



July 30, 2020

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. 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 1, 2020 through June 30, 2020.

The semi-annual MACT report covers the specific 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 Part 63 Subpart IIII, the Site E0459 is subject to compliance option 63.3091(b). Unless otherwise noted, the Site E0459 had no instances of exceeding limits, operating limits, or work practices as specified under §§63.3090, 63.3091, 63.3092, 63.3093, and 63.3094.

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

If you have any questions regarding the enclosed information, please contact Subbarao Nagulapaty at [snagulapaty@tesla.com](mailto:snagulapaty@tesla.com) or 510-996-8834.

Sincerely,

Laurie Shelby  
Vice President of Environmental, Health, and Safety

cc: Ms. Debbie Jordan, Director of Air Division, USEPA Region IX

**Semi-annual Title V and MACT Compliance Certification pursuant to Standard Condition I.F and 63.3110**

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 and semiannual MACT Subpart IIII [§63.3110(c)(2) & (c)(5)] report as accurate and true to the best of my knowledge.

Laurie Shelby

Name of Responsible Official Signature



January 1, 2020 through June 30, 2020  
Compliance Period

7/30/2020

Date

Facility # E0459  
Tesla, Inc.  
45500 Fremont Boulevard  
Fremont, CA 94538

**DEVIATIONS FROM TITLE V REQUIREMENTS****January 1, 2020 through June 30, 2020**

<b>Source No</b>	<b>Deviation Summary</b>	<b>Resolution Summary</b>	<b>Date of Discovery</b>	<b>Compliance Status</b>
S-1002	<p>On March 27, 2020, there was a natural gas outage at the Fremont Factory from approximately 9:30 AM to 2:15 PM. The natural gas outage was a result of simultaneous primary and backup power loss to the seismic sensor units that are located at the main gas yard away from the paint shop. The maintenance team was troubleshooting and replacing batteries during which process the natural gas supply was shut-off as a fail-safe measure (both primary and secondary power supply).</p> <p>There were five (5) part carriers in the oven that were in the process of curing when the natural gas outage occurred. The source and abatement device temperatures could not be maintained as the natural gas burners could not operate without natural gas supply. Although it is quite possible the curing process could have ended prior to the outage which would have resulted in zero emissions, Tesla has conservatively estimated emissions from this event to be 1.0 lb VOCs. As documented in the final deviation report and March 2020 monthly emissions report, the source was in compliance with permitted emission limits.</p>	<p>Tesla implemented the following corrective actions to prevent such incidents in the future.</p> <p>a) Warning signs were posted inside the seismic sensor units to not disconnect primary and secondary power sources to the sensor units simultaneously.</p> <p>b) Communicated the event details and trained fire maintenance staff on the procedure to replace batteries for this seismic sensor units.</p> <p>c) Added annual battery check at the seismic sensor units to the annual preventive maintenance tasks.</p> <p>BAAQMD issued an NOV# A58769 on 06/16/2020 for this deviation.</p>	03/27/2020	In-Compliance