



## UNITED AIRLINES - SFMC SEMIANNUAL MONITORING REPORT CERTIFICATION

**Facility:** **United Airlines - San Francisco Maintenance Center**  
 San Francisco International Airport  
 San Francisco, CA 94128

**Facility ID:** **A0051**

Reporting Period
<b>September 1, 2011 to February 29, 2012</b>

This monitoring report is required pursuant to the United Airlines Major Facility Review Permit Standard Conditions, Section F – Monitoring Report.

### Monitoring Statement

This facility was in compliance with all emission limitations and monitoring provisions of the Title V Operating Permit as identified by the compliance methods specified in the permit (i.e. methods that determine whether compliance was continuous or intermittent).

When non-compliance items are identified and reported, or instances where additional data were required to determine compliance, the following information will be included:

1. Emission unit identification number (Source ID);
2. Specific permit condition number;
3. Description of any deviations from the conditions of this permit, or instance where additional information was required to determine compliance, including those attributable to malfunctions/breakdowns;
4. Basis for the determination of non-compliance (including additional information **not** specified in the permit) and, if applicable, subsequent compliance.

### Certification by Responsible Official

Based upon the information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate for the semiannual reporting period indicated above.

  
 (Signature of Responsible Official)

3-28-2012  
 (Date)

Name: Mark Mounsey  
 (Type or print)

Title: Vice President – Base Maintenance  
 (Type or print)





## Introduction/Permit History

On March 17, 2000, the Bay Area Air Quality Management District (BAAQMD) issued a Major Facility Review Permit (Title V Operating Permit) to the United Airlines San Francisco Maintenance Center, Plant 51 (United) which is a significant maintenance operation for United's fleet of commercial aircraft. In 2002, United initiated a Significant Revision to the 2000 Major Facility Review Permit to incorporate a number of operational changes such as exempt and shutdown sources and administrative corrections. The BAAQMD re-issued the revised Title V Operating permit on October 22, 2003.

United submitted its permit renewal application on August 31, 2004 and the BAAQMD issued the renewed Title V Operating Permit effective July 22, 2011.

## Report Discussion

United submits this semiannual monitoring report pursuant to Standard Condition F of the facility's Title V permit issued July 22, 2011 and BAAQMD Regulation 2, Rule 6, Section 502.

The format of this report is based on the tables found in Section VII – 'Applicable Limits and Compliance Monitoring Requirements' of United's current Title V Operating Permit. Each source or group of sources is identified along with its applicable emission limit(s), specific permit condition(s) and monitoring requirement(s). A column was added to these tables to indicate compliance or non-compliance with the applicable monitoring requirements associated with the individual sources. In the case of identified non-compliance, or if a specific line item is not applicable (i.e., source no longer exists), a discussion and explanation is provided after each table or in the first section of this Report.

Copies of all monitoring records are available for inspection at United's Environmental Affairs Department located at the facility.

## Source Additions, Modifications or Deletions

This section summarizes source activities at United that have occurred at the facility since the last semi-annual report. In the context of this report, changes represent air quality-related activities such as new operating permits, authority to construct or removal of permitted sources.

United submitted one Permit to Operate/Authority to Construct application during this reporting period. United received one authority to construct for the parts washer application. The table 1 below summarizes the permit activity.

**Table 1. Permit Application/Issuance Summary**

ATC/PTO Applic #	Application PTO/ATC Issued	Source(s)	Description
23893	November 21, 2011	S334	ATC Issued for Parts Cleaner (Tire Shop).
24102	January 19, 2012	S95, S96	Application for alteration submitted. Convert auxiliary boilers to full time due to shut down of Cogon.



## **Compliance Issues**

This section provides a summary of all monitoring-related enforcement activities taken by the BAAQMD, including Notices of Violations, Episode Reporting, Variances/Enforcement Actions, Abatement Orders, Penalty Assessments and other similar actions that have occurred within the reporting period.

### **Notices of Violation**

No Notices of Violation were issued during this reporting period.

### **Episode Reports**

From time to time, United may experience breakdowns, malfunctions or indicated excess emissions at any of United's permitted sources. In such cases, United complies with Regulation 1 and the BAAQMD Manual of Procedures and reports indicated or actual non-compliance events.

No reportable episodes occurred during this reporting period.

### **Title V Deviation Reporting**

No reportable deviations occurred during this reporting period.

### **Other Non-Compliance Issues Not Previously Reported**

If, during the preparation of the Semiannual Monitoring Report, non-compliance events are discovered that were not reported previously through the Title V deviation reporting (i.e. 10-Day/30 Day Reports) or via Reportable Compliance Activity (RCAs), then such "missed" reports are identified in this section.

No "missed" non-compliance activities occurred during this reporting period.

### **Variance Applications and Enforcement Agreements**

United did not apply for, and BAAQMD, did not issue, any variances during this reporting period.

### **Penalty Assessments for Air Quality-Related Matters**

There were no such penalty assessments or settlement agreements between any agency and United Airlines San Francisco Maintenance Center during this reporting period. There were no outstanding penalties.



## Compliance Monitoring Tables

The following abbreviations are used in the tables provided in this report:

FE – Federally enforceable; Y = Yes, N = No

### Monitoring Codes:

C - Continuous	D - Daily	A - Annual
E - Per Event	M - Monthly	
N - Not Required	P - Periodic	
Q - Quarterly	W - Weekly	

NA – Not Applicable

The **'Monitoring Type or Compl. Method or Compliance Determination'** column is used to convey the method by which compliance or non-compliance is determined.

**Yes** answers in the "Continuous Compliance?" column indicate that the source was in compliance at all times during the reporting period. A **No** indicates that the source was in non-compliance at some time during the reporting period and is not indicative of continuous non-compliance. Furthermore, any source that indicates non-compliance with any requirement does not necessarily mean that the source is non-compliant at the time this report was prepared or submitted.



**Table VII - A**

**Applicable Limits and Compliance Monitoring Requirements**

**S1, S9, S10, S57, S64, S78, S80, S105, S112, S128, S140: SOLVENT CLEANING OPERATION;**

**S56: SPRAY CLEANING - PRECLEAN ROOM**

**S258: OIL COOLER FLUSH CART**

**S284: OIL COOLER FLUSH CART**

**S288, S289, S290: RECYCLING PARTS WASHERS**

**S291, S292, S293: PARTS WASHERS**

**S328, S329, S330, S331: PARTS CLEANERS**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
HAP	None	Y	None	40CFR 63.752(b)(1)	P/E	Recordkeeping	Yes
VOC for S1, S9, S10, S57, S64, S78, S80, S105, S112, S128, S140	Condition #9044, part 1	Y	32,000 gallons/yr mineral spirits, net usage	Condition #9044, Part 2	P/Q	Recordkeeping	Yes
Solvent usage for S258	Condition #8016, Part 1	Y	100 gal/yr	Condition #8016, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S284	Condition #18250, Part 1	Y	50 gal/yr	Condition #18250, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S288, S289, S290	Condition #18484, Part 1	Y	30 gal/yr (each)	Condition #18484, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S291, S292, S293	Condition #18260, Part 1	Y	120 gal/yr (each)	Condition #18260, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S328, S329	Condition #23500, Part 1	Y	100 gal/yr (each)	Condition #23500, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S330	Condition #23707, Part 1	Y	50 gal/yr	Condition #23707, Part 2	P/M	Recordkeeping	Yes
Solvent usage for S331	Condition #23737, Part 1	Y	100 gal/yr	Condition #23737, Part 2	P/M	Recordkeeping	Yes



**Table VII – B**  
**Applicable Limits and Compliance Monitoring Requirements**

**S16, S17, S18, S19, S20, S21, S22, S23: CHROME PLATING OPERATIONS**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Control Method	Continuous Compliance?
Hexavalent Chrome	Reg 11-8; 93102.4(b)(1) <sup>1</sup> Condition 23542, Part 1a	N	≤0.0016 mg/amp-hr	Reg 11-8; 93102.9(b) and 93102.12(c)(2) Condition 23542, Part 6b and 6c	C	Pressure Differential	Yes
Amp-hours	Condition #23542, Part 1b	N	60 million amp-hrs/yr (combined usage)	Reg 11-8; 93102.9(a) & 93102.12(c)(1) Condition #23542, Parts 6a and 9(b)(i)	C	Recording Amp-hr Meters	Yes
Dry Scrubber Pressure Drop	Reg 11-8; 93102.9(b) Condition #23542, Parts 6b and 6c	N	Acceptable differential pressure range across each abatement device: (in. H <sub>2</sub> O)  A-216, A-217, A-218, A-219, A-220, A-221, A-222, A-223:  ±2 inches of water column of the value established by most recent source test  A-416, A-418, A-420, A-422:  Minus ½ times to plus 2 times the inches of water column of the value established during the most recent source test	Reg 11-8, 93102.9(b) & 93102.12(c)(2)  Condition #23542, Parts 6b and 6c	P/W	Pressure Differential	Yes

<sup>1</sup> California Code of Regulations, Title 17, section 93102, hereinafter referred to as 93102. BAAQMD Regulation 11-8 incorporates 93102 by reference.



**Table VII – C**

**Applicable Limits and Compliance Monitoring Requirements**

**S61, S123, S126, S146: AEROSPACE PAINT SPRAY BOOTHS**

**S97, S98, S99, S100, S101, S102, S103, S104: AIRCRAFT PAINTING DOCKS**

**S275: TIRE SHOP MAINTENANCE AND REPAIR**

**S280: PAINT SPRAY BOOTH**

**S327: AIRCRAFT GENERATOR REPAIR STATION**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-29-302.1	Y	Primer: 350 g/l (2.9 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.2	Y	Adhesive Bonding Primer: 850 g/l (7.1 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.3	Y	Interior Topcoat: 340 g/l (2.8 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.4	Y	Electric or Radiation Effect Coating: 800 g/l (6.7 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.5	Y	Extreme Performance Interior Topcoat: 420 g/l (3.5 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.6	Y	Fire Insulation Coating: 600 g/l (5.0 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.7	Y	Fuel Tank Coating: 720 g/l (6.0 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.8	Y	High-Temperature Coating: 720 g/l (6.0 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.9	Y	Sealant: 600 g/l (5.0 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.10	Y	Self-priming Topcoat: 420 g/l (3.5 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.11	Y	Topcoat: 420 g/l (3.5 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.12	Y	Pre-treatment Wash Primer: 420 g/l (3.5 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	Regulation 8-29-302.13	Y	Sealant Bonding Primer: 720 g/l (6.0 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes





**Table VII – C**

**Applicable Limits and Compliance Monitoring Requirements**

**S61, S123, S126, S146: AEROSPACE PAINT SPRAY BOOTHS**

**S97, S98, S99, S100, S101, S102, S103, S104: AIRCRAFT PAINTING DOCKS**

**S275: TIRE SHOP MAINTENANCE AND REPAIR**

**S280: PAINT SPRAY BOOTH**

**S327: AIRCRAFT GENERATOR REPAIR STATION**

Type of Limit	Emission Limit/Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Comp. Method	Continuous Compliance?
VOC	Regulation 8-29-302.14	Y	Temporary Protective Coating: 250 g/l (2.1 lb/gal)	Regulation 8-29-501	P/W	Recordkeeping	Yes
	40 CFR 63 63.745(c)(2)	Y	Primer: 350 g/l (2.9 lb/gal)	40 CFR 63 63.752(c)(2)	P/M	Recordkeeping	Yes
	40 CFR 63 63.745(c)(4)	Y	Topcoats: 420 g/l (3.5 lb/gal)	40 CFR 63 63.752(c)(2)	P/M	Recordkeeping	Yes
Organic HAP	40 CFR 63 63.745(c)(1)	Y	Primer: 350 g/l (2.9 lb/gal)	40 CFR 63 63.752(c)(2)	P/M	Recordkeeping	Yes
	40 CFR 63 63.745(c)(3)	Y	Topcoats: 420 g/l (3.5 lb/gal)	40 CFR 63 63.752(c)(2)	P/M	Recordkeeping	Yes
Inorganic HAP for S123	40 CFR 63 63.745(g)(2)(iv)	Y	95% reduction of HAPs	Condition #21946, Part 3	C/ Once per shift	Pressure Differential and Recordkeeping	Yes
POC for S275	Condition #23499, Part 1	Y	14,780 lb/year	Condition #23499, Part 3	P/M	Recordkeeping	Yes
POC for S280	Condition #24442, Part 1	Y	20 gal/yr primer 20 gal/yr topcoat 40 gal/yr solvent	Condition #24442, Part 2	P/M	Recordkeeping	Yes
POC for S327	Condition #22985, Part 1	Y	300 gal/yr alcohol 100 gal/yr WD-40 100 gal/yr primer 75 gal/yr topcoat	Condition #22985, Part 2	P/M	Recordkeeping	Yes



**Table VII – D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S87, S88: APU TEST CELLS**  
**S89, S90: ENGINE TEST CELLS**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Visible Emissions		N		Condition #18559, Parts 2 and 3	P/E	Visible Emissions Check	Yes
Sulfur content	Regulation 9-1-304	Y	Fuel Sulfur Limit 0.5%	Condition #16558, Parts 1 and 3 Condition #14315, Parts 4 and 6	P/M	Vendor Certification or BAAQMD approved laboratory analysis	Yes
NO <sub>x</sub> for S90	Condition #14315, part 3	Y	NO <sub>x</sub> Emissions: ≤90.9 tons during any consecutive 12 month period.	Condition #14315, parts 3 and 6	P/M	Recordkeeping	Yes
Usage for S90	Condition #14315, part 1	Y	Fuel Usage: ≤764,000 gallons during any consecutive 12 month period.	Condition #14315, part 6	P/M	Recordkeeping	Yes
	Condition #14315, part 2	Y	Fuel Usage: PW4090 engine ≤344,500 gallons during any consecutive 12 month period.	Condition #14315, part 6	P/M	Recordkeeping	Yes

**Table VII – E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S92: AIRCRAFT WASHING AREA**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-4-302.1	N	5 tons/yr (each source)	Regulation 8-4-501	P/A	Recordkeeping	Yes
VOC	SIP Regulation 8-4-302.1	Y	5 tons/yr (each source)	Regulation 8-4-501	P/A	Recordkeeping	Yes



**Table VII – F**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S95, S96: BOILERS**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Sulfur Limit	Regulation 9-1-304	Y	Fuel Sulfur Limit 0.5% (liquid fuels)	Regulation 9-1-501	P/E	Vendor Certification or BAAQMD approved laboratory analysis	Yes

**Table VII – G**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S110, S191: VARNISH DIP TANKS, WITH ASSOCIATED ELECTRIC CURING OVENS**  
**S240: MISCELLANEOUS RESIN LAMINATING**  
**S262: ADHESIVE APPLICATION AND STRIPPING OPERATION**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-4-302.1	N	5 tons/yr (each source)	Regulation 8-4-501	P/A	Recordkeeping	Yes
	Regulation 8-4-302.3	Y	≤3.5 lb/gal coating VOC limit (alternative to 5 ton limit)	Regulation 8-4-501	P/A	Recordkeeping	Yes
POC for S262	Condition #9078, Parts 1 and 2	Y	2,020 gallons/yr solvent; 638 gallons/yr adhesive	Condition #9078, Part 3	P/M	Recordkeeping	Yes



**Table VII – H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S155, S156, S157: FACILITIES PAINT BOOTHS**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-14-302.2	Y	Air-Dried Coatings: 340 g/l (2.8 lb/gal)	Regulation 8-14-501	P/D	Recordkeeping	Yes
	Regulation 8-14-310.1 to 310.5	Y	Specialty Coatings, air-dried coating 420 g/l (3.5 lb/gal)	Regulation 8-14-501	P/D	Recordkeeping	Yes
VOC	Regulation 8-19-302.2	Y	Air-Dried Coatings: 340 g/l (2.8 lb/gal)	Regulation 8-19-501	P/W	Recordkeeping	Yes
	Regulation 8-19-312.1 to 312.13	Y	Specialty Coatings, Air-dried coating limits: 420 g/l or 3.5 lb/gal	Regulation 8-19-501	P/W	Recordkeeping	Yes
VOC	Regulation 8-32-302	N	General Wood Prod: 120 -350 g/l (1.0 - 2.9 lb/gal)	Regulation 8-32-501	P/D	Recordkeeping	Yes
	Regulation 8-32-303	N	Wood Furniture: 120 – 550 g/l (1.0 – 4.6 lb/gal)	Regulation 8-32-501	P/D	Recordkeeping	Yes
	Regulation 8-32-304	N	Custom Furniture 120 – 550 g/l (1.0 – 4.6 lb/gal)	Regulation 8-32-501	P/D	Recordkeeping	Yes
VOC	SIP Regulation 8-32-303.1	Y	General, High Solids, Specific Coating Limits: 240 – 275 g/l (2.0 – 2.3 lb/gal)	SIP Regulation 8-32-501	P/D	Recordkeeping	Yes
	SIP Regulation 8-32-303.2	Y	General, Low Solids coating limit: 120 g/l (1.0 lb/gal)	SIP Regulation 8-32-501	P/D	Recordkeeping	Yes
	SIP Regulation 8-32-304.1	Y	Furniture, High Solids, Specific Coating Limits: 275 – 420 g/l (2.3 – 3.5 lb/gal)	SIP Regulation 8-32-501	P/D	Recordkeeping	Yes
	SIP Regulation 8-32-304.2	Y	Furniture, Low Solids: 120 g/l (1.0 lb/gal)	SIP Regulation 8-32-501	P/D	Recordkeeping	Yes



**Table VII - H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S155, S156, S157: FACILITIES PAINT BOOTHS**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-45-301.3	Y	Adhesion Promoter: 540 g/l or 4.5 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Clear Coating: 250 g/l or 2.1 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Color Coating: 420 g/l or 3.5 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Multi-Color Coating: 680 g/l or 5.7 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Pretreatment Coating: 660 g/l or 5.5 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Primer Coating: 250 g/l or 2.1 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Primer Sealer Coating: 250 g/l or 2.1 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Single-Stage Coating: 340 g/l or 2.8 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Temporary Protective Coating: 60 g/l or 0.5 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Truck Bed Liner Coating: 310 g/l or 2.6 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Underbody Coating: 430 g/l or 3.6 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Uniform Finish Coating: 540 g/l or 4.5 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-301.3	Y	Any Other Type of Coating: 250 g/l or 2.1 lb/gal	Regulation 8-45-501	P/W	Recordkeeping	Yes
	Regulation 8-45-308.4	Y	Surface Preparation Solvent: general: 72 g/l (0.6 lb/gal) hand held spray: 780 g/l (6.5 lb/gal)	Regulation 8-45-501	P/W	Recordkeeping	Yes



**Table VII – H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S155, S156, S157: FACILITIES PAINT BOOTHS**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Material type	Regulation 8-45-312	Y	Adhesion promoter, uniform finish & multi-color coating not to exceed 5% of all topcoats applied by volume	Regulation 8-45-501	P/W	Recordkeeping	Material type
Usage	Regulation 8-45-314	Y	Precoat usage: 25% of waterborne primer sealer	Regulation 8-45-501	P/M	Recordkeeping	Yes
VOC	SIP Regulation 8-45-301.1	Y	Group I Vehicles, Precoat: 600 g/l (5.0 lb/gal)	Regulation 8-45-501	P/W	Recordkeeping	Yes
VOC	SIP Regulation 8-45-301.2	Y	Group II Vehicles, Precoat: 600 g/l (5.0 lb/gal)	Regulation 8-45-501	P/W	Recordkeeping	Yes
VOC	Regulation 8-49-301	Y	%VOC (various)	Regulation 8-49-401	P/E	Manufacturer Labeling	Yes

**Table VII – I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S195: COMBUSTION TURBINE**  
**S196: DUCT BURNER**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
NO <sub>x</sub>	Regulation 9-9-301.1.3	Y	9 ppmv @ 15% O <sub>2</sub> (dry) 3-hr average	Regulation 9-9-501	C	Continuous Emission Monitor System (CEM)	Yes
	40 CFR 60.332(a)(2)	Y	90 ppmv @ 15% O <sub>2</sub> (dry)	40 CFR 60.334(b)	C	Continuous Emission Monitor System (CEM)	Yes
	Condition #23670 Part 4	Y	9 ppmv @ 15% O <sub>2</sub> (dry)	Condition #23670 Part 11	C	Continuous Emission Monitor System (CEM)	Yes
	Condition #23670 Part 7	Y	16 ppmv @ 15% O <sub>2</sub> (dry)	Condition #23670 Part 11	C	Continuous Emission Monitor System (CEM)	Yes



**Table VII – I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S195: COMBUSTION TURBINE**  
**S196: DUCT BURNER**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
	Condition #23670 Part 6	Y	S195, S196 Combined Daily Emissions Limit: 365 lb/day (natural gas), 391 lb/day (jet fuel)	Condition #23670 Part 11	C	Continuous Emission Monitor System (CEM)	Yes
Sulfur Content	Regulation 9-1-304	Y	Fuel Sulfur Content 0.5% (liquid fuels)	Condition #23670 Parts 6 and 9	P/E	Liquid fuel usage records, vendor fuel certification or laboratory analysis	Yes
	40 CFR 60.333(b)	Y	0.8% (wt) fuel sulfur content	40 CFR 60.334(b)	P/E	Sulfur content of fuel	Yes
	BAAQMD Condition #23670 Part 9	Y	Fuel Requirement: natural gas or jet A fuel with fuel sulfur content $\leq 0.12\%$ (wt)	Condition #23670 Part 9	P/E	Liquid fuel usage records, vendor fuel certification or laboratory analysis	Yes
CO	Condition #23670 Part 10	Y	500 lb/day or $\geq 80\%$ reduction efficiency	Condition #23670 Part 11	C	Continuous Emission Monitor System (CEM)	Yes
Usage	Condition #23670 Part 6	Y	Jet Fuel Usage: $\leq 2,495$ hrs/yr	Condition #23670 Part 13	P/E	Record of Hours of Operation on Jet Fuel	Yes

**Table VII – J**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S198: WIPE CLEANING**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	40 CFR 63.744(b)(2)	Y	Composite Vapor Pressure: $\leq 45$ mmHg @ 68 degrees F	40 CFR 63.752(b)(3)	P/M	Recordkeeping	Yes

Note: All cleaning solvents used at the facility are compliant with 40 CFR 63 Subpart GG 63.744(b)(2) requirements.



**Table VII – K**  
**Applicable Limits and Compliance Monitoring Requirements**

**S244: DISSOLVED AIR FLOTATION UNIT**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Rate	Condition #5696, Part 2	Y	Wastewater Treatment Rate: ≤700 gal/min	None	D	Recordkeeping	Yes
VOC	Condition #5696, Part 3	Y	Annual Wastewater Throughput: ≤200,000,000 gal.	Condition #5696, Part 4	P/D	Recordkeeping	Yes
	Regulation 8-8-307	Y	Inspection of gaps	Regulation 8-8-503	P/Semi-Annual	Inspection for Gaps/ Recordkeeping	Yes

**Table VII – L**  
**Applicable Limits and Compliance Monitoring Requirements**

**S265: NON-RETAIL GASOLINE DISPENSING FACILITY (GDF #916)**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Gasoline Through-put	Condition #18349	N	500,000 gallons per 12-month period	Regulation 8-7-503.1	P/A	Recordkeeping	Yes
Gasoline Through-put (Exempt from Phase I)	Regulation 8-7-114	Y	1000 gallons per facility for tank integrity leak checking	Regulation 8-7-501 and 8-7-503.1	P/E	Recordkeeping	Yes
Organic Compounds	Regulation 8-7-301.2	Y	All Phase I Equipment shall Meet the Emission Limitations at the Applicable CARB Certification	None	N	Use CARB Certified System	Yes
Organic Compounds	Regulation 8-7-301.6	Y	All Phase I Equipment shall be leak free (<3 drops/minute) & vapor tight	Condition #16516	P/A	Annual check for vapor tightness and proper operation of vapor recovery system (VRS)	Yes





**Table VII – L**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S285: NON-RETAIL GASOLINE DISPENSING FACILITY (GDF #916)**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring type or Compl. Method	Continuous Compliance?
Organic Compounds	Regulation 8-7-302.5	Y	All Phase II Equipment shall be leak free (<3 drops/minute) & vapor tight	Condition #16516	P/A	Annual check for vapor tight-ness and proper operation of VRS	Yes
Organic Compounds	Condition #18135, Part 3	Y	Any emergency vent or manway shall be leak free	Condition #16516	P/A	Annual check for vapor tight-ness and proper operation of VRS	Yes
Defective Component Repair Time Limit	Regulation 8-7-302.4	Y	Must be repaired or replaced within 7 days	Regulation 8-7-503.2	N	Recordkeeping	Yes
Liquid Removal Rate	Regulation 8-7-302.8	Y	≥ 5 ml per gallon dispensed, when dispensing rate > 5 gallons/min.	None	N	Use CARB Certified System	Yes
Liquid Retain from Nozzles	Regulation and SIP 8-7-302.12	Y	≤100 ml per 1000 gallons dispensed	None	N	Use CARB Certified System	Yes
Nozzle Spitting	BAAQMD Regulation and SIP 8-7-302.13	Y	≤1.0 ml per nozzle per test	None	N	Use CARB Certified System	Yes
Pressure-Vacuum Valve	Regulation 8-7-316	Y	Pressure Setting: Less than 2.5 in w.c.	Regulation 8-7-316	N	P/V valve setting	Yes

Note: The Title V Operating permit references Condition #18135 for Organic Compounds, however, this condition does not appear in United's annual renewable PTOs.



**Table VII – M**  
**Applicable Limits and Compliance Monitoring Requirements**

**S295, S296, S297, S300, S301, S315, S326, S333:**  
**EMERGENCY STANDBY ENGINES (DIESEL)**

**S302: EMERGENCY STANDBY ENGINE (PROPANE)**

Type of limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Fuel Sulfur Content	Regulation 9-1-304	Y	< 0.5% by weight	None	P/E	Vendor fuel certification or BAAQMD-approved laboratory analysis	Yes
Hours of Operation	Regulation 9-8-330.2	N	≤100 hours each per calendar year for reliability testing	Regulation 9-8-530	C	Totalizing meter for hours of operation	Yes
				Regulation 9-8-502.1	P/M	Records	Yes
Hours of Operation	Regulation 9-8-330.3	N	≤50 hours each per calendar year for reliability testing	Regulation 9-8-530	C	Totalizing meter for hours of operation	Yes
				Regulation 9-8-502.1	P/M	Records	Yes
Hours of Operation for S295, S296, S297, S300, S301, S315	Condition #22820, Part 1	Y	≤ 20 hours/year for reliability-related activities	Condition #22820, Part 3 Part 4	C PM	Totalizing meter for hours of operation and records Records	Yes
Hours of Operation for S295, S296, S297, S300, S310, S315	93115.6(b) (3)(A)(1)(a)	N	≤ 20 hours/year for reliability-related activities	93115.10(e)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(g)	P/M	Records	Yes
Hours of Operation for S326, S333	Condition 22850, Part 1	Y	≤ 50 hours/year for reliability-related activities	Condition 22850, Part 3	C	Totalizing meter for hours of operation and records	
				Condition 22850, Part 4	P/M	Records	Yes



**Table VII – M**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S295, S296, S297, S300, S301, S315, S326, S333:**  
**EMERGENCY STANDBY ENGINES (DIESEL)**  
**S302: EMERGENCY STANDBY ENGINE (PROPANE)**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Hours of Operation for S326, S333	93115.6(a) (3)(A)(1)(a)	N	≤ 50 hours/year for reliability-related activities	93115.10(e)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(g)	P/M	Records	Yes

**Table VII – N**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S304, S305, S306, S307, S308, S309, S310, S311, S312, S313, S314:**  
**EMERGENCY STANDBY ENGINES, FIRE PUMP ENGINES**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Fuel Sulfur Content	Regulation 9-1-304	Y	≤ 0.5% by weight	None	P/E	Vendor fuel certification or BAAQMD approved laboratory analysis	Yes
Hours of Operation	Regulation 9-8-330.2	N	≤ 100 hours each per calendar year for reliability testing	Regulation 9-8-530	C	Totalizing meter for hours of operation	Yes
				Regulation 9-8-502.1	P/M	Records	Yes
Hours of Operation	Regulation 9-8-330.3	N	≤ 60 hours each per calendar year for reliability testing	Regulation 9-8-530	C	Totalizing meter for hours of operation	Yes
				Regulation 9-8-502.1	P/M	Records	Yes
Hours of Operation	93115.6(a) (4)(A)(1)(b)	N	≤ 34 hours/year for reliability-related activities	93115.10(e)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(g)	P/M	Records	Yes
Hours of Operation	Condition 22851, Part 1	Y	≤ 34 hours/year for reliability-related activities	Condition 22851, Part 3	C	Totalizing meter for hours of operation and records	Yes
				Condition 22851, Part 4	P/M	Records	Yes



**Table VII - O**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S316 through S323: THERMAL SPRAY BOOTHS**

Type of Limit	Emission Limit Citation	FE Y/N	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type or Compl. Method	Continuous Compliance?
Pressure Differential	93101.5 (e)(2)	N	Pressure drop must be maintained per manufacturer's specifications	93101.5(f)(1)	P/W	Recordkeeping	Yes
Usage	Condition #23504, Part 1	N	54,400 pounds of material containing nickel or chromium per year	Condition #23504, Part 8	P/M	Recordkeeping	Yes
Enclosure Standards	Condition #23504, Part 4	N	Average inward face velocity at least 200 fpm	Section 93101.5 (e)(4) Condition #23504, Part 8	P/A	Velocity Measurement	Yes
Enclosure Standards	Condition #23504, Part 4	N	Booth room air exchange door open $\geq$ 38 seconds after spray ceases.	Section 93101.5 (c)(1) (B)(4) Condition #23504, part 8	P	Timer	Yes
Dry Filtration (Baghouse) Pressure Drop	Condition #23504, Part 6	N	Range: 0.3" to 4.5" in H <sub>2</sub> O differential pressure across dry filter systems	Condition #23504, part 7,8	P/W	Differential Pressure/ Recordkeeping	Yes
HEPA Pressure Drop	Condition #23504, Part 6	N	Range: 1" to 4" in H <sub>2</sub> O differential pressure across HEPA systems	Condition #23504, part 7,8	P/W	Differential Pressure/ Recordkeeping	Yes



**THIS MARKS THE CONCLUSION OF THIS  
SEMIANNUAL MONITORING REPORT.**