



TV Tracking #: 696 (Annual)
TV Tracking #: 697 (Semi-Annual)

Environmental Affairs

1. RECEIVED IN ENFORCEMENT: 03/30/2023

March 30, 2023

Sent via email: compliance@baaqmd.gov

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

RE: Submittal of Air Quality Compliance Status Reports for United Airlines, Inc. – San Francisco Maintenance Center - BAAQMD Plant No. 51

Dear Mr. Gove:

In accordance with United Airlines, Inc.’s Major Facility Review Permit dated May 30, 2018, we hereby submit the below referenced reports, which are due on or before March 31, 2023. We note that a timely and complete renewal application for the Major Facility Review Permit was submitted on November 22, 2022, and is currently undergoing BAAQMD’s review. The following table contains a summary of these reports:

Report Description	Reporting Period
Major Facility Review Permit (Title V) Annual Compliance Certification Report	March 1, 2022 to February 28, 2023
Major Facility Review Permit (Title V) Semiannual Monitoring Status Report	September 1, 2022 to February 28, 2023
Semiannual Aerospace NESHAP Compliance Status Report	September 1, 2022 to February 28, 2023

Please note that the Annual Compliance Certification and Semiannual Monitoring Status Reports are combined into a single submission per BAAQMD’s guidance. If you should have any questions or need additional information regarding this submission, please contact me at (650) 874-4572.

Sincerely,

Alyson Dagly, P.E.
Manager, California Air Compliance
Environmental Affairs

Mr. Jeffrey Gove
March 30, 2023
Page 2

cc: Alison Kehrer (United), Averil Edwards (United), Simon Winer (BAAQMD)

Enclosures: SFMC Mar 2023 Title V Annual Compliance Certification
SFMC Mar 2023 Title V Semiannual Monitoring Status Report
SFMC Mar 2023 Aerospace NESHAP Semiannual Compliance Status Report



**SAN FRANCISCO
MAINTENANCE CENTER**

**Major Facility Review Permit
Annual Compliance Certification Report
Semiannual Monitoring Status Report**

**Annual Period: March 1, 2022, through February 28, 2023
Semiannual Period: September 1, 2022, through February 28, 2023
BAAQMD Facility # A0051**



Prepared by:

**United Airlines, Inc.
Environmental Affairs
San Francisco, California**

March 30, 2023

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Major Facility Review Permit

Plant ID #A0051

Title V Annual Compliance Certification Report & Semiannual Monitoring Status Report

March 1, 2022, through February 28, 2023 & September 1, 2022, through February 28, 2023

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**UNITED AIRLINES, INC. - SFMC
MAJOR FACILITY REVIEW PERMIT
ANNUAL COMPLIANCE CERTIFICATION REPORT (ACC)
SEMIANNUAL MONITORING STATUS REPORT (SAMR)**

Facility: **United Airlines, Inc. – San Francisco Maintenance Center**
800 South Airport Blvd, Building 49-2 SFOMP
San Francisco International Airport
San Francisco, CA 94128

Facility ID: **A0051**

ACC Reporting Period
March 1, 2022, to February 28, 2023

SAMR Reporting Period
September 1, 2022, to February 28, 2023

This annual compliance certification report is required pursuant to the United Airlines, Inc. Major Facility Review Permit, Standard Conditions, Section G – Compliance Certifications.

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



1. Compliance Statement & 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), except where stated below.

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; and
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 on information and belief formed after reasonable inquiry, I, as a Responsible Official of the above-mentioned facility, certify that the statements and information contained in this report are true, accurate, and complete for the annual and semiannual reporting periods indicated above.

<p>DocuSigned by: <i>Bill Fulton</i> ACBBFA1DEA4E446...</p> <hr style="border: 0; border-top: 1px solid black;"/> <p>Signature</p>	<p>3/29/2023</p> <hr style="border: 0; border-top: 1px solid black;"/> <p>Date</p>
--	--

<p>Name: <u>Bill Fulton</u> <i>(Type or print)</i></p>	<p>Title: <u>Managing Director – Engine & Component Operations</u> <i>(Type or print)</i></p>
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Major Facility Review Permit

Plant ID #A0051

Title V Annual Compliance Certification Report & Semiannual Monitoring Status Report

March 1, 2022, through February 28, 2023 & September 1, 2022, through February 28, 2023

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2. Introduction

On March 17, 2000, the Bay Area Air Quality Management District (BAAQMD) issued its initial Major Facility Review Permit (Title V Operating Permit) to the United Airlines, Inc. (United) San Francisco Maintenance Center (SFMC). The primary activity conducted at this facility is commercial aircraft maintenance. United received its most recent Title V Operating Permit renewal on May 30, 2018. As required by the Clean Air Act and BAAQMD Regulations, United submitted a timely and complete application for the Title V Operating Permit renewal on November 22, 2022. The renewal is currently under review by the BAAQMD.

3. Report Discussion

United is submitting this Annual Compliance Certification Report pursuant to Regulation 2, Rule 6, Section 409.17 and the SFMC's Title V Operating Permit Standard Conditions, Section I.G.

The format of this report is based on Sections I, III, IV, V, and VII as set forth in United's most current Title V Operating Permit dated May 30, 2018. These sections are:

- I. Standard Conditions
- III. Generally Applicable Requirements
- IV. Source-Specific Applicable Requirements
- V. Schedule of Compliance
- VII. Applicable Limits & Compliance Monitoring Requirements

In the tables below, each source or group of sources is identified along with the applicable requirement(s), permit condition(s), applicable emission limit(s), and/or monitoring requirement(s). A column was added to the tables that indicates continuous compliance or non-compliance with the applicable requirements for this reporting period. All answers marked and explanations given are valid for the reporting period identified in this report. In the case of identified non-compliance, or if a specific line item is not applicable (i.e., the source no longer exists), a brief explanation is provided after each table or in the first section of this report.

Copies of all required monitoring records are maintained at the SFMC and/or United's electronic systems and are available for inspection.

Compliance Status Column - Abbreviations Key

Answers marked in the Compliance Status column as:

CC indicate that the source was in continuous compliance at all times during the reporting period.

NC indicates that the source was in non-compliance at some point in time during the reporting period and is not indicative of continuous non-compliance. The fact that this report indicates non-compliance by a particular source with any requirement for the period covered by this report does not necessarily mean that the source is non-compliant at the time this report was prepared or submitted.

NA means not applicable. Common reasons are that the regulation is a general statement requiring no action on the part of the permittee, or that the regulation is an administrative action directed to the BAAQMD.

Source Additions, Modifications or Deletions

This section provides a summary of source activities that have occurred at the SFMC since United's submission of its last Annual Compliance Certification Report to the BAAQMD in March 2022. This summary is limited to source activities relevant to the Title V Operating Permit, including matters such as new operating permits, authorities to construct and/or the removal of permitted sources.

S-128 was removed from the PTO during the reporting period.



Compliance Issues

This section provides a summary of enforcement-related 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

United did not receive any notices of violation (NOVs) during this reporting period.

Reportable Compliance Activity Notifications

No reportable compliance activity (RCA) notifications were submitted, and no reportable episodes occurred during this reporting period.

Title V Deviation Reporting

Upon review of internal monitoring records, United has complied with all applicable air quality regulations during this reporting period; therefore, no deviations were reported.

Other Non-Compliance Issues Not Previously Reported

No other deviations or occurrences of non-compliance with applicable air quality regulations not previously reported occurred during this reporting period.

Variance Applications and Enforcement Agreements

United did not file any variance applications or enter into any enforcement agreements during this reporting period.

Penalty Assessments for Air Quality-Related Matters

United did not receive nor settle any penalty assessments from either the BAAQMD or the United States Environmental Protection Agency (EPA) during this reporting period.



Major Facility Review Permit
 Title V Annual Compliance Certification Report & Semiannual Monitoring Status Report
 March 1, 2022, through February 28, 2023 & September 1, 2022, through February 28, 2023

Plant ID #A0051

4. Compliance Status Tables

I. Standard Conditions

A. Administrative Requirements

Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 1 - General Provisions and Definitions</i>		
1-101 Description	NA	No applicable requirement – BAAQMD responsibility.
1-102 More Than One Emission Standard	NA	No applicable requirement – BAAQMD responsibility.
1-103 Violations Not Authorized	NA	No applicable requirement – BAAQMD responsibility.
1-104 Circumvention Not Permitted	NA	No applicable requirement – BAAQMD responsibility.
1-105 Regulations Not Intended to Apply to Workroom Atmosphere	NA	No applicable requirement – BAAQMD responsibility.
1-106 Separation of Emissions	NA	No applicable requirement – BAAQMD responsibility.
1-107 Combination of Emissions	NA	No applicable requirement – BAAQMD responsibility.
1-108 Metric Governs	NA	No applicable requirement – BAAQMD responsibility.
1-109 Severability	NA	No applicable requirement – BAAQMD responsibility.
1-110 Exclusions	NA	No applicable requirement – BAAQMD responsibility.
1-112 Breakdown	NA	No applicable requirement – BAAQMD responsibility.
1-113 Discretionary Enforcement, Breakdown	NA	No applicable requirement – BAAQMD responsibility.
1-301 Public Nuisance	CC	
1-401 Violation Notice	NA	No applicable requirement – BAAQMD responsibility.
1-402 Status of Violation Notices During Variance Proceedings	NA	No applicable requirement – BAAQMD responsibility.
1-410 Registration	NA	Facility is exempt from registration.
1-411 Permits May Be Needed	CC	
1-412 Address For Service	CC	
1-420 Emission Source Data	CC	
1-430 Breakdown Procedures	NA	No applicable requirement – BAAQMD responsibility.
1-431 Breakdown Report	NA	United did not seek breakdown relief during this reporting period.
1-432 Written Breakdown Report	NA	United did not seek breakdown relief during this reporting period.
1-433 Determination of Breakdown	NA	No applicable requirement – BAAQMD responsibility.



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Plant ID #A0051

Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 1 - General Provisions and Definitions</i>		
1-434 Administrative Violation, Breakdown	NA	No applicable requirement – BAAQMD responsibility.
1-440 Right of Access to Premises	CC	
1-441 Right of Access to Information	CC	
1-501 Sampling Facilities	CC	
1-502 Sampling at Type B Emission Points	NA	No sampling has been required at Type B emission points.
1-510 Area Monitoring	NA	Area monitoring has not been required nor requested by the BAAQMD.
1-520 Continuous Emission Monitoring	CC	
1-521 Monitoring May Be Required	NA	No applicable requirement – BAAQMD responsibility.
1-522 Continuous Emission Monitoring and Recordkeeping Procedures	NA	United is not required to use CEMS.
1-523 Parametric Monitoring and Recordkeeping Procedures	CC	
1-530 Area Monitoring Downtime	NA	United is not required to conduct area monitoring.
1-540 Area Monitoring Data Examination	NA	United is not required to conduct area monitoring.
1-542 Area Concentration Excesses	NA	United is not required to conduct area monitoring.
1-543 Record Maintenance for Two Years	NA	United is not required to conduct area monitoring.
1-544 Monthly Summary	NA	United is not required to conduct area monitoring.
1-600 Manual of Procedures	NA	No applicable requirement – BAAQMD responsibility.
1-601 Approval of Sampling Facilities	NA	No applicable requirement – BAAQMD responsibility.
1-602 Area and Continuous Emission Monitoring Requirements	NA	Administrative, no specific requirement – reference.
1-603 Visible Emissions	NA	Administrative, no specific requirement – reference.
1-604 Opacity Measurements	NA	Administrative, no specific requirement – reference.
1-605 Laboratory, Source Test and Air Monitoring Procedures	NA	Administrative, no specific requirement – reference.
SIP Regulation 1 - General Provisions and Definitions	CC	



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 March 1, 2022, through February 28, 2023 & September 1, 2022, through February 28, 2023

Plant ID #A0051

Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 2, Rule 1 - Permits, General Requirements</i>		
2-1-101 Description	NA	No applicable requirement – BAAQMD responsibility.
2-1-102 Applicable Requirements	NA	No applicable requirement – BAAQMD responsibility.
2-1-129 Major Facility Review	NA	No applicable requirement – BAAQMD responsibility.
2-1-301 Authority to Construct	CC	
2-1-302 Permit to Operate	CC	
2-1-303 Fees	CC	United has paid all applicable fees associated with the permitting of sources.
2-1-304 Denial, Failure to Meet Emission Limitations	NA	No applicable requirement – BAAQMD responsibility.
2-1-305 Conformance with Authority to Construct	CC	
2-1-305 Denial, Equipment Not in Conformance with Authority to Construct	NA	No applicable requirement – BAAQMD responsibility.
2-1-306 Mandated Reductions Not Applicable	NA	United has not applied for emissions banking of mandated emission reductions.
2-1-307 Failure to Meet Permit Conditions	CC	United complied with all permit conditions during this reporting period.
2-1-308 Fugitive Emissions	CC	
2-1-309 Canceled Application	NA	No applicable requirement – BAAQMD responsibility.
2-1-310 Applicability of CEQA	NA	No applicable requirement – BAAQMD responsibility.
2-1-311 Ministerial Projects	NA	No applicable requirement – BAAQMD responsibility.
2-1-312 Other Categories of Exempt Projects	NA	No applicable requirement – BAAQMD responsibility.
2-1-313 Projects Not Exempt From CEQA Review	NA	No applicable requirement – BAAQMD responsibility.
2-1-314 Case-by-Case CEQA Determinations	NA	No applicable requirement – BAAQMD responsibility.
2-1-315 Denial, Failure to Mitigate Significant Adverse Environmental Impacts	NA	No applicable requirement – BAAQMD responsibility.
2-1-316 New or Modified Sources of Toxic Air Contaminants or Hazardous Air Pollutants	CC	
2-1-317 Public Nuisance Sources	CC	
2-1-318 Hazardous Substances	CC	
2-1-319 Source Expressly Subject to Permitting Requirements	CC	



Major Facility Review Permit
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 March 1, 2022, through February 28, 2023 & September 1, 2022, through February 28, 2023

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Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 2, Rule 1 - Permits, General Requirements</i>		
2-1-401 Persons Affected	CC	
2-1-402 Applications	CC	
2-1-403 Permit Conditions	NA	No applicable requirement – BAAQMD responsibility.
2-1-404 Changes in Throughput and Hours of Operation	CC	
2-1-405 Posting of Permit to Operate	CC	
2-1-406 Transfer	CC	
2-1-407 ATC Permit Expiration	CC	
2-1-408 Action on Applications	NA	No applicable requirement – BAAQMD responsibility.
2-1-409 Regulations in Force Govern	NA	No applicable requirement – BAAQMD responsibility.
2-1-410 Appeal	NA	No appeals were filed during this reporting period.
2-1-411 Permit to Operate, Final Action	NA	No applicable requirement – BAAQMD responsibility.
2-1-412 Public Notice, Schools	NA	The facility is not located within 1000 feet of the outer boundary of a K-12 school.
2-1-413 Portable Equipment Operated Within the District	NA	United has not applied for a portable source permit.
2-1-414 Loss of Exemption, Public Nuisance	NA	United has not caused a public nuisance or received NOV's associated with this regulation.
2-1-415 Source Pre-Certification Procedure	NA	United has not requested Pre-Certification.
2-1-416 Temporary Amnesty for Unpermitted Sources	NA	No applicable requirement– BAAQMD responsibility.
2-1-420 Suspension	NA	No applicable requirement – BAAQMD responsibility.
2-1-421 Appeal from Suspension	NA	No applicable requirement per 2-1-420.
2-1-422 Revocation	NA	No applicable requirement – BAAQMD responsibility.
2-1-423 Hearings	NA	No applicable requirement – BAAQMD responsibility.
2-1-424 Loss of Exemption	NA	United did not operate any sources that lost exemptions during this reporting period.
2-1-425 Sources of Toxic Air Contaminants	CC	
2-1-426 CEQA-Related Information Requirements	NA	No applicable requirement.
2-1-427 Procedure for Ministerial Evaluations	NA	No applicable requirement.
2-1-428 Criteria for Approval of Ministerial Permit Applications	NA	No applicable requirement.



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Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 2, Rule 1 - Permits, General Requirements</i>		
2-1-429 Federal Emissions Statement	CC	
2-1-430 Maintenance of the Permit Handbook and BACT/TBACT Workbook	NA	No applicable requirement – BAAQMD responsibility.
2-1-431 Date of Completion	NA	No applicable requirement – BAAQMD responsibility.
2-1-432 Determination of Complete Application	NA	No applicable requirement – BAAQMD responsibility.
2-1-501 Monitors	CC	
2-1-502 Burden of Proof	CC	
2-1-601 Engineering Permitting Procedures	NA	No applicable requirement – BAAQMD responsibility.
2-1-602 CEQA Guidelines	NA	No applicable requirement – BAAQMD responsibility.
SIP Regulation 2, Rule 1 - Permits, General Requirements	CC	

Requirement	Compliance Status	Comment/Corrective Action
<i>BAAQMD Regulation 2, Rule 2 - Permits, New Source Review</i>		
2-2-101 Description	CC	
2-2-301 Best Available Control Technology Requirement	CC	
2-2-302 Offset Requirements, POCs and Nitrogen Oxides, NSR	CC	
2-2-303 Offset Requirement, PM ₁₀ and Sulfur Dioxide, NSR	CC	
2-2-304 PSD Requirement	CC	
2-2-305 Carbon Monoxide Modeling Requirement, PSD	CC	
2-2-306 Non-Criteria Pollutant Analysis, PSD	CC	
2-2-307 Denial, Failure of all Facilities to be in Compliance	NA	No applicable requirement – BAAQMD responsibility.
2-2-308 Class I Area Requirements, PSD	NA	United is not located within 10 km of Class I area.
2-2-309 Denial for Air Quality Related Values, PSD	NA	No applicable requirement – BAAQMD responsibility.
2-2-310 Denial, Failure to Use BACT	NA	No applicable requirement – BAAQMD responsibility.
2-2-311 Denial, Failure to Provide Offsets	NA	No applicable requirement – BAAQMD responsibility.
2-2-312 Denial, Failure to Meet Permit Conditions	NA	No applicable requirement – BAAQMD responsibility.



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Requirement	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 2, Rule 2 - Permits, New Source Review		
2-2-314 Federal New Source Review Applicability	CC	Addressed in permitting process.
2-2-315 Federal Prevention of Significant Deterioration Applicability	CC	
2-2-316 No Net Increase Status Report	NA	No applicable requirement – BAAQMD responsibility.
2-2-317 Maximum Achievable Control Technology (MACT) Requirement	NA	No applicable requirement – BAAQMD responsibility.
2-2-401 Application	CC	
2-2-402 Complete Application	CC	
2-2-404 Authority to Construct, Preliminary Decision	NA	No applicable requirement – BAAQMD responsibility.
2-2-405 Publication and Public Comment	NA	No applicable requirement – BAAQMD responsibility.
2-2-406 Public Inspection	NA	No applicable requirement – BAAQMD responsibility.
2-2-407 Authority to Construct, Final Action	NA	No applicable requirement – BAAQMD responsibility.
2-2-409 Requirements, Permit to Operate	NA	No applicable requirement – BAAQMD responsibility.
2-2-410 Issuance, Permit to Operate	NA	No applicable requirement – BAAQMD responsibility.
2-2-411 Permit to Operate, Final Action	NA	No applicable requirement – BAAQMD responsibility.
2-2-412 Source Obligation, Relaxation of Enforceable Conditions	NA	Trigger condition has not occurred.
2-2-414 PSD Air Quality Analysis	CC	Addressed in permitting process.
2-2-415 Notice to EPA and Federal Land Managers	NA	No applicable requirement – BAAQMD responsibility.
2-2-416 Report, PSD Increment Consumption	NA	No applicable requirement – BAAQMD responsibility.
2-2-417 Visibility, Soils, and Vegetation Analysis	CC	Addressed in permitting process.
2-2-418 PSD Analysis Stack Heights	CC	Addressed in permitting process.
2-2-419 Permit Conditions	NA	No applicable requirement – BAAQMD responsibility.
2-2-421 Offset Deferral, Annual Permit Renewal	NA	Offset deferrals were not applied for during this reporting period.
2-2-422 Offset Refunds	NA	No applicable requirement – BAAQMD responsibility.
2-2-423 Demonstration of Offset Program Equivalence	NA	No applicable requirement – BAAQMD responsibility.
2-2-501 PSD Pre-Construction Ambient Air Monitoring	CC	Addressed in permitting process.
2-2-502 PSD Post-Construction Monitoring	CC	Addressed in permitting process.
2-2-601 Ambient Air Quality Monitoring	NA	This rule references the MOP for air quality monitoring.
2-2-602 Good Engineering Practice (GEP) Stack Height	NA	This rule references the GEP method.



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Requirement	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 2, Rule 2 - Permits, New Source Review		
2-2-603 PSD Air Quality Evaluation Procedure	NA	This rule references the PSD Guidelines.
2-2-604 Emission Increase Calculation Procedures, New or Modified Sources	CC	
2-2-605 Emission Calculation Procedures, Emission Reduction Credits	CC	
2-2-606 Emission Calculation Procedures, Offsets	NA	This rule describes the emission offset calculation procedure.
2-2-607 Emission Calculation Procedures, Emission Reduction Credits for Mobile Sources	NA	This rule describes the emission offset calculation procedure.
SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration	CC	
BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking		
2-4-101 Banking	NA	Not an applicable requirement. Rules define what can be banked, rather than specifying requirements for facilities.
2-4-301 Bankable Reductions	NA	
2-4-302 Bankable Reductions for Closures	NA	
2-4-303 Limitations on Deposits	NA	
2-4-304 Limitations on Use of Deposits	NA	
2-4-305 Use of Withdrawals	NA	

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

Requirement	Compliance Status	Comment/Corrective Action
1. This Major Facility Review Permit was issued on May 30, 2018 and expires on May 29, 2023. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than November 29, 2022, and no earlier than May 29, 2022. If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after May 29, 2023. If the permit renewal has not been issued by May 29, 2023, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application. (BAAQMD Regulation 2-6-307, 404.2, 407, & 409.6; MOP Volume II, Part 3, §4.2)	CC	As required by the Clean Air Act and BAAQMD Regulations, United submitted a timely and complete application for the Title V Operating Permit renewal on November 22, 2022. The renewal is currently under review by the BAAQMD.



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Requirement	Compliance Status	Comment/Corrective Action
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (BAAQMD Regulation 2-6-307; MOP Volume II, Part 3, §4.11)	NA	Enforcement action is the responsibility of the governing agencies.
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)	NA	Enforcement action is the responsibility of the governing agencies.
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (BAAQMD Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)	NA	Action is responsibility of the governing agencies.
5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (BAAQMD Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)	NA	Action is responsibility of the governing agencies.
6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (BAAQMD Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)	CC	
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (BAAQMD Regulation 1-441, BAAQMD Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)	CC	
8. Any records required to be maintained pursuant to this permit, which the permittee considers to contain proprietary or trade secret information, shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (BAAQMD Regulation 2-6-419; MOP Volume II, Part 3, §4.11)	NA	Facility has claimed no proprietary information regarding records maintained for compliance that were submitted to the District during this compliance period.
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR, Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)	NA	Facility has claimed no proprietary information regarding records maintained for compliance that were submitted to the EPA during this compliance period.
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions or the potential to emit for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)	NA	Facility submitted an emissions inventory during the Title V Operating Permit renewal application process. No further action is necessary.



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Requirement	Compliance Status	Comment/Corrective Action
11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (BAAQMD Regulation 2-6-409.20, MOP Volume II, Part 3, §4.11)	CC	
12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless of whether it acts through employees, agents, contractors, or subcontractors. (BAAQMD Regulation 2-6-307)	CC	

C. Requirement to Pay Fees

Requirement	Compliance Status	Comment/Corrective Action
The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (BAAQMD Regulation 2-6-402 & 409.13, BAAQMD Regulation 3; MOP Volume II, Part 3, §4.12)	CC	

D. Inspection and Entry

Requirement	Compliance Status	Comment/Corrective Action
Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (BAAQMD Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)	CC	

E. Records

Requirement	Compliance Status	Comment/Corrective Action
The permit holder must provide any information, records, and reports requested or specified by the APCO. (BAAQMD Regulation 1-441, BAAQMD Regulation 2-6-409.4)	CC	



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Requirement	Compliance Status	Comment/Corrective Action
Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of creation of the record. (BAAQMD Regulation 2-6-501, MOP Volume II, Part 3, §4.7)	CC	

F. Monitoring Reports

Requirement	Compliance Status	Comment/Corrective Action
<p>Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. Reports shall be submitting for the following periods: September 1st through February 28th or 29th and March 1st through August 31st and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent by email to compliance@baaqmd.gov or by postal mail to the following address:</p> <p style="text-align: center;">Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105 Attn: Title V Reports</p> <p>(BAAQMD Regulation 2-6-502; MOP Volume II, Part 3, §4.7)</p>	CC	



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G. Compliance Certification

Requirement	Compliance Status	Comment/Corrective Action
<p>Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be March 1st through February 28th or 29th of each year. The certification shall be submitted by March 31st of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance and any other specific information required by the permit. The certification should be sent by e-mail to compliance@baaqmd.gov or by postal mail directed to the District's Compliance and Enforcement Division at the address above in Subsection F, and a copy of the certification shall be sent by e-mail to r9.aeo@epa.gov or postal mail to the Environmental Protection Agency at the following address:</p> <p style="text-align: center;">Director Enforcement Division, TRI & Air Section (ENF-2-1) USEPA Region 9 75 Hawthorne Street San Francisco, CA 94105</p> <p>(MOP Volume II, Part 3, §4.5 and 4.15)</p>	CC	

H. Emergency Provisions

Requirement	Compliance Status	Comment/Corrective Action
<p>1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)</p>	NA	No breakdown relief has been sought during this reporting period.



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Requirement	Compliance Status	Comment/Corrective Action
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)	NA	No breakdown relief has been sought during this reporting period.
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)	NA	Enforcement is the responsibility of the governing agencies.

I. Severability

Requirement	Compliance Status	Comment/Corrective Action
In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (BAAQMD Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)	NA	No portion or provision of this Permit has been invalidated by any court or tribunal of competent jurisdiction, or by the Administrator of the EPA, during this reporting period.

J. Miscellaneous Conditions

Requirement	Compliance Status	Comment/Corrective Action
The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Any exceedance of the maximum allowable capacity for any source is a violation of BAAQMD Regulation 2, Rule 1, Section 301. (BAAQMD Regulation 2-1-301)	CC	

K. Accidental Release

Requirement	Compliance Status	Comment/Corrective Action
This facility is not currently subject to 40 CFR Part 68, Chemical Accident Prevention Provisions.	NA	United has less than the threshold quantity of a regulated substance in a process than the regulatory threshold, therefore 40 CFR Part 68 is not applicable. 40 CFR 68.10(a).



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III. Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)	N	CC	
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y	CC	
BAAQMD Regulation 2, Rule 1	General Requirements (12/6/17)	N	CC	
SIP Regulation 2, Rule 1	General Requirements (8/1/16)	Y	CC	
BAAQMD Regulation 2, Rule 2	Permits, New Source Review (12/6/17)	N	CC	
SIP Regulation 2, Rule 2	Permits, New Source Review (8/1/16)	Y	CC	
BAAQMD Regulation 2, Rule 6	Permits, Major Facility Review (12/6/17)	N	CC	
SIP Regulation 2, Rule 6	Permits, Major Facility Review (6/23/95)	Y	CC	
BAAQMD Regulation 3	Fees (6/16/10)	N	CC	
SIP Regulation 3	Fees (5/03/84)	Y	CC	
BAAQMD Regulation 2-1-429	Federal Emissions Statement (12/21/04)	N	CC	
SIP Regulation 2-1-429	Federal Emissions Statement (04/03/95)	Y	CC	
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N	CC	
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y	CC	
BAAQMD Regulation 5	Open Burning (6/19/13)	N	CC	
SIP Regulation 5	Open Burning (9/4/98)	Y	CC	
BAAQMD Regulation 6, Rule 1	Particulate Matter and Visible Emissions (12/5/07)	N	CC	
SIP Regulation 6	Particulate Matter and Visible Emissions (09/04/98)	Y	CC	
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N	CC	
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y	CC	
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)	N	CC	
SIP Regulation 8, Rule 2	Organic Compounds, Miscellaneous Operations (3/22/95)	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (7/1/09)	N	CC	
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (1/2/04)	Y	CC	
BAAQMD Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)	Y	CC	
SIP Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)	Y	CC	
BAAQMD Regulation 8, Rule 5	Organic Compounds – Storage of Organic Liquids (10/18/06)	N	CC	
SIP Regulation, Rule 5	Organic Compounds – Storage of Organic Liquids (06/5/03)	Y	CC	
BAAQMD Regulation 8, Rule 14	Organic Compounds – Surface Preparation and Coating of Large Appliances and Metal Furniture (10/16/02)	Y	CC	
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/1/94)	Y	CC	
BAAQMD Regulation 8, Rule 16	Organic Compounds – Solvent Cleaning Operations (10/16/02)	N	CC	
SIP Regulation 8, Rule 16	Organic Compounds – Solvent Cleaning Operations (8/26/03)	Y	CC	
BAAQMD Regulation 8, Rule 19	Organic Compounds – Surface Preparation and Coating of Miscellaneous Metal Parts and Products (10/16/02)	Y	CC	
BAAQMD Regulation 8, Rule 29	Aerospace Assembly and Component Coating Operations (12/20/95)	Y	CC	
BAAQMD Regulation 8, Rule 32	Organic Compounds – Wood Products Coatings (8/5/09)	N	CC	
SIP Regulation 8, Rule 32	Organic Compounds – Wood Products Coatings (12/20/95)	Y	CC	
BAAQMD Regulation 8, Rule 40	Organic Compounds, Contaminated Soil and UST Removal (6/15/05)	N	CC	
SIP Regulation 8, Rule 40	Organic Compounds, Contaminated Soil and UST Removal (4/19/01)	Y	CC	
BAAQMD Regulation 8, Rule 45	Organic Compounds – Motor Vehicle and Mobile Equipment Coating Operations (12/3/08)	N	CC	
SIP Regulation 8, Rule 45	Organic Compounds – Motor Vehicle and Mobile Equipment Coating Operations (11/3/96)	Y	CC	
BAAQMD Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (6/15/05)	N	CC	
SIP Regulation 8, Rule 47	Organic Compounds – Air Stripping and Soil Vapor Extraction Operations (4/26/95)	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N	CC	
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y	CC	
BAAQMD Regulation 8, Rule 50	Organic Compounds - Polyester Resin Operations (12/2/09)	N	CC	
SIP Regulation 8, Rule 50	Organic Compounds – Polyester Resin Operations (12/20/95)	Y	CC	
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	N	CC	
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y	CC	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)	N	CC	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/99)	Y	CC	
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	N	CC	
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance – Sandblasting (7/11/90)	N	NA	United did not conduct activities covered by this regulation during this reporting period.
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance – Sandblasting (9/2/81)	Y	NA	United did not conduct activities covered by this regulation during this reporting period.
BAAQMD Regulation 14, Rule 1	Mobile Source Emissions Reduction Measures – Bay Area Commuter Benefits Program (3/19/14)	N	CC	
California Code of Regulations, Title 13, Division 3, Chapter 9, Article 5, Section 2450 et seq.	Regulation to Establish a Statewide Portable Equipment Registration Program	N	CC	
California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 7.5, Section 44300 et seq.	Air Toxics “Hot Spots” Information and Assessment Act of 1987	N	CC	
California Code of Regulations, Title 17, Section 93101.5	Airborne Toxic Control Measure to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying (10/17/2006)	N	CC	
California Code of Regulations, Title 17, Section 93102	Airborne Toxic Control Measure for Chromium Plating and Chromic Acid Anodizing Facilities (10/24/07)	N	CC	
California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 7.5, Section 93115	Airborne Toxic Control Measure for Stationary Compression Ignition Engines	N	CC	
California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 7.5, Section 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
EPA 40 CFR Part 60 Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions	Y	CC	
EPA 40 CFR Part 61 Subpart M	National Emission Standards for Hazardous Air Pollutants – Asbestos (7/20/04)	Y	CC	
EPA 40 CFR Part 63 Subpart GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities (12/08/00)	Y	CC	
EPA 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 63	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (2/27/14)	Y	CC	
EPA 40 CFR Part 82	Protection of Stratospheric Ozone (12/1/16)	Y	CC	
EPA Subpart E, 40 CFR 82.106	Containers containing a Class I or Class II substance and products containing or manufactured with a Class I substance (1/19/95)	Y	CC	
EPA Subpart E, 40 CFR 82.108	Warning statements (1/19/95)	Y	CC	
EPA Subpart E, 40 CFR 82.110	Labels (10/28/14)	Y	CC	
EPA Subpart E, 40 CFR 82.112	Modification, removal, or interference with warning statements (10/28/14)	Y	CC	
EPA Subpart F, 40 CFR 82.156	Recycling and Emissions Reductions – Required Practices (12/1/16)	Y	CC	
EPA Subpart F, 40 CFR 82.161	Recycling and Emissions Reductions – Technician Certification (12/1/16)	Y	CC	
EPA Subpart F, 40 CFR 82.166	Recycling and Emissions Reductions – Reporting and Recordkeeping Requirements (12/1/16)	Y	CC	



IV. Source-Specific Applicable Requirements

Table IV – A: Solvent Cleaning Sources (Grouped)

S1, S9, S10, S57, S64, S78, S80, S105, S112, S128, S140: Solvent Cleaning Operations*

S258: Oil Cooler Flush Cart

S284: Oil Cooler Flush Cart

S288, S289, S290: Recycling Parts Washers

S330, S331: Parts Cleaners

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-1-322	Spray Equipment Clean-up Limitation	Y	CC	
BAAQMD Regulation 8, Rule 16	Organic Compounds – Solvent Cleaning Operations (10/16/02)			
8-16-123	Limited Exemptions, Specific Cleaning Operation	Y	CC	
8-16-303	Cold Cleaner Requirements	Y	CC	
8-16-303.1	General Operating Requirements	Y	CC	
8-16-303.1.2	Leak Repair Requirement	Y	CC	
8-16-303.1.3	Solvent Storage or Disposal – Evaporation Prevention	Y	CC	
8-16-303.1.4	Waste Solvent Disposal	Y	CC	
8-16-303.1.5	Solvent Evaporation Minimization Devices shall not be Removed	Y	CC	
8-16-303.1.6	Solvent Spray Requirements	Y	CC	
8-16-303.2	Cold Cleaner Operating Requirements	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-16-303.2.1	Solvent shall be Drained from Cleaned Parts	Y	CC	
8-16-303.2.2	Solvent Agitation	Y	CC	
8-16-303.2.3	Solvent Cleaning of Porous or Absorbent Materials is Prohibited	Y	CC	
8-16-303.3	Cold Cleaner General Equipment Requirements	Y	CC	
8-16-303.3.1	Container	Y	CC	
8-16-303.3.2	Solvent Evaporation Reduction for Idle Equipment	Y	CC	
8-16-303.3.3	Used Solvent Returned to Container	Y	CC	
8-16-303.3.4	Label Stating Operating Requirements	Y	CC	
8-16-303.4	Control Device (one of the following, except as provided in 8-16-303.5)	Y	CC	
8-16-303.4.1	Freeboard Ratio ≥ 0.75	Y	CC	
8-16-303.4.5	Enclosed Design	Y	CC	
8-16-501	Solvent Records	Y	CC	
8-16-501.2	Facility-wide Annual Solvent Usage Records	Y	CC	
8-16-501.5	Records Retained for Previous 60 Month Period	Y	CC	
BAAQMD Regulation 8, Rule 29	Aerospace Assembly and Component Coating Operations (12/20/95)			
8-29-304	Solvent Evaporative Loss Minimization	Y	CC	
8-29-304.1	Use closed containers for solvent surface prep and cleanup	Y	CC	
8-29-304.3	Close containers of stripper subject to this Rule, coating, catalyst, thinner, or solvent when not in use	Y	CC	
EPA 40 CFR 63 Subpart GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities (12/08/00)			
63.744	Standards: Cleaning Operations	Y	CC	
63.744 (a)	Housekeeping Measures	Y	CC	
63.744 (a)(1)	Closed Containers for Solvent Laden Materials	Y	CC	
63.744 (a)(2)	Closed Containers for Fresh or Spent Solvents	Y	CC	



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63.744 (a)(3)	Solvent Handling – Spill Minimization	Y	CC	
63.744 (d)	Flush Cleaning – Enclosed Containers	Y	CC	
63.752	Recordkeeping Requirements	Y	CC	
63.752(b)(1)	Name, Vapor Pressure, and HAP Content of Each Cleaning Solvent	Y	CC	
63.753	Reporting Requirements	Y	CC	
63.753(b)(1)	Semiannual Reports	Y	CC	
BAAQMD Cond #9044	Permit Condition For S1, S9, S10, S57, S64, S78, S80, S105, S112, S128, S140			
Part 1	Annual Solvent Usage Limit [Offsets]	Y	CC	
Part 2	Recordkeeping [Offsets]	Y	CC	
BAAQMD Cond #8016	Permit Condition for S258			
Part 1	Net Solvent Usage Limit [Offsets]	Y	CC	
Part 2	Recordkeeping [Offsets]	Y	CC	
BAAQMD Cond #18250	Permit Condition for S284			
Part 1	Net Solvent Usage Limit [Cumulative Increase]	Y	CC	
Part 2	Recordkeeping [Cumulative Increase, Regulation 2, Rule 5]	Y	CC	
BAAQMD Cond #18484	Permit Condition for S288, S289, S290			
Part 1	Net Solvent Usage Limit [Cumulative Increase]	Y	CC	
Part 2	Recordkeeping [Cumulative Increase, Regulation 2, Rule 5]	Y	CC	
BAAQMD Cond #23707	Permit Condition For S330			
Part 1	Net Solvent Usage Limit [Cumulative Increase, BACT]	Y	CC	
Part 2	Recordkeeping [Cumulative Increase, Reg. 8-16-501]	Y	CC	



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BAAQMD Cond #23737	Permit Condition For S331			
Part 1	Net Solvent Usage Limit [Cumulative Increase, BACT]	Y	CC	
Part 2	Recordkeeping [Cumulative Increase, Reg. 8-16-501]	Y	CC	

* Source S-128 was removed from the PTO during this reporting period. Sources S-105, S-128, S-140, and S-289 have been permanently removed and are no longer permitted with the BAAQMD.

Table IV – B: Chrome Plating Operations

S16, S17, S18, S19, S20, S21, S22, S23: Chrome Plating Operations

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 11, Rule 8	Hazardous Pollutants – Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations (11/4/98) – Adoption of Section 93102, Subchapter 7.5, Chapter 1, Division 3, Title 17 of the California Code of Regulations	Y	CC	
CCR, Title 17, Section 93102 – 93102.16	Airborne Toxic Control Measure for Chromium Plating and Chromic Acid Anodizing Facilities (10/24/2007)	Y	CC	
93102.4	Requirements for Existing, Modified, and New Hexavalent Chromium Plating and Chromic Acid Anodizing Facilities	Y	CC	
93102.4(b)(1)	Limits that Apply to All Existing Hexavalent Chromium Plating and Chromic Acid Anodizing Facilities after October 24, 2007	Y	CC	
93102.4(b)(2)	Demonstrating Compliance with the Emission Limitations in Table 93102.4	Y	CC	
93102.4(b)(2)(A)(2)	Measurement from centroid of the stack to the property line of the nearest sensitive receptor	Y	CC	
93102.4(b)(2)(B)	Must use an add-on air pollution control device(s) to control hexavalent chromium	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
93102.5	Requirements that Apply to Existing, Modified and New Hexavalent Chromium Plating and Chromic Acid Anodizing Facilities Beginning October 24, 2007	Y	CC	
93102.5(a)	Removal of Add-on Pollution Control Device(s)	Y	CC	
93102.5(b)	Environmental Compliance Training	Y	CC	
93102.5(c)	Housekeeping Requirements	Y	CC	
93102.7	Performance Test Requirements and Test Methods	Y	CC	
93102.7(a)	Performance Test Requirements	Y	CC	
93102.9	Parameter Monitoring Requirements	Y	CC	
93102.9(a)	Ampere-hours	Y	CC	
93102.9(b)	Pressure drop	Y	CC	
93102.10	Inspection and Maintenance Requirements	Y	CC	
93102.10(a)	Table 93102.10 – Summary of Inspection and Maintenance Requirements	Y	CC	
93102.11	Operation and Maintenance Plant (O & M Plan) Requirements	Y	CC	
93102.11(a)	Prepare O & M Plan	Y	CC	
93102.11(b)	Retain the O & M Plan	Y	CC	
93102.11(c)	Changes to the O & M Plan	Y	CC	
93102.11(d)	Revisions to the O & M Plan to Address Breakdowns	Y	CC	
93102.12	Recordkeeping Requirements	Y	CC	
93102.12(a)	Inspection records	Y	CC	
93102.12(b)	Performance test records	Y	CC	
93102.12(c)	Monitoring data records	Y	CC	
93102.12(d)	Breakdown records	Y	CC	No recordable breakdowns occurred during this reporting period.
93102.12(e)	Records of excesses	Y	CC	No recordable excesses occurred during this reporting period.



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93102.12(g)	Records of annual ampere-hour use	Y	CC	
93102.12(j)	New/modified source review information	Y	CC	
93102.12(k)	Housekeeping records	Y	CC	
93102.12(l)	Records retention	Y	CC	
93102.13	Reporting Requirements	Y	CC	
93102.13(a)	Performance test documentation	Y	CC	
93102.13(c)	Ongoing compliance status reports	Y	CC	
93102.13(d)	Reports of breakdowns	Y	CC	No reportable breakdowns occurred during this reporting period.
93102.13(f)	Adjustments to the timeline for submittal and format of reports	Y	NA	This is an agency requirement. No adjustments to report timelines have been requested.
93102.14	Procedures for Establishing Alternative Requirements	Y	CC	
93102.14(a)	Request approval of an Alternative Requirement	Y	NA	No alternative requirements were requested.
93102.14(b)	Approval of an Alternative Requirement	Y	NA	This is an agency requirement. No alternative approvals were requested.
93102.14(c)	Concurrence for an Alternative Requirement	Y	NA	This is an agency requirement. No alternative approvals were requested.
93102.14(d)	Reports of Approved Alternative Requirements to U.S. EPA and ARB	Y	NA	This is an agency requirement. No alternative approvals were requested.
93102.14(e)	Approval Criteria	Y	NA	This is an agency requirement. No alternative approvals were requested.
93102.14(f)	Alternatives Approved by U.S. EPA	Y	NA	This is an agency requirement. No alternative approvals were requested.
BAAQMD Cond #23542				
Part 1	Performance Standards [93102.4(b)(1), 93102.2(b)]	Y	CC	
Part 2	Abatement [TBACT]	Y	CC	
Part 3	Source Testing [93102.7]	Y	CC	
Part 4	Training [93102.5(b)]	Y	CC	



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Part 5	Housekeeping [93102.5(c)]	Y	CC	
Part 6	Monitoring [93102.10(a), 93102.12(c)(1), 93102.9(b)]	Y	CC	
Part 7	Operation & Maintenance (O&M) Plan [93102.11]	Y	CC	
Part 8	Inspection & Maintenance Frequency [93102.10(a), Reg. 2-5]	Y	CC	
Part 9	Recordkeeping [93102.12]	Y	CC	
Part 10	Reporting [93102.13(a), 93102.13(c)]	Y	CC	

Table IV – C: Solvent Cleaning Operations
S56: Spray Cleaning – Preclean Room
S92: Aircraft Wash Area
S198: Wipe Cleaning

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
BAAQMD Regulation 8, Rule 16	Organic Compounds – Solvent Cleaning Operations (10/16/02)			
8-16-111	Exemption, Wipe Cleaning	Y	CC	
8-16-123	Limited Exemption, Specific Cleaning Operations	Y	CC	
8-16-501	Recordkeeping	Y	CC	
8-16-501.2	Facility-wide Annual Solvent Usage Records	Y	CC	
8-16-501.3	Wipe Cleaning Solvent Usage Records	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-16-501.5	Records Retained for Previous 60 Month Period	Y	CC	
BAAQMD Regulation 8, Rule 29	Aerospace Assembly and Component Coating Operations (12/20/95)			
8-29-304	Solvent Evaporative Loss Minimization	Y	CC	
8-29-304.1	Use closed containers for solvent surface prep and cleanup	Y	CC	
8-29-304.3	Close containers of stripper subject to this Rule, coating, catalyst, thinner, or solvent when not in use	Y	CC	
EPA 40 CFR Part 63 Subpart GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities (12/7/15)			
63.744	Standards: Cleaning Operations	Y	CC	
63.744(a)	Housekeeping Measures	Y	CC	
63.744(a)(1)	Closed Containers for Solvent Laden Materials	Y	CC	
63.744(a)(2)	Closed Containers for Fresh or Spent Solvents	Y	CC	
63.744(a)(3)	Solvent Handling – Spill Minimization	Y	CC	
63.744(b)	Hand-wipe Cleaning	Y	CC	
63.744(b)(2)	Composite Vapor Pressure Limit	Y	CC	
63.752	Recordkeeping Requirements	Y	CC	
63.752(b)(1)	Name, Vapor Pressure, and HAP Content of Each Cleaning Solvent	Y	CC	
63.753	Reporting Requirements	Y	CC	
63.753(b)(1)	Semiannual Reports	Y	CC	



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Table IV – D: Coating Operations

S61, S123, S126, S146: Aerospace Paint Spray Booths with Associated Drying Ovens
S400: Facility-Wide Non-Booth Aerospace Coating Operations

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-1-322	Spray Equipment Cleanup Limitation	Y	CC	
BAAQMD Regulation 8, Rule 29	Organic Compounds – Aerospace Assembly and Component Coating Operations (12/20/95)			
8-29-302	Coating VOC Limitations	Y	CC	
8-29-304	Solvent Evaporative Loss Minimization	Y	CC	
8-29-304.1	Closed Containers for Solvent Impregnated Paper or Cloth	Y	CC	
8-29-304.2	No Organic Compounds for Cleanup of Spray Equipment Unless Controls are Used	Y	CC	
8-29-304.3	Closed Containers of Solvent or Coating	Y	CC	
8-29-308	Prohibition of Specification	Y	CC	
8-29-310	Spray Application Equipment Limitations	Y	CC	
8-29-501	Records	Y	CC	
8-29-501.1	Maintain Data Necessary to Evaluate Compliance	Y	CC	
8-29-501.2	Weekly Coating Usage Records	Y	CC	
8-29-501.4	Monthly Cleanup Solvent Usage	Y	CC	
8-29-501.6	Records Retention	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
40 CFR 63 Subpart GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities (12/7/15)			
63.744	Standards: Cleaning Operations	Y	CC	
63.744 (a)	Housekeeping Measures	Y	CC	
63.744 (a)(1)	Closed Containers for Solvent Laden Materials	Y	CC	
63.744 (a)(2)	Closed Containers for Fresh or Spent Solvents	Y	CC	
63.744 (a)(3)	Solvent Handling – Spill Minimization	Y	CC	
63.744(c)	Spray Gun Cleaning Techniques	Y	CC	
63.745	Standards: Primer and Topcoat Application Operations	Y	CC	
63.745(b)	Spill Minimization	Y	CC	
63.745(c)	HAP and VOC Limits for Uncontrolled Coatings	Y	CC	
63.745(e)	Compliance Methods	Y	CC	
63.745(f)	Application Equipment	Y	CC	
63.745(f)(1)	Acceptable Application Techniques	Y	CC	
63.745(f)(2)	Proper Operation of Application Devices	Y	CC	
63.745(f)(3)	Application Equipment Exemptions	Y	CC	
63.745(f)(3)(iv)	Airbrush Application Exemptions	Y	CC	
63.745(f)(3)(v)	Handheld Spray Gun Application Exemption	Y	CC	
63.745(f)(3)(vi)	Touch-up and Repair Exemption	Y	CC	
63.745(g)	Control of Inorganic HAP Emissions as Particulate (does not apply to S-400)	Y	CC	
63.751	Monitoring Requirements	Y	CC	
63.751(a)	Monitoring of Enclosed Spray Gun Cleaners	Y	NA	There were no enclosed spray gun cleaners in use during this reporting period.



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
63.751(c)	Monitoring of Particulate Control Equipment (does not apply to S-400)	Y	CC	
63.752	Recordkeeping Requirements	Y	CC	
63.752(b)(1)	Name, Vapor Pressure, and HAP Content of Each Cleaning Solvent	Y	CC	
63.752(c)(1)	Name and VOC of Each Primer and Topcoat	Y	CC	
63.752(c)(2)(i)	Mass Emissions of Organic HAP and VOC	Y	CC	
63.752(c)(2)(ii)	Data Used to Determine Mass Emissions	Y	CC	
63.752(c)(2)(iii)	Monthly Record of the Volume of Each Coating Used	Y	CC	
63.752(d)	Primer and Topcoat Inorganic HAP Emissions – Records for Particulate Control Devices (does not apply to S-400)	Y	CC	
63.753	Reporting Requirements	Y	CC	
63.753(b)(1)	Semiannual Reports – Cleaning Operations	Y	CC	
63.753(c)(1)	Semiannual Reports – Primer and Topcoat Operations	Y	CC	
63.753(c)(2)	Annual Reports – HAP Particulate Control Systems	Y	CC	
BAAQMD Cond #21946	Permit Condition for S123			
Part 1	Abatement requirement [Cumulative increase, Regulation 2, Rule 5]	Y	CC	
Part 2	Abatement operating requirement [Cumulative increase, 40 CFR 63.745(g)(3)]	Y	CC	
Part 3	Abatement equipment and recordkeeping requirements [40 CFR 63.745(g)(2)(iv), Regulation 2-1-403]	Y	CC	



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Table IV – E: APU and Engine Test Cell

S87, S88: APU Test Cells
S89, S90: Engine Test Cells

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/07)			
6-1-301	Ringelmann #1 Limitation	N	CC	
6-1-401	Appearance of Emissions	N	CC	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann #1 Limitation	Y	CC	
6-401	Appearance of Emissions	Y	CC	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)			
9-1-301	Limitations on Ground Level Concentrations	N	CC	
9-1-304	Liquid and Solid Fuels	N	CC	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/1999)			
9-1-301	Limitations on Ground Level Concentrations	Y	CC	
9-1-304	Liquid and Solid Fuels	Y	CC	
BAAQMD Cond #16558	Permit Condition for S87, S88, S89			
Part 1	Low Sulfur Fuel [Regulation 9-1-304]	Y	CC	
Part 2	Visible Emissions Check [Regulation 2-1-403]	Y	CC	
Part 3	Recordkeeping [Regulation 2-6-501]	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Cond #14315	Permit Condition for S90			
Part 1	Operating Time Limitations [Offsets]	Y	CC	
Part 2	Fuel Usage Limitation, Engine Model PW4090 [Offsets]	Y	CC	
Part 3	NO _x Emission Limit/Engine Specific Emission Factors [Cumulative Increase, Offsets]	Y	CC	
Part 4	Low Sulfur Fuel [Regulation 9-1-304]	Y	CC	
Part 5	Visible Emissions Check [Regulation 2-1-403]	Y	CC	
Part 6	Recordkeeping [Regulation 2-6-501]	Y	CC	

Table IV – F: Boilers
S95, S96: Boilers

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 6, Rule 1	Particulate Matter and Visible Emissions (12/5/07)			
6-1-301	Ringelmann #1 Limitation	N	CC	
6-1-305	Visible Particles	N	CC	
6-1-310	Particulate Weight Limitation	N	CC	
6-1-310.3	Heat Transfer Operations	N	NA	Actual measure of PM concentration was not conducted during this reporting period.
6-1-401	Appearance of Emissions	N	CC	
6-1-601	Particulate Matter Manual of Procedures	N	CC	
SIP Regulation 6	Particulate Matter and Visible Emissions (12/19/90)			



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
6-301	Ringelmann #1 Limitation	Y	CC	
6-305	Visible Particles	Y	CC	
6-310	Particulate Weight Limitation	Y	CC	
6-310.3	Heat Transfer Operations	Y	NA	Actual measure of PM concentration was not conducted during this reporting period.
6-401	Appearance of Emissions	Y	CC	
6-1-601	Particulate Matter Manual of Procedures	Y	CC	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)			
9-1-301	Limitations on Ground Level Concentrations	N	CC	Natural gas firing.
9-1-302	General Emissions Limitation	N	CC	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (6/8/99)			
9-1-301	Limitations on Ground Level Concentrations	Y	CC	
9-1-302	General Emissions Limitation	Y	CC	
BAAQMD Regulation 9, Rule 7	Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (5/4/11)			
9-7-115	Limited Exemption, Startup and Shutdowns	N	CC	
9-7-307	Final Emission Limits	N	CC	
9-7-307.6	NOx and CO Limits (NOx Limit: 5 ppmv, dry at 3% oxygen; CO Limit: 400 ppmv, dry at 3% oxygen) for boilers >75 MMBtu/hr	N	CC	
9-7-311	Insulation Requirements	N	CC	
9-7-312	Stack Gas Temperature Limits	N	CC	
9-7-503	Records	N	CC	
9-7-503.4	Source Test Records and Record Retention	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
9-7-506	Periodic Testing	N	CC	
SIP Regulation 9, Rule 7	Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (12/15/97)			
9-7-301	Emission Limits – Gaseous Fuels	Y	CC	
9-7-301.1	Performance Standard, NOx	Y	CC	
9-7-301.2	Performance Standard, CO	Y	CC	
9-7-503	Records	Y	CC	
9-7-503.1	Tune-up Records	Y	CC	
9-7-503.2	Natural Gas Curtailment Records	Y	NA	Natural gas curtailments did not occur during this reporting period.
9-7-503.4	Source Test Records and Record Retention	Y	NA	This initial compliance demonstration requirement pre-dates July 1996 operations.
40 CFR Part 63, Subpart DDDDD	National Emissions Standards for Hazardous Air Pollution Industrial, Commercial, and Institutional Boilers and Process Heaters (3/21/11)			
63.7500	Emission limitations, work practice standards, and operating limits	Y	CC	
63.7500(e)	Tune-up requirement for unit designed to burn gas I subcategory	Y	CC	
63.7505	General Requirements	Y	CC	
63.7505(a)	Compliance with emission limits, work practice standards, and operating limits	Y	CC	
63.7505(c)	Compliance with emission limits	Y	CC	
63.7530	Initial Compliance Requirements	Y	CC	
63.7530(d)	Notification of Compliance Status	Y	CC	
63.7555	Record Requirements	Y	CC	
63.7555(a)	Records	Y	CC	
63.7555(a)(1)	Notification and Report Records	Y	CC	



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Table 3 to Subpart DDDDD	Annual Tune-up Requirements	Y	CC	
BAAQMD Cond #25429				
Part 1	Abatement Requirements [Cumulative Increase]	Y	CC	
Part 2	Exhaust Ammonia Concentration Requirements [Regulation 2-5, Regulation 2-1-403]	Y	CC	
Part 3	Startup and Shutdown Requirements [Regulation 9-7-115]	Y	CC	

Table IV – G: Non-Aerospace Paint Booths (Facilities)**S155, S156, S157: Facilities Paint Booth**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-1-322	Spray Equipment Clean-up Limitation	Y	CC	
BAAQMD Regulation 8, Rule 14	Organic Compounds – Surface Coating of Miscellaneous Metal Parts and Products (10/16/02)			
8-14-302	Coating VOC Limits	Y	CC	
8-14-304	Transfer Efficiency	Y	CC	
8-14-308	Prohibition of Specification	Y	CC	
8-14-310	Specialty Coating VOC Limits	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-14-320	Solvent Evaporative Loss Minimization	Y	CC	
8-14-320.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-14-320.2	Closed Containers for Fresh or Spent Solvent Storage	Y	CC	
8-14-320.3	Spray Equipment Cleanup Requirements	Y	CC	
8-14-321	Surface Preparation Standards	Y	CC	
8-14-501	Records	Y	CC	
8-14-501.1	Maintain Current List of Coatings and Data Necessary to Evaluate Compliance	Y	CC	
8-14-501.2	Daily Coating Usage Records	Y	CC	
8-14-501.3	Monthly Coating Usage Records	Y	CC	
8-14-501.4	Records Retention	Y	CC	
BAAQMD Regulation 8, Rule 19	Organic Compounds – Surface Coating of Miscellaneous Metal Parts and Products (10/16/02)			
8-19-302	Coating VOC Limits	Y	CC	
8-19-307	Prohibition of Specification	Y	CC	
8-19-312	Specialty Coating VOC Limits	Y	CC	
8-19-313	Spray Application Equipment Limitations	Y	CC	
8-19-313.1	HVLP Spray; or	Y	CC	
8-19-313.2	Electrostatic Spray; or	Y	NA	Electrostatic spray gun was not used during the reporting period.
8-19-313.3	Detailing Gun; or	Y	NA	Detailing spray gun was not used during the reporting period.
8-19-313.4	Other Method Approved in Writing by the APCO	Y	NA	Other application methods were not used during the reporting period.
8-19-320	Solvent Evaporative Loss Minimization	Y	CC	
8-19-320.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-19-320.2	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-19-320.3	Spray Equipment Cleanup Requirements	Y	CC	
8-19-321	Surface Preparation Standards	Y	CC	
8-19-501	Records	Y	CC	
8-19-501.1	Maintain Data Necessary to Evaluate Compliance	Y	CC	
8-19-501.2	Weekly Coating Usage Records	Y	CC	
8-19-501.4	Monthly Cleaning Solvent Records	Y	CC	
8-19-501.5	Records Retention	Y	CC	
BAAQMD Regulation 8, Rule 32	Organic Compounds – Wood Products Coatings (8/5/09)			
8-32-301	Spray Application Equipment Limitations	N	CC	
8-32-302	General Wood Products Coating VOC Limits	N	CC	
8-32-303	Furniture, Custom Cabinetry, and Custom Architectural Millwork VOC Limits	N	CC	
8-32-304	Custom and Contract Furniture VOC Limits	N	NA	Custom furniture operations are not conducted at these sources.
8-32-305	Prohibition of Specification	N	CC	
8-32-320	Solvent Evaporative Loss Minimization	N	CC	
8-32-320.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	N	CC	
8-32-320.2	Closed Containers for Spent or Fresh Organic Solvents	N	CC	
8-32-320.3	Mixing and Storage Equipment Cleanup Requirements	N	CC	
8-32-320.4	Spray Equipment Cleanup Requirements	N	CC	
8-32-320.5	Closed Containers for Wood Products Coatings and Solvents	N	CC	
8-32-321	Surface Preparation Standards	N	CC	
8-32-501	General Recordkeeping Requirements	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-32-501.1	Maintain Current List of Coatings and Data Necessary to Evaluate Compliance	N	CC	
8-32-501.2	Daily Coating and Solvent Usage Records	N	CC	
8-32-501.4	Records Retention	N	CC	
8-32-502	Refinishing, Replacement, and Custom Replica Furniture Operations Recordkeeping	N	NA	
8-32-502.1	Maintain Current List of Coatings and Data Necessary to Evaluate Compliance	N	NA	Refinishing, replacement or custom replica furniture operations are not conducted at these sources.
8-32-502.2	Monthly Coating and Solvent Usage Records	N	NA	Refinishing, replacement or custom replica furniture operations are not conducted at these sources.
8-32-502.3	Records Retention	N	NA	Refinishing, replacement or custom replica furniture operations are not conducted at these sources.
8-32-503	Custom Architectural Millwork and Cabinetry Recordkeeping Requirements	N	NA	Custom architectural millwork and cabinetry are not conducted at these sources.
SIP Regulation 8, Rule 32	Organic Compounds – Wood Products Coatings (12/23/97)			
8-32-301	Spray Application Equipment Limitations	Y	CC	
8-32-303	General Wood Products Coating VOC Limits	Y	CC	
8-32-304	Furniture, and Custom Architectural Millwork Coating VOC Limits	Y	CC	
8-32-320	Solvent Evaporative Loss Minimization	Y	CC	
8-32-320.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-32-320.2	Closed Containers for Fresh or Spent Solvent Storage	Y	CC	
8-32-320.3	Mixing and Storage Equipment Cleanup Requirements	Y	CC	
8-32-320.4	Closed Containers for Wood Products Coatings and Solvents	Y	CC	
8-32-501	General Recordkeeping Requirements	Y	CC	
8-32-501.1	Maintain Current List of Coatings and Data Necessary to Evaluate Compliance	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-32-501.2	Daily Coating and Solvent Usage Records	Y	CC	
8-32-501.4	Records Retention	Y	CC	
8-32-502	Refinishing, Replacement and Custom Replica Furniture Recordkeeping Requirements	Y	CC	
8-32-502.1	Maintain Current List of Coatings and Data Necessary to Evaluate Compliance	Y	CC	
8-32-502.2	Monthly Coating and Solvent Usage Records	Y	CC	
8-32-502.3	Records Retention	Y	CC	
8-32-503	Custom Architectural Millwork Recordkeeping Requirements	Y	NA	Custom architectural millwork and cabinetry are not conducted at these sources.
BAAQMD Regulation 8, Rule 45	Organic Compounds – Motor Vehicle and Mobile Equipment Coating Operations (12/3/08)			
8-45-301	Coating VOC Limits	N	CC	
8-45-303	Transfer Efficiency	N	CC	
8-45-303.1	Electrostatic Application; or	N	NA	Electrostatic application equipment was not used during the reporting period.
8-45-303.2	HVLP Spray; or	N	CC	
8-45-303.3	Other Method Approved in Writing by the APCO	N	NA	Other types of application methods requiring APCO approval were not used during the reporting period.
8-45-304	Prohibition of Specification	N	CC	
8-45-308	Surface Preparation and Solvent Loss Minimization	N	CC	
8-45-308.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	N	CC	
8-45-308.2	Closed Containers for Spent or Fresh Organic Solvents	N	CC	
8-45-308.3	Spray Equipment Cleanup Requirements	N	CC	
8-45-308.5	Surface Preparation Solvent VOC Limits	N	CC	
8-45-315	HVLP Marking	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-45-316	Particulate Filtration	N	CC	
8-45-317	Most Restrictive VOC Limit	N	CC	
8-45-318	Prohibition of Possession	N	CC	
8-45-501	Records	N	CC	
8-45-501.1	Maintain Data Necessary to Evaluate Compliance	N	CC	
8-45-501.2	Monthly Coating Records	N	CC	
8-45-501.3	Current Material Information	N	CC	
8-45-501.4	Records Retention	N	CC	
SIP Regulation 8, Rule 45	Organic Compounds – Motor Vehicle and Mobile Equipment Coating Operations (5/26/00)			
8-45-301	Coating VOC Limits	Y	CC	
8-45-303	Transfer Efficiency	Y	CC	
8-45-303.1	Electrostatic Application; or	Y	CC	
8-45-303.2	HVLP Spray; or	Y	CC	
8-45-303.3	Other Method Approved in Writing by the APCO	Y	CC	
8-45-308	Surface Preparation and Solvent Loss Minimization	Y	CC	
8-45-308.4	Surface Preparation Solvent VOC Limits	Y	CC	
8-45-311	Small Production/Utility Bodies – Exclusion	Y	CC	
8-45-312	Specialty Coating Limitations	Y	CC	
8-45-313	Temporary Protective Coating Limitation	Y	CC	
8-45-314	Precoat Limitation	Y	CC	
8-45-316	Particulate Filtration	Y	CC	
8-45-501	Coating Records	Y	CC	
8-45-501.2	Weekly Coating Records	Y	CC	
8-45-501.3	Daily Coating Records	Y	CC	
8-45-501.4	Monthly Coating Records	Y	CC	
8-45-501.5	Records Retention	Y	CC	



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Table IV – H: Resin Laminating

S240: Facility-Wide Miscellaneous Resin Laminating

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
BAAQMD Regulation 8, Rule 50	Organic Compounds – Polyester Resin Operations (10/2/09)			
8-50-301	Process Material Requirements	N	CC	
8-50-301.4	Closed Mold	N	CC	
8-50-301.5	Vapor Suppressant Requirements	N	CC	
8-50-301.6	Open Mold Requirements	N	CC	
8-50-301.7	Hand-held Application Requirements	N	CC	
8-50-302	Application Requirements	N	CC	
8-50-302.2	Resin Application Requirements	N	CC	
8-50-302.3	Touch-up Application Requirements	N	CC	
8-50-305	Surface Preparation and Cleaning Products Requirements	N	CC	
8-50-306	Equipment Requirements	N	CC	
8-50-307	Gel Coat Requirement	N	CC	
8-50-308	Prohibition of Specification Requirement	N	CC	
8-50-309	Compliance Statement Requirement	N	CC	
8-50-501	Recordkeeping Requirements	N	CC	
8-50-501.1	Resin List Requirements	N	CC	
8-50-501.2	Resin Content Requirements	N	CC	
8-50-501.3	Vapor Suppressed Resin Requirements	N	CC	
8-50-501.4	Daily Record Requirements	N	CC	
8-50-501.5	Records Retention	N	CC	



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Table IV – I: Adhesive Application and Stripping Operation

S262: Adhesive Application and Stripping Operation

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
BAAQMD Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)			
8-4-302	Solvents and Surface Coating Requirements	Y	CC	
8-4-312	Solvent Evaporation Loss Minimization	Y	CC	
8-4-312.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-4-312.3	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-4-501	Recordkeeping	Y	CC	
8-4-501.1	Maintain Data Necessary to Evaluate Compliance	Y	CC	
8-4-501.2	Annual Records of Coating Applied and Solvent Used	Y	CC	
8-4-501.4	Records Retention	Y	CC	
BAAQMD Cond #9078	Permit Condition for S262			
Part 1	Net Solvent Usage Limit [Cumulative Increase]	Y	CC	
Part 2	Adhesive Usage Limit [Cumulative Increase]	Y	CC	
Part 3	Recordkeeping [Cumulative Increase]	Y	CC	



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Table IV – J: Dissolved Air Flotation Unit**S244: Dissolved Air Flotation Unit**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 8	Organic Compounds – Wastewater Collection and Separator Systems (9/15/04)			
8-8-303	Gauging and Sampling Devices – Vapor Tight Covers	N	CC	
8-8-305	Oil-Water Separator and/or Air Flotation Unit Slop Oil Vessels	N	CC	
8-8-305.1	Solid, Gasketed, Fixed Cover	N	CC	
8-8-307	Air Flotation Unit	N	CC	
8-8-307.1	Solid, Gasketed, Fixed Cover	N	CC	
8-8-308	Junction Box – Solid, Gasketed, Fixed Cover or Solid Manhole Cover	Y	CC	
8-8-501	API Separator or Air Flotation Bypassed Wastewater Records	N	CC	
8-8-503	Inspection and Repair Records	N	CC	
SIP Regulation 8, Rule 8	Organic Compounds – Wastewater Collection and Separator Systems (8/29/94)			
8-8-303	Gauging and Sampling Devices – Vapor Tight Covers	Y	CC	
8-8-305	Oil-Water Separator and/or Air Flotation Unit Slop Oil Vessels	Y	CC	
8-8-305.1	Solid, Gasketed, Fixed Cover	Y	CC	
8-8-307	Air Flotation Unit	Y	CC	
8-8-307.1	Solid, Gasketed, Fixed Cover	Y	CC	
8-8-308	Junction Box – Solid, Gasketed, Fixed Cover or Solid Manhole Cover	Y	CC	
8-8-501	API Separator or Air Flotation Bypassed Wastewater Records	Y	CC	
8-8-503	Inspection and Repair Records	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Cond #5696				
Part 1	Enclosed with Solid, Gasketed Cover [Regulation 8-8-307.1]	Y	CC	
Part 2	Maximum Equipment Capacity Limit [Offsets]	Y	CC	
Part 3	Annual Throughput Limit [Offsets]	Y	CC	
Part 4	Recordkeeping [Recordkeeping]	Y	CC	

Table IV – K: Non-Retail Gasoline Dispensing Facility*

S285: Non-Retail Gasoline Dispensing Facility

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 7	Organic Compounds – Gasoline Dispensing Facilities (11/6/02)			
8-7-113	Tank Gauging and Inspection Exemption	Y	CC	
8-7-114	Stationary Tank Testing Exemption	Y	CC	
8-7-116	Periodic Testing Requirements Exemption	Y	CC	
8-7-301	Phase I Requirements	Y	CC	
8-7-301.1	Requirements for Transfers into Stationary Tanks, Cargo, Tanks, and Mobile Refuelers	Y	CC	
8-7-301.2	CARB Certification Requirements	Y	CC	
8-7-301.3	Submerged Fill Pipe Requirement	Y	CC	
8-7-301.5	Maintenance and Operating Requirement	Y	CC	
8-7-301.6	Leak-Free and Vapor Tight Requirement for Components	Y	CC	
8-7-301.7	Fitting Requirements for Vapor Return Line	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-7-301.8	Coaxial Phase I Systems Certified by CARB prior to January 1, 1994, may not be installed on New or Modified Systems	Y	NA	Coaxial Phase I system not installed.
8-7-301.9	Anti-rotational Coupler or Swivel Adapter Required	Y	CC	
8-7-301.10	Vapor Recovery Efficiency Requirements for New and Modified Systems	Y	CC	
8-7-301.12	Spill Box Drain Valve Limitation	Y	CC	
8-7-301.13	Annual Vapor Tightness Test Requirement	Y	CC	
8-7-302	Phase II Requirements	Y	CC	
8-7-302.1	Requirements for Transfers into Motor Vehicle Fuel Tanks	Y	CC	
8-7-302.2	Maintenance Requirement	Y	CC	
8-7-302.3	Proper Operation and Free of Defects Requirements	Y	CC	
8-7-302.4	Repair Time Limit for Defective Components	Y	NA	No components have been marked as defective.
8-7-302.5	Leak-Free and Vapor Tight Requirements for Components	Y	CC	
8-7-302.6	Requirements for Bellows Nozzles	Y	CC	
8-7-302.7	Requirement for Vapor Recovery Nozzles on Balance Systems	Y	CC	
8-7-302.8	Minimum Liquid Removal Rate	Y	CC	
8-7-302.9	Coaxial Hose Requirement	Y	CC	
8-7-302.10	Construction Materials Specifications	Y	CC	
8-7-302.12	Liquid Retain Limitation	Y	CC	
8-7-302.13	Nozzle Spitting Limitation	Y	CC	
8-7-302.14	Annual Back Pressure Test Requirements for Balance Systems	Y	CC	
8-7-302.15	Annual Testing Requirements for Vacuum Assist Systems	Y	CC	
8-7-303	Topping Off	Y	CC	United complied with this requirement during this reporting period via operating practices.
8-7-304	Certification Requirements	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
8-7-306	Prohibition of Use	Y	CC	
8-7-307	Posting of Operating Instructions	Y	CC	
8-7-308	Operating Practices	Y	CC	
8-7-309	Contingent Vapor Recovery Requirements	Y	CC	
8-7-313	Requirements for New or Modified Phase II Installations	Y	CC	
8-7-314	Hold Open Latch Requirement	Y	CC	
8-7-316	Pressure Vacuum Valve Requirements, Aboveground Storage Tanks and Vaulted Below Grade Storage Tanks	Y	CC	
8-7-401	Equipment Installation or Modification	Y	CC	
8-7-406	Testing Requirements, New and Modified Installations	Y	CC	
8-7-407	Periodic Testing Requirements	Y	CC	
8-7-408	Periodic Testing Notification and Submission Requirements	Y	CC	
8-7-501	Burden of Proof	Y	CC	
8-7-502	Right of Access	Y	CC	
8-7-503	Record Keeping Requirements	Y	CC	
8-7-503.1	Gasoline Throughput Records	Y	CC	
8-7-503.2	Maintenance Records	Y	CC	
8-7-503.3	Records Retention Time	Y	CC	
BAAQMD Condition #18349	Gasoline Throughput Limit (Toxic Risk Management Policy)	N	NA	S-285 is no longer subject to this condition per PTO issued on October 1, 2021.
BAAQMD Condition #18135				S-285 is no longer subject to this condition per PTO issued on October 1, 2021.
Part 1	Phase II Vapor Recovery System (CARB Executive Order G-70-187)	N	NA	
Part 2	Fuel Recordkeeping (Regulation 2-1-403)	N	NA	
Part 3	Leak Free Components (Regulations 8-7-301.6 and 8-7-302.5)	N	NA	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
Part 4	Annual Leak/Pressure Test (CARB Executive Order G-70-187)	N	NA	
Part 5	Test Notification (Regulation 8-7-408)	N	NA	
Part 6	Coaxial Hose Length (CARB Executive Order G-70-187)	N	NA	
Part 7	Fuel Dispensing Rate (CARB Executive Order G-70-187)	N	NA	
Part 8	CARB-Approved System Monitor (CARB Executive Order G-70-187)	N	NA	
Part 9	Vacuum Operating Levels (CARB Executive Order G-70-187)	N	NA	
Part 10	OSHA Access Required (Regulation 2 - 1-403)	N	NA	
Part 11	Open Ball Valve Required (CARB Executive Order G-70-187)	N	NA	
Part 12	Maintenance Requirement (CARB Executive Order G-70-187)	N	NA	
Part 13	Fuel Dispensing Limitation (CARB Executive Order G-70-187)	N	NA	
Part 14	Equipment Painting (Regulation 2-1-403)	N	NA	
BAAQMD Condition #25723				
Part 1	Phase I Vapor Recovery System	N	CC	
Part 2	Standing Loss Control Requirements	N	CC	
Part 3	Static Pressure Performance Test	N	CC	
Executive Order G-70-187	CARB Executive Order G-70-187; Healy Model 400 ORVR System for Aboveground Tanks	N	CC	S-285 is no longer subject to this EO per PTO issued on October 1, 2021.
Executive Order VR-402-A	CARB Executive Order VR-402-A: Morrison Bros. Phase I Enhanced Vapor Recovery (EVR) System for Protected Aboveground Storage Tanks (AST)	N	CC	
Executive Order VR-301-A	CARB Executive Order VR-301-A: Standing Loss Control Vapor Recovery System for Existing Installations of Aboveground Storage Tanks	N	CC	

*S-285 is no longer subject to Condition #18349 and Condition #18135. S-285 is now subject to Condition #26870 (Phase II EVR Source Testing Requirement – EO VR-501) and Condition #22874 (Throughput Limit), which United is compliant with.



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Table IV – L: Diesel Engines for Standby Generators

S295, S296, S297, S300, S301, S326, S333: Emergency Standby Engines (Diesel)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/2007)			
6-1-303.1	Ringelmann No. 2 Limitation	N	CC	
6-1-310	Particulate Weight Limitation	N	CC	
6-1-401	Appearance of Emissions	N	CC	
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions	N	NA	No sampling equipment is used at these sources.
SIP Regulation 6	Particulate Matter and Visible Emissions (09/04/1998)			
6-1-303.1	Ringelmann No. 2 Limitation	Y	CC	
6-1-310	Particulate Weight Limitation	Y	CC	
6-1-401	Appearance of Emissions	Y	CC	
6-1-601	Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions	Y	NA	No sampling equipment is used at these sources.
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (3/15/1995)			
9-1-301	Limitations on Ground Level Concentrations	N	CC	
9-1-302	General Emission Limitation	N	CC	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	N	CC	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (6/8/99)			



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
9-1-301	Limitations on Ground Level Concentrations	Y	CC	
9-1-302	General Emission Limitation	Y	CC	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	CC	
BAAQMD Regulation 9, Rule 8	Inorganic Gaseous Pollutants, NOX and CO from Stationary IC Engines (07/25/2007)			
9-8-110.5	Exemptions: Emergency Standby Engines	N	CC	
9-8-330.1	Emergency Standby Engines, Hours of Operation – Unlimited for Emergencies	N	CC	
9-8-330.3	Emergency Standby Engines, Hours of Operation – 50 hrs limit	N	CC	
9-8-530	Emergency Standby Engines, Monitoring and Recordkeeping	N	CC	
9-8-530.1	Hours of operation (total)	N	CC	
9-8-530.2	Hours of operation (emergency)	N	CC	
9-8-530.3	Nature of the emergency condition	N	CC	
40 CFR Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (2/27/14) for S295, S296, S297, S300, S301, S326, S333			
63.6585	Applicability	Y	CC	
63.6585(a)	Applicable to stationary RICE	Y	CC	
63.6585(b)	Applicable to major sources of HAPs	Y	CC	
63.6640(f)	Requirements for emergency stationary RICE	Y	CC	
63.6640(f)(1)(i)	No time limit on use during emergency situations	Y	CC	
63.6640(f)(1)(ii)	Maintenance checks and readiness testing annual hour limit	Y	CC	
63.6640(f)(1)(iii)	Non-emergency operation annual hour limit	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
63.6602	Emission limitations for existing stationary RICE < 500 bhp located at major source of HAP emissions	Y	CC	
63.6625(f)	Installation of non-resettable hour meter	Y	CC	
63.6625(h)	Minimize engine idle time, not to exceed 30 minutes	Y	CC	
63.6655	What Records must I keep?	Y	CC	
63.6655(f)	Hours of operation	Y	CC	
Table 2c to Subpart ZZZZ	Requirements for existing Compression Ignition Stationary RICE Located at a Major Source of HAP Emissions	Y	CC	
Table 2c 1. a.	Schedule for oil and filter change	Y	CC	
Table 2c 1. b.	Schedule for air cleaner inspection	Y	CC	
Table 2c 1. c.	Schedule for hose and belt inspection	Y	CC	
Table 6 to Subpart ZZZZ	Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices	Y	CC	
Table 6 9. a.	Work Management Practices	Y	CC	
CCR, Title 17, Section 93115	ATCM for Stationary Compression Ignition Engines (5/19/2011) Applicable to S295, S296, S297, S300, S301			
93115.5	Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater than 50 bhp	N	CC	
93115.5(b)	Fuel requirements for in-use emergency standby stationary diesel-fueled CI engines	N	CC	
93115.5(b)(1)	CARB Diesel Fuel Requirements	N	CC	
93115.6	Emergency Standby Diesel-Fueled CI Engine (>50 bhp) Operating Requirements and Emission Standards	N	CC	
93115.6(b)	In-Use Emergency Standby Diesel-Fueled CI Engine (> 50 bhp) Operating Requirements and Emission Standards	N	CC	
93115.6(b)(1)	Operating restrictions for rotating outages	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
93115.6(b)(3)	Emission and operation standards	N	CC	
93115.6(b)(3)(A)	Diesel PM Standard and Hours of Operation Limitations	N	CC	
93115.6(b)(3)(A)(1)	General Requirements	N	CC	
93115.6(b)(3)(A)(1)(a)	Operating for maintenance and testing limited to 20 hrs/year when PM emitted at a rate ≥ 0.40 g/bhp-hr, excluding operating for emergency use and emissions testing	N	CC	
93115.10	Recordkeeping, Reporting, and Monitoring Requirements	N	CC	
93115.10(d)	Monitoring Equipment	N	CC	
93115.10(d)(1)	Install non-resettable hour meter with minimum display capability of 9,999 hours	N	CC	
93115.10(f)	Reporting Requirements for Emergency Standby Engines	N	CC	
93115.15	Severability	N	NA	General regulatory statement.
BAAQMD Cond #22820	Permit Condition for S295, S296, S297, S300, S301			
Part 1	Reliability-related testing limit (BAAQMD Regulation 2-5, Title 17, CCR, Section 93115.6(b)(3)(A)(1)(a))	N	CC	
Part 2	Emergency standby engine operations (BAAQMD Regulation 9-8-330, Title 17, CCR, Section 93115.6(b)(3)(A)(1)(a))	N	CC	
Part 3	Emergency standby engine non-resettable totalizing meter requirements (BAAQMD Regulation 9-8-530, Title 17, CCR, Section 93115.10(d)(1))	N	CC	
Part 4	Emergency standby engine recordkeeping (BAAQMD Regulation 9-8-530, 2-6-501, and Title 17, CCR, Section 93115.10(f))	N	CC	
40 CFR Part 60 Subpart A	Standards of Performance for New Stationary Sources – General Provisions (12/22/08) (S333 only)			



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
60.4	Address	Y	CC	
60.4(a)	Required submissions to Administrator	Y	CC	
60.7	Notification and Record-keeping	Y	CC	
60.7(b)	Maintain records of occurrence and duration of startup, shutdown, or malfunction	Y	CC	
60.12	Circumvention	Y	CC	
60.14	Modification	Y	CC	
60.15	Reconstruction	Y	CC	
60.19	General Notification and Reporting Requirements	Y	CC	
40 CFR Part 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (8/29/11) (S333 only)			
60.4200	Applicability	Y	CC	
60.4200(a)	Owners and operators of stationary CI ICE	Y	CC	
60.4200(a)(2)	Owners and operators of stationary CI ICE that commence construction after July 11, 2005, and CI ICE are manufactured after April 1, 2006, and are not fire pump engines	Y	CC	
60.4200(a)(4)	60.4208 applies if CI ICE commenced construction after July 11, 2005	Y	CC	
60.4205	Emissions Standards	Y	CC	
60.4205(b)	2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with standards for new nonroad CI engines in 60.4202 (40 CFR 89.112-113)	Y	CC	
60.4206	Comply with emissions standards over life of engine	Y	CC	
60.4207	Fuel Requirements	Y	CC	
60.4207(b)	Diesel fuel must meet requirements of 40 CFR 80.510(b) for nonroad fuel	Y	CC	
60.4209	Monitoring Requirements	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
60.4209(a)	Non-resettable hour meter	Y	CC	
60.4211	Compliance Requirements	Y	CC	
60.4211(a)	Compliance requirements for owners and operators that must comply with emissions standards	Y	CC	
60.4211(a)(1)	Operate and maintain the engine according to manufacturer's emission-related instructions	Y	CC	
60.4211(a)(2)	Change only emission-related settings allowed by manufacturer	Y	CC	
60.4211(c)	Purchase certified engine and install and configure according to manufacturer's emission-related specifications	Y	CC	
60.4211(f)	Comply with operating hours limitations	Y	CC	
60.4211(f)(1)	No limit on use of emergency stationary engine in emergency situations	Y	CC	
60.4211(f)(2)	Operate for specified purposes for max of 100 hours per calendar year	Y	CC	
60.4211(f)(2)(i)	Operate for maintenance checks and readiness testing recommended by federal, state, or local governments, manufacturer, or vendor	Y	CC	
60.4211(f)(3)	Operate for up to 50 hours per calendar year in non-emergency situations (counts toward 100-hour requirement in 60.4211(f)(2))	Y	CC	
60.4214	Notification, Reporting, and Record-keeping Requirements	Y	CC	
60.4214(b)	Not required to submit initial notification	Y	CC	
60.4218	Applicability of the General Provisions (40 CFR Part 60 Subpart A)	Y	CC	
CCR, Title 17, Section 93115	ATCM for Stationary Compression Ignition Engines (5/19/2011) Applicable to S326 and S333			
93115.5	Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater than 50 bhp	N	CC	
93115.5(a)	Fuel requirements for new emergency standby stationary diesel-fueled CI engines	N	CC	
93115.5(a)(1)	CARB Diesel Fuel Requirements	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
93115.6	ATCM for Stationary CI Engines - Emergency Standby Diesel-Fueled CI Engine (>50 bhp) Operating Requirements and Emission Standards	N	CC	
93115.6(a)	New Emergency Standby Diesel-Fueled CI Engine (> 50 bhp) Operating Requirements and Emission Standards	N	CC	
93115.6(a)(2)	Operating restrictions for rotating outages	N	CC	
93115.6(a)(3)	Emission and operation standards	N	CC	
93115.6(a)(3)(A)	Emissions Standards and Hours of Operating Requirements	N	CC	
93115.6(a)(3)(A)(1)	Applicable operating requirements and emission standards	N	CC	
93115.6(a)(3)(A)(1)(a)	Emission standards for new engines	N	CC	
93115.6(a)(3)(A)(1)(b)	Emissions standards for new engines (S333 only)	N	CC	
93115.6(a)(3)(A)(1)(c)	Operating Requirements	N	CC	
93115.10	ATCM for Stationary CI Engines - Recordkeeping, Reporting, and Monitoring Requirements	N	CC	
93115.10(d)	Monitoring Equipment	N	CC	
93115.10(d)(1)	Install non-resettable hour meter with minimum display capability of 9,999 hours	N	CC	
93115.10(f)	Reporting Requirements for Emergency Standby Engines	N	CC	
93115.15	Severability	N	NA	General regulatory statement.
BAAQMD Cond #22850	Permit Condition for S326, S333			
Part 1	Reliability-related testing limit (BAAQMD Regulation 2-5, Title 17, CCR, Section 93115.6(a)(3)(A)(1)(c))	N	CC	
Part 2	Emergency standby engine operations (BAAQMD Regulation 9-8-330, Title 17, CCR, Section 93115.6(a)(3)(A)(1))	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
Part 3	Emergency standby engine non-resettable totalizing meter requirements (BAAQMD Regulation 9-8-530, Title 17, Section 93115.10(d)(1))	N	CC	
Part 4	Emergency standby engine recordkeeping (BAAQMD Regulation 9-8-530, 2-6-501, and Title 17, Section 93115.10(f))	N	CC	



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Table IV – M: Diesel Engines for Standby Generators and Fire Pumps

**S304, S305, S306, S307, S308, S309, S310, S311, S312, S313, S314: Emergency Standby Engines,
 Fire Pump Engines (Diesel)**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/2007)			
6-1-303.1	Ringelmann No. 2 Limitation	N	CC	
6-1-310	Particulate Weight Limitation	N	CC	
6-1-401	Appearance of Emissions	N	CC	
SIP Regulation 6	Particulate Matter and Visible Emissions (09/04/1998)			
6-1-303.1	Ringelmann No. 2 Limitation	Y	CC	
6-1-310	Particulate Weight Limitation	Y	CC	
6-1-401	Appearance of Emissions	Y	CC	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (3/15/95)			
9-1-304	Fuel Burning (Liquid and Solid Fuels)	N	CC	
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants, Sulfur Dioxide Emissions Limitations (6/8/1999)			
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	CC	
BAAQMD Regulation 9, Rule 8	Inorganic Gaseous Pollutants, NOX and CO from Stationary IC Engines (07/25/2007)			
9-8-110.5	Exemptions: Emergency Standby Engines	N	CC	
9-8-330	Emergency Standby Engines, Hours of Operation	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
9-8-330.1	Emergency Standby Engines, Hours of Operation – Unlimited for Emergencies	N	CC	
9-8-330.3	Emergency Standby Engines, Hours of Operation – 50 hrs limit	N	CC	
9-8-530	Emergency Standby Engines, Monitoring and Recordkeeping	N	CC	
9-8-530.1	Hours of operation (total)	N	CC	
9-8-530.2	Hours of operation (emergency)	N	CC	
9-8-530.3	Nature of emergency condition	N	CC	
40 CFR Part 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (2/27/14)			
63.6585	Applicability	Y	CC	
63.6585(a)	Applicable to stationary RICE	Y	CC	
63.6585(b)	Applicable to major sources of HAPs	Y	CC	
63.6585(f)	Requirements for emergency stationary RICE	Y	CC	
63.6640(f)(1)(i)	No time limit on use during emergency situations	Y	CC	
63.6640(f)(1)(ii)	Maintenance checks and readiness testing annual hour limit	Y	CC	
63.6640(f)(1)(iii)	Non-emergency operation annual hour limit	Y	CC	
63.6602	Emission limitations for existing stationary RICE < 500 bhp located at major source of HAP emissions	Y	CC	
63.6625(f)	Installation of non-resettable hour meter	Y	CC	
63.6625(h)	Minimize engine idle time, not to exceed 30 minutes	Y	CC	
63.6655	What Records must I keep?	Y	CC	
63.6655(f)	Hours of operation	Y	CC	
Table 2c to Subpart ZZZZ	Requirements for existing Compression Ignition Stationary RICE Located at a Major Source of HAP Emissions	Y	CC	
Table 2c 1. a.	Schedule for oil and filter change	Y	CC	
Table 2c 1. b.	Schedule for air cleaner inspection	Y	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
Table 2c 1. c.	Schedule for hose and belt inspection	Y	CC	
Table 6 to Subpart ZZZZ	Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices	Y	CC	
Table 6 9. a.	Work or Management Practices	Y	CC	
63.6640(f)	Requirements for emergency stationary RICE	Y	CC	
CCR, Title 17, Section 93115	ATCM for Stationary Compression Ignition Engines (5/19/2011)			
93115.3(n)	Exemptions from 93115.6(b)(3) for in-use NFPA applicable engines.	N	CC	
93115.5	Fuel and Fuel Additive Requirements for New and In-Use Stationary CI Engines That Have a Rated Brake Horsepower of Greater than 50 (> 50 bhp)	N	CC	
93115.5(b)	Fuel requirements for in-use emergency standby stationary diesel-fueled CI engines	N	CC	
93115.6(b)(1)	Operating restrictions for rotating outages	N	CC	
93115.10(d)(1)	Install non-resettable hour meter with minimum display capability of 9,999 hours	N	CC	
93115.10(f)	Reporting Requirements for Emergency Standby Engines	N	CC	
93115.15	Severability	N	NA	General regulatory statement.
BAAQMD Cond #22851	Permit Condition for S304, S305, S306, S307, S308, S309, S310, S311, S312, S313, S314			
Part 1	Reliability-related testing limit ("Stationary Diesel Engine ATCM", Title 17, CCR, Section 93115.3(n))	N	CC	
Part 2	Emergency standby engine operations (BAAQMD Regulation 9-8-330)	N	CC	
Part 3	Emergency standby engine non-resettable totalizing meter requirements. (BAAQMD Regulation. 9-8-530, "Stationary Diesel Engine ATCM" Title 17, CCR, Section 93115.10(d)(1))	N	CC	
Part 4	Emergency standby engine recordkeeping (BAAQMD Regulation 9-8-530, 2-6-501, and "Stationary Diesel Engine ATCM" Title 17, CCR, Section 93115.10(f))	N	CC	



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Table IV – N: Thermal Spray Operations

S316, S317, S318, S319, S320, S321, S322, S323: Thermal Spray Booths

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 6, Rule 1	Particulate Matter (12/5/07)			
6-1-301	Ringelmann No. 1 Limitation	N	CC	
6-1-310	Particulate Weight Limitation	N	CC	
6-1-401	Appearance of Emissions	N	CC	
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)			
6-301	Ringelmann No. 1 Limitation	Y	CC	
6-310	Particulate Weight Limitation	Y	CC	
6-401	Appearance of Emissions	Y	CC	
CCR, Title 17, Section 93101.5	ATCM to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying (10/17/2006)			
93101.5(c)(1)(A)	Control Efficiency Requirements for Existing Thermal Spray Operations	N	CC	
93101.5(c)(1)(B)	Enclosure Standards	N	CC	
93101.5(c)(1)(C)	Ventilation Standards	N	CC	
93101.5(d)(1)	Testing to Demonstrate Compliance with Enclosure and Ventilation Standards	N	CC	
93101.5(d)(2)	Verification of Control Efficiency	N	CC	
93101.5(e)(1)	Monitoring Requirements	N	CC	
93101.5(e)(2)	Pressure Drop Monitoring Requirements	N	CC	
93101.5(e)(4)	Inspection and Maintenance Requirements	N	CC	
93101.5(f)	Recordkeeping Requirements	N	CC	
93101.5(g)	Reporting Requirements	N	CC	



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Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Cond. #23504	Permit Condition for S316, 317, 318, 319, 320, 321, 322, and 323			
Part 1	Usage Limit [Cumulative Increase, Regulation 2, Rule 5]	N	CC	
Part 2	Abatement [Regulation 2, Rule 5, Title 17, CCR, Section 93101.5(c)(1)(A).]	N	CC	
Part 3	Emission Rate Limit [Title 17, CCR, Section 93101.5(c)(1)(A)(2)]	N	CC	
Part 4	Equipment and operating Standards [Regulation 2-1-412, Title 17, CCR, Section 93101.5(c)(1)(B)]	N	CC	
Part 5	Equipment Standards [Title 17, CCR, Section 93101.5(c)(1)(C)]	N	CC	
Part 6	Monitoring Standards [Title 17, CCR, Section 93101.5(e)(1) & (e)(2)]	N	CC	
Part 7	Recordkeeping [Title 17, CCR, Section 93102.5(e)(1) Table (3)]	N	CC	
Part 8	Recordkeeping [Regulation 2-1-403, Title 17, CCR, Section 93101.5(f)]	N	CC	



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Table IV – O: Fuel Quantity Process Units (FQPU)**S401: FQPU Repair and Refurbish Station***

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Compliance Status	Comment/Corrective Action
BAAQMD Regulation 8, Rule 1	Organic Compounds – General Provisions (6/15/94)			
8-1-320	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-1-321	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
BAAQMD Regulation 8, Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)			
8-4-302	Solvents and Surface Coating Requirements	Y	CC	
8-4-312	Solvent Evaporation Loss Minimization	Y	CC	
8-4-312.1	Storage and Disposal of Solvent Impregnated Cloth or Paper	Y	CC	
8-4-312.3	Closed Containers for Spent or Fresh Organic Solvents	Y	CC	
8-4-501	Recordkeeping	Y	CC	
8-4-501.1	Maintain Data Necessary to Evaluate Compliance	Y	CC	
8-4-501.2	Annual Records of Coating Applied and Solvent Used	Y	CC	
8-4-501.4	Records Retention	Y	CC	
BAAQMD Regulation 8, Rule 29	Aerospace Assembly and Component Coating Operations (12/20/95)			
8-29-304	Solvent Evaporative Loss Minimization	Y	CC	
8-29-304.1	Use closed containers for solvent and surface prep and cleanup	Y	CC	
BAAQMD Cond. #26311	Permit Condition for S401			
Part 1	Net Materials Usage Limits [Cumulative Increase]	Y	CC	
Part 2	Alternative Materials Usage Limit [Cumulative Increase]	Y	CC	
Part 3	Recordkeeping [Cumulative Increase]	Y	CC	

* Source S-401 is no longer operation and removed from the site.



V. SCHEDULE OF COMPLIANCE

United Airlines is not under any Schedule of Compliance.

VI. PERMIT CONDITIONS

These are addressed in summary in Section IV.

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

A. 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.

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



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Table VII – A: Solvent Cleaning Sources (Grouped)

Applicable Limits and Compliance Monitoring Requirements

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

S258: OIL COOLER FLUSH CART

S284: OIL COOLER FLUSH CART

S288, S289, S290: RECYCLING PARTS WASHERS*

S330, S331: PARTS CLEANERS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
HAP	None	Y	None	40 CFR 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 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

*Sources S-105, S-129, S-140, and S-289 have been permanently removed and are no longer permitted with the BAAQMD.



Table VII – B: Chrome Plating Operations
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	Monitoring Type or Compl. Method	Continuous Compliance?
Hexavalent Chrome	Reg 11-8; 93102.4(b)(1) ¹ Condition #23542, Part 1a	Y	≤0.0015 mg/amp-hr	Reg 11-8; 93102.9(b) and 93102.12(c)(2) Condition #23542, Parts 6b and 6c	C	Pressure Differential	Yes
Amp-hours	Condition #23542, Part 1b	Y	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

¹ California Code of Regulations, Title 17, Section 93102, hereinafter referred to as 93102. BAAQMD Regulation 11-8 incorporates 93102 by reference.



Table VII – B: Chrome Plating Operations
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	Monitoring Type or Compl. Method	Continuous Compliance?
Dry Scrubber Pressure Drop	Reg 11-8; 93102.9(b), 93102.9(b)(ii) Condition #23542, Parts 6b and 6c	Y	Acceptable differential pressure range across each abatement device: (in. H ₂ 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, A422: 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; Section 93102.12(c)(2) Condition #23542, Parts 6b and 6c	P/W	Pressure Differential	Yes



Table VII – C: Solvent Cleaning Operations
Applicable Limits and Compliance Monitoring Requirements

S56: SPRAY CLEANING-PRECLEAN ROOM
S92: AIRCRAFT WASH AREA
S198: FACILITY-WIDE WIPE CLEANING OPERATIONS

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

Table VII – D: Coating Operations
Applicable Limits and Compliance Monitoring Requirements

S61, S123, S126, S146: AEROSPACE PAINT SPRAY BOOTHS WITH ASSOCIATED DRYING OVENS
S400: FACILITY-WIDE NON-BOOTH AEROSPACE COATING OPERATIONS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	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



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Table VII – D: Coating Operations

Applicable Limits and Compliance Monitoring Requirements

S61, S123, S126, S146: AEROSPACE PAINT SPRAY BOOTHS WITH ASSOCIATED DRYING OVENS S400: FACILITY-WIDE NON-BOOTH AEROSPACE COATING OPERATIONS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
	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	Pretreatment 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



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Table VII – D: Coating Operations

Applicable Limits and Compliance Monitoring Requirements

S61, S123, S126, S146: AEROSPACE PAINT SPRAY BOOTHS WITH ASSOCIATED DRYING OVENS
S400: FACILITY-WIDE NON-BOOTH AEROSPACE COATING OPERATIONS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. 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 63.745(c)(2)	Y	Primer: 350 g/l (2.9 lb/gal)	40 CFR 63.752(c)(2)	P/M	Recordkeeping	Yes
	40 CFR 63.745(c)(4)	Y	Topcoats: 420 g/l (3.5 lb/gal)	40 CFR 63.752(c)(2)	P/M	Recordkeeping	Yes
Organic HAP	40 CFR 63.745(c)(1)	Y	Primer: 350 g/l (2.9 lb/gal)	40 CFR 63.752(c)(2)	P/M	Recordkeeping	Yes
	40 CFR 63.745(c)(3)	Y	Topcoats: 420 g/l (3.5 lb/gal)	40 CFR 63.752(c)(2)	P/M	Recordkeeping	Yes
Inorganic HAP for S123	40 CFR 63.745(g)(2)(iv)	Y	95% reduction of HAPs	Condition #21946, Part 3	Once per shift	Pressure Differential and Recordkeeping	Yes



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Table VII – E: APU and Engine Test Cells
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Opacity	Regulation 6-1-301	N	Ringelmann 1.0	None	N	N/A	Yes
Opacity	SIP Regulation 6-301	Y	Ringelmann 1.0	None	N	N/A	Yes
Visible Emissions		N		Condition #16558, Parts 2 and 3	P/E	Visible Emissions Check	Yes
FP	SIP Regulation 6-310	Y	0.15 gr/dscf	None	N	N/A	Yes
FP	Regulation 6-1-310	N	0.15 gr/dscf	None	N	N/A	Yes
SO ₂	Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours.	Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes



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Table VII – E: APU and Engine Test Cells
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
SO ₂	SIP Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours.	SIP Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes
Sulfur content	SIP Regulation 9-1-304	Y	Fuel Sulfur Limit 0.5%	Condition #16558, Parts 1 and 3 Condition #14315, Part 4	P	Vendor Certification or BAAQMD approved laboratory analysis	Yes
Sulfur content	Regulation 9-1-304	Y	Fuel Sulfur Limit 0.5%	Condition #16558, Parts 1 and 3 Condition #14315, Part 4	P	Vendor Certification or BAAQMD approved laboratory analysis	Yes
NO _x for S90	Condition #14315, Part 3	Y	90.9 tons/yr	Condition #14315, part 3	P/M	Records: Based on Engine Specific Emission Factors and Fuel Usage	Yes



Table VII – E: APU and Engine Test Cells
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Usage for S90	Condition #14315, Part 1	Y	Total Fuel Usage: $\leq 764,000$ gallons during any consecutive 12-month period.	Condition #14315, part 6	P/M	Recordkeeping	Yes
	Condition #14315, Part 2	Y	Model PW4090 Fuel Usage: $\leq 344,500$ gallons during any consecutive 12-month period.	Condition #14315, part 6	P/M	Recordkeeping	Yes

Table VII – F: Boilers
Applicable Limits and Compliance Monitoring Requirements

S95, S96: BOILERS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Opacity	BAAQMD Regulation 6-1-301	Y	Ringelmann 1.0	None	N	N/A	Yes
FP	BAAQMD Regulation 6-1-310	Y	0.15 gr/dscf @ 6% O ₂	None	N	N/A	Yes



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

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
NOx	BAAQMD Regulation 9-7-301.1	Y	Gaseous Fuel: 30 ppmv @ 3% O2 (dry)	None	N	N/A	Yes
NOx	SIP Regulation 9-7-301.1	Y	Gaseous Fuel: 30 ppmv @ 3% O2 (dry)	None	N	N/A	Yes
NOx	BAAQMD Regulation 9-7-307.6	Y	Gaseous Fuel: 5 ppmv @ 3% O2 (dry)	BAAQMD Regulation 9-7-506	P/A	N/A	Yes
SO2	BAAQMD Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours	BAAQMD Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes
SO2	SIP Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours	SIP Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes



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

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
SO2	BAAQMD Regulation 9-1-302	Y	300 ppm (dry) general emission limitation	None	N	N/A	Yes
SO2	SIP Regulation 9-1-302	Y	300 ppm (dry) general emission limitation	None	N	N/A	Yes
CO	BAAQMD Regulation 9-7-307.6	N	Gaseous Fuel: 400 ppmv @ 3% O2 (dry)	BAAQMD Regulation 9-7-506	P	N/A	Yes
CO	SIP Regulation 9-7-302.2	Y	Gaseous Fuel: 400 ppmv @ 3% O2 (dry)	None	N	N/A	Yes
Ammonia	BAAQMD Condition #25429 Part 1	Y			10 ppmv @ 3%O2		Yes
Tune-Up	Table 3 to 40 CFR Part 63, Subpart DDDDD	Y	Tune-up as work practice for all regulated pollutants under 40 CFR Part 63, Subpart DDDDD	40 CFR 63.7540	P/A	N/A	Yes



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Table VII – G: Non-Aerospace Paint Booths (Facilities)
Applicable Limits and Compliance Monitoring Requirements
S155, S156, S157: FACILITIES PAINT BOOTHS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	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
VOC	Regulations 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
	Regulations 8-19-312.1 to 312.13	Y	Specialty Coatings, Air-dried coating: 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: 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: 120 g/l (1.0 lb/gal)	SIP Regulation 8-32-501	P/D	Recordkeeping	Yes



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Table VII – G: Non-Aerospace Paint Booths (Facilities)
Applicable Limits and Compliance Monitoring Requirements
S155, S156, S157: FACILITIES PAINT BOOTHS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
	SIP Regulation 8-32-304.1	Y	Furniture, High Solids, Specific Coating: 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
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



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Table VII – G: Non-Aerospace Paint Booths (Facilities)
Applicable Limits and Compliance Monitoring Requirements
S155, S156, S157: FACILITIES PAINT BOOTHS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
	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 Coat: 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
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	Yes
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



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Table VII – G: Non-Aerospace Paint Booths (Facilities)
Applicable Limits and Compliance Monitoring Requirements

S155, S156, S157: FACILITIES PAINT BOOTHS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
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	SIP Regulation 8-49-308.4	Y	Surface Preparation Solvent: general: 72 g/l (0.6 lb/gal) hand held spray: 780 g/l (6.5 lb/gal)	SIP Regulation 8-45-501	P/W	Recordkeeping	Yes
Usage	SIP Regulation 8-45-314	Y	Precoat usage: 25% of waterborne primer sealer	Regulation 8-45-501	P/M	Recordkeeping	Yes
VOC	Regulation 8-49-301	Y	%VOC (various)	Regulation 8-49-401	P/E	Manufacturer Labeling	Yes



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Table VII – H: Resin Laminating
Applicable Limits and Compliance Monitoring Requirements
S240: FACILITY-WIDE MISCELLANEOUS RESIN LAMINATING

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-50-301.5	N	≤50 g/m ² of exposed surface area	Regulation 8-50-501	P/M	Recordkeeping	Yes
Material Type	Regulation 8-50-301.6	N	Monomer Content: Various	Regulation 8-50-501	P/M	Recordkeeping	Yes
VOC	Regulation 8-50-305.4	N	Cleaning Products: ≤25 g/L	Regulation 8-50-501	P/M	Recordkeeping	Yes
VOC	Regulation 8-50-307	N	Gel Coat: ≤250 g/L applied	Regulation 8-50-501	P/M	Recordkeeping	Yes



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Table VII – I: Adhesive Application and Stripping Operation
Applicable Limits and Compliance Monitoring Requirements
S262: ADHESIVE APPLICATION AND STRIPPING OPERATION

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-4-302.1	Y	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 – J: Dissolved Air Flotation Unit
Applicable Limits and Compliance Monitoring Requirements
S244: DISSOLVED AIR FLOTATION UNIT

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	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	Inspection for Gaps/ Recordkeeping	Yes



**Table VII – K: Non-Retail Gasoline Dispensing Facility
 Applicable Limits and Compliance Monitoring Requirements
 S285: NON-RETAIL GASOLINE DISPENSING FACILITY (GDF #916)**

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Gasoline Through-put	Condition #22874	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 8-7-503.2	P/E	Recordkeeping	Yes
Organic Compounds	Regulation 8-7-301.2	Y	All Phase I Equipment shall Meet the Emission Limitations of the Applicable CARB Certification	None	N	Use CARB Certified System	Yes
Organic Compounds	Regulation 8-7-301.6	Y	All Phase I Equipment (except components with allowable leak rates) 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
Organic Compounds	Regulation 8-7-302.5	Y	All Phase II Equipment (except components with allowable leak rates) shall be leak free (<3 drops/ minute) & vapor tight	Condition #16516	P/A	Annual check for vapor tightness and proper operation of VRS	Yes



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Table VII – K: Non-Retail Gasoline Dispensing Facility
Applicable Limits and Compliance Monitoring Requirements
S285: NON-RETAIL GASOLINE DISPENSING FACILITY (GDF #916)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Organic Com-pounds	Condition #18135, Part 3	Y	Any emergency vent or manway shall be leak free	Condition #16516	P/A	Annual check for vapor tightness and proper operation of VRS	Yes
Defective Component Repair/Replacement 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



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
SO2	Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours.	Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes
SO2	Regulation 9-1-302	Y	300 ppm (dry) general emission limitation	None	N	N/A	Yes
Fuel Sulfur Content	Regulation 9-1-304	Y	≤ 0.5% by weight	None	P/E	Vendor fuel certification or BAAQMD-approved laboratory analysis	Yes
SO2	SIP Regulation 9-1-301	Y	Ground Level Concentrations: 0.5 ppm for 3 consecutive minutes, 0.25 ppm averaged over 60 consecutive minutes, 0.05 ppm averaged over 24 hours.	SIP Regulation 9-1-501	N (unless requested by APCO)	N/A	Yes



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
SO2	SIP Regulation 9-1-302	Y	300 ppm (dry) general emission limitation	None	N	N/A	Yes
Fuel Sulfur Content	SIP Regulation 9-1-304	Y	Fuel Sulfur Limit 0.5% (liquid fuels)	None	P/E	Vendor fuel certification or BAAQMD-approved laboratory analysis	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 & 9-1-530	P/M	Records	Yes
Opacity	Regulation 6-1-303.1	N	Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	Yes
Opacity	SIP Regulation 6-1-303.1	N	Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	Yes



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
FP	Regulation 6-1-310	N	0.15 grain/dscf	None	N	N/A	Yes
FP	SIP Regulation 6-310	N	0.15 grain/dscf	None	N	N/A	Yes
Hours of Operation for S295, S296, S297, S300, S301	Condition #22820, Part 1	Y	≤ 20 hours/year for reliability-related activities	Condition #22820, Part 3	C	Totalizing meter for hours of operation and records	Yes
				Part 4	P/M		
Hours of Operation for S295, S296, S297, S300, S301,	93115.6(b) (3)(A)(1)(a)	N	≤ 20 hours/year for reliability-related activities	93115.10(d)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(f)	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	Yes
				Condition 22850, Part 4	P/M	Records	Yes
Hours of Operation for S326, S333	93115.6(a) (3)(A)(1)(c)	N	≤ 50 hours/year for reliability-related activities	93115.10(d)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(f)	P/M	Records	Yes



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Opacity for S333	40 CFR 60.4205(b)	Y	Acceleration mode $\leq 20\%$, Lugging mode $\leq 15\%$, Peaks in either mode $\leq 50\%$	None	N	N/A	Yes
PM for S333	40 CFR 60.4205(b)	Y	0.15 g/kW-hr	None	N	N/A	Yes
NMHC + HC for S333	40 CFR 60.4205(b)	Y	4.8 g/hp-hr	None	N	N/A	Yes
CO for S333	40 CFR 60.4205(b)	Y	2.6 g/hp-hr	None	N	N/A	Yes
Fuel Sulfur Content and Other Limits for S333	40 CFR 60.4207(b)	Y	≤ 15 ppm sulfur content and cetane index ≥ 40 or aromatic content $\leq 35\%$ by volume (for fuel sold after 6/1/10)	None	N	N/A	Yes
Operating Hours for S333	40 CFR 60.4211(f)(2)	Y	≤ 100 hours each per year for maintenance checks and readiness testing	40 CFR 60.4209(a)	C	Non-resettable meter for hours of operation	Yes
Hours of Operation	40 CFR 63.6640(f)(1)(ii)	Y	≤ 100 hours each per calendar year for maintenance checks and readiness testing	40 CFR 63.6625(f)	C	Totalizing meter for hours of operation	Yes
				40 CFR 63.6655(f)	P/M	Records	Yes



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Hours of Operation	40 CFR 63.6640(f)(1)(iii)	Y	≤ 50 hours each per calendar year for non-emergency operation	40 CFR 63.6625(f)	C	Totalizing meter for hours of operation	Yes
				40 CFR 63.6655(f)	P/M	Records	Yes
Engine idle time during startup	40 CFR 63.6625(h)	Y	≤ 30 minutes	None	N	N/A	Yes
Schedule for oil and filter change for S295, S296, S297, S300, S301, S326, S333	Table 2c 1.a. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 500 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes
Schedule for air cleaner inspection for S295, S296, S297, S300, S301, S326, S333	Table 2c 1.b. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 1,000 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes



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Table VII – L: Diesel Engines for Standby Generators
Applicable Limits and Compliance Monitoring Requirements
S295, S296, S297, S300, S301, S326, S333:
EMERGENCY STANDBY ENGINES (DIESEL)

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Schedule for hose and belt inspection for S295, S296, S297, S300, S301, S326, S333	Table 2c 1.c. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 500 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes

Table VII – M: Diesel Engines for Standby Generators and Fire Pumps
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	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



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Table VII – M: Diesel Engines for Standby Generators and Fire Pumps
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
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 and 9-1-530	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 and 9-1-530	P/M	Records	Yes
Hours of Operation	93115.6(a)(4)(A)(1)(b)	N	≤ 34 hours/year for reliability-related activities	93115.10(d)(1)	C	Totalizing meter for hours of operation	Yes
				93115.10(f)	P/M	Records	Yes
Opacity	Regulation 6-1-303.1	N	Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	Yes
Opacity	SIP Regulation 6-1-303.1	N	Ringelmann No. 2 for no more than 3 minutes in any hour or equivalent opacity	None	N	N/A	Yes
FP	Regulation 6-1-310	N	0.15 grain/dscf	None	N	N/A	Yes



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Table VII – M: Diesel Engines for Standby Generators and Fire Pumps
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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
FP	SIP Regulation 6-310	N	0.15 grain/dscf	None	N	N/A	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
Hours of Operation	40 CFR 63.6640(f)(1)(ii)	Y	≤ 100 hours each per calendar year for maintenance checks and readiness testing	40 CFR 63.6625(f)	C	Totalizing meter for hours of operation	Yes
				40 CFR 63.6655(f)	P/M	Records	Yes
Hours of Operation	40 CFR 63.6640(f)(1)(iii)	Y	≤ 50 hours each per calendar year for non-emergency operation	40 CFR 63.6625(f)	C	Totalizing meter for hours of operation	Yes
				40 CFR 63.6655(f)	P/M	Records	Yes
Engine idle time during startup	40 CFR 63.6625(h)	Y	≤ 30 minutes	None	N	N/A	Yes



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Table VII – M: Diesel Engines for Standby Generators and Fire Pumps

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	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
Schedule for oil and filter change for S295, S296, S297, S300, S301, S326, S333	Table 2c 1.a. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 500 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes
Schedule for air cleaner inspection for S295, S296, S297, S300, S301, S326, S333	Table 2c1b. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 1,000 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes
Schedule for hose and belt inspection for S295, S296, S297, S300, S301, S326, S333	Table 2c1c. to 40 CFR Part 63 Subpart ZZZZ	Y	Every 500 hours of operation or annually, whichever comes first	40 CFR 63.6655(e)	N	Records	Yes



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Table VII – N: Thermal Spray Operation
Applicable Limits and Compliance Monitoring Requirements
S316, S317, S318, S319, S320, S321, S322, S323: THERMAL SPRAY BOOTHS

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	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(e)(1)	P/M	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
Dry Filtration Pressure Drop	Condition #23504, Part 6	N	Across dry filter: 0.3" to 4.5" water column. Across HEPA filter: 1" to 4" water column	Condition #23504, Parts 6,7,8	P/W	Differential Pressure/ Recordkeeping	Yes



**Table VII – O: Fuel Quantity Process Units (FQPU)
 Applicable Limits and Compliance Monitoring Requirements
 S401: Fuel Quantity Process Units (FQPUs) Repair and Refurbish Station***

Type of limit	Emission Limit Citation	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency	Monitoring Type or Compl. Method	Continuous Compliance?
VOC	Regulation 8-4-302.1	Y	5 tons/yr (each source)	Regulation 8-4-501	P/A	Recordkeeping	Yes
VOC	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 S401	Condition #26311, Parts 1 and 2	Y	10 gallons/yr HumiSeal Thinner 503 solvent; 3 gal/yr Kester 1544 flux; 10 gal/yr Proclean MCC Pro solvent; 3 gal/yr HumiSeal 1831 coating; 1 gal/yr Polybond Avigel-100 coating; 1 gal/yr Henkel Loctite 222 coating	Condition #26311, Part 3	P/M	Recordkeeping	Yes

* Source S-401 has been removed from the PTO and facility.

THIS MARKS THE CONCLUSION OF THIS ANNUAL AND SEMIANNUAL REPORTS.



**UNITED AIRLINES, INC.
SAN FRANCISCO MAINTENANCE CENTER**

**Semiannual Aerospace NESHAP
Compliance Status Report**

Reporting Period: September 1, 2022 through February 28, 2023

BAAQMD Facility # A0051



Prepared by:

**United Airlines, Inc.
Environmental Affairs
San Francisco, California**

March 30, 2023

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1.0 Semiannual Compliance Status Notification Report

Applicable Rule: 40 CFR Part 63, Subpart GG — National Emission Standards for Aerospace Manufacturing and Rework Facilities. Semiannual notification is being made in accordance with 40 CFR §§ 63.753(b)(1), (c)(1), (d)(1), and/or (e).

1.1 General Information

A. Print or type the following information for each facility in which aerospace manufacturing and rework operations are performed (40 CFR §§ 63.9(b)(2)(i)-(ii)):

Operating Permit Number (OPTIONAL)	Facility I.D. Number (OPTIONAL)	
	A0051	
Owner/Operator/Title		
United Airlines, Inc. – San Francisco Maintenance Center		
Street Address		
800 S Airport Blvd, Building 49-2 SFOMP, San Francisco International Airport		
City	State	ZIP Code
San Francisco	CA	94128
Facility Contact	Title	Phone (OPTIONAL)
Alyson Dagly	Manager – California Air Compliance	650-874-4572

B. Check which affected source(s), as defined by 40 CFR § 63.741(c), were in operation at your facility during the semiannual reporting period:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Hand-wipe cleaning (Section 1.3, A) | <input checked="" type="checkbox"/> Primer and topcoat application (Section 1.4) |
| <input checked="" type="checkbox"/> Flush cleaning (not covered) | <input type="checkbox"/> Depainting operations (Section 1.5)* |
| <input checked="" type="checkbox"/> Spray gun cleaning (Section 1.3, B) | <input type="checkbox"/> Chemical milling maskant applications (Section 1.6) |
| <input checked="" type="checkbox"/> Waste storage and handling (no reporting required) | |

* Please see the discussion in Section 1.5 of this report.

C. Certification period is from **September 1, 2022** through **February 28, 2023**.



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1.2 Certification

Based upon 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 [40 CFR § 63.9(h)(2)(i)(G)]. The above-mentioned facility has complied with applicable requirements in 40 CFR Part 63, Subpart GG during the semiannual reporting period as indicated below (check all that apply) [40 CFR §§ 63.753(b)(1)(v), (c)(1)(vii), (d)(1)(ix), and (e)(6)].

APPLICABLE REQUIREMENTS

- flush cleaning requirements under §63.744(d)
- hand-wipe cleaning requirements under §63.744(b)
- spray gun cleaning requirements under §63.744(c)
- organic primer and topcoat requirements under §63.745
- inorganic primer and topcoat requirements under §63.745
- depainting requirements under §63.746
- chemical milling maskant operations under §63.747
- recordkeeping under §63.10(b)

FACILITY HAS COMPLIED

- Yes No NA
- Yes No NA
- Yes No NA
- Yes No NA
- Yes No NA
- Yes No NA
- Yes No NA
- Yes No NA

DocuSigned by:

Bill Fulton

AGBDF41DFA4E446...

Bill Fulton

Managing Director – Engine & Component Operations

3/29/2023

Date

1.3 Cleaning Operations

A. Hand-Wipe Cleaning

- Have you used non-compliant cleaning solvents for a non-exempt hand-wipe cleaning operation during the reporting period? Yes No (*if no, go to A.4.*) [40 CFR § 63.753(b)(1)(i)]
- If you answered yes, please provide the following information for each instance where you used a non-compliant cleaning solvent for a non-exempt hand-wipe cleaning operation (*for additional entries, please use Continuation Sheet 1.3.A.2.*) **Not applicable.**
- (OPTIONAL) If you reported deficiencies in A.2. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**
- Have you used any new hand-wipe cleaning solvents during the reporting period? Yes No (*if no, go to B.1.*) [40 CFR § 63.753(b)(1)(ii)]
- If you answered yes, please provide the following information for each new cleaning solvent used: (*For additional entries, please use Continuation Sheet 1.3.A.5.*) **Not applicable.**

B. Spray Gun Cleaning

- Did your facility use a non-compliant (i.e., other than enclosed, non-atomized, disassembled, or atomized) spray gun cleaning method during the reporting period? Yes No (*if no, go to B.3.*) [40 CFR § 63.753(b)(1)(iii)]
- If you answered yes, please describe the non-compliant cleaning method you used: **Not applicable.**
- Did your facility have any instance where a leaking **enclosed** spray gun cleaner remained unrepaired and in use for more than 15 days during the reporting period? Yes No (*if no, go to Section 1.4*) [40 CFR § 63.753(b)(1)(iv)]



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4. If you answered yes, please provide the following information for each instance where you used a leaking enclosed spray gun cleaner for more than 15 days: *(for additional entries, please use Continuation Sheet 1.3.B.4.)* **Not applicable.**
5. (OPTIONAL) If you reported deficiencies in B.4. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**

1.4 Primer and Topcoat Application

A. Uncontrolled primer and topcoats

1. Did your facility have any instance where primer or topcoat compliance was uncontrolled (e.g., you did not use averaging or a control device) during the reporting period? Yes No *(if no, go to B.1.)* [40 CFR § 63.753(c)(1)(i)]
2. If you answered yes, did primer or topcoat values for either H_i (the mass of organic HAP emitted per unit volume of coating as applied, less water) or G_i (the mass of VOC emitted per unit volume of coating as applied, less water and exempt solvents) ever exceed the applicable organic HAP or VOC content limit specified in 40 CFR § 63.745(c)? Yes No *(if no, go to B.1.)* [40 CFR § 63.753(c)(1)(i)]
3. If you answered yes, please provide the following information for each coating formulation within each coating category that exceeds the applicable limits in 40 CFR § 63.745(c) [40 CFR § 63.752(c)(2)(i), 40 CFR § 63.753(c)(1)(i)]: *(for additional entries, please use Continuation Sheet 1.4.A.3.)* **Not applicable.**
4. (OPTIONAL) If you reported deficiencies in A.3. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**

B. Averaged primer and topcoats

1. Did your facility have any instance where primer or topcoat compliance was achieved through the use of averaging during the reporting period? (Averaging is allowed only for uncontrolled primers or topcoats; averaging primers together with topcoats is prohibited. Each averaging scheme shall be approved in advance by the permitting agency and be adopted as part of the facility's Title V permit. (40 CFR § 63.745(e)(2))). Yes No *(if no, go to C.1.)* [40 CFR § 63.753(c)(1)(ii)]
2. If you answered yes, did primer or topcoat values for either H_a (the monthly volume-weighted average mass of organic HAP emitted per unit volume of coating as applied, less water) or G_a (the monthly volume-weighted average mass of VOC emitted per unit volume of coating as applied, less water and exempt solvents) for all coatings ever exceed the applicable organic HAP or VOC content limit specified in 40 CFR § 63.745(c)? Yes No *(if no, go to C.1.)* [40 CFR § 63.753(c)(1)(ii)] **Not applicable.**
3. If you answered yes, please provide the following information for all coatings within each coating category that exceeds the applicable limits in 40 CFR § 63.745(c) [40 CFR §§ 63.752(c)(4)(i), 63.753(c)(1)(ii)] *(for additional entries, please use Continuation Sheet 1.4.B.3.)* **Not applicable.**
4. (OPTIONAL) If you reported deficiencies in B.3. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**



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C. Controlled primer and topcoats using incineration

1. Did your facility have any instance where primer or topcoat compliance was achieved through the use of incinerators during the reporting period? Yes No (*if no, go to D.1.*) [40 CFR § 63.753(c)(1)(iii)]
2. If you answered yes, were there any instances when the 3-hour average combustion temperature(s) were less than the minimum average combustion temperature(s) established under 40 CFR § 63.751(b)(11) or (12) during the most recent performance test during which compliance was demonstrated? Yes No (*if no, go to D.1.*) [40 CFR §§ 63.753(c)(1)(iii), 63.751(b)(11) - (12)] **Not applicable.**
3. If you answered yes, please provide the following information for each period when the 3-hour average combustion temperature was less than established values: (*for additional entries, please use Continuation Sheet 1.4.C.3.*) **Not applicable.**
4. (OPTIONAL) If you reported deficiencies in C.3. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**

D. Controlled primer and topcoats using carbon adsorption

1. Did your facility have any instance where primer or topcoat compliance was achieved through the use of carbon adsorption during the reporting period? Yes No (*if no, go to D.5.*) [40 CFR § 63.753(c)(1)(iv)]
2. If you answered yes, were there any rolling periods when the overall efficiency of the carbon adsorber was calculated to be less than 81%? Yes No (*if no, go to D.5.*) [40 CFR § 63.753(c)(1)(iv)(A)] **Not applicable.**
3. If you answered yes, please provide the following for each rolling period when the overall control efficiency of your carbon adsorber was calculated less than 81%. Include as an attachment to this report the initial material balance calculation and any calculations that demonstrate exceedances [40 CFR § 63.753(c)(1)(iv)(A)]: (*for additional entries, please use Continuation Sheet 1.4.D.3.*) **Not applicable.**
4. (OPTIONAL) If you reported deficiencies in D.3. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved: **Not applicable.**
5. Did your facility use nonregenerative carbon adsorbers at any time during the reporting period? Yes No (*if no, go to E.1.*) [40 CFR § 63.753(c)(1)(iv)(B)]
6. If you answered yes, please attach the following:
 - > the design evaluation
 - > the continuous monitoring system performance report
 - > any excess emissions as demonstrated through deviations of monitored values for each nonregenerative carbon adsorber. [40 CFR § 63.753(c)(1)(iv)(B)]

E. Controlled primer and topcoats using other than incineration or carbon adsorption

1. Did your facility use any control devices other than an incinerator or carbon adsorber at any time during the reporting period (including dry or wet particulate filters)? Yes No (*if no, go to E.8.*) [40 CFR § 63.753(c)(1)(v)]



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2. If you answered yes, did any of these control devices exceed the operating parameter(s) established under the initial performance test during which compliance was demonstrated?
 Yes No Not Applicable (*if no, go to E.5.*) [40 CFR § 63.753(c)(1)(v)]
3. If you answered yes, please provide the following for each exceedance of your control device's operating parameter(s):
Not applicable.
4. (OPTIONAL) If you reported deficiencies in E.3. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved:
Not applicable.
5. Did your facility have any instance within this semiannual reporting period where a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, or the water flow rate through a waterwash system, or recommended parameter(s) through a pumpless system, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures? Yes No (*if no, go to Section 1.5.*) [40 CFR § 63.753(c)(1)(vi)]
6. If you answered yes, please provide the following for each time the booth was not immediately shut down when values were outside limits:
Not applicable.
7. (OPTIONAL) If you reported deficiencies in E.6. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved:
Not applicable.

1.5 Depainting Operations (Not Applicable)

On June 1, 2015, United began operation of a new depainting booth that uses a non-chemical-based process for depainting aircraft parts, subassemblies and assemblies that are normally removed from the aircraft for depainting. The blast media is food grade corn starch which is captured in a closed loop system. Media that is no longer useful is routed to a baghouse type abatement device. Based on the types of parts, subassemblies, and assemblies depainted, the standards for depainting operations in 40 CFR § 63.746 are not applicable, and the depainting operation is not an affected source. 40 CFR §§ 63.741(b) and (c)(8), 63.746(a)(1) and (3). United maintains records of aircraft components depainted at this booth.

A. Depainting, General

1. Did your facility depaint more than six new or discontinued aircraft models during the reporting period?
 Yes No (*if no, go to Section 1.6*) [40 CFR § 63.753(d)(1)(viii)]
2. If you answered yes, please provide the following parts information for each new and discontinued aircraft models depainted at your facility: **Not applicable.**
3. (OPTIONAL) If you reported deficiencies in A.2. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved:
Not applicable.
4. Did your facility have any 24-hour periods where organic HAPs were emitted from depainting of the outer surface areas of aerospace vehicles (other than from exempt operations listed in 40 CFR §§ 63.746(a), (b)(3) and (b)(5) during the reporting period? Yes No (*if no, go to B.1.*) [40 CFR §§ 63.753(d)(1)(i), 63.746(a)(1)]. **Not applicable.**



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Note: Under A., do not report 24-hour periods where you used a control device to capture emissions under 40 CFR § 63.746(c), this will be reported later in this section.

5. If you answered yes, please provide the following for each 24-hour period where you emitted HAPs.
Not applicable.
6. (OPTIONAL) If you reported deficiencies in A.5. above, please describe the corrective action(s) you took to address them and prevent recurrence, to include time frames involved and results achieved:
Not applicable.

1.6 Chemical Milling Maskant Application Operations (Not Applicable)

1.7 Recordkeeping Requirements

- A. Is your facility in compliance with recordkeeping requirements to keep all information (including all reports and notifications) available for inspection for a period of five years, and maintain the most recent two years on site? Yes No **(if yes, go to Section 1.8)** [40 CFR § 63.10(b)(1)]
- B. If you answered no, please indicate the corrective action(s) you are taking to comply with record keeping requirements. **Not applicable.**

1.8 Changes in Information Already Provided

Have there been any changes in information already provided for your facility since the NOCS or any subsequent report that have not otherwise been listed in this report and that were not reported within 15 days of making the change? Yes No [40 CFR § 63.9(j)] **(if no, end of form)** If you answered yes, please describe the changes below:

1.9 Additional Comments

- A. Do you have additional facility-specific information or comments you would like to present that have already been addressed elsewhere in the body of this report. Yes No **(if no, go to end of form.)**
- B. If you answered yes, please enter the information or comments below.



United Airlines, Inc.
San Francisco Maintenance Operations Center
40 CFR 63 Subpart GG – Aerospace NESHAP
Source-Specific Compliance Summary

The following tables contain a list of the sources subject to the Aerospace NESHAP identified in United Airlines, Inc.'s (United's) most recent Title V Operating Permit (issued May 30, 2018). The tables contain a summary of applicability and compliance for each source related to the specific Aerospace NESHAP categories, i.e., housekeeping, hand-wipe cleaning, spray gun cleaning, flush cleaning and primer and topcoat application operations. The facility does not perform depainting operations subject to the standards in 40 CFR § 63.746 or chemical milling maskant operations subject to 40 CFR § 63.747.

Table 1-1: Emission Standards								
40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities								
§ 63.744 Standards: Cleaning Operations					§ 63.745 Standards: Primer and Topcoat			Comments
Source	(a) House- keeping	(b) Hand- wipe	(c) Spray Gun Cleaning	(d) Flush Cleaning	(c) Uncontrolled Coatings – Organic HAP and VOC Content	(f) Application Method	(g) Inorganic HAP	
S-1	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-9	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-10	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-56	C	C	NA	NA	NA	NA	NA	Spray Cleaning
S-57	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-61	C	C	C	NA	C	C	C	Paint Spray Booth
S-64	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-78	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-80	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-112	C	NA	NA	C	NA	NA	NA	Solvent Spray Booth
S-123	C	C	C	NA	C	C	C	Paint Spray Booth
S-126	C	C	C	NA	C	C	C	Paint Spray Booth



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Table 1-1: Emission Standards								
40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities								
§ 63.744 Standards: Cleaning Operations				§ 63.745 Standards: Primer and Topcoat				
Source	(a) House-keeping	(b) Hand-wipe	(c) Spray Gun Cleaning	(d) Flush Cleaning	(c) Uncontrolled Coatings – Organic HAP and VOC Content	(f) Application Method	(g) Inorganic HAP	Comments
S-146	C	C	C	NA	C	C	C	Paint Spray Booth.
S-198	C	C	NA	NA	NA	NA	NA	Facility-wide Solvent Hand-wipe Operations
S-258	C	NA	NA	C	NA	NA	NA	Flush Cart
S-284	C	NA	NA	C	NA	NA	NA	Flush Cart
S-288	C	NA	NA	C	NA	NA	NA	Recycling Parts Cleaner
S-290	C	NA	NA	C	NA	NA	NA	Recycling Parts Cleaner
S-330	C	C	NA	NA	C	C	NA	Parts Cleaner
S-331	C	C	NA	NA	C	C	NA	Parts Cleaner
S-400	C	C	NA	NA	C	C	C	Facility-wide Non-Booth Aerospace Coating Operations

C = Compliant
NC = Non-Compliant
NA = Not Applicable



United Airlines, Inc.
San Francisco Maintenance Operations Center
40 CFR 63 Subpart GG – Aerospace NESHAP
Source-Specific Compliance Summary

Table 1-2: Monitoring and Recordkeeping						
Source	40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities					
	§ 63.751 Monitoring Requirements		§ 63.752 Recordkeeping Requirements			
	(a) Enclosed Spray Gun Cleaners	(c) Dry Particulate Filter – Primer and Topcoats	(b) Cleaning Operations	(c) Primer and Topcoat Application	(d) Inorganic HAP Emissions	Comments
S-1	NA	NA	C	NA	NA	
S-9	NA	NA	C	NA	NA	
S-10	NA	NA	C	NA	NA	
S-56	NA	NA	C	NA	NA	
S-57	NA	NA	C	NA	NA	
S-61	NA	C	C	C	C	
S-64	NA	NA	C	NA	NA	
S-78	NA	NA	C	NA	NA	
S-80	NA	NA	C	NA	NA	
S-112	NA	NA	C	NA	NA	
S-123	NA	C	C	C	C	
S-126	NA	C	C	C	C	
S-146	NA	C	C	C	C	
S-198	NA	NA	C	NA	NA	
S-258	NA	NA	C	NA	NA	



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Table 1-2: Monitoring and Recordkeeping						
Source	40 CFR Part 63, Subpart GG National Emission Standards for Aerospace Manufacturing and Rework Facilities					
	§ 63.751 Monitoring Requirements		§ 63.752 Recordkeeping Requirements			
	(a) Enclosed Spray Gun Cleaners	(c) Dry Particulate Filter – Primer and Topcoats	(b) Cleaning Operations	(c) Primer and Topcoat Application	(d) Inorganic HAP Emissions	Comments
S-284	NA	NA	C	NA	NA	
S-288	NA	NA	C	NA	NA	
S-290	NA	NA	C	NA	NA	
S-330	NA	NA	C	NA	NA	
S-331	NA	NA	C	NA	NA	
S-400	NA	NA	NA	C	C	

C = Compliant
NC = Non-Compliant
NA = Not Applicable



2.0 DISCUSSION

2.1 Cleaning Operations: Housekeeping Measures

Housekeeping Requirements for Cleaning Operations:

Aerospace NESHAP housekeeping requirements for cleaning operations include the following (40 CFR §§ 63.744(a)(1)-(3)):

- Solvent-laden cloth, paper, or other absorbent applicators used for cleaning aerospace vehicles or components must be stored in bags or other closed containers after use. These bags or containers must be designed to contain solvent vapors and be kept closed except when depositing or removing materials. This requirement does not apply to cotton-tipped swabs for very small cleaning operations.
- Fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations must be stored in closed containers.
- Cleaning solvents must be handled and transferred to or from enclosed systems, vats, or waste containers in a manner that minimizes spills.

Housekeeping measures are applicable to all United cleaning operations, as defined in 40 CFR § 63.742, except those utilizing solvents with VOC or HAP levels below the minimums in 40 CFR § 63.741(f) and those utilizing solvents classified as “semi-aqueous solvent cleaners.” (40 CFR §§ 63.741(f), 63.742, 63.744(a)). These requirements also do not govern use of solvents outside of aerospace operations. (40 CFR §§ 63.742, 63.744(a)).

Process Description:

United uses solvent-laden cloth, paper, and other absorbent applicators for cleaning aerospace components throughout the SFMC. United has approved the following containers for the storage and disposal of solvent-laden material:

- 5- to 10-gallon safety container with foot operated, gravity-closing lid;
- 55-gallon “open-head drum funnels” with closing lid and lip cover clip;
- 1-gallon can with lid; and
- Plastic bags that are kept closed.

These containers meet the requirements in 40 CFR § 63.744(a)(1), which specifies that the cleaning operations use “bags and containers of such design so as to contain the vapors of the cleaning solvent.”

Monitoring Requirements:

See the discussions of the specific cleaning operations below.

Recordkeeping Requirements:

Records that include the name, vapor pressure, and documentation of the organic HAP constituents of each cleaning solvent used at the affected sources are maintained on-site. (40 CFR § 63.752(b)(1)).

Reporting Requirements:

No specific reporting requirements are associated with housekeeping measures.



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2.2 Hand-Wipe Cleaning Operations

Requirements:

Hand-wipe cleaning is defined as “removal of contaminants . . . from an aerospace vehicle or component by physically rubbing it with a material such as a rag, paper, or cotton swab that has been moistened with a cleaning solvent.” (40 CFR § 63.742). Hand-wipe cleaning operations that use solvents with HAP or VOC content above the threshold amounts in 40 CFR § 63.741(f) are subject to the Aerospace NESHAP. In general, operations must use cleaning solvents that meet one of the classifications below (40 CFR § 63.744(b)(1)-(2)):

- Aqueous cleaner in which water is the primary ingredient (i.e., ≥ 80% water).
- Hydrocarbon-based cleaner with a vapor pressure maximum of 7 mm Hg at 20 deg. C, containing no HAP compounds.
- Cleaner which has a composite vapor pressure of 45 mm Hg or less at 20 degrees C.

Exempt Cleaning Operations:

Thirteen exempt cleaning operations in which non-compliant solvent can be used are specified in 40 CFR § 63.744(e). The eight exempt cleaning operations applicable to United are listed below:

- Cleaning and surface activation prior to adhesive bonding (40 CFR § 63.744(e)(3));
- Cleaning of electronic parts and assemblies containing electronic parts (40 CFR § 63.744(e)(4));
- Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid of hydraulic fluid systems (40 CFR § 63.744(e)(5));
- Cleaning of fuel cells, fuel tanks, and confined spaces (40 CFR § 63.744(e)(6));
- Surface cleaning of solar cells, coated optics, and thermal control surfaces (40 CFR § 63.744(e)(7));
- Cleaning during fabricating, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft (40 CFR § 63.744(e)(8));
- Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components (40 CFR § 63.744(e)(9)); and
- Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing (40 CFR § 63.744(E)(11)).

Process Description:

Presently 11 different hand-wipe solvents are being used at the SFMC. Table 2-1 summarizes the hand-wipe cleaning solvents used at the SFMC.

Monitoring Requirements:

None.

Recordkeeping Requirements:

The facility must maintain records as follows (40 CFR §§ 63.752(b)(1)-(4)):



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- Maintain records showing the name, vapor pressure, and the organic HAP constituents for every cleaning solvent used.
- Retain the name, all data and calculations that demonstrate composition, and annual records of the volume of each cleaning solvent used in hand-wipe operations that comply with the composition requirements of 40 CFR § 63.744(b)(1).
- Retain the name, vapor pressure, data/calculations/test results that demonstrate vapor pressure, and monthly records of the volume (in gallons) of each cleaning solvent used in hand-wipe operations that comply with the vapor pressure requirements of 40 CFR §63.744(b)(2) but not the requirements of 40 CFR § 63.733(b)(1).
- Retain the identity and monthly record of the usage rate (in gallons) for each solvent used in exempt hand-wipe cleaning operations that does not conform to the vapor pressure or composition requirements of 40 CFR § 63.744(b). Include a list of the processes provided in 40 CFR § 63.744(e) at which the cleaning operation was used.

Reporting Requirements:

The facility must report the following information semiannually (40 CFR § 63.753(b)):

- Any instance when a non-compliant solvent is used in a non-exempt hand-wipe operation;
- Any new cleaning solvents used in the previous six months (report, as appropriate, either their composite vapor pressure or provide notification that they comply with the composition requirements of 40 CFR § 63.744(b)(1)); and
- A statement certifying the facility compliance status with the applicable standards and a statement of compliance signed by a responsible official certifying compliance with all applicable requirements.

Table 2-1: United Airlines, Inc. Hand-Wipe Cleaning Solvents Summary

Solvent	Vapor pressure (mm Hg @ 20°C)	Contain VOCs or HAPs?	Acceptable for Hand-Wipe Cleaning?
Isopropyl Alcohol	33	Yes	Yes
Acetone	182	No	Yes
Desoclean 45	45	Yes	Yes
Toluene	22	Yes	Yes
Stoddard Solvent	1	Yes	Yes
Denatured Alcohol	42	Yes	Yes
Ethyl Alcohol	42	Yes	Yes
Naphtha	1	Yes	Yes
LPS Presolv	<5	Yes	Yes
Citrikleen	0.18	Yes	Yes
Mineral Spirits	1	Yes	Yes

2.3 Spray Gun Cleaning Operations

Requirements:

Spray guns are devices that atomize a coating or other material and project the particulates or other material on to a substrate. (40 CFR § 63.742). Spray guns used for applying primers, topcoats, and specialty coatings must be cleaned using one or more of the following techniques, unless the cleaning solvents used contain HAP and VOC amounts greater than the thresholds in 40 CFR § 63.741(f) (40 CFR §§ 63.744(c)(1)-(4)):



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- **Enclosed System:** The spray gun is cleaned by forcing solvent through the gun in an enclosed system that is closed at all times except when inserting and removing the spray gun.
- **Non-atomized Cleaning:** The spray gun is cleaned by placing cleaning solvent in the pressure pot and forcing it through the spray gun with the atomizing cap in place using no atomizing air. The cleaning solvent must be directed into a vat, drum, or other waste container that is closed when not in use.
- **Disassembled Spray Gun Cleaning:** The spray gun is disassembled, and components cleaned by hand in a vat, which remains closed at all times except when in use. Alternatively, the components are soaked in a vat that remains closed during the soaking period and when not inserting or removing the components.
- **Atomized Cleaning:** The spray gun is cleaned by forcing cleaning solvent through the gun and directing the resulting atomized spray into a waste container fitted with a device designed to capture the atomized cleaning solvent emissions.

Cleaning nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, are exempt from these requirements. (40 CFR § 63.744(c)(5)).

Process Description:

Solvents used to clean paint guns at the SFMC include: Desoclean 45, isopropyl alcohol, and denatured alcohol. Spray gun cleaning with each of these solvents is subject to the Aerospace NESHAP.

Spray gun cleaning is performed at the following paint spray booths:

- S-61
- S-123
- S-126
- S-146

Enclosed spray gun cleaning, non-atomized spray gun cleaning, and atomized spray gun cleaning are not utilized at the above applicable paint spray booths. Therefore, all spray gun cleaning is classified as disassembled spray gun cleaning as defined in 40 CFR § 63.744(c)(3).

Monitoring Requirements:

Inspect enclosed spray gun cleaners at least once per month while the system is in operation, as described in 40 CFR § 63.751(a). (Note: United does not utilize enclosed spray gun cleaners at the applicable paint spray booths).

Recordkeeping:

The facility must maintain records showing the name, vapor pressure, and organic HAP constituents of each cleaning solvent used by each spray gun cleaning operation subject to the Aerospace NESHAP. (40 CFR § 63.752(b)(1)). (Note: United does not utilize enclosed spray gun cleaners at the applicable paint spray booths).

Reporting Requirements:

The facility must report the following information semiannually (40 CFR §§ 63.753(b)(1)(iii), (iv)-(v)):

- Any instance when a non-compliant spray gun cleaning method is used.
- Any instance when a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days. (Note: United does not utilize enclosed spray gun cleaners at the applicable paint spray booths).



- A statement certifying the facility compliance status with the applicable standards and a statement of compliance signed by a responsible official certifying compliance with all applicable requirements.

2.4 Flush Cleaning Operations

Requirements:

Flush cleaning means "the removal of contaminants...from an aerospace vehicle or component or coating equipment by passing solvent over, through, or into the item being cleaned." (40 CFR § 63.742). Flush cleaning operations that do not use solvents that have HAP or VOC amounts over the thresholds in 40 CFR 63.741(f) or that qualify as hydrocarbon-based or aqueous cleaning solvents per Table 1 in 40 CFR § 63.744 are not subject to flush cleaning requirements (40 CFR § 63.744(d)). Otherwise, the used cleaning solvent must be emptied each time aerospace parts or assemblies, or components of a coating unit, other than spray guns, are flush cleaned into an enclosed container or collection system that remains closed when not in used or into a system with equivalent emission control. (*Id.*)

Process Description:

All flush cleaning operations at the SFMC primarily use mineral spirits/stoddard solvent at solvent spray booths (non-atomized), or cold cleaners.

Monitoring Requirements:

None.

Recordkeeping Requirements:

The facility must maintain records showing the name, vapor pressure, and organic HAP constituents of each cleaning solvent used by each flush cleaning operation subject to the Aerospace NESHAP. (40 CFR § 63.752(b)(1)). For semi-aqueous cleaning solvents used for flush cleaning operations, records must include the amount of each cleaning solvent used, data and calculations that demonstrate the cleaning solvent complies with the composition requirements, and annual records of the volume of each solvent used, as determined by purchase or usage records (40 CFR § 63.752(b)(2)). United keeps usage records for flush cleaning throughput to comply with the Bay Area Air Quality Management District's permit to operate.

Reporting Requirements

The facility must report the following information semiannually (40 CFR § 63.753(b)(1)(v)):

- A statement certifying the facility compliance status with the applicable standards and a statement of compliance signed by a responsible official certifying compliance with all applicable requirements.

2.5 Primer and Topcoat Application Operations: Inorganic HAP Emissions

Requirements:

The Aerospace NESHAP applies to each spray booth or hangar that contains a primer or topcoat application operation that uses coatings with inorganic HAPs. (40 CFR § 63.749(a)(1)). Under the Aerospace NESHAP, the compliance date for specialty coating application operations existing on February 17, 2015, is December 7, 2018. (40 CFR § 63.741(f)). If these primer and topcoat application operations spray-apply inorganic HAP coatings, they must comply with the following requirements (40 CFR §§ 63.745(g)(1)-(3)):

- Apply the primer or topcoat in a booth or hangar in which airflow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets; and
- If the source is existing (40 CFR § 63.745(g)(2)(i)):



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- Before exhausting the air stream to the atmosphere, pass it through a certified dry particulate filter system or an air pollution control system that meets or exceeds the efficiency standards and/or data points in Tables 1 and 2 of 40 CFR § 63.745; or
 - Before exhausting the air stream to the atmosphere, pass it through a waterwash system that remains in operation during all coating application operations; or
- If the source is new (40 CFR § 65.745(g)(2)(ii)):
 - Pass the air stream through a certified dry particulate filter system or an air pollution control system that meets or exceeds the efficiency data points in Tables 3 and 4 of 40 CFR § 63.745; or
- If the new source was constructed or reconstructed prior to June 6, 1994, but prior to October 29, 1996, the facility may comply with the following requirements instead (40 CFR § 65.745(g)(2)(iii)):
 - Pass the air stream through a two-stage dry particulate filter system or a waterwash system; or
 - If the primer or topcoat contains chromium or cadmium, the source must use a HEPA filter system, three-stage filter system, or other control system equivalent to a three-stage filter system approved by the BAAQMD.

A conventional waterwash system must have the water flow rate monitored continuously and have the rate read and recorded once per shift. (40 CFR § 63.745(g)(2)(v)). A pumpless system must continuously monitor booth parameter(s) that indicate performance consistent with the manufacturer's recommendations, and the parameter(s) must be read and recorded once per shift or must have an interlock system that will automatically shut down the coating spray application system if the booth parameters are outside the parameter range in the manufacturer's recommendations. (*Id.*)

A dry particulate filter system must be maintained in good working order, have a differential pressure gauge across the filter banks, and have the pressure drop across the filter continuously monitored, and be read and recorded once per shift or have an interlock system that will automatically shut down the coating spray application system if the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s). (40 CFR §§ 63.745(g)(2)(iv)(A)-(C)). If the pressure drop exceeds or falls below the filter manufacturer's recommended limits, the facility must take corrective action. (*Id.* at § 63.745(g)(2)(iv)(D)).

If the dry particulate filter systems and/or waterwash systems do not perform as specified by 40 CFR § 63.745(g)(3), the operation must be shut down immediately and corrective action must be taken. (40 CFR § 63.745(g)(3)).

Process Description:

Inorganic HAPs in paints and primers used at the SFMC include chromium and nickel compounds. Presently, four aircraft painting booths use HVLP spray guns to apply various inorganic HAP-containing primers. These booths are listed in Table 2-2.

Monitoring Requirements:

The following monitoring requirements are established by 40 CFR § 63.751(c):

- Continuously monitor the pressure drop across the dry particulate filters, and record the pressure drop once during each shift of coating operation or install an interlock system.
- Continuously monitor the water flow rate through the waterwash system and record the water flow rate once during each shift of coating operation or install an interlock system. (Note: United does not operate any waterwash control units.)

Recordkeeping Requirements:

The following recordkeeping measures are required by 40 CFR §§ 63.752(d)(1)-(3):



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- For the dry particulate filter or HEPA filter systems, the pressure drop across the operating system (i.e., filter bank) shall be recorded once each shift.
- For waterwash systems, the water flow rate shall be recorded on the log sheet once each shift of coating operation. (Note: United does not operate any paint booths utilizing waterwash control.)
- The logs shall include the acceptable operating pressure drop range, water flow rate, or booth manufacturer recommended parameters as applicable.

In addition, the Aerospace NESHAP requires the following information for any failure to meet an applicable standard (40 CFR §§ 63.752(a)(1)-(3)):

- Number, date, time, and duration of failures to meet the applicable standard;
- List of affected sources or equipment, an estimate of the quantity of excess emissions, and description of emissions estimation method; and
- Details of actions taken to minimize emissions in accordance with 40 CFR § 63.743(e) and corrective actions to return affected unit to normal or usual manner of operation.

Reporting Requirements:

The facility must report the following information semiannually (40 CFR §§ 63.753(c)(1)(v)-(vii)):

- Each exceedance of the operating parameter(s) established for control devices under the initial compliance test.
- Any times when the primer or topcoat operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system, or the recommended parameters(s) that indicate the booth performance for pumpless systems was outside the manufacturer's recommended range or limits in locally prepared operating procedures.
- A statement that the operations have complied with applicable standards.

The facility must report the following information annually (40 CFR § 63.753(c)(2)):

- The number of times the pressure drop or water flow rate for each dry filter or waterwash system was outside applicable limits specified by the filter or booth manufacturer or in locally prepared operating procedures.

Table 2-2
Booths Subject to Inorganic HAP Requirements

Source ID	Location	Operation	Paint Booth Filter Parameters		
			Pressure Monitoring Device Required	Number of Stages Required	Compliant Filter Manufacturer
S-61	Bldg. 84 A	Miscellaneous parts painting (FR primer and topcoat)	Yes	2	ATI
S-123	Bldg. 84	Landing gear paint booth (FR primer and topcoat)	Yes	3	SmartMedia®/ Purolator
S-126	Bldg. 15	Bonding primer paint booth (also FR primer and topcoat)	Yes	2	ATI



**Table 2-2
Booths Subject to Inorganic HAP Requirements**

Source ID	Location	Operation	Paint Booth Filter Parameters		
			Pressure Monitoring Device Required	Number of Stages Required	Compliant Filter Manufacturer
S-146	Bldg. 10	Cabin equipment paint shop plus radomes and flaps	Yes	2	ATI

2.6 Primer and Topcoat Application Operations: Organic HAP/VOC Content

Requirements:

The Aerospace NESHAP regulates organic HAP and VOC emissions from primer and topcoat application operations. (40 CFR §§ 63.741(c)(2)-(3)).

Under the Aerospace NESHAP, the compliance date for specialty coating application operations existing on February 17, 2015, is December 7, 2018. (40 CFR § 63.749(a)(1)).

Coatings applied to parts and assemblies not critical to an aerospace vehicle's structural integrity or flight performance are not covered. Nor are primers and topcoats containing HAP and VOC concentrations below amounts established in 40 CFR § 63.741(f) covered. A low volume coating exemption is provided for non-compliant primers and topcoats in which the annual use for each formulation does not exceed 50 gallons and the combined annual total of these low-volume coatings is less than 200 gallons. (40 CFR § 63.741(g)).

A non-exempt primer or topcoat operation with organic HAP or VOC emissions must comply with the following requirements (40 CFR §§ 63.745(b)-(f)):

- The handling and transfer of primers and topcoats to or from containers, tanks, vats, vessels, and piping systems must be done in a way that minimizes spills.
- For coatings that are uncontrolled:
 - Organic HAP and VOC emissions for primers must be limited to the applicable content levels set forth in 40 CFR § 63.745(c)(1)-(2); and
 - Organic HAP and VOC emissions for topcoats must be limited to the applicable content levels set forth in 40 CFR § 63.745(c)(2)-(3).
 - Compliance with these limits will occur with use of coatings that with compliant organic HAP and VOC content levels and/or with use of the averaging provisions in 40 CFR § 63.743(d).
- For coatings that are controlled, each control system shall reduce the operation's organic HAP and VOC emissions by 81% or greater, as determined using the procedures in 40 CFR §§ 63.750(g)(h).
- The facility must also use certain primer and topcoat application techniques and equipment as specified in 40 CFR § 63.745(f). Situations in 40 CFR § 63.745(f)(3) may be exempt from the application technique requirements.

Compliance Option Selection:

The SFMC has selected the as-applied method of achieving compliance, i.e., use of primers and/or topcoats that comply with the content levels set forth in 40 CFR § 63.745(c)(1)-(4). Monthly records are maintained in United's online databases, which are readily accessible to the Environmental Affairs team.



Process Description:

The primers and topcoats used at the paint booths or coating application areas meet the Aerospace NESHAP limits. United maintains "Aerospace Coating Usage Records" for each paint booth or operation. These records provide data necessary to calculate the monthly VOC and organic HAP content.

United has also developed an emissions tracking database that electronically stores the usage data and can be used to generate usage and emission summary reports.

The coating operations that are subject to the NESHAP are listed in Table 2-3.

Table 2-3
United's Coating Operations Subject to the Organic HAP/VOC Standard

Source ID	Location	Operation
S-61	Building 84A	Miscellaneous Parts Painting
S-123	Building 84	Landing Gear Paint Booth
S-126	Building 15	Bonding Primer Paint Booth
S-146	Building 10	Cabin Equipment Paint Shop
S-400	Facility-wide	Aerospace Non-booth Coating Operations

Recordkeeping Requirements:

For the operations described in this report, United must maintain records as follows (40 CFR §§ 63.752(c)(1)-(2)):

- The name and VOC content as received and as applied for each primer and topcoat used at the facility; and
- For uncontrolled primers and topcoats that meet the organic HAP and VOC content limits in 40 CFR §§ 63.745(c)(1)-(4) without averaging:
 - The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Gi) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR §§ 63.750(c) and (e));
 - All data, calculations, and test results used to determine the values of Hi and Gi; and
 - The volume (gal) of each coating formulation within each coating category used each month; or
 - The manufacturer's supplied data to demonstrate compliance with 40 CFR § 63.745(c).

Reporting Requirements:

The facility must report the following information semiannually (40 CFR §§ 63.753(c)(1)(i), (6)):

- All instances when applicable organic HAP or VOC limits were exceeded.
- A statement that the operations have complied with applicable standards.

2.7 Depainting Operations (Not Applicable)

United does not conduct depainting operations regulated by 40 CFR § 63.746.

2.8 Chemical Milling Maskant Operations (Not Applicable)

United does not conduct chemical milling maskant application operations regulated by 40 CFR § 63.747.



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THIS PAGE MARKS THE CONCLUSION OF THIS SEMIANNUAL REPORT.