

December 18, 2002

Mr. Jack Broadbent
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Broadbent:

The requirements for public and EPA review of the following proposed Major Facility Review Permit have been completed:

	Facility #	Facility Name	Application #
ALAMEDA COUNTY Roberta Cooper Scott Haggerty (Vice-Chairperson) Nate Miley Shelia Young	A1438	NUMMI	16480
CONTRA COSTA COUNTY Mark DeSaulnier Mark Ross Gayle Uilkema			

The District received your comment letter dated September 4, 2002. Based on your comments, we have (1) made corrections on federal enforceability for applicable requirements and (2) corrected a typographical error noted in Condition # 207 – Table 1.d. However, no changes were made as a result of your third comment because all applicable sources listed in Condition # 207 and # 10320 already have reference to Subpart A and Subpart MM. Those sources listed in Condition # 207 and # 10320 which are not subject to Subpart MM due to their date of construction or type of coating applied do not have reference to Subpart A or Subpart MM.

Comments from a NUMMI employee, Our Children's Earth Foundation (OCE), and NUMMI were also received. Based on all comments received, the following corrections and changes have been made to the permit:

- Regulation 1-523 and SIP Regulation 1-523 have been corrected.
 - Various additions were Inclusion of S-48 Bumper Molding Operation as a significant (but exempt) source.
- S1809 is subject to Regulation 8-51 (and not subject to Regulation 8-2).
- A facility table has been added to Section IV of the permit to include specific requirements to meet the remaining deadlines set forth in the 112(j) regulations.
- The permit has been modified to incorporate changes to the standard language of the permit since the permit was initially proposed.
- The approval dates of various rules and SIP rules have been corrected.
- The Regulation 5 citations in Table III have been updated.
- A citation for 40 CFR Part 61, Subpart M, Asbestos, has been added to Table III.
- SIP Regulation 9, Rule 1, Sulfur Dioxide, has been deleted because the sections that apply are in the current District rule.
- The citations for BAAQMD Regulation 1-523 and SIP Regulation 1-523 have been corrected.

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Vice-Chairperson)
Nate Miley
Shelia Young

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Chris Daly
Leland Yee
(Vacant)

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Secretary)

SANTA CLARA COUNTY
Randy Attaway
(Chairperson)
Liz Kniss
Julia Miller
Dena Mossar

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

William C. Norton
EXECUTIVE OFFICER/APCO

- Various additions were made to the glossary. In particular, the definitions of “Act”, “Filterable Particulate”, and TRMP Toxic Risk Management Plan were added. Minor corrections were made to several definitions.
- Section XI, Applicable State Implementation Plan, has been amended to show the web address of EPA Region IX SIP database.
- Change of Responsible Official.
- Minor amendment to Conditions # 10320 affecting sources S1070 and S1071 (resulting from Application # 6445). The prior version of this condition allows the use of solvent-based and water-based coatings in S-1070, but does not allow both types of coatings to be used at the same time. This is because NUMMI is required to use a thermal oxidizer to abate the solvent-based coatings, but not the water-based coatings. NUMMI requested that flexibility to apply both types of coating at the same time, and has agreed to the new requirement to use the thermal oxidizer when both types of coating are being applied. This change will allow NUMMI to apply water-based coatings to select instrument panels, without having to build a new booth. NUMMI will not be required to use the thermal oxidizer if they are using only water-based coatings exclusively. There will not be any increase in emissions from this minor condition amendment.
- Corrections on federal enforceability for applicable requirements.
- Editorial and typographical corrections.

After considering all comments and making appropriate revisions, the District has made a decision to issue this Major Facility Review Permit.

Enclosed for your information is a copy of the final permit, the comment letters, and the response to comments. If you have any questions regarding this project, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

William C. Norton
Air Pollution Control Officer

Enclosure

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