

December 18, 2002

Stephen E. Trebaol
1516 Scaraway Drive
San Jose, CA 95132

Dear Mr. Trebaol:

The requirements for public and EPA review of the proposed Major Facility Review Permit for NUMMI have been completed. The District received your email dated August 10, 2002. In your email you expressed concern regarding a PX2 oil used in the stamping plant's 6AOTR press. The following is a summary of your comment and our response:

Comment: A new large washing oil filter unit, which uses "PX2" oil, was installed on the 6AOTR press in early July 2002. The filter unit constantly recirculates the PX2 oil. It is common for the oil reservoir to become frothy. In early July 2002, visible fog-like oil mists were observed inside the 6AOTR press and inside the stamping facility near the 6AOTR press as well. Action was taken to reduce the visible mists refill the washing oil filter unit as part of my normal work routine. Since July 22, 2002, I have added 20 barrels (55 gal each) to replenish the filter unit. Despite the additions, the wash oil level is 10 barrels below the July 22 level. My observations indicate a 5-barrel loss per week. There are no signs of a large liquid leak. My observations, and my concern, are that the oil is evaporating and being lost into the atmosphere. Some oil remains on the parts after they are washed. However, the previous filter unit lost about 1 barrel per week. If 4 barrels per week are evaporating, 220 gallons per week, the annual rate is 208 barrels, 11440 gallons. I think the PX2 oil situation needs to be properly monitored and resolved. The PX2 oil is also used in other washing oil units at NUMMI.

Response: The oil storage tank for the stamping press was replaced in July 2002. Cedar Draw PX2 oil is used to coat the new pieces of sheet metal from the stamping press to give the metal elasticity. The new tank capacity is 1,500 gallons versus the old 700-gallon tank. During the initial startup of the new system, there were problems with the pump resulting in over spraying of oil in the unit. Such activity has since been remedied and there should no longer be a significant loss per week of oil. To prevent pump cavitations the tank is not allowed to go below a certain level. Consequently the tank is filled more frequently. The unit is equipped with a mist collector. All mist oil is collected by the mist collector and reused in the system to coat the parts. The stamping operation itself is exempt from permitting requirements per Regulation 2-1-121.1 as long as organic emissions from the use of coolant, lubricant, or cutting oil are 5 tons per year or less. NUMMI is required per Regulation 2-1-502 to maintain records to provide substantial credible evidence proving that they qualify for the exemption.

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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,

William deBoisblanc
Director, Permit Services