

December 18, 2002

**New United Motor Manufacturing Inc.**

Attention: Edward Moore  
45500 Fremont Boulevard  
Fremont, CA 94538

**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

Dear Mr. Moore

The requirements for public and EPA review of the proposed Major Facility Review Permit for NUMMI have been completed. The District received your two comment letters dated September 4, 2002 and emails dated September 11, 12, and 16, and October 21, 2002. Based on the comments received, the District has amended your Title V permit to reflect the following:

- 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.
- 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.

Attached for your information are detailed responses to your comments. After considering all comments and making appropriate revisions, the District has made a decision to issue this Major Facility Review Permit. If you have any questions regarding this project, please call M.K. Carol Lee at (415) 749-4689.

Sincerely yours,

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William deBoisblanc  
Director, Permit Services

Enclosure

## **New United Motor Manufacturing Inc. September 4, 2002 Letters**

### **Issue # 1. "District-Approved"**

**Comment #1:** NUMMI expressed its concern regarding the phrase "District-approved" utilized throughout both the Title V permit and the current operating permit. The reason NUMMI concerns regarding the phrase "District approved" for matters such as measuring and monitoring equipment, logs, reports formats and things of that nature is because a third party audit, such as the U.S. Environmental Protection Agency or a contractor hired as their representative, can issue a finding specifying NUMMI not to be able to prove the District has approved these items. NUMMI proposed language that allowed NUMMI 30 days to submit a plan for ensuring District approval, if the District ever found any equipment or recordkeeping method as inadequate.

**Response #1:** The District has used the term District-approved in all its operating permits and Title V permits and have yet to experience a problem that would substantiate NUMMI's above-described concern. As a result, no change is warranted. In addition, allowing 30 days just to submit a plan if the District were to find any equipment or recordkeeping method inadequate is too relaxed a requirement.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

**Issue # 2. Federal Enforceability**

The following table identifies errors in the proposed Title V permit regarding reference to federal enforceability that were corrected in the Title V permit:

<b>SECTION III – GENERALLY APPLICABLE REQUIREMENTS</b>			
<b>Page</b>	<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
32	BAAQMD 2-1-429	Federal emission statement	(N) This BAAQMD regulation is not federally enforceable, but is listed as “Y”
33	BAAQMD Reg. 5	Open burning	The most recent revision date has been corrected. Final Federal Register Date is 09/04/98.
33	BAAQMD Reg. 6	Particulate matter and visible emissions	(Y) This BAAQMD regulation is federally enforceable, but is listed as “N.”
33	BAAQMD Reg. 8-3	Organic compounds – architectural coatings	(N) This BAAQMD regulation is not federally enforceable, but is listed as “Y.” Also, the most recent revision date has been corrected.
33	SIP Reg. 8-3	Organic compounds – architectural coatings	(Y) Because the current BAAQMD version of Reg. 8-3 has not received SIP approval, it is not federally enforceable. Because there is a SIP-approved version of Reg. 8-3, it has been included here. Final Federal Register Date is 02/18/98.
33	BAAQMD Reg. 8-51	Organic compounds – adhesive and sealant products	The most recent revision date has been corrected. The latest rule was adopted on 7/17/02. The SIP rule has the Final Federal Register Date of 02/26/02.
33	Reg. 9-1	Inorganic gaseous pollutants	(N). The most current BAAQMD regulation is not federally enforceable, but is listed as “Y”. Also, the most recent revision date has been corrected.
33	SIP Reg. 9-1	Inorganic gaseous pollutants	(Y) Because the current BAAQMD version of Reg. 9-1 has not received SIP approval, it is not federally enforceable. Because there is a SIP-approved version of Reg. 9-1, it has been included here. The Final Federal Register Date for Regulation 9-1 is 06/28/99.

RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT

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33	BAAQMD Reg. 11-2	Hazardous pollutants	(N) This BAAQMD regulation is not federally enforceable, but is listed as "Y." Also, the most recent revision date has been corrected and 40 CFR 61, Subpart M has been added to this table.

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35	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
36	Reg. 1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
37	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
37	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
38	Condition 4281, Part 4	Temperature monitoring	The basis is identified as BACT and Regulation 1-523. BACT is federally enforceable.
39	Reg. 1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
42	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
42	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.

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44	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
45	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
45	Condition 207, Part 8.b	Miscellaneous – "NUMMI"	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
47	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
47	Condition 207, Part 8.b	Miscellaneous – "NUMMI"	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
48	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
49	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
50	Condition 207, Part 8.b	Miscellaneous – "NUMMI"	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.

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51	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
51	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.



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51	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
51	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
52	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.

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52	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
52	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
55	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
55	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
58	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
58	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.

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59	8-7-301.8	No coaxial phase 1	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-301.9	CARB-certified anti-rotational coupler or swivel adapter	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-301.10	System vapor recovery rate	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-301.11	CARB-certified spill box	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-301.12	Drain valve permanently plugged	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.6	Insertion interlocks	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.7	Built-in vapor check valve	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.8	Minimum liquid removal rate	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.9	Coaxial hose	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."

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59	8-7-302.10	Galvanized piping or flexible tubing	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.11	ORVR compatible	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.12	Liquid retention limit	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
59	8-7-302.13	Spitting limit	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
60	8-7-311	Exempt tank requirements	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
60	8-7-313	Requirements for new or modified phase II installations	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
60	8-7-315	Pressure vacuum valve requirement – UST	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
60	8-7-316	Pressure vacuum valve requirement – AST	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."
60	8-7-406	Testing requirements	(Y) This BAAQMD regulation is federally enforceable, although it is listed as "N."

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60	8-7-503	Record keeping requirements	(Y) This BAAQMD regulation is federally enforceable, although it is listed as “N.”
61	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
62	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
62	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
63	Condition 207, Part 5.c	Recordkeeping and reporting – temperature records	(N) The basis is identified as Regulation 1-523, but BAAQMD Reg. 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
63	Condition 207, Part 8.b	Miscellaneous – “NUMMI”	(N) The basis is identified as Regulation 1-241, but BAAQMD Reg. 1-241 is not federally enforceable.
64	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
64	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
64	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”

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65	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
65	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

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65	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
65	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
66	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
66	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.

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66	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
68	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
69	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
69	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
69	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
69	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
69	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
69	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”



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69	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
69	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
69	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

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<b>SECTION IV – SOURCE-SPECIFIC APPLICABLE REQUIREMENTS</b>			
<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
69	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
70	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
70	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
70	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
74	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
75	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.

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<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
76	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
77	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
79	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
82	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
83	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
84	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
86	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
87	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.

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88	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
90	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
91	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
93	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
95	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
96	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
97	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
99	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.

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<b>SECTION IV – SOURCE-SPECIFIC APPLICABLE REQUIREMENTS</b>			
<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
100	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
103	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
105	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
106	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
109	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
110	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.
113	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
115	Condition 9156, Part 1	Offset baseline	No change. Regulation 2-2-302 is federally enforceable.
115	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.

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<b>SECTION IV – SOURCE-SPECIFIC APPLICABLE REQUIREMENTS</b>			
<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
119	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
121	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
121	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
122	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.

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<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
122	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
122	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
123	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.

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<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
123	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
123	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
123	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
123	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
123	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."



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124	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
124	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.4.1	Freeboard ratio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

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124	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
124	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
125	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
125	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
125	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
131	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y." This section has been expanded to include those subsections that are federally enforceable.

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133	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
138	1-523	Parametric monitoring and recordkeeping requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.” This section has been expanded to include those subsections that are federally enforceable.
146	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
146	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”

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146	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
146	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”
146	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as “Y.”

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147	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
147	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
147	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
151	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
151	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

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151	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
151	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

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151	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
151	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
152	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
152	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.

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152	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.
152	8-16-118	Limited exemption, compounds of low volatility	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
152	8-16-303	Cold cleaner requirements	(N) Although parts of BAAQMD Reg. 8-16-303 are federally enforceable, Reg. 8-16-303 is not, in its entirety, federally enforceable.
152	8-16-303.1	General operating requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.1.4	Waste solvent disposal	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.1.4(a)	Covered containers for waste solvent awaiting pickup	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.1.4(b)	On-site waste treatment	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.1.5	Solvent evaporation minimization devices	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."



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153	8-16-303.1.6	Solvent spray requirements	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.3	Cold cleaner general equipment requirements	(N) Although parts of BAAQMD Reg. 8-16-303.3 are federally enforceable, Reg. 8-16-303.3 is not, in its entirety, federally enforceable.
153	8-16-303.3.2	Solvent evaporation reduction	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.3.3	Used solvent returned to container	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.4	Control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.4.1	Freeboard radio	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.4.2	Water cover	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.4.3	Freeboard chiller	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."
153	8-16-303.4.4	Approved emission control device	(N) This BAAQMD regulation is not federally enforceable, although it is listed as "Y."

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

<b>SECTION IV – SOURCE-SPECIFIC APPLICABLE REQUIREMENTS</b>			
<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
154	SIP 8-16-501.5	Records made available to APCO	There is no SIP-approved version of Regulation 8-16-501.5. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.5 under the SIP rule. Because BAAQMD Reg. 8-16-501.5 is identified as an applicable requirement for these sources, the line was deleted.
154	SIP 8-16-501.6	Other information	There is no SIP-approved version of Regulation 8-16-501.6. The draft permit correctly indicates that this is not federally enforceable. However, it incorrectly lists Reg. 8-16-501.6 under the SIP rule. Because BAAQMD Reg. 8-16-501.6 is not identified as an applicable requirement for these sources, it was added in the appropriate section and this line was deleted.
154	SIP Reg. 8, Rule 16	(Various)	Several of the BAAQMD Reg. 8, Rule 16 provisions were misidentified in the draft as federally enforceable. Where these BAAQMD rules are not federally enforceable and where there is a corresponding SIP-approved version of the provisions, the SIP-approved versions of the rule were added to the table.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

The following table identifies errors or requested minor changes to improve clarity that were corrected in the Title V permit:

<b>SECTION VI – PERMIT CONDITIONS</b>			
<b>Page</b>	<b>Condition Number</b>	<b>Part</b>	<b>Comment(s)</b>
161	3. Emission Control Equipment	b.2	No basis is provided for S808 Passenger/Truck Sealer Oven thermal control parameters. Added Cumulative Increase and BACT as the basis.
163	5. Record Keeping and Reporting	c	BAAQMD Regulation 1-523 is not federally enforceable. However, 1-523.4 (Records) is federally enforceable.
163	8. Miscellaneous	b	An asterisk was added because BAAQMD Regulation 1-1-241 is not federally enforceable.
166	4281	4	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
174	9156	1	BAAQMD Regulation 2-2-302 is federally enforceable.
178	9158	3	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
186	9163	6	An asterisk was added because BAAQMD Regulation 2-1-103 is not federally enforceable. 1-523.4 (Records) is federally enforceable.
187	9163	11	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
190	9164	3	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
213	10320	22a	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
227	10578	6	No basis is provided for this condition. Added Cumulative Increase as the basis.
230	10578	17	The basis is identified as “TBACT.” This appears to be a typographical error and has been changed to “BACT.”

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

<b>SECTION VI – PERMIT CONDITIONS</b>			
<b>Page</b>	<b>Condition Number</b>	<b>Part</b>	<b>Comment(s)</b>
236	14206	1	No basis is provided for this condition. Added Cumulative Increase as the basis.
238	14206	12	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
242	14207	12	Both BACT and Regulation 1-523 are identified as the basis. BACT is federally enforceable. 1-523.4 (Records) is federally enforceable.
249	19492	1a, b	No basis is provided for this condition. Added Cumulative Increase as the basis.

<b>SECTION VII – APPLICABLE LIMITS AND COMPLIANCE MONITORING REQUIREMENTS</b>			
<b>Page</b>	<b>Applicable Requirement</b>	<b>Source or Description of Limit</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
258	BAAQMD 6-311	Table VII – E FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
259	BAAQMD 6-311	Table VII – F FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
261	BAAQMD 6-311	Table VII – G1 FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
261	BAAQMD 6-311	Table VII – G2 FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
263	BAAQMD 6-311	Table VII – H FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
265	BAAQMD 6-311	Table VII – I FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

<b>SECTION VII – APPLICABLE LIMITS AND COMPLIANCE MONITORING REQUIREMENTS</b>			
<b>Page</b>	<b>Applicable Requirement</b>	<b>Source or Description of Limit</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
268	BAAQMD 6-311	Table VII – K1 FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
268	BAAQMD 6-311	Table VII – K2 FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.
381	BAAQMD 6-311	Table VII - BQ FP	(Y) This BAAQMD Reg. is federally enforceable, although federal enforceability is not indicated.

<b>Condition</b>	<b>Current Draft</b>	<b>Recommend Change</b>	<b>Justification</b>
207, Part 1a	Specifies the emission limit as “tons”	This should be changed to tons of VOC. It would read as such “shall not exceed 459.2 tons of VOC”, and “shall not exceed 250.5 tons of VOC per year.”	Clarifies that this particular part is applicable only to VOC emissions as identified in the Condition 207, Part 1d, Emission Limitation Table.
9156 Part 11	For sources S1002, S1003, ...	Delete S1002 from Part 11 of Condition 9156	Source S-1002 should be eliminated because it is the Truck ELPO Oven Heater Box. This source does not have a dry filter abatement system. Natural gas is used as the fuel source. Pressure drop readings to verify compliance with Regulation 6-310, Particulate Weight Limitation, are not applicable.
9158, Part 1a	“NUMMI shall monitor the operations as required in parts 1b-1g of Condition 9158.”	Delete the first line of this condition part.	Parts 1b-1g of Condition 9158 stipulate how to calculate net mass emissions from the applicable sources. Source testing and recording of the operating temperature is how the operations for the applicable sources, Truck Line Oven Incinerators/Heater Boxes, are monitored. The monitoring aspects for these sources are addressed in Parts 3 and 4 of Condition 9158.
9159 Parts 6 and		These parts of Condition	These parts refer to heat sources utilized at this location.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

Condition	Current Draft	Recommend Change	Justification
7		9159 should be deleted from the permit.	No drying or heat source is applied at this location. The drying takes place in the Truck Sealer Oven (S-1007). These parts of Condition 9159 are not applicable to this S-1005, Truck Undercoat Booth.
9167	Explanation keeps referencing S-1053 as S-1013.	Change reference from "S-1013" to S-1053.	Correction of a typographical error.
9171	S-1019 is refereed to as "Cavity Wax Booth"	Change name to "Truck Cavity Wax Booth."	This is the correct name for the source and also makes it consistent with it's listing in the source referenced section of Condition 9156 and Table II A, Permitted Sources.
9174 Part 4	All source test records and records of maintenance schedule shall ...	Change to "All source test records and preventative maintenance records shall be kept and made available for District inspection for a period of five years following the date of record generation."	Clarifies that both the source test records and the preventative maintenance records, not the maintenance schedule, shall be kept and made available for District inspection.
10320, Source List	S-1502, Protectoseal Cleaning Tank	Change S-1502 to S-1509.	Source 1502 is a gun washer and is listed as such in Table II A, Permitted Sources. S-1509 is the Protectoseal Cleaning Tank and is listed as such in Table II A. Permitted Sources.
10578, Part 20	For source S1050...	Part 20 of Condition 10578 should be deleted from the permit.	There is no dry filter system for S-1050, Truck Fuel Tank Booth. The particulate effluent goes directly into the Anti-Chip Incinerator (A-808) and is destroyed.
14209, Part 2	The particulate matter missions from the booths (S3019 and A3020) ...	Should be changed to "The particulate matter emissions from the booth (S319 and S3020) ..."	Corrects typographical errors, changing the word "missions" to "emissions" and reference source "A3020" to "S3020".
19492 Source List	"For S1601, Cold Cleaner"	Change to "For S1901, Offline Export Final Repair Area/Booth"	This is the correct source name and number for this permit condition.
Conditions 9161(7,8); 9163(20,21); 9164(21,22);	The corresponding tables do not contain the actual limits for the pressure drop: (>1" pressure drop <5")	Add the limit amount on each table where the Pressure drop should be added to the corresponding	The pressure drop limit is imposed in the conditions. To be consistent with the purpose of the tables, these pressure drop limits should be inserted.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

Condition	Current Draft	Recommend Change	Justification
9166(3,4); 9170(6,7); 10320(29, 30, 45, 46); 10484(9, 10); and 10578(20)		tables for these conditions	
14205(3)	"...to demonstrate that they meet all qualifying criteria for allowable temperature excursions are met..."	Delete "they meet"	Grammatical clarification. This should also be done for all references to the allowable temperature excursion language in the permit.
Table VII S3007, S3008,	Emissions limit identifies "new passenger paint shop" Text at 14205(6) identifies "North passenger paint shop"	Replace "new" with "north" in the tables S3007,	Use of consistent terms for sources and areas of the plant provide less confusion.
14205(6)	". . .shall be maintained available. . ."	Replace "maintained" with "made"	Better word choice
Table VII s3008	". . . 16.36 tons/mon . . ."	<del>Replace "mon" with "Mo"</del> Define "mon" in glossary.	NUMMI's requested change (replace "mon" with "Mo" was to improve clarity of text. However, change was not implemented. Instead a definition for "mon" was added to the glossary of the Title V permit.
Table IV –R	S-808 – Sealer Oven (Thermal Oxidizer Zones 1,2,3,4,5)	Change source name to "S-808 Passenger/Truck Sealer Oven"	Consistent with listing specified in Condition 207.
Table VII – T	S-808 – Sealer Oven (Thermal Oxidizer Zones 1,2,3,4,5)	Change source name to "S-808 Passenger/Truck Sealer Oven"	Consistent with listing specified in Condition 207.
Table VII – T2	S-808 – Sealer Oven (Thermal Oxidizer Zones 1,2,3,4,5)	Change source name to "S-808 Passenger/Truck Sealer Oven"	Consistent with listing specified in Condition 207.
Tables VII S2, S3, S41, S57, S60 S61, S62, S63, S71, S72, S73, S101, S102, S802, S803, S804,	The monitoring type for opacity is specified as "pressure drop"	Replace "Pressure drop" with "Opacity"	Opacity is measured and monitored using the Ringlemann scale not by pressure drop across a filter.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

Condition	Current Draft	Recommend Change	Justification
S805, S807, S808, S826, S900, S1001, S1002, S1003, S1005, S1006, S1007, S1008, S1009, S1010, S1012, S1014, S1015, S1018, S1019, S1020, S1021, S1050, S1051, S1053, S1056, S1061, S1070, S1809, S2826, S3007, S3008, S3009, S3014, S3015, S3018, S10112			
14206( 16), 14207(16), 14208(4), 14209(5)	"A district approved log book shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be . . ."	These parts should be changed to read "A record of weekly pressure drop readings for the [unit] shall be maintained. In addition to pressure drop notations the records shall contain the time, date, and the name or initials of the individual taking the readings. Records shall be retained for a period 5 years from the date of entry and made available to District staff upon request. (basis: Regulation 2-6-409.2)"	The existing text is unclear as to what measurements need to be recorded, and unclear as to how often the District needs to approve the logbook. Moreover the text is different from pressure drop requirements specified in 9 other conditions (9159, 9161, 9163, 9164, 9166, 9170, 10320, 10484, and 10578.) This change should correct all three problems.
Table VII, S1008	"BAAQMD Condition 9163	Replace "14" with "13"	Limits referenced in the limit column refer to part 13 not



**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

Condition	Current Draft	Recommend Change	Justification
page 303 column 6 row 5	Part 14”		part 14.
Table VII S1018 page 322 column 5 rows 2&3	“ASCA Chassis BLK”	Replace with “Blackout”	Text in corresponding condition 9710 specifies Blackout and has “ASCA Chassis BLK” in strike out. This change makes table consistent with its corresponding condition
Table VI[sic]-AT S1056, column 5 row2	Limit specifies “30 ppmv @3%)2 dry, 3-hr average”	Replace “3-hr” with “1-hr”	BAAQMD 9-7-3012.1 specifies a 1-hour average not a 3-hour average.
Table VII AW S1070 column 5 rows 2 &3	POC limit numbers 21.66, 37,157, and 16,317	Replace 21.66 with 21.61; 37,157 with 37,071; and 16,317 with 16,279.	Limits in table are not the same as the limits in the corresponding conditions.
Table VII – AB S1001 Column 5 row 4	Text contains limit of <515 gals/day	Delete the limit < 515 gals/day	This text is in strike-out in the corresponding condition 9257(2). This change would make the table consistent with the permit condition.

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

The following changes in determinations of federal enforceability requested by NUMMI were not incorporated. The reasons for not implementing these changes are indicated in the Federally Enforceable (Y) or (N) section:

<b>SECTION IV – SOURCE-SPECIFIC APPLICABLE REQUIREMENTS</b>			
<b>Page(s)</b>	<b>Applicable Requirement  (Regulations are BAAQMD Regulations unless otherwise noted)</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable Yes (Y) or No (N)</b>
344	None	Table VII – AX VOC	NUMMI: (N) The stated basis for the limitation is “none.” Without a federally enforceable basis, the limitation is not federally enforceable. <b>BAAQMD: (Y) The monitoring is federally enforceable. Correction was made to reflect that requirement is 8-5-501.</b>
344	None	Table VII – AY VOC	NUMMI: (N) The stated basis for the limitation is “none.” Without a federally enforceable basis, the limitation is not federally enforceable. <b>BAAQMD: (Y) The monitoring is federally enforceable. Correction was made to reflect that requirement is 8-5-501.</b>
377	None	Table VII – BM VOC	NUMMI: (N) The stated basis for the limitation is “none.” Without a federally enforceable basis, the limitation is not federally enforceable. <b>BAAQMD: (Y) The monitoring is federally enforceable. Correction was made to reflect that requirement is 8-5-501.</b>

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

The following changes requested by NUMMI were not incorporated. The reasons for not implementing these changes are indicated in the Justification section:

Condition	Current Draft	Recommend Change	Justification
9159, Parts 8, 10,11 and 12		These parts of Condition 9159 should be deleted from the permit.	NUMMI: All of the referenced parts refer to particulate matter (PM <sub>10</sub> ) conditions. PM <sub>10</sub> is not generated at this source, S-1005, Truck Undercoat Booth. A thick waxy substance is applied at this location. <b>BAAQMD: The District disagrees.</b>
Table VII s3008	". . . 16.36 tons/mon . . ."	Replace "mon" with "Mo"	NUMMI: Improve clarity of text. Mon is generally an abbreviation for Monday whereas Mo is the usual abbreviation for Month. <b>BAAQMD: "Mon" has been added to the glossary and defined as month.</b>
Tables VII S57, S1006, S1008, S1014, S1018, S1061, S1070, S2826, S3007, S3008, S3009, S3014, S3015, S3018, S3019,	In many tables one of the "type of limit" used is PM10. [e.g. See 14206(7) and BAAQMD 6-301and 6-310 and compare with S3008]	Replace "PM10" with "PM"	NUMMI: PM10 is nowhere used in the text of the permit nor in the cited BAAQMD regulations. Particulate Matter is the term used in the permit conditions and in the regulations. This change will improve accuracy of information in the tables VII. <b>BAAQMD: PM10 has been added to the glossary and defined.</b>
Tables VII S2, S3, S41, S57, S60 S61, S62, S63, S71, S72, S73, S101, S102, S802, S803, S804, S805, S807, S808, S826, S900, S1001, S1002, S1003, S1005, S1006, S1007, S1008, S1009, S1010, S1012, S1014, S1015, S1018, S1019, S1020, S1021, S1050,	In many tables one of the "type of limit" used is FP. This is not a limit cited in BAAQMD regulations.	Replace "FP" with "PM"	FP is not an accurate description for the type of limit. It should be PM. <b>BAAQMD: The District uses the term FP and it has been added to the glossary.</b>

**RESPONSES TO NUMMI'S COMMENTS FOR NUMMI TITLE V PERMIT**

Condition	Current Draft	Recommend Change	Justification
S1051, S1053, S1056, S1061, S1070, S1809, S2826, S3007, S3008, S3009, S3014, S3015, S3018, S10112			
Tables VII S2, S3, S41, S57, S60 S61, S62, S63, S71, S72, S73, S101, S102, S802, S803, S804, S805, S807, S808, S826, S900, S1001, S1002, S1003, S1005, S1006, S1007, S1008, S1009, S1010, S1012, S1014, S1015, S1018, S1019, S1020, S1021, S1050, S1051, S1053, S1056, S1061, S1070, S1809, S2826, S3007, S3008, S3009, S3014, S3015, S3018, S10112	Under emssion limit 0.15 grains/dscf is provided without reference to a pollutant	Add "particulate weight limit of" to 0.15 grains/dscf and to "4.10P0.67 lb/hr . . ."	NUMMI: Clarification of text in the tables. <b>BAAQMD: FP                      is defined in the glossary.</b>

**NUMMI September 11, 2002 Email**

**Comment:** S124 is listed in the Title V permit (Table IV-I) as a cold cleaner. S124 is a small parts washer. This should be corrected in Table II – A, Permitted Sources too. The correct name should be “Small Parts Washer”.

**Response:** Change has been made.

**NUMMI September 12, 2002 Email**

**Comment:** NUMMI requests that S808 be changed to Passenger Sealer-Antichip Oven (from Passenger Truck Sealer Oven).

**Response:** Change has been made.

**NUMMI September 16, 2002 Email**

**Comment:** NUMMI requests to eliminate part 11 of Condition # 9164. It states “to minimize the amount of purge solvent used in S1014 Topcoat Booth I, NUMMI shall coat at least 2 vehicles between purge cycles”. Since NUMMI builds to order this provision limits their operating flexibility

**Response:** Removing this BACT requirement would relax the operating permit of S1014. The purpose of the Title V permit process is not to relax existing requirements.

**NUMMI October 21, 2002 Email**

**Comment:** In Conditions 14206, Part 7 and 14207, Part 7 there is a requirement for weekly recording of the pressure drop across the air filters used in the Topcoat and Prime coating systems. This includes the booths (S-3008, S-3014 and S-3016) and ovens (S-3009, S-3015 and S-3017). However the air filtration systems for these operations are all directly connected to the inlet piping of their respective thermal oxidization units. The minimum permitted operating temperature for the oxidizers is 1400 (superscript: 0) F. NUMMI should not be required to record the pressure drop readings across for the air filters. Any particulate matter that would get past the air filters would go directly into the thermal oxidizers and be destroyed. Requiring recording of the pressure drop readings for the air filters places an undue administrative burden upon the facility with no tangible emission reduction assurances. It is NUMMI's opinion that pressure drop recording provisions for these particular units be removed from the permit.

**Response:** The purpose of the pressure drop readings is to ensure that the filters are in good operating condition. If the pressure is too high, the filters are plugged and need to be replaced. If too low, there may be a tear or hole that needs to be repaired. In either case, the filters are not working properly, which could increase the emission load on the downstream thermal oxidizer. The point of the pressure reading is to make sure that they pay attention to the pressure at least once per week, and therefore, could detect and correct

a problem with the filters. It's better to catch the particulate in the filters, rather than rely on the thermal oxidizer to destroy particulate that the filters should have picked up. In addition, some types of particulate (i.e. metals) are not destroyed in the thermal oxidizer. As a result, the conditions shall remain in place.

**NUMMI November 14, 2002 Email**

**Comment:** Please replace Yuji Niimi, Senior Vice President as responsible official with Mr. Steve St. Angelo, Vice President Manufacturing Operations. Please change contact phone number for responsible official from 510-498-5554 to 510-498-5553.

**Response:** The responsible official has been changed as requested.