45500 Fremont BLVD., Fremont CA 94578
P 650 681 5100 F 650 681 5101

July 31st, 2025

TV Tracking #1183 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 07/31/2025

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

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

Dear Mr. Gove:

This report satisfies the semi-annual reporting requirements for Tesla, Inc. (Tesla) Fremont Factory Site E0459 for NSPS Subpart MM 60.395, MACT Subpart IIII 63.3120, and Title V Standard Condition I.F for reporting period January 1st, 2025 through June 30th, 2025.

For MACT Subpart IIII, the semi-annual MACT report covers the general requirements identified in Part 63.3120 which include the following:

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

For MACT Subpart IIII, the Site E0459 (Fremont Factory), is subject to compliance option 40 CFR 63.3091(a)[1]. Note that the North Paint Shop (NPS) is subject to the limits under 40 C.F.R. 63.3090(b) with respect to Best Available Control Technology for Toxics ("TBACT") requirements, not Subpart IIII. The semi-annual MACT IIII report will also be submitted via CDX CEDRI.

For NSPS MM, the VOC standards as specified under 40 CFR 60.392 for EDP prime, Guide coat and Topcoat were met during each month of operation for this reporting period under consideration for the North paint shop and South paint shop (body line). The semi-annual NSPS MM report will also be submitted via CDX CEDRI.

Unless otherwise noted, the Site E0459 had no instances of exceeding limits, operating limits, or work practices as applicable and as specified under §§63.3090, 63.3091, 63.3092, and 63.3093 (See Attachment 2 for applicability). The semi-annual MACT IIII report will also be submitted via CDX CEDRI.

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

[1] 40 CFR 63.3091: "Limit combined organic HAP … to no more than 0.072 kg/liter (0.60 lb/gal) of coating solids deposited during each month..".

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If you have any questions regarding the enclosed information, please contact Hari Krishna Bharadwaj at HBharadwaj@tesla.com.

Sincerely,

Leonardo V Guerrero C

Leonardo Guerrero
Director - Vehicle Component and Remanufacturing Operations, Fremont

cc: USEPA Region IX

Attachment 1: Signed certification by Responsible Official
Attachment 2: MACT IIII Applicability
Attachment 3: List of Deviations under Applicable Permits (Title V and BAAQMD ATC/PTO)

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ATTACHMENT 1: SIGNED CERTIFICATION

Semi-annual Title V, NSPS MM and MACT IIII Compliance Certification pursuant to Standard Condition I.F, 60.395 and 63.3120

Based upon the information and belief formed after a reasonable inquiry, I, as responsible Official of the Tesla, Inc. facility in Fremont, CA, submit the information contained in the semiannual Title V report, semi-annual NSPS Subpart MM [§ 60.395 (b)] and semiannual MACT Subpart IIII [§63.3110(c)(2) & (c)(5)] report as accurate and true to the best of my knowledge.

Leonardo Guerrero (Director, Vehicle Component and Remanufacturing Operations, Fremont)

Name of Responsible Official Signature

Leonardo V Guerrero C
_____

Signature

January 1st, 2025 through June 30th, 2025
Compliance Period

7/31/2025

Date

Facility # E0459

Tesla, Inc.

45500 Fremont Boulevard

Fremont, CA 94538

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ATTACHMENT 2: MACT IIII APPLICABILITY TABLE

Citation	Brief Summary	Tesla Response
40 CFR 63.3090	Emission limits for a new or reconstructed affected source	Not applicable. The Fremont Factory is an existing source.
40 CFR 63.3091	Emission limits for existing affected source	Applicable - In Compliance
40 CFR 63.3092	Control emissions from electrodeposition primer system if I want to comply with the combined primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive emission limit	Electrodeposition primer system, as provided by the manufacturer (BASF) - has 0.00 wt% HAP, therefore these requirements are not applicable (Notwithstanding the fact that emissions from the E-coat ovens are always controlled)
40 CFR 63.3093	Operating Limits	Pursuant to 40 CFR 63.3093(a) - As no emission capture systems and add-on controls are required to comply with the emission limits, no operating limit requirements outlined under 40 CFR 63.3093 are applicable
40 CFR 63.3094	Work Practice Standards	Applicable, in compliance with Standards

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ATTACHMENT 3: LIST OF DEVIATIONS DURING THIS PERIOD (January 1st, 2025 THRU June 30th, 2025)

Attachment 3.1 - Deviations List (Self-Reported Deviations for the North Paint Shop (NPS), Castings, Plastic Paint Shop (PPS) and South Paint Shop (SPS))

Time Period January 1, 2025 through June 30, 2025

Source No.	Deviation Summary	Root Cause	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area	Date and Time of Event	NOV Issuance	NOV Number
S-4036/ A-30180 S-4037/ A-30181 S-4038/ A-30182	This event was reported in 2024 second half. On November 19th, there was an unforeseen malfunction that triggered the fire alarm in the Basecoat Booth (S-4037) Air Supply House (ASH) at the South Paint Shop Body Line. The fire alarm affected the Prime Booth (S-4036), Basecoat Booth (S-4037), and Clearcoat Booth (S-4038) and corresponding Thermal Oxidizers (A-30180, A-30181, and A-30182). All four booth bypass dampers for the booth TOs opened during the event. Booth TOs lost set-point temperature and fell below 1400F during this event. Note: This event was reported in 2H 2024, however the NOV was issued during the 1H 2025 reporting period.	Air Supply House being open and the air supply fan running at a lower speed.	The controls team increased the air supply fan speed to 59 Hz, improving the airflow. A new protocol for opening the ASH door was also created, ensuring team members turn off the burner prior to opening the door.	11/19/2024	In Compliance	SPS	11/19/2024 1:28 AM –11/19/2024 5:07 AM	Yes	A64759
S-3008, S-3014, S-3016, S-4006, S-3009, S-4010 and S-3015	This event was reported in 2024 second half. On December 8th, 2024, there was a thermal event which occurred within the Basecoat (BC) booth at NPS that affected the booths, ovens and their abatement system. The robot (located in Phase 2 in the BC exterior booth) that is responsible for painting the liftgate, attempted to spray a unit that was not in the correct position. The titanium bell cup, the part of the robot that atomizes the paint as it rotates, crashed into the unit as it was not in alignment. The friction as the bell cup continued to rotate caused a spark that ignited the hydropurge in the purge box. The team failed to extinguish the fire with fire extinguishers, and they manually activated the deluge system. Once the deluge system was activated, the safety sequencing initiated the RTO and ovens to shutdown and the oven and booth bypass dampers to open. The internal fire team arrived, and the fire was successfully suppressed. The RTO temperature started dropping but was recovered and did not go below 1400 F Note: This event was reported in 2H 2024, however the NOV was issued during the 1H 2025 reporting period.	Paint build-up on the skid.	The affected equipment was replaced/ repaired. As a preventative action, an employee has been assigned to visually check skid conditions before they enter the paint booths. Skids that have excessive paint buildup or deformities can be called out before they begin the painting system. A second sensor, that would detect skid position before robot movement, was scheduled to be installed where the event occurred. The installation was scheduled for the extended Christmas shutdown in 2024 and was installed.	12/8/2024	In Compliance	NPS	12/8/2024 5:29 PM –12/9/2024 3:10 AM 12/8/2024 5:28 PM –12/8/2024 7:18 PM	Yes	A64760
S-4037/A-30181	This event was reported in 2024 second half. On December 8th, 2024, one of the two bypass dampers associated with the Basecoat Booth (S-4037) abatement system (A-30181) at the South Paint Shop opened intermittently between 22:18-23:07. There was an unexpected malfunction with the humidifier pump which resulted in humidity to drop below the low setpoint, this caused the booth to lose production release. The new start-up sequence, was initiated but failed due to a prior restart of the PLC. There were 6 units in the 3-wet booth when the bypass damper opened Note: This event was reported in 2H 2024, however the NOV was issued during the 1H 2025 reporting period.	Evaporator pump was not running because the pump motor had overloaded, likely due to moisture in the peckerhead.	Both the pump and motor were replaced, but the pump did not restart. The night shift crew arrived and found that the thermal overload protection units had also failed. New thermal overload units were installed and the system was restarted. The team was not able to utilize the start-up procedure due to zone stop procedures which resulted in the bypass damper opening. The Controls team have made changes to the logic to allow the new logic to always be available to avoid this from reoccurring in the future.	12/8/2024	In Compliance	SPS	12/08/2024 10:18 PM –12/08/2024 11:07 PM	Yes	A64761
S-4036/ A-30180 S-4037/ A-30181 S-4038/ A-30182	This event was reported in 2024 second half. On December 10th, 2024, there was an unforeseen malfunction event at the South Paint Shop that affected the Booths (Prime: S-4036, Basecoat: S-4037, Clearcoat: S-4038), and their associated abatement systems (A-30180, A-30181, A-30182). A "Fire in KCR" fire alarm was triggered in the Basecoat Booth, initiating the safety sequencing that caused all the booth bypass dampers to open and their TOs to drop below 1400 F. It must be noted that as a safety safeguard, the bypass dampers are designed to open in potential fire scenarios, such as fire alarms getting triggered. There were 10 units in the booth when the bypass dampers opened. Note: This event was reported in 2H 2024, however the NOV was issued during the 1H 2025 reporting period.	A leak in the sprinkler system's piping.	The corroded piping at (scaffolding accessible spaces) has been removed (12/17) and new galvanized steel piping will be installed (12/18). The remaining installation has been scheduled to be completed during the shutdown (12/23/24), after which it will be tied into the existing system, and it will be back in service. The steel piping and flex drops will eliminate the need for insulation.	12/10/2024	In Compliance	SPS	12/10/2024 12:35 PM -3:35PM 12:35 PM - 3:23 PM 12:35 PM- 3:17 PM	Yes	A64762
S-4039/ A-30195	On December 27th, 2024, there was an unforeseen equipment malfunction at the South Paint Shop that affected the 3-Wet Oven (Prime and Clearcoat) Secondary Thermal Oxidizer (A-30195). The burner controller in the TO detected a flame failure, causing the TO to fault. The TO temperature dropped below 1400 F from 2:03 PM – 2:21 PM. There were 4 units in the 3-wet oven during the time of the event. The team inspected the valves and flame eye; however, no defects were identified. On January 4 the, 2025, the same malfunction occurred while there were 16 units in the 3-Wet Oven. The fault was reset after the team inspected and cleaned the fire eye. The following day on January 5th, 2025, same flame fault failure occurred at the Oven TO and it dropped below 1400 F while 10 units were in the booth.	Low pressure in the burner.	The burner was reset and the TO was restarted, bringing the TO back up to temperature. As a corrective action the controls team adjusted the logic to ensure that the valve only moves from 40-100% to keep the pressure optimal and the flame burning.	1/4/2025	In Compliance	SPS	01/04/2025 2:00 PM – 01/04/2025 3:03PM	Yes	A64763

Attachment 3.1 - Deviations List (Self-Reported Deviations for the North Paint Shop (NPS), Castings, Plastic Paint Shop (PPS) and South Paint Shop (SPS))

Time Period January 1, 2025 through June 30, 2025

Source No.	Deviation Summary	Root Cause	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area	Date and Time of Event	NOV Issuance	NOV Number
S-4039/ A-30195	Same flame fault failure as previous occurred at the Oven TO and temperature dropped below 1400 F while 10 units were in the booth.	Low pressure in the burner.	The burner was reset and the TO was restarted, bringing the TO back up to temperature. As a corrective action the controls team adjusted the logic to ensure that the valve only moves from 40-100% to keep the pressure optimal and the flame burning.	1/5/2025	In Compliance	SPS	01/05/2025 9:50 PM – 01/05/2025 10:09 PM	Yes	A64764
S-3009/ A-3008 S-4036 / A-30180	The main substation at Tesla's Fremont Factory facility experienced a voltage sag that impacted power distribution across the entire facility. PG&E supplies power to Tesla's entire Fremont Factory via the Newark Substation. PG&E has stated there was a 115kV insulator flashover inside the Newark substation that resulted in the voltage sag impacting the Tesla facility. Tesla receives power from PG&E at a very high distribution voltage to the main substation on site, which utilizes transformers to step the voltage down for distribution across the entire facility. Therefore, the voltage sag resulting from PG&E's substation resulted in a voltage sag across the site. These impacts include Tesla's North Paint Shop and South Paint Shop.	Voltage sag due to insulator flashover in the Newark substation.	This deviation was not caused by faulty or improper operation of the booths, ovens, or abatement devices, rather it was due to external events beyond the control and purview of Tesla.	1/8/2025	In Compliance	Multiple Shops	01/08/2025 7:32 AM – 8:12AM 01/08/2025 7:30 AM - 8:24 AM	No Action	N/A
S-4039/ A-30195	On January 17th, 2025, there was an unforeseen equipment malfunction at the South Paint Shop that affected the 3-Wet Oven (Prime and Clearcoat) Secondary Thermal Oxidizer (A-30195). The team was alerted of a fault at the 3-Wet Oven (Fan MCR OFF Fault) and shortly after, the burner controller was turned off and the TO temperature dropped below 1400 F. There were 17 units in the 3-wet oven during the time of the event.	Loose bridge caused loss of power.	The team reinserted the bridge that connects the terminals (10031) and ensured it sat making full contact. The 3-Wet Oven Burner panel, where the affected bridge and terminals are located, was installed in 2024. The first annual electrical preventative maintenance (PM) for this piece of equipment was done on 5/7/2025, where bridge connections, together with terminal connections was inspected.	1/17/2025	In Compliance	SPS	01/17/20253:38 PM – 01/17/2025 4:14 PM	Yes	A64768
S-65/ A-30170	On March 11th, 2025, the bypass damper associated with the plastics paint abatement system (A-30170) at the Plastics Paint Shop opened at 11:44 AM while there were units curing in the Topcoat Oven (S-65). There were 21 skids in the topcoat oven when the bypass damper opened (Note that the Booths and heated flash off zones (HFOs) were empty). Tesla had previously provided emission estimates for this event, but upon further analysis of bypass damper data, it was identified that the bypass damper fan motor (Tag – "ISO1_VA510_M2\opc/speedActual") did not run during this event, as this was not an event triggered by a malfunction.	As the Plastics Paint Shop was entering a planned maintenance window, the PPS team attempted an oven cool down in order to perform maintenance work. The oven cool down was accidentally initiated before the units that were added had time to cure.	Tesla does not believe that there were unabated emissions on 3/11/2025. Logic change was implemented to ensure there are no units in oven before any cool down procedure is initiated.	3/11/2025	In Compliance	PPS	03/11/2025 11:44 AM – 03/11/2025 2:17 PM	Yes	A65205
S-57, S-58, S-59 and S-65/ A-30170	The bypass damper associated with the plastics paint abatement system (A-30170) at the Plastics Paint Shop opened at 9:23 AM while there were units in the booths and ovens. The bypass exhaust motor was in operation when the bypass damper was open.	The team was troubleshooting a conveyor fault and had downloaded an unsatisfied data length into PLC LF7911 (PLC related to the conveyor system) which caused the PLC to stop. As the team continued to try and fix the issue, they restarted PLC LV7491 (related to the air house) by mistake which triggered the system sequencing that caused the bypass damper to open.	As a corrective action the team completed a training, ensuring they understood how the different PPS PLC systems are connected and how they affect each other.	3/31/2025	In Compliance	PPS	03/31/2025 9:23 AM – 03/31/2025 9:31 AM	Yes	A65206
S-3008 S-3014 S-3015 S-3016/ A-3008	North Paint Shop (NPS) experienced an electrical related fault that caused the filterhouse bypass damper (FA516M2) to open while there were units in the paint booths and the basecoat oven. The team received the fault code that read "PN: No cnc connection. When the team opened the S01 cabinet related to the desorb system (LV6411) to inspect the SCALANCE (the 16-port ethernet switch manufactured by Siemens), they found that the lights that flash when communication is being made, were off, confirming that the VFD lost communication to the desorb fan. This resulted in the bypass damper opening.	The cause of this event was the loss in communication between the VFD and the desorb fan. During troubleshooting, the team discovered that the port in the SCALANCE had worn out, making it difficult for the connection to be made.	As an immediate corrective action, the team re-terminated the cable and switched the port in which the cable was connected (completed on 4/10/2025). The lights next to the port began flashing, verifying that there was successful communication being made after the switch was made. Due to the nature of this electrical fault and this piece of equipment, there are no visual inspections that could have prevented this event.	4/10/2025	In Compliance	NPS	4/10/2025 4:04 AM – 4/10/2025 4:12 AM	Yes	A65211
S-57 S-58 S-59 S-65/ A-30170	On May 6th, 2025, the bypass damper associated with the abatement system (A number: TBD (Assigned as A-30170 in permitting drafts) at the Plastics Paint Shop opened at 2:15 PM while there were units in the booths and ovens. During production the team received a fault informing them that the signal from the media bed's thermocouple was lost. This thermocouple is designed to protect the rotor of the RTO, by monitoring its temperature. When the thermocouple signal was no longer being made, it caused the damper to open, to prevent overheating of the rotor. The RTO was also affected, and the temperature began to drop, however in line with the safety logic, the bypass damper opened. The team was able to recover the RTO before it could go below 1400 F.	Tesla believes that moisture contributed to the corrosion of the transmitter which caused the fault.	As a corrective action, the transmitter was replaced on 5/6/2025. Note that the entire thermocouple is routed inside the ceramic media bed and can only be replaced during a ceramic media rebuild.	5/6/2025	In Compliance	PPS	5/6/2025 2:15 PM – 5/6/2025 2:53 PM	Yes	A65212

Attachment 3.2 - NOVs/Deviations issued by BAAQMD for Castings Operations (Note that the Castings permit allows for the bypass damper openings with a 10-day reporting window for maintenance and emergency events). BAAQMD issued NOVs claiming that these events were not emergency or maintenance.

Time Period January 1, 2025 through June 30, 2025

Source No.	Deviation Summary	Root Cause	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area	Date and Time of Event	NOV Issuance
S-4046/A-30193	The bypass damper opened due to short circuit at Furnace 2 (S-4046).	Heavy rains caused the water to enter the conduit and shorted the cables thereby causing sudden power loss.	The cables were replaced, and the conduit was sealed.	11/22/2024	In compliance	Castings	11/22/2024 8:53 PM - 11/23/2024 5:51 AM	A64765
S-4046/A-30193	The bypass damper opened due to short circuit at Furnace 2 (S-4046).	Sudden power loss due to a blown fuse in the electrical panel associated with the valve motor circuit. Water leaked into the electrical panel as there was heavy rainfall that morning. Note: the electrical panel associated with this event is not th e same panel associated with the event on 11/22/2024.	The affected fuse was replaced.	12/14/2024	In compliance	Castings	12/14/2024 5:13 AM - 12/14/2024 9:15 AM	A64766

Attachment 3.3 - This table below shows Notices of Violations issued to Tesla during the reporting period but Tesla does not believe a violation or deviation has occurred.

Source No.	NOV ID	Deviation Summary	Resolution Summary	Date of NOV Issuance	Compliance Status	Shop/Area	Time Period Covered
S-4036, S-4037 and S-4038	A65208, A65209 & A65210	BAAQMD alleges that bypass monitoring records was not maintained and deviation not reported per S.C. F.	N/A. These were alleged violations. Tesla provided a detailed response addressing this NOV that included a request to the District to rescind this NOV. This is pending further action from BAAQMD.	5/22/2025	In compliance	SPS	8/2/2024 23:50 - 8/3/2024 19:34 11/1/2024 21:49 - 11/2/2025 5:53 11/24/2024 13:28 - 11/24/2024 14:13
S-3009	A64774	NOV was issued for allegedly failing to comply with Permit Condition #26027, Parts A.3.12 and J.13 (failing to maintain bypass monitoring records at S-3009/A-3008) and Title V Permit Standard Condition F (failing to report deviation)	N/A. These were alleged violations. Tesla provided a detailed response addressing this NOV that included a request to the District to rescind this NOV. This is pending further action from BAAQMD.	5/1/2025	In compliance	NPS	9/30/2024
S-3008 ,S-3014 , S-3015 , S-3016	A64775, A64776, A64777 and A65203	NOVs were issued for allegedly failing to comply with Permit Condition #26027, Parts E.4, F.4, and G.4 (not abating at all times of operation from bypass events) and Title V Permit Standard Condition F (failing to report deviations)	N/A. These were alleged violations. Tesla provided a detailed response addressing this NOV that included a request to the District to rescind this NOV. This is pending further action from BAAQMD.	5/1/2025	In compliance	NPS	9/30/24 8/4/24, 8/30/24, 10/1/24, 10/23/24, 10/31/24, 12/24/24 8/4/24, 8/30/24, 10/1/24, 10/23/24, 10/31/24, 11/12/24, 11/28/24, 12/24/24 8/4/24, 8/30/24, 10/1/24, 10/23/24, 10/31/24, 11/12/24, 11/28/24, 12/24/24 8/4/24, 8/30/24, 10/1/24, 10/23/24, 10/31/24, 11/12/24, 11/28/24, 12/24/24