



January 31, 2019

Mr. Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Re: Tesla, Inc. Fremont Factory Site E0459  
Semi-annual Reports for MACT Subpart IIII, NSPS Subpart MM, and Title V Standard  
Condition I.F

Dear Mr. Gove:

This report satisfies the semi-annual reporting requirements for Tesla, Inc. Fremont Factory Site E0459 for NSPS Subpart MM 60.395, MACT Subpart IIII 63.3120, and Title V Standard Condition I.F for reporting period July 1, 2018 through December 31, 2018.

The semi-annual MACT report covers the specific general requirements identified in Part 63.3120 which include the following:

- A. Company name and address
- B. Statement by responsible official with official's name, title and signature certifying the truth, accuracy, and completeness of report.
- C. Date of report and beginning and ending dates of the reporting period.
- D. Identification of compliance option specified in § 63.3082(c)
- E. Certification of deviation occurrence during reporting period.

For Part 63 Subpart IIII, the Site E0459 is subject to compliance option 63.3091(b). Unless otherwise noted, the Site E0459 had no instances of exceeding limits, operating limits, or work practices as specified under §§63.3090, 63.3091, 63.3092, 63.3093, and 63.3094.

Unless otherwise noted, site E0459 had no instances of deviation from NSPS Subpart MM or Title V permit requirements during the reporting period.

If you have any questions regarding the enclosed information, please contact Brandon Freeman at 510-299-5718.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurie Shelby", is written over a light blue horizontal line.

Laurie Shelby  
Vice President of Environmental, Health, and Safety

cc: Ms. Debbie Jordan, Director of Air Division, USEPA Region IX

**Semi-annual Title V and MACT Compliance Certification pursuant to Standard Condition I.F and 63.3110**

Based upon the information and belief formed after a reasonable inquiry, I, as responsible Official of the Tesla, Inc. facility in Fremont, CA, submit the information contained in the semiannual Title V report and semiannual MACT Subpart IIII [§63.3110(c)(2) & (c)(5)] report as accurate and true to the best of my knowledge.

Laurie Shelby  
Name of Responsible Official Signature



July 1, 2018 through December 31, 2018  
Compliance Period

1/31/2019

\_\_\_\_\_  
Date

Facility # E0459  
Tesla, Inc.  
45500 Fremont Boulevard  
Fremont, CA 94538

**DEVIATIONS FROM TITLE V REQUIREMENTS**  
**July 1, 2018 through December 31, 2018**

Source No	Description of Deviation and Resolution	Date of Discovery	Compliance Status
S-4019	Startup of Betafoam process, which had an existing permit application at the time, but neither the Authority-to-Construct (ATC) or Permit-to-Operate (PTO) had been issued. The permit application (A # 28845) was submitted to BAAQMD on 8/21/2017 and is still pending approval. <b>Resolution:</b> Pending. Source continues to operate while BAAQMD processes permit application.	1/19/2018	Pending
S-2826	Startup of Bayco Oven at Plastics without PTO. <b>Resolution:</b> Source rendered inoperable (locked out) until permit can be obtained.	8/22/2018	C
S-805 S-4030 S-4031	Failure to secure PTO for general assembly operations GA3 and GA4. Permit application (A #29533) was submitted to BAAQMD on 9/28/18 and is still pending approval. <b>Resolution:</b> Pending. Source continues to operate while BAAQMD processes permit application.	Uncertain	Pending
S-4028	Failure to secure PTO for Paint Hospital Operations. Permit application (A #29465) was submitted to BAAQMD on 8/20/18 and is still pending approval. . <b>Resolution:</b> Pending. Source continues to operate while BAAQMD processes permit application.	Uncertain	Pending
S-1020	Failure to maintain and report usage records for S/X Paint Hospital. <b>Resolution:</b> On August 20, 2018 Tesla implemented a logging system at the Paint Hospitals in order to separately track usage and emissions from the North Paint Shop. These usages and emissions will be subtracted from North Paint Shop throughput to avoid double counting emissions.	8/20/2018	C
S-1002 A-1002	Shutdown of abatement control device for south paint e-coat oven without shutting down e-coat oven. <b>Resolution:</b> Tesla sought breakdown relief for the failure of the control device. A replacement part was fabricated, and operation of the control device was restored 4.5 days after the initial shutdown.	9/17/2018	C
S-3009 S-4006 S-4010	Failure to secure PTO for installation of 3 burners at North Paint (2 e-coat, 1 top/prime oven) in 2017. <b>Resolution:</b> These burners will be included in the North Paint Shop permit application, scheduled to be submitted during the last week of January 2019.	10/18/2018	Pending
A-1002	Failure to maintain records for south paint e-coat oven thermal oxidizer for 2016-2018: <b>Resolution:</b> After the discovery of the deviation, Tesla implemented a digital recordkeeping system for the south paint shop e-coat oven thermal oxidizer. The new recording system includes a new alarm system that alerts operators via email and maintains records for at least 5 years.	10/15/2018	C
S-30960	Failure to secure permit for purge solvent that triggered acute and chronic toxic thresholds. <b>Resolution:</b> After discovery of the deviation, Tesla switched to a purge solvent which did not contain any toxic air contaminants.	11/9/2018	C
S-4006 S-32006	On November 2, 2018, Tesla reported that a source test measured CO levels that, if sustained, would lead to an exceedance of	11/2/2018	C

	<p>annual CO emission limits. However, a subsequent test indicates that the CO emission levels have not been sustained. Therefore, this test does not indicate either a deviation or non-compliance.</p> <p><b>Resolution:</b> Tesla withdraws the deviation report.</p>		Not a deviation.
A-1002	<p>Failure to complete Annual Source Test requirements during 2018. On January 2, 2019, Site E0459 discovered that the required 2018 annual source testing was performed but it did not capture all of the emission parameters required due to a miscommunication between Tesla and its source test contractor. <b>Resolution:</b> A make-up compliance test was immediately scheduled to be conducted during the week of January 21, 2019.</p>	1/2/2018	C