20/22 TIME: -- HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE ⁶ SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: NPS ovens and booths not abated at all times of operation (RCA #08J27-28 & #08J48-49)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 7/12/22 TIME: 0915 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61169**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 1002 NAME: E-coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/13/22 TIME: 0351 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-1002 was not abated at all times of operation (RCA #08J31-32)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 7/12/22 TIME: 0915 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
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(415) 749-5000

NOTICE OF VIOLATION

No. **A61170**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 6/21/22 TIME: 1226 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-4039 was not abated at all times of operation (RCA #08J58-59)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs
 SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 7/12/22 TIME: 0915 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61174**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 7/6/22 TIME: 2258 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-4039 was not abated at all times of operation (RCA #08J95-96)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 9/12/22 TIME: 1100 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61175**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 3008 NAME: Primer Spray Booth + others
 EMISSION PT: P# _____ NAME: _____
 DATE: 7/21/22-8/2/22 TIME: -- HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: NPS ovens/booths not abated at all times (RCA #08K36-43, #08K47-48, #08K50-51, #08K56-59)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 9/12/22 TIME: 1100 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61177**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 3009 NAME: Primer Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 8/24/22 TIME: 1533 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-3009 not abated at all times of operation (RCA #08L22)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 9/22/22 TIME: 0920 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61604**

ISSUED TO: Tesla, Inc P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (650) 681-5100
 N# Mailing Address on F61

OCCURRENCE
 NAME: Tesla, Inc
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# S-4039 NAME: Prime and Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 3/25/22 TIME: 0217 HRS

<input type="checkbox"/> REG 2 RULE 1 SEC 301 No Authority to Construct	<input type="checkbox"/> REG 2 RULE 1 SEC 302 No Permit to Operate
<input type="checkbox"/> REG 1 SEC 301 H & S CODE - 41700 Public Nuisance	<input checked="" type="checkbox"/> REG 2 RULE 6 SEC 307 Failure to Meet Permit Condition
<input type="checkbox"/> REG 5 SEC 301 Prohibited Open Burning	<input type="checkbox"/> REG 6 RULE 1 SEC 301 Excessive Visible Emissions
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	
<input type="checkbox"/> REG _____ RULE _____ SECTION _____ CODE _____	

Details: POC/NPOC emissions were not abated at all times of operation

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Aleah Zapf INSP # 893
 DATE: 05/02/22 TIME: 1430 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

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PUBLIC COPY



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61753**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 9/15/22 TIME: 0930 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-4039 was not abated at all times of operation (RCA #08L88-89)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ 

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 10/11/22 TIME: 1005 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

If there are any questions regarding the submission of a Permit Application, call the Permit Services Division at (415) 749-4990.

ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
375 Beale Street, Suite 600, San Francisco, CA 94105
(415) 749-5000

NOTICE OF VIOLATION

No. **A61754**

ISSUED TO: Tesla, Inc. P G N# A1438
 ADDRESS: 45500 Fremont Blvd
 CITY: Fremont STATE: CA ZIP: 94538
 PHONE: (510) 249-3604
 N# Mailing Address on F61

OCCURRENCE
 NAME: _____
 ADDRESS: _____ Same As Above
 CITY: _____ ZIP: _____
 SOURCE: S# 4039 NAME: Prime & Clear Coat Oven
 EMISSION PT: P# _____ NAME: _____
 DATE: 9/19/22 TIME: 2229 HRS

REG 2 RULE 1 SEC 301
No Authority to Construct

REG 2 RULE 1 SEC 302
No Permit to Operate

REG 1 SEC 301
H & S CODE - 41700
Public Nuisance

REG 2 RULE ⁶ SEC 307
Failure to Meet Permit Condition

REG 5 SEC 301
Prohibited Open Burning

REG 6 RULE 1 SEC 301
Excessive Visible Emissions

REG _____ RULE _____ SECTION _____ CODE _____

REG _____ RULE _____ SECTION _____ CODE _____

Details: S-4039 was not abated at all times of operation (RCA #08M09)

RECIPIENT NAME: Jimmy Dileo
 TITLE: Manager, Environmental Affairs

SIGNING THIS NOTICE IS NOT AN ADMISSION OF GUILT X _____ *Jimmy Dileo* _____

➔ **WITHIN 10 DAYS, RETURN A COPY OF THIS NOTICE WITH A WRITTEN DESCRIPTION OF THE IMMEDIATE CORRECTIVE ACTION YOU HAVE TAKEN TO PREVENT CONTINUED OR RECURRENT VIOLATION. THIS VIOLATION IS SUBJECT TO SUBSTANTIAL PENALTY. YOUR RESPONSE DOES NOT PRECLUDE FURTHER LEGAL ACTION.**

ISSUED BY: Alyssa Espiritu INSP # 879
 DATE: 10/17/22 TIME: 1515 HRS MAILED

PLEASE PRESS HARD

INSTRUCTIONS

PERMIT VIOLATIONS - (REG 2, RULE 1, SECTION 301 AND/OR 302)

Within 30 days, a permit application must be submitted to the District's Permit Division. The permit application must reference the Violation Notice Number Shown on the front of this notice. If either the Violation Notice Number is not referenced or no permit application is received, then this matter will be referred to the District's Legal Department for legal action. Your response does not preclude further legal action.

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ALL OTHER VIOLATIONS

Within 10 days, return a copy of this notice with a written description of the corrective action you have taken to prevent continued or recurrent violation. Immediate corrective action must be taken to stop the violation. This violation is subject to substantial penalty. Your response does not preclude further legal action.

A variance should be sought if it is necessary to continue to operate in violation of District Regulations. For information on eligibility for, or filing of, a variance, call (415) 749-5073.

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ATTACHMENT F.2 – ALL NOVS ISSUED TO THE FACILITY OVER THE LAST 12 MONTHS

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ATTACHMENT F.2 - NOVIs issued to the facility over the last 12 months (October 2021- October 2022)

Date of Notice	Event Date	NOV#	Nature of Emission	Regulation/Rule/Section	Affected Equipment	Area	Equipment Name	Related to Variance request
10/7/2021	9/3, 9/9, 9/10 and 9/14/2021	A60216	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
10/12/2021	9/14/2021	A60217	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4036, S-4037, S-4038, A-30180, A-30181, A-30182	SPS Body Line	Prime Booth, BC Booth and CC; Prime TO, BC TO and CC TO	Yes
10/29/2021	11/7/2020	A60218	N/A	Reg. 1-523.3	S-4037/A-30181	SPS Body Line	Basecoat Booth/Basecoat TO	No
11/8/2021	2020 Intermittent	A60219	N/A	PC #27161, Part 49.c; Regulation 2-6-307	A-30185, A-30186 and A-30187	SPS Body Line	Prime, BC and CC Filter houses	No
11/8/2021	11/8/2021	A60220	N/A	PC #26999, Part 2 b; Regulation 2-6-307	S-4028	Paint Hospital	Model 3 paint hospital	No
11/30/2021	11/30/2021	A60222	As, Pb and Hex Cr (Annual Limits)	PC #27327, Part 7; Regulation 2-6-307	S-4045 & S-4046	Castings	Castings Furnace	No
12/7/2021	12/7/2021	A60223	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
12/12/2021	12/12/2021	A60224	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
2/7/2022	11/13/2021	A61153	POC	Permit Condition #10321, Parts 10 & 11; Regulation 2-6-307	S-57, S-58, S-59, S-65	Plastics Paint Line	Plastic Bumper Booths and Ovens	Yes
2/24/2022	12/20/2021	A61154	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-1002/A-30192	SPS Body Line	Ecoat Oven/Ecoat Oven TO	Yes
4/25/2022	3/8/2022	A61155	POC	PC #27161, Parts 15 & 19; Regulation 2-1-403	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
4/25/2022	3/14/2022	A61156	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-1007/A-1007	SPS Body Line	Sealer Oven & Sealer Oven TO	Yes
4/28/2022	2/21/2022	A61157	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
4/28/2022	2/24/2022	A61158	POC	PC #26027, Parts C.4; Regulation 2-6-307	S-4006 & A-3008	NPS	Ecoat Oven/RTO	Yes
4/28/2022	3/2/2022	A61159	POC	PC #26027, Parts C.4; Regulation 2-6-307	S-4006 & A-3008	NPS	Ecoat Oven/RTO	Yes
5/7/2022	3/25/2022	A61604	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
5/12/2022	4/6/2022	A61160	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
6/1/2022	5/8 and 5/9/2022	A61161	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-1002/A-30192	SPS Body Line	Ecoat Oven/Ecoat Oven TO	Yes
6/1/2022	5/11/2022	A61162	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4036, S-4037, S-4038, A-30180, A-30181, A-30182	SPS Body Line	Prime Booth, BC Booth and CC; Prime TO, BC TO and CC TO	Yes
6/16/2022	5/6/2022	A61163	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
6/16/2022	5/13/2022	A61164	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
6/18/2022	5/21/2022	A61165	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
6/27/2022	5/28, 6/3 and 6/8/2022	A61166	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
7/12/2022	6/4, 6/14 and 6/15/2022	A61167	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
7/12/2022	6/9 and 6/20/2022	A61168	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
7/12/2022	6/13/2022	A61169	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-1002/A-30192	SPS Body Line	Ecoat Oven/Ecoat Oven TO	Yes

7/12/2022	6/21/2022	A61170	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
9/12/2022	7/6/2022	A61174	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
9/12/2022	7/20 through 7/26; 8/1 thru 8/2	A61175	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
9/22/2022	8/24/2022	A61177	POC	PC #26027, Parts C.4, E.4, F.4, and G.4; Regulation 2-6-307	NPS Booths/Ovens & A-3008	NPS	NPS Booths and Ovens	Yes
10/11/2022	9/15/2022	A61753	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes
10/17/2022	9/19/2022	A61754	POC	PC #27161, Parts 15 & 19; Regulation 2-6-307	S-4039/A-30183	SPS Body Line	Prime/CC oven & Prime/CC oven TO	Yes

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ATTACHMENT G - List all District Regulations, Rules, and/or Permit Conditions from which Applicant is seeking variance relief

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ATTACHMENT G - List all District Regulations, Rules, and/or Permit Conditions from which Applicant is seeking variance relief

Regulations, Rules, Permit Conditions	Explanation
<p>BAAQMD Regulation 2-6-307; Regulation 2-1-307</p> <p>Title V Permit Condition #26027, Parts C.4, E.4, F.4, and G.4.</p>	<p>The variance is requested to address the cited permit terms that have been interpreted by the District as supporting a Notice of Violation when all emissions limits are being met but a malfunction causes an unplanned shutdown of the control device. The shutdown of the control equipment during such incidents is necessary for maintaining the integrity and safe operation of the controls.</p> <p>The time period for the variance is limited to the timeframe for a previously requested permit revision (App # 31879)¹ to be issued that will accommodate unplanned shutdowns of pollution control devices (due to a malfunction or breakdown of the device itself or other equipment in the process line) that do not cause an exceedance of existing numeric permit limits for the NPS. The permit revision will also confirm the methodology for emissions calculations during those periods. Because the company cannot operate the control equipment during these unplanned shutdowns of pollution control devices, the variance is necessary. We request that in issuing the variance, the Board include and confirm the method to be used to account for emissions resulting from unplanned shutdowns of pollution control devices during the one-year variance period.</p> <p>Note that Tesla will continue to track any such unplanned shutdown events, estimate emissions, and include these emissions as a part of the monthly compliance reports. Tesla will also continue to report these events to the District in continuance of the current protocol for reporting these events.</p>
<p>BAAQMD Regulation 2-6-307; Regulation 2-1-307</p> <p>Authority to Construct Application #30204, Permit Condition #27161, Part 15.</p>	<p>The variance is requested to address the cited permit terms that have been interpreted by the District as supporting a Notice of Violation when all emissions limits are being met but a malfunction causes an unplanned shutdown of the control device. The shutdown of the control equipment during such incidents is necessary for maintaining the integrity and safe operation of the controls.</p> <p>The time period for the variance is limited to the timeframe for a requested permit revision (App # 31706)¹ to be issued that will accommodate unplanned shutdowns of pollution control devices (due to a malfunction or breakdown of the device itself or other equipment in the process line) that do not cause an exceedance of existing numeric limits for the SPS Body line. The permit revision will also confirm the methodology for emissions calculations during those periods. Because the company cannot operate the control equipment during these unplanned shutdowns of pollution control</p>

¹ The pending application refers to a request for a permit *modification*. The requested changes to the permit do not, however, constitute a “modification” as defined under 40 C.F.R. § 52.21 and do not trigger New Source Review. This request is consistent with the Hearing Board’s variance authority.

	<p>devices, the variance is necessary. We request that in issuing the variance, the Board include and confirm the method to be used to account for emissions resulting from unplanned shutdowns of pollution control devices during the one-year variance period.</p> <p>Note that Tesla will continue to track any such unplanned shutdown events, estimate emissions, and include these emissions as a part of the monthly compliance reports. Tesla will also continue to report these events to the District in continuance of the current protocol for reporting these events.</p>
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ATTACHMENT H - Describe, in detail, the event leading to the need for a variance

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ATTACHMENT H - Describe, in detail, the event leading to the need for a variance

The NPS and SPS are designed with an interlock between production and the air pollution control abatement systems for each of the two lines. To comply with Title V Permit Condition #26027 for NPS² and Authority to Construct #30204, Permit Condition #27161 for SPS,³ any unplanned shutdown of an abatement device associated with one of the two lines (NPS or SPS) causes all operation for that line to stop (i.e., all active production is halted, “Production release” will not be achieved). All emissions during such a shutdown are strictly evaporative emissions from vehicles or parts that have already been coated, including those that remain in a booth and those that are being cured in the ovens at the time the shutdown occurs, and from purging ambient air in the booths and ovens.

During such unplanned shutdown events, emergency bypass dampers automatically open to allow the temporary residual evaporation from the drying process and ambient air from the booths and ovens to exit the system prior to the abatement device restarting. This is a necessary requirement to ensure worker and public safety and for equipment integrity (i.e., to prevent fires/explosive situations).

The quantity of POC emissions from such unplanned shutdown events can be estimated conservatively; the format and estimation methodology of these emissions have been discussed and finalized with the District’s permitting division. Tesla has submitted permit applications to formalize these changes, which could be processed simultaneously with other pending permit applications for the NPS and SPS Body Line.

A variance from application of the certain current permit conditions during unplanned shutdowns is therefore necessary at this time.

² NPS: Title V PC # 26027, Parts C.4, E.4, F.4, and G.4

³ SPS: Authority to Construct #30204, PC #27161, Part 15.

ATTACHMENT I- Explain why it is beyond Applicant's reasonable control to comply with the Regulation(s) and/or Permit Condition(s)

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ATTACHMENT I - Explain why it is beyond Applicant's reasonable control to comply with the Regulation(s) and/or Permit Condition(s):

Tesla cannot comply with the permit condition from which the variance is requested because continued operation of the control devices during these unplanned shutdowns presents concerns as to the integrity of the equipment. During such periods, it is necessary to investigate the cause of the fault/shutdown before allowing operation to resume. Because Tesla also shuts down coating operations in such cases, the emissions are minimal. Tesla believes that allowing shutdown of both the coating line and the control device in these situations is consistent with the objectives of the applicable permit conditions for NPS (Title V PC # 26027, Parts C.4, E.4, F.4, and G.4) and SPS (Authority to Construct #30204, PC #27161, Part 15), which are to ensure the control device operated when possible and that emission limits in the permit are met.

As noted above, Tesla's practice is to (1) minimize emissions when a control device shuts down; (2) immediately cease all emission-generating production activity (i.e., stop the progress of parts through the booth even if coating is not complete); and (3) do so consistent with safety and good air pollution control practices for minimizing emissions to the level of the standard. This means that the production line stops, the coating of any vehicles/parts then in a booth ceases, and the curing of any vehicles/parts in an oven is not completed. The only emissions during an unplanned shutdown like this result from the evaporation of volatile organic compounds in the coatings that have already been applied to the vehicles at the time a malfunction/breakdown occurs, the venting of recirculated air in the booths, and the release of ambient air from the ovens. As a result, emissions from an unplanned shutdown event are already the minimum achievable under such circumstances. Tesla is requesting that this foreseeable situation be addressed and allowed for by the variance. Note that Tesla is not requesting a variance from (or any change to) in its current numeric emission limits, but simply that these uncontrolled emissions be counted towards the emission limits, with no requirement to continue operating the control device during an unplanned shutdown of the RTO/TO equipment due to a malfunction or breakdown of the RTO/TO equipment or other coating line equipment. As indicated, the existing permit conditions, as interpreted by the District, require operation of the control devices at all times that POCs are being emitted, regardless of whether such emissions are below the applicable limits in the permit.

Compliance with such a requirement cannot be achieved when the control device malfunctions or requires shutdown due to safety considerations, as described earlier. Tesla implements measures to minimize emissions, even during an unplanned shutdown event. Specifically, Tesla is (1) abating emissions when the RTOs/TOs are working, (2) not completing the coating of vehicles or parts that have already begun the coating process (which means they must be pulled out and reprocessed at a later date or scrapped), and (3) stopping the introduction of any new vehicles or parts into the coating process (and thus is not generating new emissions). Tesla does not benefit from and has every incentive to prevent equipment breakdowns and malfunctions and the resulting RTO/TO shutdowns, which are very costly and reduce the facility's production capacity.

Installing redundant control devices to serve as a backup for control of emissions during these unplanned events is not reasonable and would have adverse emission effects that outweigh the benefit of preventing the small amount of emissions that may occur during a shutdown. The backup RTO/TO equipment would need to be capable of becoming operational immediately upon an equipment breakdown or malfunction that leads to an RTO/TO shutdown. Tesla will not be able to predict when operation of a backup RTO/TO device would be necessary and there is not enough time when equipment breaks down or malfunctions to initiate a cold startup to ensure that there is an RTO/TO operating at all times that there are vehicles or parts in a booth or oven. Tesla would therefore need to operate the backup RTO/TOs at low levels 8760 hours per year, generating additional combustion emissions (NO_x, CO, and CO₂). Because Tesla will

count the emissions that occur during a malfunction/shutdown incident when determining whether it complies with the applicable numeric emissions limits and because the emissions are de minimis, there will be no discernable benefit in terms of a POC emission reduction. The analysis below, which was done assuming a single RTO installation and operation as the back-up device in the SPS Body Line, illustrates that adding redundant control equipment would not be cost-effective:

- BAAQMD has adopted guidelines for the maximum cost per ton of air pollutants controlled that would be considered cost-effective; for POC, this number is \$17,500 (\$/ton removed).
- The preliminary cost-effectiveness calculations (Annualized Cost/POC Emission Reduction) for 2022 unplanned events as the basis at the SPS Body Line, is calculated as \$917,136 per ton of POC removed. Note that this does not include cost for ductwork or EPC costs for including the ovens, which would increase the cost further.

Installed Equipment Cost (Spares + Base equipment cost, subtracted wheel cost)	2,844,700	\$
Ductwork Cost (Just for the booths)	1,938,220	\$
EPC Cost (Engineering, Procurement and Construction Estimate) -> Just for the booths	3,192,185	\$
Annualized Cost	1,802,373.81	\$/yr
Assumed average destruction efficiency	97%	
Annual POC emissions (From unplanned shutdown events from SPS Body Line), assuming worst case POC emissions and 40 such events during the year) - See Table 2	2.03	tons/yr
POC emission reduction	1.97	tons/yr
Cost-effectiveness = Annualized Cost/ POC Emission Reduction		
Cost-effectiveness	\$ 917,136	\$/ton
Values exceeds the maximum cost guideline of \$17,500/ton of POC		

- See Attachment I.1 and I.2 for further details on the cost-effectiveness calculations.
- The cost-effectiveness calculations for NPS (Annualized Cost/POC Emission Reduction) would be along similar lines.
- Therefore, a back-up control device is neither a cost-effective nor an environmentally viable option by a significant margin.

Accordingly, Tesla seeks this variance to provide interim relief for a period of one year from this permit requirement. If the permit revision applications are processed to establish permit conditions that account for these emissions under existing permit limits and do not make unplanned shutdowns of the control

device as described above an automatic violation before expiration of the variance, the variance can expire or be rescinded at that time.

Enclosures:

Attachment I.1: BACT calculations

Attachment I.2: Cost estimates for control device, duct work and EPC costs

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Attachment I.1: BACT calculations

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Annualized Cost = Installed Equipment Cost x [Capital Recovery Factor + Tax Factor + Insurance Factor + G & A Factor + Annual Operating/Maintenance Factor]
 where: CFR = 0.136, Tax = 0.01, Insur. = 0.01, G&A = 0.02, O&M = 0.05

RTO + Wheel cost (\$)	3,051,800
Wheel cost (\$)	300000
RTO cost (\$)	2,751,800

Table 1 - BACT analysis for SPS Body Line

Installed Equipment Cost (Spares + Base equipment cost, subtracted wheel cost)	2844700	\$
Ductwork Cost (Just for the booths)	1,938,220	\$
EPC Cost (Engineering, Procurement and Construction Estimate) - Just for the booths	3,192,185	\$
Annualized Cost	1,802,373.81	\$/yr
Assumed average destruction efficiency	97%	
Annual POC emissions (From unplanned shutdown events from SPS Body Line), assuming worst case POC emissions and 40 such events during the year) - See Table 2	2.03	tons/yr
POC emission reduction	1.97	tons/yr
Cost-effectiveness = Annualized Cost/ POC Emission Reduction		
Cost-effectiveness	\$ 917,136	\$/ton
Values exceeds the maximum cost guideline of \$17,500/ton of POC		

Note 1, 2

Note 3

Note 4

Note 5

Description	Value	Unit
Estimated POC (worst case emissions) per event	101.3	lb/event
Actual Number of events in 2022 till date (Jan 2022 - Sept 2022)	34	events
Estimated events till end of year (extrapolated till December 2022)	40	events
Total Estimated POC	4052	lbs/yr
Total Estimated POC	2.03	tons/yr

Notes:

1. Policy and Implementation Procedure accessed at: <https://www.baaqmd.gov/~media/files/engineering/bact-tbact-workshop/bact-tbact-policy-and-implementation/policy-and-implementation-procedure.pdf?la=en>
2. Factors provided in BAAQMD Policy and Implementation Procedure
3. Based on cost for RTO + Concentrator Wheel provided to Tesla dated August 2022. The majority of the Costs are for the RTO (notwithstanding the wheel, which is approx ~\$300,000) + Cost for spares (\$92,900)
4. Based on proposal from Abednego. Note that this is for just ductwork from the Booths, there will be additional cost for ducting the ovens over as well.
5. Note that estimated actual emissions from SPS events (as provided in Deviation reports) for 2022 (Jan through Sept) is 0.52 tons

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Attachment I.2: Cost estimates for control device, duct work and EPC costs

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**Tesla Motors Assembly Plant
Fremont CA**

South Paint New RTO Ductwork
21-217R4

ABEDNEGO

A Nalco Water Company

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Tesla Factory – Fremont CA
45500 Fremont Blvd
Fremont CA 94538

August 16th, 2022

Attn: Jethro Tuazon <jtuazon@tesla.com>

Subject: Abednego Proposal 21-217R4 South Paint New RTO Ductwork

Mr. Tuazon,

Scope of Supply:

Abednego will provide a Turnkey (Design Build) duct route from Primer, Basecoat, and Clearcoat booths to the new RTO. Seismic anchoring and design will be provided for this project. Duct Route layout will follow the design laid out in the “South_Paint_Equipment Layout RTO Plan.dwg”

Volumetric Flows

- 1) Below is the list of targeted duct volumetric flows based off ambient temperature
 1. Primer booth: 38,040 scfm
 2. Basecoat booth: 25,536 scfm
 3. Clearcoat booth: 54,384 scfm

Engineering and Design

- 1) Design, construction, and commissioning of RTO Ductwork
- 2) Work with Tesla’s Facilities and Design Team on their engineering package to ensure permitting is awarded by the city of Fremont.
- 3) Engineering provided to verify above volumetric flows will be met
- 4) Seismic engineering provided to establish seismic anchoring and design requirements
- 5) Commissioning engineer provided upon start up
- 6) Layout drawings to execute the scope of work
- 7) All drawings included

Engineering and Design\$125,000.00

Project Management

- 1) Project Management team is required for duration of package to ensure completion of the following:
 - a. Provide applicable turnover documentation (as applicable) including
 - i. a. Manuals
 - ii. b. Comprehensive list of any contractor or subcontractor supplied equipment or materials, Manufacturer, Model, Serial, etc.
 - iii. c. Critical Spare Parts Lists
 - iv. d. Warranty documentation
 - b. Bill of Materials and Operations and Maintenance Manuals for all materials used and pertinent as identified by Tesla.
 - c. Create and uphold timeline of projects and communicate with Tesla the timing of each phase. Each week project management team will provide Tesla with updated 2 week forecast
 - d. Coordination of all skilled laborers

Total Cost Project Management Package..... \$65,000.00

Turnkey RTO Ductwork

- 1) Fabrication and Installation of turnkey ductwork solution as designed by Abednego Engineers following layout and requirements of Tesla
- 2) Required (but not limited to) materials are as follows:
 - a. Duct
 - b. Dampers (as necessary)
 - c. Actuators
 - d. Electrical components
- 3) Required (but not limited to) equipment are as follows:
 - a. Crane (Limit to 24 days. If extra days need final cost will increase)
 - b. Scaffolding
 - c. Scissor Lifts
 - d. Boom Lifts
 - e. Generators
- 4) Field Labor to install
 - a. New duct supports to be mounted on roof frame structure
 - b. Supports to be engineered
 - c. Existing roof structure to be calculated by Tesla
 - d. New Ducting on supports
 - e. 4300 Hours based on 6 day work weeks 10 hours per day

- 5) Shop Labor to fabricate ductwork
 - a. Fabrication of all ductwork
 - b. 5000 hours based on 6 day work weeks 10 hours per day

Field Labor	\$420,000.00
Shop Labor	\$342,000.00
Materials	\$354,575.00
Crane (duration of project)	\$480,000.00
Scaffolding	\$107,150.00
Misc. rentals	\$44,495.00

Total Price for Entire Recommended Order..... \$1,938,220.00

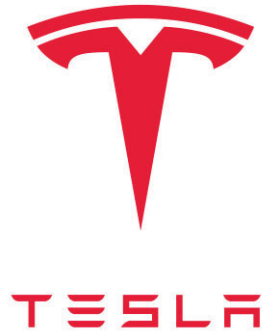
Clarifications:

- This proposal is issued and pursuant to the GTC agreement by and between Tesla, Inc and Nalco.
- Abednego does not include liability for penalty or fees related to the consequential damages.
- Pricing is in US Dollars.
- **Absolutely no permitting included.**
- No warranty of existing equipment included
- No warranty of existing equipment functionality when relocated
- No production standby included
- No conveyor work included
- No Underground utilities repaired, relocated, or replaced
- No civil work, excavation, backfill, concrete, etc., included
- No air balance testing nor reports included
- Shipping is Prepay and Add
- No duct insulation included
- **Duct Pricing is based on similar duct work in North and South Paint. A Change order may be necessary if duct sizing is larger than quoted**
- **No Controls Labor or Engineering Included**
- **No Electrical connections included.**
- **Quote valid for 30 days, but this proposal is budgetary due to volatility of material prices specifically steel.**

We hope you find this proposal to fully meets your requirements and objectives. Please feel free to contact us with any questions or required clarifications.

Sincerely,

Jason Soppe
Business Development
515-783-7329
Jason.soppe@ecolab.com
jsoppe@abednego.biz
Abednego Environmental Services



A CONIFER Custom Solution Utilizing
One (1) Rotary Concentrator &
One (1) **2-can** Regenerative Thermal Oxidizer (RTO)
For the Abatement of Paint Booth & Curing Oven
Emissions (future connection) in Fremont, CA

Revision 6
Yellow Highlight Denotes Revision

6515 Willowbrook Park
Houston, Texas 77066
832.476.9024
www.conifersystems.com





SECTION 2: COMMERCIAL

2.1 Pricing and Options

Equipment Price

Item 1: Base Bid

Design and Supply of one (1) Concentrator & RTO system, CONIFER model: RC-1180-RTO-500-2T-FD to treat booth and future ovens streams, as described in this proposal herein, DPU Jobsite in Fremont, CA (INCOTERMS 2020). Base bid also includes equipment handling, unloading, storage on site, equipment installation service, site supervision, commissioning, start-up & training. **\$ 3,051,800 USD**

Add-Ons

Item 2: Spare Parts – Estimated

Exact spare parts list determined during project engineering. Spare parts ordered at the completion of the Engineering Phase shall be discounted by 10%. Spare parts ordered at a later date will be offered at the non-discounted price. Waiting time for recommended spare parts not purchased by customer shall not be covered under the CONIFER warranty. **\$ 92,900 USD**

Item 3: Extended Warranty / Preventative Maintenance Program

Includes 1-Year Preventative Maintenance Program including Semi-annual online and offline Inspections; extends the warranty period to 24 months. Included with Item 1

Item 4: Price Deduct for Exclusion of Exhaust Stack

Price deduct for exclusion of exhaust stack from scope of supply. **-\$72,500 USD**

2.2 Project Schedule (see attachment in section 9)

Notes:

- Lead time may vary based on the timing of an order. CONIFER will confirm project schedule within two weeks of order placement and deposit.
- Lead time does not consider hold points, document reviews, addition testing and customer inspections, or any other customer originated considerations during the execution of the oxidizer design / build process.
- Project expedition options may be available. Consult your sales representative for further details.

EPC Costs inclusive of Safety Buffer

Project: F21-0199 SPaint TO Upgrade		TOTAL		Type:	Concept
Estimate: ROM Estimate				Accuracy:	-35% to +65%
Date: 13-Sep-22				Revision:	4

Scope	Description	Manhours	Labor	Materials	Equipment	OH&P	TOTAL	TOTAL
Electrical Distribution	17,600 LF of new cabling w/ 4400 LF of 3 1/2" conduit	2,787	\$ 373,866.54	\$ 581,800.00	\$ 51,600.00	\$ 143,349.98	\$ 1,150,616.52	\$ 1,279,467.75
Equipment Pad & Piers	16" Concrete slab 3,600 SF	1,000	\$ 109,953.96	\$ 66,666.67	\$ 11,111.11	\$ 26,493.09	\$ 214,224.83	\$ 297,534.48
Grading, paving and Bioswale	3600 SF of demo and grading, 1,080 SF of paving and 114 SF of bioswale	407	\$ 60,355.10	\$ 30,240.00	\$ 15,480.00	\$ 13,589.26	\$ 119,664.36	\$ 166,200.50
Fire Suppression & Alarm	Fire suppression for panel roof, control room and ductwork. Fire alarm to control room	401	\$ 75,954.97	\$ 11,031.49	\$ 7,080.00	\$ 13,047.97	\$ 107,114.42	\$ 112,029.39
Sanitary Relocation	Allowance of 200 LF	340	\$ 50,444.28	\$ 25,000.00	\$ 10,000.00	\$ 11,316.64	\$ 96,760.92	\$ 96,760.92
Stormwater Relocation	Allowance of 200 LF	200	\$ 29,673.11	\$ 14,000.00	\$ 5,000.00	\$ 6,550.97	\$ 55,224.07	\$ 55,224.07
Compressed Air	Allowance of 100 LF of compressed air piping	125	\$ 21,765.27	\$ 5,000.00	\$ 1,000.00	\$ 4,014.79	\$ 31,780.06	\$ 25,624.04
Natural Gas	Allowance of 75 LF of new natural gas line	75	\$ 13,059.16	\$ 3,000.00	\$ 750.00	\$ 2,408.87	\$ 19,218.03	\$ 19,218.03
Network	Allowance for 1x network connection	50	\$ 6,626.83	\$ 1,500.00	\$ 500.00	\$ 1,219.03	\$ 9,845.86	\$ 17,690.34
Wall Penetration	Wall penetration for natural gas & compressed air	25	\$ 2,758.77	\$ -	\$ 1,500.00	\$ 413.82	\$ 4,672.58	\$ 11,995.86
TOTAL DIRECTS		5,410	\$ 744,457.97	\$ 738,238.16	\$ 104,021.11	\$ 222,404.42	\$ 1,809,121.65	\$ 2,264,979.18
General Requirements	3% of direct cost to cover: 3rd party inspections, surveys and equipment support	270	\$ 29,753.30	\$ 36,911.91	\$ 5,201.06	\$ 9,999.78	\$ 81,866.04	\$ 101,856.78
Construction Staff Aug		-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Design Staff Aug		-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commissioning		-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Permitting	2% of direct cost to cover: City drawing review and inspections costs	108	\$ 6,498.12	\$ 14,764.76	\$ 2,080.42	\$ 3,189.43	\$ 26,532.74	\$ 32,606.67
Crane Rental		-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL OVERHEAD REQUIREMENTS		379	\$ 36,251.41	\$ 51,676.67	\$ 7,281.48	\$ 13,189.21	\$ 108,398.78	\$ 134,463.45
SUBTOTAL BASE ESTIMATE		5,788	\$ 780,709	\$ 789,915	\$ 111,303	\$ 235,594	\$ 1,917,520	\$ 2,399,442.63
CONTINGENCY	25% Contingency	-	183,170	181,640	25,594	54,721	445,125	\$ 792,742.71
TOTAL ESTIMATE INCLUDING CONTINGENCY		5,788	\$ 963,879	\$ 971,554	\$ 136,896	\$ 290,315	\$ 2,362,645	\$ 3,192,185.34

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ATTACHMENT J

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ATTACHMENT J

10. When and how did Applicant first become aware that it was not in compliance with the Rule(s) and/or permit condition(s)?

Tesla Response:

Tesla tracks RTO/TO temperatures and bypass damper positions for the paint shops in accordance with the permit requirements. Via this tracking mechanism, Tesla has been reporting all RTO/TO unplanned shutdown events that have the potential for uncontrolled emissions to BAAQMD under the RCA/Title V deviation protocol. Tesla has been working in close coordination with BAAQMD to both proactively report these events and answer any follow-up questions from the District. In addition, the facility has been submitting all of the required reports within the regulatorily specified timeframes.

As explained above, the emissions from these events can be conservatively estimated and accommodated under (i.e., will not cause an exceedance of) existing numeric permit limits, and the District can include any additional reporting deemed necessary as part of its variance approval as well as in any revised permits.

During the timeframe that the variance is applicable, Tesla will timely submit required reports and will remain in close communication with the District. The variance may include this as a requirement.

11. What actions has Applicant taken since that time to achieve compliance with the Regulation(s) or permit condition(s)?

Tesla Response:

Tesla has a strong economic incentive to reduce these unplanned shutdowns of the RTO/TO equipment because these events always result in a shutdown of the entire production line. Shutdowns are highly disruptive to plant operations and are to be avoided as much as is reasonably possible. They result in downtime and loss of production, as well as the need to scrap or reprocess vehicles and parts that were in process at the time of the shutdown. Note that Tesla's process is more stringent than the typical automotive industry practice where coating operations may continue. In Tesla's case, production is completely stopped and the units are usually scrapped.

Not only are the paint shops affected during such downtime, a shutdown also causes upstream (Body in White Areas) and downstream (General Assembly Areas) production bottlenecks. In other words, vehicles that were about to enter the coating operation cannot do so, which causes a backup in the upstream feed to the coating operation, and assembly areas that would receive the coated vehicle shells downstream to complete assembly of the vehicle will not be able to access coated vehicles due to the shutdown. Tesla has a dedicated crew of control engineers, process engineers, internal maintenance staff, and external contractors that are working continuously to minimize unplanned downtime.

In addition, the systems are programmed so that during such unplanned events, the fault must be cleared/resolved before the abatement systems can be restarted and production can resume operation.

12. What would be the harm to Applicant's business if the variance were not granted?

Economic Losses: Absent a variance and to avoid a violation of its permit, Tesla will be in the untenable position of either (1) operating the control devices rather than venting to the atmosphere following a

shutdown event, which it should not do in order to ensure worker and public safety as well as mechanical integrity or (2) obtain and install multiple backup, redundant control devices, which were never contemplated by the permit when it was issued, have adverse environmental effects because the backups would need to be “kept warm” in order to start during a malfunction, and are cost prohibitive. The costs of backup control devices would be disproportionate to any benefit, particularly given that emissions during such events are de minimis, the current numeric emission limits will still apply even when the variance is applicable, emissions can be conservatively estimated, and compliance with those limits can be assured.

Number of employees laid off (if any): Although to date, there have not been impacts to employees, the issue could impact employees and those impacts would be avoided if the permit terms were focused on the emission limits being met. As background, the facility employs 25,000 to 28,000 employees overall, with ~1600 employees across the paint shops alone.

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs and/or similar impacts).

As described earlier, the paint shops at the Fremont Factory are integral to the production of Tesla’s Electric Vehicles (EVs) . Without the paint shops, production of Tesla’s EVs will grind to a halt.

The Fremont Factory is the largest and most productive automobile manufacturing facility in North America. It manufactures almost 100% of the EVs produced by Tesla in North America and nearly 50% of all Tesla’s EV production worldwide. Tesla has invested nearly \$5 billion dollars in the Fremont Factory (as of April 2022) and an overall \$10.5 billion dollars into California manufacturing, resulting in employment of nearly 28,000 people across the Fremont Factory and its associated facilities.

From an environmental perspective, EVs are a key component to combatting global climate change, and Tesla is the torchbearer for this revolution. In 2021, the global fleet of Tesla vehicles, energy storage, and solar panels prevented the emission of 8 million metric tons of CO_{2e}. Bringing some of these metrics closer to home, 353,325.98 metric tonnes of CO_{2e} were avoided from being released within the BAAQMD boundary by the usage of Tesla EVs instead of traditional internal combustion engine vehicles.

Each Tesla vehicle on the road ends up saving nearly 7 metric tons of CO₂ and 1.4 metric tonnes of NO_x per vehicle lifetime. The importance of Tesla in the bigger picture of California moving to 100% new zero-emission vehicle sales by 2035 cannot be understated. With the Fremont Factory being the only remaining automotive manufacturing factory in the entire state of California, there is a burgeoning need to increase EV production responsibly to meet these progressive regulations, to tackle climate change and other environmental issues, and to meet the concomitant increased demand for EVs.

Granting this variance would ensure that these goals can be met in the near-term until the pending permit revisions are processed. Given that compliance with the numeric emission limits in the permits would be achieved even without the variance, not granting it would create a scenario wherein Tesla would have to continue to operate the RTO/TO control devices until all vehicles and parts currently in process cleared the coating booths and ovens to avoid a permit violation, even if doing so posed a threat to safety and mechanical integrity—which Tesla does not want to do. Violations of the permit are therefore essentially unavoidable due to safety and mechanical integrity concerns, even though the emission limits are being met. Without the variance, the District would presumably continue issuing NOV’s as a result of these violations, which give the appearance that emissions above permit limits are occurring even though they are not. Tesla is concerned about the potential reputational damage from being considered by the District to be in violation of its permit in these unavoidable situations.

17. Explain why the Applicant cannot curtail or terminate operations in lieu of obtaining a variance:

Tesla Response

Because Tesla's operating procedure is to immediately shut down the entire coating line (all spraying stops, no new units enter booths or ovens, and operation of the RTO/TOs ceases) when a breakdown or malfunction of an RTO/TO control device or other equipment in the process line occurs, the only emissions occurring during such an event are from evaporation during the drying process for the vehicles or parts that were already in the paint booths or curing ovens at the time of the malfunction (or the purging of ambient air from the ovens and booths). This means that Tesla is already curtailing and terminating operation of the coating lines during such unplanned shutdown events.

The only reasonable way to address emissions during such unplanned shutdowns is to request permit revisions to ensure that the permit conditions address how these emissions are to be calculated to demonstrate compliance with the existing permit limits and clarify that non-operation of the RTO/TO equipment due to a malfunction/unplanned shutdown is not a permit violation.

18. Explain how Applicant plans to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible (mitigation may include reductions at other sources):

Tesla Response

Refer to Attachment I

20. How does the Applicant intend to achieve compliance with the Rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed and/or modifications or process changes to be made, a list of the dates by which the actions will be completed, and an estimate of total costs:

Tesla Response

Tesla intends to achieve compliance by working with the District to conform the permits with Tesla's current practice and eliminate or alter terms that could be interpreted to mean that a control device shutdown is an automatic violation of the permit, regardless of whether the facility actually remains in compliance with its numeric permit limits. This variance is being requested only until the permit revisions for App #31879 (NPS) and App #31706 (SPS body line) have been processed and changes to permit conditions incorporated, which would allow emissions from such unplanned events to be counted towards existing numeric limits and clarify that the unplanned shutdown of control equipment is not an automatic violation. Note that the proposed revisions to the permit conditions as provided under applications App #31879 (NPS) and App #31706 (SPS body line) have been based on Title V permit conditions granted by BAAQMD in other permits for other facilities in the District, so this request is consistent with approaches the District has taken in the past.

ATTACHMENT K

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NPS Emission Calculations submitted for App 31879 on Nov 7, 2022

CAS #	Parameter	Emissions (lb/hr)	2-5 TAC Acute Limit (lb/hr)	Exceeds Limit?
	Estimated VOC Released during Event	9490	-	NO
111-76-2	2-Butoxyethanol	076	2.10E+00	NO
50-00-0	Formaldehyde	001	2.40E-02	NO
71-43-2	Benzene	000	1.20E-02	NO
108-95-2	Phenol	000	2.60E+00	NO
110-54-3	n-Hexane	000	-	NO
100-41-4	Ethylbenzene	002	-	NO
91-20-3	Naphthalene	000	-	NO
1330-20-7	Xylene	016	9.70E+00	NO
7631-86-9	Silica, amorphous	020	-	NO
78-93-3	Ethyl methyl ketone	000	5.80E+00	NO
67-56-1	Methanol	000	1.20E+01	NO
107-98-2	1-Methoxy-2-propanol	000	0	NO
67-63-0	Isopropyl alcohol	057	1.40E+00	NO
108-88-3	Toluene	000	2.20E+00	NO

Workbook Notes:

1. VOCs per equipment is estimated in CPMS Calcs, and Booth VOC Calcs
2. VOCs are estimated on a basis of VOC per Car based on throughputs
3. Tesla is estimating TACs based on SDS and TDS forms for paint and overall paint usage recorded in 2021.
4. Tesla is estimating VOC and TAC during a shutdown event based on the materials with the highest VOC content and its weighted usage.

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CAGE Code	Part Name	Part Number	VOC Content*		Density	MSDS Section Number																																				
			1117-12	1117-13		1117-14	1117-15	1117-16	1117-17	1117-18	1117-19	1117-20	1117-21	1117-22	1117-23	1117-24	1117-25																									
0304	Aluminum	6061-T6	0.00	0.00	2.70	1117-14	1117-15	1117-16	1117-17	1117-18	1117-19	1117-20	1117-21	1117-22	1117-23	1117-24	1117-25	1117-26	1117-27	1117-28	1117-29	1117-30	1117-31	1117-32	1117-33	1117-34	1117-35	1117-36	1117-37	1117-38	1117-39	1117-40	1117-41	1117-42	1117-43	1117-44	1117-45	1117-46	1117-47	1117-48	1117-49	1117-50
0304	Aluminum	6061-T6	0.00	0.00	2.70	1117-14	1117-15	1117-16	1117-17	1117-18	1117-19	1117-20	1117-21	1117-22	1117-23	1117-24	1117-25	1117-26	1117-27	1117-28	1117-29	1117-30	1117-31	1117-32	1117-33	1117-34	1117-35	1117-36	1117-37	1117-38	1117-39	1117-40	1117-41	1117-42	1117-43	1117-44	1117-45	1117-46	1117-47	1117-48	1117-49	1117-50
0304	Aluminum	6061-T6	0.00	0.00	2.70	1117-14	1117-15	1117-16	1117-17	1117-18	1117-19	1117-20	1117-21	1117-22	1117-23	1117-24	1117-25	1117-26	1117-27	1117-28	1117-29	1117-30	1117-31	1117-32	1117-33	1117-34	1117-35	1117-36	1117-37	1117-38	1117-39	1117-40	1117-41	1117-42	1117-43	1117-44	1117-45	1117-46	1117-47	1117-48	1117-49	1117-50

* Data from source (MSDS) and other documents (PPE, MSDS, etc.) dated 12/31/2011. Use Reference VOC Content.

** Data from source (MSDS) and other documents (PPE, MSDS, etc.) dated 12/31/2011. Use Reference VOC Content.

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Coating/Sealer	Coating Name	Volume per car					VOC (lb/gal) ²	lb VOC/car ³
		Volume (Gal) ¹	Volume (ml) ¹	Buffer%	Buffered Values (ml)	Buffered Values (gal)		
Ecoat Paste								
Ecoat Resin								
Primer								
Base Coat								
Clear Coat								

¹ Conservative estimated values, which are further buffered by a conservative percentage to estimate the worst case volume of coating per car

² Based on worst case VOC lb/gal from the SDS sheets used in the permit application

³ VOC (lb/gal) * Buffered Values (gal/car). No Buffer for this application

Max Rate (units/hour)³

Description	Units/hr	VOC per unit (lb/car) **
E-coat Oven		
Prime Booth		
Primer Oven		
Basecoat Booth		
Basecoat Oven		
Topcoat Booth		
Topcoat Oven		

³ Actual max capacity is around 69 to 70 units/hr

** Assumed 70%/30% split between Booth and Oven respectively

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Note: These are the absolute worst case emission values in the unlikely scenario that all booths and ovens are full and all bypass dampers open

- ¹ Emissions released into the atmosphere from booth/oven air volume (lb) = Concentration of exhaust (lb VOC/ft³) * Volume of booth or oven (ft³)
- ² Emissions released into the atmosphere from coating on the car (lb) = VOC per car (lb VOC/car) * cars/units during bypass in the booth or oven (cars)

³ Total Released from booth or oven (lb) = Emissions released into atmosphere from booth/oven air volume (lb) + Emissions released from coating on the car (lb). Note this is a super conservative estimate which assumes that full volume of paint or car evaporates along with the booth volume. See Booth VOC Calc for method of calculation for the emissions released from booth recirculation air.

Key Variables which feed into the above equations are:

- 1) Concentration in Exhaust (lb VOC/ft³) = (lb VOC/car) * cars/hr / Exhaust Air flow rate (ft³/hr)
- 1.1) lb VOC/car = Coating Volume per car (Buffered value in gal/car) * Worst Case VOC content in the coating (lb VOC/gal)
- 1.2) cars/hr = Max capacity of the plant, buffered to 40
- 1.3) Exhaust flow rate (ft³/hr) = Design Value
- 2) Volume of booth or oven (ft³) = Design Value
- 3) cars or units during bypass = Maximum capacity of the ovens and booth during any given time (Actual values to be used if available)

tabulate between what he is calculation vs Tesla calc
177 ppm to lbs of VOC per event

BAAQMD Calculations

Abbreviation	Description	Units
c	concentration in booth	(kg/kg)
q	amount of VOC added to booth	(kg/hr)
n	volume changes per hour	
V	booth volume	m ³
t	time	hour
c ₁	booth concentration at start	kg/kg
c ₂	incoming air concentration	kg/kg

Equation Used in Calculations:

$$c = (q/nV)(1 - e^{-nt}) + (c_1 - c_2)e^{-nt} + c_2$$

$$c = c_1 + (q/nV)(1 - e^{-nt}) + c_2(1 - e^{-nt})$$

$$c = c_1 + (q/nV) - (q/nV)(e^{-nt}) + c_2(1 - e^{-nt})$$

$$c = c_1 + (q/nV) - (q/nV)(e^{-nt}) + c_2 - (c_2)(e^{-nt})$$

Asymptote = q/AR

$$q = (\# \text{ cars/hour}) \times (\text{VOC kg/car})$$

$$c_2 (+1) = (\text{air recycle rate} \times (\text{exhaust rate}) \times c(i))$$

$$c_2 (0) = 0$$

$$n = (\text{Air Recycle \%}) \times (\# \text{ Air Exchanges per Hour})$$

Booth VOC (lbs) Over Time



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BAAQMD Calculations

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Source	Volume of Booth/oven (ft ³)	Exhaust Air flow rate (ft ³ /hr)	Max Rate of the Plant (Jobs or car units/hour)	Worst case VOC per car (lb VOC/car) *
Topcoat/Clearcoat Booth				
Basecoat Booth				
Prime Booth				

Upon using the toggle tab and recycle rate	VOC in the booth	Recycle Rate (Adjust in Booth Calcs)
Prime Booth		
Basecoat Booth		
CC Booth		

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EMISSION CALCULATIONS PROVIDED FOR
SPS MODIFICATION APPLICATION #31706

CAS #	Parameter	Emissions (lb/hr)	2-5 TAC Acute Limit (lb/hr)	Exceeds Limit?
	Estimated VOC Released during Event	101.9 -		NO
67-63-0	Isopropyl alcohol	436	7.1	NO
1330-20-7	Xylene	000	49	NO
100-41-4	Ethylbenzene	000 -		NO
50-00-0	Formaldehyde	000	0.12	NO
91-20-3	Naphthalene	000 -		NO
107-98-2	1-Methoxy-2-propanol	000 -		NO

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Method 1: Average Based on worst case VOC lb/gal from the SDS sheets used in the permit application

Coating/Sealer	Coating Name	Contribution ¹	TAC Percent of VOC					
			67-83-0 Isopropyl alcohol	1330-20-7 Xylene	100-41-4 Ethylbenzene	50-00-0 Formaldehyde	91-20-3 Naphthalene	107-98-2 1-Methoxy-2-propanol
Ecoat Paste			0%	0%	0%	0%	0%	0%
Ecoat Resin			0%	0%	0%	0%	0%	0%
Primer			24%	0%	0%	0%	0%	0%
Base Coat			8%	0%	0%	0%	0%	0%
Clear Coat			0%	0%	0%	0%	0%	0%
Sealer			0%	0%	0%	0%	0%	0%
Thinner (BC)			0%	0%	0%	0%	0%	0%
Thinner (CC)			0%	0%	0%	0%	0%	0%
Thinner (Primer)			0%	0%	0%	0%	0%	0%
TAC total (lb/hr)			5.44	0.00	0.00	0.00	0.00	0.00

1. Contribution determined by Ratio of VOC/car

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¹ Emissions released into the atmosphere from booth/oven air volume (lb) = Concentration of exhaust (lb VOC/ft³) * Volume of booth or oven (ft³)

² Emissions released into the atmosphere from coating on the car (lb) = VOC per car (lb VOC/car) * cars/units during bypass in the booth or oven (cars)

³ Total Released from booth or oven (lb) = Emissions released into atmosphere from booth/oven air volume (lb) + Emissions released from coating on the car (lb). Note this is super conservative estimate which assumes that full volume of paint on car evaporates along with the booth volume.

Key Variables which feed into the above equations are:

- 1) Concentration in Exhaust (lb VOC/ft³) = (lb VOC / car) * cars/hr / Exhaust Air flow rate(ft³/hr)
- 1.1) lb VOC/car = Coating Volume per car (Buffered value in gal/car) * Worst Case VOC content in the coating (lb VOC/gal)
- 1.2) cars/hr = Max capacity of the plant, buffered to 40
- 1.3) Exhaust flow rate (ft³/hr) = Provided by Durr
- 2) Volume of booth or oven (ft³) = Provided by Durr
- 3) cars or units during bypass = Maximum capacity of the ovens and booth during any given time

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Coating/Sealer	Coating Name	Volume per car				VOC (lb/gal) ²	lb VOC/car ³
		Volume (Gal) ¹	Volume (ml) ¹	Buffer%	Buffered Values (ml)		
Ecoat Paste							
Ecoat Resin							
Primer							
Base Coat							
Clear Coat							
Sealer							
Thinner (BC)							
Thinner (CC)							
Thinner (Primer)							
LASD							

¹ Conservative estimated values, which are further buffered by a conservative percentage to estimate the worst case volume of coating per car

² Based on worst case VOC lb/gal from the SDS sheets used in the permit application

³ VOC (lb/gal) * Buffered Values (gal/car)

Max Rate (units/hour)³

Description	Units/hr	Buffered units/hr
E-coat Oven		
Sealer Oven		
s-wet process booth		
Prime and Clearcoat oven		

lb VOC/car in the booths and oven⁴

Ovens and Booths	lb VOC/car
Sealer Oven	
TC Oven	
TC Booth	
E-coat Oven	

³ Current maximum design capacity is 36 to 37 units/hr, 40 units/hr is provided as an absolute, beyond capacity worst case estimate

⁴ Primer, Basecoat, Clear coat and Thinner VOCs are estimated to be split as 70% released in the TC booth and 30% in the TC oven

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Coating/Sealer	Coating Name	VOC Content		TAL: Weight Percent						TAL: Percent of VOC					
		lb/gal	lb/gal	67-63.0	1336-26-7	106-41.4	66-09-0	91-29-3	107-88-2	67-63.0	1336-26-7	106-41.4	66-09-0	91-29-3	107-88-2
				Isopropyl alcohol	Xylene	Ethylbenzene	Formaldehyde	Naphthalene	1-Methoxy-2-propanol	Isopropyl alcohol	Xylene	Ethylbenzene	Formaldehyde	Naphthalene	1-Methoxy-2-propanol
Coat Paste				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Coat Paste				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Primer				0%	0%	0%	0%	0%	0%	24%	0%	0%	0%	0%	0%
Base Coat				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Clear Coat				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Sealer				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Thinner (B)				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Thinner (C)				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Thinner (Primer)				0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

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BAAQMD Calculations

Abbreviation	Description	Units
c	concentration in booth	(kg/kg)
q	amount of VOC added to booth	(kg/hr)
n	volume changes per hour	
V	booth volume	m ³
t	time	hour
c ₁	booth concentration at start	kg/kg
c ₂	incoming air concentration	kg/kg

Equation Used in Calculations:

$$c = (q/nV)(1 - e^{-nt}) + (c_1 - c_2)e^{-nt} + c_2$$

$$c = c_1 + (q/nV)(1 - e^{-nt}) + c_2(1 - e^{-nt})$$

$$c = c_1 + (q/nV) - (q/nV)(e^{-nt}) + c_2(1 - e^{-nt})$$

$$c = c_1 + (q/nV) - (q/nV)(e^{-nt}) + c_2 - (c_2)(e^{-nt})$$

Asymptote = q/nV

$$q = (\# \text{ cars/hour}) \times (\text{VOC kg/car})$$

$$c_2 (\text{+1}) = (\text{air recycle rate} \times (\text{exhaust rate}) \times c_i)$$

$$c_2 (0) = 0$$

$$n = (\text{Air Recycle \%}) \times (\# \text{ Air Exchanges per Hour})$$

tabulate between what he is calculation vs Tesla calc
177 ppm to lbs of VOC per event

Booth VOC (lbs) Over Time



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BAAQMD Calculations

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Source	Volume of Booth/oven (ft ³)	Exhaust Air flow rate (ft ³ /hr)	Max Rate of the Plant (Jobs or car units/hour)	Worst case VOC per car (lb VOC/car) *
E-coat oven				
Sealer oven				
3-Wet Process Booth				
Primer and Clearcoat oven				

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ATTACHMENT L – PROPOSED OPERATING CONDITIONS

Tesla proposes the following operating conditions in the eventuality of an unplanned shutdown of a control device or other equipment upstream of the control device at the NPS and SPS Body line:

- a) Initial notification will be made within 24 hours of an unplanned shutdown of any control device to BAAQMD, including worst-case emissions estimate as provided in the RCA.
- b) Calculations (as agreed to by the BAAQMD permitting division) will be provided to BAAQMD within 10 days of a control device shutdown to demonstrate that, inclusive of the actual, uncontrolled emissions from the unplanned shutdown event, emissions are below the numeric emission limitations in the permit.
- c) Any emissions calculated under (b) shall be included in the monthly emission reports submitted to BAAQMD.
- d) A malfunction, breakdown, or other process upset of a control device or other equipment upstream of the control device that results in emissions from such unplanned events is not an automatic violation of the permit

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