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Attorneys for Plaintiff
ENVIRONMENTAL DEMOCRACY PROJECT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ENVIRONMENTAL DEMOCRACY
PROJECT, a California non-profit
corporation,

Plaintiff,

v.

TESLA, INC.; TESLA MOTORS, INC.;
and DOES 1 through 20,

Defendant.

Case No.

**COMPLAINT FOR INJUNCTIVE
RELIEF, DECLARATORY RELIEF,
AND CIVIL PENALTIES**

[Clean Air Act 42 U.S.C. § 7604(a) Citizen
Suit]

INTRODUCTION

1
2 1. This is a citizen suit brought under the Clean Air Act, 42 U.S.C. § 7604(a)(1), by
3 Environmental Democracy Project (EDP), against Tesla, Inc., Tesla Motors, Inc., and DOES 1
4 through 20 (collectively, Tesla). This complaint seeks relief based on Tesla's ongoing failure to
5 comply with the Clean Air Act in Tesla's operation of an automotive manufacturing and
6 assembly facility in Fremont, California (the Fremont Factory).

7 2. Tesla's Fremont Factory has violated the Clean Air Act hundreds of times since
8 January 2021, emitting harmful pollution into the neighborhoods surrounding the Factory.
9 Tesla's Clean Air Act violations are ongoing.

10 3. As a result of Tesla's violations, Tesla has exposed residents and workers in the
11 area surrounding the Fremont Factory to excess amounts of air pollution, including nitrogen
12 oxides, arsenic, cadmium, and other harmful chemicals. These exposures are extensive and
13 ongoing.

14 4. EDP seeks to put an end to Tesla's Clean Air Act violations at the Fremont
15 Factory and penalize Tesla for its unlawful conduct, thereby deterring future noncompliance.

JURISDICTION

16
17 5. This Court has jurisdiction over this lawsuit under 28 U.S.C. § 1331
18 (federal question jurisdiction), 28 U.S.C. § 2201 (actions for declaratory relief), and 42
19 U.S.C. § 7604(a) (the Clean Air Act's citizen suit provision).

20 6. The Act authorizes citizen suits against any person who has violated or is in
21 violation of conditions imposed by an operating permit for major sources of pollution,
22 commonly referred to as a Title V permit. *See* 42 U.S.C. § 7604(a)(1) & 7604(f)(4).

23 7. On March 4, 2024, EDP gave notice to Tesla, the United States Environmental
24 Protection Agency (EPA), and the State of California of its intent to file suit against Tesla, as
25 required by the Act. *See* 42 U.S.C. § 7604(b). A copy of the notice is attached to this complaint
26 as **Attachment 1** and is incorporated by reference. More than sixty days have passed since EDP
27 provided the requisite notice, and thus a citizen suit may be filed.
28

VENUE

8. Venue is proper in the Northern District of California pursuant to section 304 of the Clean Air Act, 42 U.S.C. § 7604, and 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this District, and the Fremont Factory is located in this District.

INTRADISTRICT ASSIGNMENT

9. Assignment of this action to the San Francisco or Oakland Division is proper pursuant to Local Rule 3-2(d) because this is a civil action arising in Alameda County.

PARTIES

10. Plaintiff Environmental Democracy Project is a California non-profit corporation headquartered in Oakland, California. EDP is an environmental justice organization dedicated to addressing and remedying exposures to pollution that disproportionately affect communities of color. Members of EDP work and recreate near the Fremont Factory and are regularly exposed to its illegal pollution. The effects of Tesla's unlawful pollution on EDP's members include actual and threatened harm to their health as well as their professional and economic interests in spending time near the Fremont Facility. Tesla's pollution also injures EDP's members' aesthetic and recreational enjoyment of the area near the Fremont Facility. Unless this Court provides relief, EDP and its members will continue to be harmed.

11. EDP is a "person" within the meaning of section 304(a) of the Act. 42 U.S.C. § 7604(a).

12. The Court's grant of the requested relief will redress the harm to EDP's interests by (1) requiring Tesla to comply with its air quality permit; (2) deterring Tesla and other industrial facilities in the region from future violations of the Act; and (4) providing up to \$100,000 of civil penalties for mitigation projects to benefit the community.

13. Defendant Tesla, Inc. is a Delaware corporation. Tesla owns and/or operates the automotive manufacturing facility located at 45500 Fremont Blvd, Fremont, California that is the subject of this lawsuit.

14. Defendant Tesla Motors, Inc. is a Delaware corporation. Tesla owns and/or operates the automotive manufacturing facility located at 45500 Fremont Blvd, Fremont, California that is the subject of this lawsuit.

15. Tesla is a “person” within the meaning of section 304(a) of the Act. 42 U.S.C. § 7604(a).

16.

FACTUAL BACKGROUND

17. Tesla owns and operates the Fremont Factory and is responsible for the Fremont Factory’s operations and resulting air emissions. The Fremont Factory is located at 45500 Fremont Boulevard, Fremont, CA 94538.

18. The Fremont Factory is one of the largest manufacturing sites in California. The Fremont Factory has a long history of noncompliance with environmental laws, including the Clean Air Act. The Fremont Factory’s two paint shops—the North Paint Shop and the South Paint Shop—are the main sources of Tesla’s Clean Air Act violations since January 2021. The paint shops emit significant amounts of hazardous and criteria air pollutants. Tesla has failed to abate these emissions in violation of its air quality permit.

19. The Fremont Factory is a major source of air pollution subject to the Operating Permit requirements of Title V of the Clean Air Act. *See* 42 U.S.C. §§ 7661(2) & 7661a. The Fremont Factory is required to comply with the conditions imposed by an air permit known as a “Permit to Operate” (the Air Permit), which was issued by the Bay Area Air Quality Management District (the Air District).

20. Tesla is required to report its violations of the Air Permit to the Air District. Between January 2022 and June 2023, Tesla reported more than 90 instances of noncompliance with the Air Permit, which have caused excess emissions of nitrogen oxides, arsenic, cadmium, and other harmful chemicals. Tesla’s self-reported violations of the Air Permit are prima facie violations of the Clean Air Act. Tesla’s self-reported violations of the Clean Air Act are attached as **Exhibit A** to **Attachment 1**. The self-reported violations in Exhibit A identify the date on which the permit violations occurred and the activity underlying the violations. Tesla’s

1 self-reported violations of federally enforceable air permit requirements occurred between
2 January 2022 and the present and are ongoing.

3 21. The Air District has determined that Tesla violated the Air Permit more than 163
4 times between January 2021 and January 2024. The Air District's notices of violations of the
5 Air Permit are attached as **Exhibit B to Attachment 1**. These violations include the emissions
6 of pollutants in excess of the Air Permit's limits, failing to operate and maintain pollution
7 abatement equipment, failing to report noncompliance with Air Permit requirements, and failing
8 to conduct mandatory emissions testing.

9 22. The Air District notices of violation in Exhibit B to Attachment 1 identify the
10 date on which the notices were issued. Tesla is in possession of the notices of violation from the
11 Air District. Tesla's violations are ongoing.

12 23. Neither the Air District nor has the EPA has commenced and is diligently
13 prosecuting a civil action in a court of the United States or a State to require compliance with the
14 violations alleged in this action.

15 **LEGAL BACKGROUND**

16 24. The Clean Air Act, 42 U.S.C. §§7401-7671q, enacted in 1970 and amended in
17 1977 and 1990, establishes a comprehensive program to "protect and enhance the quality of the
18 Nation's air resources so as to promote the public health and welfare and the productive capacity
19 of its population." 42 U.S.C. § 7404(b)(1).

20 25. The Clean Air Act creates a framework for the development and operation of
21 federal, state, and local programs to prevent and control air pollution. 42 U.S.C. § 7401(a)(4).

22 26. The Act requires EPA to establish, review, and revise nationally applicable
23 health-based standards for a small class of common air pollutants (criteria pollutants), known as
24 national ambient air quality standards (NAAQS). 42 U.S.C. §§ 7408-7409. The NAAQS
25 establish permissible concentrations of those pollutants in the "ambient," or outside air. *See*,
26 *e.g.*, 40 C.F.R. § 81.305.

27 27. The Act requires each state to adopt, and submit to EPA for approval, a plan for
28 the implementation, maintenance, and enforcement of the NAAQS in each air quality control

1 region within the state. 42 U.S.C. § 4710. These plans are known as State Implementation
2 Plans.

3 28. State Implementation Plans contain controls on individual sources of air
4 pollution, as well as specific enforceable strategies for government agencies to implement,
5 attain, and maintain the NAAQS. 42 U.S.C. § 7410. Plans approved by EPA become federal
6 law. Thus, violations of State Implementation Plan requirements applicable to individual
7 sources of air pollution are subject to enforcement by citizens.

8 29. Title V of the Clean Air Act, 42 U.S.C. §§ 7661-7661f, establishes an operating
9 permit program for major sources of air pollution. 42 U.S.C. § 7661a(a); 40 C.F.R. §§ 71.1-
10 71.12. Title V is implemented by the states under EPA oversight. The EPA has approved a
11 State Implementation Plan submitted by the Air District containing a Title V operating permit
12 program.

13 30. Title V of the Clean Air Act defines a major source as a facility that has the
14 potential to emit: (i) 10 tons or more per year of any hazardous air pollutant; (ii) 25 tons or more
15 per year of any combination of such hazardous air pollutants; or (ii) 100 tons per year or more of
16 any criteria air pollutants. 40 C.F.R. § 71.2; SIP Reg. 2-6-212.

17 31. A violation of any requirement of a Title V permit, such as the Air Permit, is a
18 violation of the Clean Air Act. *See* 42 U.S.C. § 7661a. The Clean Air Act imposes strict
19 liability upon owners and operators who violate the Act.

20 32. The Act authorizes citizen suits against any person who has violated or is in
21 violation of an “emission standard or limitation.” 42 U.S.C. § 7604(a)(1). The term “emission
22 standard or limitation” is defined in the Act to include an emission limitation; emission
23 standard; any standard or limitation established under an applicable state implementation plan
24 approved by the U.S. Environmental Protection Agency; and any requirement to obtain a permit
25 as a condition of operations. 42 U.S.C. § 7604(f). The conditions imposed by a Title V permit,
26 such as Tesla’s Air Permit, constitute “emission standard[s] or limitation[s]” under the Clean Air
27 Act and are enforceable by citizens in federal court. *See* 42 U.S.C. § 7604(a); *id.* § 7604(f)(4).

28 33. Tesla’s violations of the Air Permit are violations of the State Implementation

Plan including SIP Regulation 2-1-307 (failure to meet permit conditions) and the Clean Air Act.

FIRST CLAIM

**Violations of Title V Permit, the State Implementation Plan, and the Clean Air Act—
Injunctive Relief, Declaratory Relief and Civil Penalties**

34. EDP realleges and incorporates by reference the previous paragraphs, as though fully alleged herein.

35. Tesla's Air Permit, issued under Title V of the Clean Air Act, contains federally-enforceable requirements for the Fremont Factory. Tesla has violated these requirements hundreds of times since January 2021. Tesla's violations were both self-reported and identified by the Air District. The violations are set forth in Attachment 1, Exhibits A and B, which is attached to this complaint and incorporated by reference. Tesla's violations are ongoing.

36. Tesla's violations of its Air Permit include the emissions of harmful pollutants in excess of the Air Permit's limits, failing to operate and maintain pollution abatement equipment, failing to report noncompliance with Air Permit requirements, and failing to conduct mandatory emissions testing.

37. Prior to filing this action, EDP served the requisite notice of intent to sue on Tesla, EPA, and the State. Neither the Air District nor EPA has filed a civil action in federal or state court to enforce the violations alleged in this action.

38. Unless ordered by this Court, Tesla will continue to violate the Air Permit and the State Implementation Plan in violation of the Clean Air Act.

PRAYER FOR RELIEF

The Environmental Democracy Project requests that this Court enter judgment as follows:

1. An injunction prohibiting the Tesla from violating its Air Permit, the State Implementation Plan, and the Clean Air Act;

2. A declaration that Tesla violated and continues to violate its Air Permit, the State Implementation Plan, and the Clean Air Act;

1 3. An order requiring Tesla to pay civil penalties, up to \$121,275 per day, or
2 an amount adjusted for inflation, for each violation of the Clean Air Act, and order that up to
3 \$100,000 of such penalties be used in beneficial mitigation projects consistent with the Clean
4 Air Act, 42 U.S.C. § 7604(g);

5 4. An order requiring Tesla to pay EDP's costs of litigation, including
6 reasonable attorney and expert witness fees; and

7 5. An award of such other and further relief as this Court deems just and
8 proper.

9
10 DATED: May 13, 2024

LEXINGTON LAW GROUP

11
12
13 /s/ Lucas Williams

14 Lucas Willaims
15 Attorneys for Plaintiff
16 ENVIRONMENTAL DEMOCRACY
17 PROJECT
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Attachment 1



503 DIVISADERO STREET, SAN FRANCISCO, CALIFORNIA 94117-2212
TELEPHONE (415) 913-7800 FACSIMILE (415) 759-4112

March 4, 2024

BY CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Elon Musk, CEO
Tesla, Inc.
c/o The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware, 19801

Re: Notice of Intent to File Suit Under the Clean Air Act

Dear Mr. Musk:

Tesla, Inc.'s automotive manufacturing facility in Fremont, California (the Fremont Factory) is in violation of the Clean Air Act. Tesla's Fremont Factory has violated its air quality permit hundreds of times since January 2021, emitting harmful pollution into the ambient air and neighborhoods surrounding the facility. Tesla's Clean Air Act violations are ongoing.

Environmental Democracy Project (EDP), an environmental justice nonprofit corporation, intends to file suit to enjoin the Fremont Factory's Clean Air Act violations and impose civil penalties on Tesla for its unlawful conduct. The Clean Air Act requires that citizens give 60 days' notice of their intent to file suit under the Act. 42 U.S.C. § 7604(b)(1)(A). EDP's members live and work near the Fremont Factory and are injured by Tesla's Clean Air Act violations. EDP hereby provides notice to Tesla of EDP's intent to file suit against Tesla under the Clean Air Act.

I. Background

The Clean Air Act is designed to "protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and productive capacity of its population." 42 U.S.C. § 7401(b)(1). Tesla owns and operates the Fremont Factory and is responsible for the Fremont Factory's operations and resulting air emissions. The Fremont Factory is a "major source" of air pollution subject to the Operating Permit requirements of Title V of the Clean Air Act. *See* 42 U.S.C. §§ 7661(2), 7661a. The Fremont Factory is required to comply with the conditions imposed by an air permit known as a "Permit to Operate" (the Air Permit), which was issued by the Bay Area Air Quality Management District (the Air District).

II. Tesla's Violations of Emissions Standards and Limitations under the Clean Air Act

Tesla has violated and continues to violate the Air Permit's requirements. A violation of any requirement of a Title V permit, such as the Air Permit, is a violation of the Clean Air Act. *See* 42 U.S.C. § 7661a. The Clean Air Act "imposes strict liability upon owners and operators who violate the Act." *Pound v. Aerosol Co., Inc.*, 498 F.3d 1089, 1097 (10th Cir. 2007).

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March 4, 2024

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The Clean Air Act entitles any person to sue for violations of “an emission standard or limitation under [the Act]” or “an order issued by the Administrator or a State with respect to such a standard or limitation.” 42 U.S.C. § 7604(a)(1). The conditions imposed by a Title V major source operating permit, such as the Air Permit, constitute “emission standard[s] or limitation[s]” under the Clean Air Act and are enforceable by citizens in federal court. *See* 42 U.S.C. § 7604(a); *id.* § 7604(f)(4).

EDP intends to file suit based on each of Tesla’s violations of the Air Permit described below. Tesla is required to report its violations of the Air Permit to the Air District. Between January 2022 and June 2023, Tesla reported at least 90 instances of noncompliance with the Air Permit, which have caused excess emissions of nitrogen oxides, arsenic, cadmium, and other harmful chemicals. Tesla’s self-reported violations of the Air Permit are *prima facie* violations of the Clean Air Act. *See Sierra Club v. Pub. Serv. Co. of Colorado, Inc.*, 894 F. Supp. 1455, 1461 (D. Colo. 1995); *Grand Canyon Trust v. Public Service Co. of New Mexico* 294 F.Supp.2d 1246, 1247 D.N.M. 2003); *Concerned Citizens Around Murphy v. Murphy Oil USA, Inc.*, 686 F. Supp. 2d 663, 680 (E.D. La. 2010). Tesla’s self-reported violations of the Clean Air Act at issue in this letter are attached as **Exhibit A**. The self-reported violations in Exhibit A identify the date on which the permit violations occurred and the activity underlying the violations. EDP intends to enforce each of Tesla’s self-reported violations of federally enforceable Air Permit requirements that occurred between January 2022 and the present, as well as violations of federally enforceable Air Permit conditions reported after the date of this letter.

In addition, the Air District has determined that Tesla violated the Air Permit at least 163 times between January 2021 and January 2024. The Air District’s notices of violations of the Air Permit are attached as **Exhibit B**. These violations include the emissions of harmful pollutants in excess of the Air Permit’s limits, failing to operate and maintain pollution abatement equipment, failing to report noncompliance with Air Permit requirements, and failing to conduct mandatory emissions testing.

The Air District has not brought any action in federal court to enforce these violations—leaving it to citizens like EDP to bring their own enforcement action. *See Baughman v. Bradford Coal Co., Inc.*, 592 F.2d 215, 218 (3d Cir. 1979) (“Congress intended citizen suits to both goad the responsible agencies to more vigorous enforcement of the anti-pollution standards and, if the agencies remained inert, to provide an alternate enforcement mechanism.”).

The Air District notices of violation in Exhibit B identify the date on which the notices were issued. Tesla is in possession of the notices of violation from the Air District, and Tesla is the only entity that knows precisely when the violations occurred. Tesla thus has sufficient information to identify the Clean Air Act violations alleged in this presuit notice. EDP intends to enforce each of the federally enforceable violations identified by the Air District from January 2021 through January 2024, as well as violations that are identified after the date of this letter.

III. Relief to Be Requested

To remedy Tesla’s violations, EDP will ask the court to order Tesla to pay civil penalties up to the amount authorized by Clean Air Act, *i.e.*, \$121,275 per day. *See* 88 Fed.

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Reg. 89309 (December 27, 2023). Tesla is liable for penalties on each day the violations occur. Penalties are calculated based on statutory factors including Tesla's size and compliance history. *See* 42 U.S.C. § 7413(e). EDP will also seek declaratory relief confirming that Tesla has violated and continues to violate the Clean Air Act. EDP will also seek injunctive relief that requires Tesla to take all actions necessary to immediately comply with the Air Permit and Clean Air Act. Finally, EDP intends to seek the recovery of costs, including attorney and expert fees, as authorized by the Clean Air Act.

IV. The Entity Giving Notice and Potential Resolution of Issues During the Sixty-Day Period

The entity giving notice is the Environmental Democracy Project, a California nonprofit corporation, headquartered in Oakland, California at 66 Franklin Street, Oakland, California 94607. EDP is represented by legal counsel and their contact information is:

Lucas Williams
Jacob Janzen
Lexington Law Group, LLP
503 Divisadero Street
San Francisco, CA 94117-2212
Telephone: 415-913-7800
lwilliams@lexlawgroup.com
jjanzen@lexlawgroup.com

During the 60-day notice period, EDP is willing to discuss effective remedies for the violations of the Clean Air Act at issue in this notice as well as Tesla's ongoing violations of the Act. We strongly suggest that you initiate these discussions immediately with legal counsel before the end of the 60-day notice period. EDP does not intend to delay the filing of a complaint if the discussions fail to resolve the matter within the sixty-day notice period, and we intend to seek all appropriate relief, including injunctive relief, penalties, and all costs of litigation.

V. Conclusion

We believe that this notice provides information sufficient for you to identify the violations of the Clean Air Act, the activity alleged to be in violation, and the location of the alleged violations. Additional information, including information not yet available to EDP, may reveal additional violations, which this letter intends to cover.

Tesla, Inc. – Prior Notice of Citizen Suit under the Clean Air Act
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We look forward to hearing from you.

Sincerely,

/s/ _____
Lucas Williams

cc: Tesla Motors, Inc.
California Registered Corporate Agent (1505)
C.T. Corporation System
330 North Brand Boulevard, Suite 700
Glendale, CA 91203
(Certified Mail/Return Receipt Requested)

Hon. Michael S. Regan, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington DC 20460
(Certified Mail/Return Receipt Requested)

Hon. Chairman Liane M. Randolph
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814
(Certified Mail/Return Receipt Requested)

Hon. Martha Guzman
Regional Administrator
Office of Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
Mail Code: ORA-1
San Francisco, CA, 94105
(U.S. Mail)

Hon. Gavin Newsom
Governor of California
State Capitol Building
Sacramento, CA 95814
(U.S. Mail)

Tesla, Inc. – Prior Notice of Citizen Suit under the Clean Air Act
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Alexander Crockett
District Counsel
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
(U.S. Mail)

Exhibit A



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

ATTACHMENT 3: LIST OF DEVIATIONS DURING THIS PERIOD (JANUARY 1ST, 2022 THRU JUNE 30TH, 2022)

Attachment 3 -
Deviations List
Time Period

January 1, 2022 through June 30, 2022

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
S-4045	Tesla conducted Air District approved source testing for criteria pollutants and metals on Furnace 2/Abatement 2 (Filter House A-30194) between October 26 through October 28, 2021. Testing was conducted by the source testing contractor (Alliance Source Testing, LLC) and results were submitted to the Source Testing Division on December 27, 2021 (NST-6782).	Tesla repaired the filters in the filter house and source retests were conducted to demonstrate compliance.	1/6/2022	In Compliance	Castings
S-4046					
A-30193					
A-30194					
S-3008	There were unforeseen breakdown/malfunction events at NPS Booths & oven which caused the bypass damper for booths/basecoat oven to open (Note that the RTO temperature was not affected). This was caused by an outage from Substation 16 being tripped.	Tesla's Plant Operations team investigated the issue on February 2nd 2022 and found no issues or concerns with the substation. As a corrective and preventative action however, the Tesla team replaced the breaker at the station with a new breaker.	1/21/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
A-30180	There were unforeseen breakdown/malfunction events at the South Paint Shop that caused the A-30180, A-30181, and A-30182 to lose temperature. During the emergency shutdowns, the VOCs were recirculated back to the booth instead of being routed to abatement systems as designed by closing the damper to the abatement systems and routing all air back to the booth. The shutdowns were caused by an outage from a feeder in Substation 16 being tripped.	Tesla's Plant Operations team investigated the issue on February 2nd 2022 and found no issues or concerns with the substation. As a corrective and preventative action however, the Tesla team replaced the breaker at the station with a new breaker.	1/22/2022	In Compliance	SPS
A-30181					
A-30182					
A-30182					
S-4036	There were unforeseen malfunctions at various devices at the Fremont Factory due to a PG&E power failure event.	PG&E expressed that the cause for this event as a mylar balloon strike which exercised their safety systems and resulted in a loss of factory power through the reset process. Tesla is looking into potential changes to reduce vulnerability to power outages.	1/24/2022	In Compliance	NPS, SPS, Plastics
S-4037					
S-4038					
S-4039					
S-1002					
S-1007					
A-30180					
A-30181					
A-30182					
A-30183					
A-30192					
A-1007					
S-57					
S-58					
S-59					
S-65					
A-30170					
S-3008					
S-3014					
S-3015					
S-3016					
S-4006(S-32006)					
S-3009					
S-32010					
A-3008					
S-4045					
S-4046					
A-30193					
A-30194					
A-30180	There was an unforeseen malfunction at the Prime Wheel/TO (Zone 1) of the 3 wet-system at the South Paint Shop. The TO (A-30180) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30180) to drop below the permitted temperature of 1400 °F and the VOCs were recirculated back to the booth instead of being routed to abatement systems.	Upon investigation, maintenance identified a potential issue with the spray booth air flow switch. As a corrective action and preventative action the air flow switch was replaced on January 30th 2022.	1/26/2022	In Compliance	SPS
S-3008	There were unforeseen breakdown/malfunction events at NPS Booths & oven (S-3008, S-3014, S-3016 and S-3015) which caused the bypass damper for booths/basecoat oven to open (Note that the RTO temperature was not affected). The outage was caused by Substation 16 being tripped.	The outage was caused by Substation 16 being tripped. Tesla's Plant Operations team investigated the issue on February 2nd 2022 and walked all the systems connected to this specific bus and found no indications of any abnormal conditions. No physical signs of any faults were found and no disturbance to the power at the time of the fault was identified. The power metering devices also did not show any abnormalities.	2/2/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
A-30180	There were unforeseen breakdown/malfunction events at the South Paint Shop that caused the A-30180, A-30181, and A-30182 to lose temperature. During the emergency shutdowns, the VOCs were recirculated back to the booth instead of being routed to abatement systems. This was caused by an outage from Substation 16 being tripped	As a corrective and preventative action however, the Tesla team replaced the breaker at the station with a new breaker. Further investigation of the area was conducted but nothing abnormal was detected. Tesla continues to closely monitor the substation for issues.	2/2/2022	In Compliance	SPS
A-30181					
A-30182					

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
S-3008	There were unforeseen breakdown/malfunction events at NPS Booths & oven (S-3008, S-3014, S-3016 and S-3015) which caused the bypass damper for booths/basecoat oven to open (Note that the RTO temperature was not affected). The outage was caused by Substation 1B being tripped. Upon investigation, Tesla believes the root cause to be a faulty transformer.	The outage was caused by Substation 1B being tripped. Upon investigation, Tesla believes the root cause to be a faulty transformer. As a corrective and preventative action Tesla's Plant Operations team replaced the transformer on the substation in April 2022. In the interim the substation has been taken offline to prevent reoccurrence.	2/6/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
A-30182	There was an unforeseen breakdown/malfunction event (at the South Paint Shop that caused A-30182 to lose temperature. During the emergency shutdown , the VOCs were recirculated back to the booth instead of being routed to abatement systems. The root cause were screws that were loose that allowed the motor shaft to spin without the linkage on desorb damper opening or closing.	The root cause was screws that were loose that allowed the motor shaft to spin without the linkage on desorb damper opening or closing. As a corrective and preventative action, the desorb damper was manually closed and the screws were tightened. Maintenance checked to ensure the motor shaft and damper linkage moved in unison by forcing the damper to open.	2/8/2022	In Compliance	SPS
A-3008	There were two unforeseen breakdown/malfunction events at North paint shop which affected the booths/ovens and caused the bypass dampers to open. The events affected the RTO (A-3008) also, but the RTO temperature recovered quickly, and therefore these periods can be classified as allowable temperature excursions.	The root cause was an unexpected drop in temperature of the RTO as the exhaust fan kicked into full auto mode as a part of production restart which caused a large temperature fluctuation resulting in a loss of production. As a preventative action Tesla has established a protocol to gradually increase fan speed before setting to auto mode, which will eliminate large temperature fluctuations within the TO.	2/21/2022	In Compliance	NPS
S-32006/S-4004	There was an unforeseen breakdown/malfunction event at NPS E-coat oven (S-32006/S-4006). Cars stopped on oven chain exiting the oven and were not able to drop into the strip-out. This caused a loss of production at the e-coat oven and the bypass damper opened up during this event. The root cause is suspected to be a downstream breakdown in the manual sealer line which caused a blockage and subsequent production loss at the E-coat oven.	As a corrective and preventative action, both Tesla's controls and maintenance team revamped the control logic to prevent this from happening in the future. Tesla also will continue monitoring skid stack for possible root causes.	2/24/2022	In Compliance	NPS
S-32006/S-4004	There were unforeseen breakdown/malfunction events at the NPS E-Coat Oven (S-32006/S-4004) which caused the bypass damper for booths/basecoat oven to open (Note that the RTO temperature was not affected). The root cause was a failure of plastic sprocket and compressed fiberglass spine chain (manufactured in Germany).	Tesla's maintenance team propped the lifter up, dismantle the damaged sprocket/spine and reassembled with a new sprocket/spine which was available on site. As a preventative action, Tesla is in talks with a new vendor to potentially source a local sprocket/spine.	3/2/2022	In Compliance	NPS
A-30183	There was an unforeseen malfunction at the Prime and Clearcoat Oven Thermal Oxidizer (TO) of the 3 wet-system at the South Paint Shop. The Prime and Clearcoat Oven TO (A-30183) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The root cause of the issue was found to be a defective air flow switch.	As a corrective and preventative action, the air flow switch was replaced with an on hand spare part.	3/8/2022	In Compliance	SPS
S-1007/A-1007	The Sealer Oven TO (A-1007) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-1007) to drop below the permitted temperature of 1400 °F. The root cause of the event is a defective TAR thermocouple that was incorrectly recording temperatures above the high setpoint of the TO causing a shutdown.	As a corrective and preventative action the defective TAR thermocouple was replaced. The defective TAR thermocouple was recently installed by an external contractor on 2/25/22 and thus was probably a defective part from the manufacturer.	3/14/2022	In Compliance	SPS
S-1007/A-1007	There was an unforeseen malfunction at the Sealer Oven and TO (S-1007/A-1007) at the South Paint Shop. The Sealer Oven TO (A-1007) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-1007) to drop below the permitted temperature of 1400 °F. The root cause of the event is water damage to the zone 1 power cabinet which houses controls for the sealer oven and its respective thermal oxidizer.	All water was removed, and the water damaged parts of the control panel were replaced. Tesla is evaluating replacing sprinkler heads with higher temperature limits as well as sealing off conduits to prevent water intrusion into the system.	3/14/2022	In Compliance	SPS
S-4039/A-30183	There was an unforeseen malfunction at the prime & Clearcoat Oven TO (A-30183) of the 3 wet-system at the South Paint Shop. The TO lost temperature during production due to a burner fault which triggered an emergency shutdown of the incinerator and the ovens. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F.	The cause was a loose wire on the damper motor control circuit. The wire was inserted back and tightened down promptly. The dampers were inspected to ensure actuating correctly. The issue was resolved, and the oven was started back up within 55 mins. As a preventative action, the South Paint Shop team inspected the entire cabinet for any loose wires to avoid any similar incidents. The team also formulated a plan for annual panel check for CY2022.	3/22/2022	In Compliance	SPS
S-4039/A-30183	There was an unforeseen malfunction that required a shutdown of the Prime and Clear Oven (S-4039) and the prime & Clearcoat Oven TO (A-30183) of the 3 wet-system at the South Paint Shop. This shutdown resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. Two vehicle bodies on the conveyor line collided on 3/25/2022. As a result, to safely enter the oven and clear the vehicle bodies, maintenance initiated an emergency shutdown of the oven and TO.	The collision was due to a faulty stopper, as a preventative action a new stopper was installed internally on 3/26/22 and validated. Tesla has not had issues with the stopper since operation began in the South Paint Shop. As a preventative action Tesla has added visual checks of the stopper to monthly preventative maintenance.	3/25/2022	In Compliance	SPS
S-4045	Tesla exceeded permitted NOx limits at the castings operation. Tesla tuned the burners at both furnaces during commissioning and operational fine-tuning, activities and subsequently, conducted a new source test in Sept/October 2021. The source test demonstrated a 27% and 29% reduction in NOx at Furnace 1 and Furnace 2 respectively. On analysis of annual emissions data following the date of source testing (Post October 1st, 2021), it was identified that the daily limit specified in BAAQMD Regulation 2 Rule 2 of 10 pounds per day were potentially exceeded at Furnaces 1 and 2.	Tesla has reached out to multiple vendors and the furnace manufacturer to assist in identifying options for further NOx reduction. All third-party vendors and the manufacturer confirmed that the current NOx ppm as achieved during the most recent source test is the lowest achievable for stack melter type furnaces with the equipment available. Tesla is now in process of working with a 3rd party vendor for a more novel solution. A permit application has been submitted to trial this solution at Furnace 1.	4/1/2022	Interim Compliance	Castings
S-4046					
S-1002/A-30192	There was an unforeseen malfunction at the South Paint Shop E-coat Thermal Oxidizer (TO). There were two units in the oven during the event. The malfunction caused all TO burners to fault and shut off. The root cause is suspected to be a jammed linkage assembly.	The maintenance team replaced the motor on April 10th, 2022 after an initial investigation suspected the motor to be the root cause; however, they still experienced the issues with actuating of the damper. The team inspected the damper with the contractor that installed the damper on April 17th. Additionally, as a preventative action, the team inspected E-coat incinerator dampers and switches to ensure all flow switches and dampers are functioning correctly in auto position.	4/4/2022	In Compliance	SPS

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
A-30182	There was an unforeseen malfunction at the Clearcoat (CC) Wheel/TOS (Zone 3) of the 3 wet-system at the South Paint Shop. The TO (A-30182) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30182) to drop below the permitted temperature of 1400 °F. During the emergency shutdowns noted above, the VOCs were recirculated back to the booth instead of being routed to abatement systems. Maintenance identified the issue with the defective caster wheel which caused KCR not supplying air to the booth.	Maintenance replaced the caster wheel promptly. As a preventative action, the maintenance will also inspect the KCR wheel bearing on a timely basis and inspect KCR caster assembly, motors and gearboxes during system shutdown.	4/6/2022	In Compliance	SPS
A-3008	There were unforeseen breakdown/malfunction event at the NPS Abatement (A-3008) which caused the NPS to enter an emergency shutdown and the bypass damper for booths and ovens to open (Note that the RTO temperature was not affected). The root cause of the emergency shutdown was the TO bed temperature spiking above 480 °F. The cause of the spike is suspected to be due to the fact the NPS was restarting from a 4 day shutdown coupled with a temperature controller issue.	As a preventative measure Tesla has inspected all temperature controllers to ensure the limits on the controller match the correct limits. All documentation of the event was provided to the district and visually verified upon their site visit on 4/14/2022. This event was due to a first of its kind breakdown event associated with a temperature controller.	4/6/2022	In Compliance	NPS
A-30182	There was an unforeseen malfunction at the Clearcoat (CC) Wheel/TOS (Zone 3) of the 3 wet-system at the South Paint Shop. The TO (A-30182) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30182) to drop below the permitted temperature of 1400 °F. During the emergency shutdowns noted above, the VOCs were recirculated back to the booth instead of being routed to abatement systems. The root cause was diagnosed to be a damaged friction pad.	Maintenance took intermediate steps to bring the friction pad to working order. As a preventative action the friction pad was replaced during a weekend shut down on 4/17/2022.	4/7/2022	In Compliance	SPS
S-3008	There was an unforeseen breakdown/malfunction event at the NPS which affected the RTO (temperature dropped just below 1400 °F) and caused the bypass damper for the booths/ovens to open. The outage was caused by a fault on the motor which is on the cross-chain exit of the topcoat oven, which then caused the ovens to back-up with cars as production was stopped.	The motor was inspected, and a call was made to swap the motor out after verifying that the fault was not due to the drive or any other components (The windings of the motor was damaged). A new motor was installed and back in action – however due to this breakdown, the RTO was idling with no active production, due to which the RTO temperature dropped just below 1400 °F which resulted in the bypass dampers opening. The RTO temperature was immediately revived, and production restarted soon. Note that this was a completely unforeseen malfunction for this cross-chain exit motor which has had no prior instances of failure.	5/4/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
S-4006					
S-3009					
S-32010					
A-30180	There were two unforeseen malfunctions at the A-30180 of the 3 wet-system at the South Paint Shop. The TO (A-30180) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30180) to drop below the permitted temperature of 1400 °F. During the emergency shutdowns , the VOCs were recirculated back to the booth instead of being routed to abatement systems. The first fault was triggered by the PLC thermocouple seeing temperature above the high set point, which caused the system emergency shutdown. The second fault was a result of the loose wires connecting the temperature signals to the high limit temperature thermocouple.	To promptly solve the issue and restart the system for the first fault, the controls team routed the temperature signal through the high limit temperature thermocouple to get correct temperature reading. Upon discovery of the second fault, the controls team tightened the wires immediately. As a corrective action, the defective thermocouple was replaced on May 9th. Documentation of the repair was provided to the district via information request on May 10th 2022.	5/4/2022	In Compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by an air flow switch fault resulting in the 3 wet oven incinerator and zone 1 & 2 dropping out, which caused the system emergency shutdown.	The maintenance team immediately purged the 3 wet oven and successfully ignited the incinerator and oven zone 1 and 2. As a preventative action, the team checked all air flow switches of the 3 wet oven and are doing routine planned maintenance to ensure proper functioning.	5/6/2022	In Compliance	SPS
S-1002/A-30192	There were two unforeseen malfunctions at the South Paint Shop E-coat Thermal Oxidizer (TO). For the first malfunction (May 8th, 2022), the heat exchange damper of the Ecoat TO had a mechanical failure causing the TO to lose temperature. The second malfunction (May 9th, 2022) was due to the damper adjustment for oven temperature causing unexpected loss of air flow which faulted the TO and the burner. The root cause of the first event is the fresh air heat exchange damper of the Ecoat oven not being in correct position due to an inadvertent misalignment by South Paint Shop contractor Thermo. The second event was due to the damper adjustment to slightly increase the oven temperature causing unexpected loss of air flow, which faulted out the TO and all the burners.	Upon investigation of the first event, the maintenance team manually placed the damper into the correct closed position and restarted the incinerator burner with monitoring until production release was achieved. For the second event, the maintenance team manually adjusted the damper to the correct position and restarted the ovens. To prevent the recurrence of these specific events, the South Paint Shop team is planning to mark the location of the bypass dampers to ensure correct damper adjustment.	5/8/2022	In Compliance	SPS
S-3008	There was an unforeseen breakdown/malfunction event at the NPS which affected the RTO (temperature dropped just below 1400 °F) and caused the bypass damper for the booths/ovens to open. The outage was caused by water ingress into the pecker head of the ARU motor. As a result, the motor faulted causing a production loss.	The pecker head was drained, the leads were inspected and allowed time to dry. Afterwards the motor was able to start without issue. The ARU room is airtight with sealed door that cannot be opened during production and thus the chances of incidental water leaks are minimal. There is no history of a similar event corresponding to this motor and thus was a first of its kind event. As a result, maintenance has decided to include inspecting the pecker head for potential condensation as part of the quarterly PM. Note that this PM is above and beyond what is recommended by the manufacturer.	5/9/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
S-4006					
S-3009					
S-32010					

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
A-30182	There was an unforeseen malfunction at the Clearcoat (CC) Booth TO (A-30181) at the South Paint Shop. The TO (A-30182) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30182) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a circuit breaker issue that prevented the system from being reset.	The breaker was reset, and the system restarted without issue. As a preventative action the breaker has been changed.	5/11/2022	In Compliance	SPS
A-30180	There were unforeseen breakdown/malfunction events at the South Paint Shop that caused the A-30180, A-30181, and A-30182 to lose temperature (1400 F) and the dampers to momentarily open. The shutdown was triggered by a fire alarm being set off precipitated by a car door hitting the sprinkler system. There were two main (waterflow) alarms that were triggered with the unexpected event of the car door hitting the system.	The fire safety team performed the necessary emergency response activity to rectify the situation including draining the water and recharging the line. As a corrective action, Tesla has identified the need for a branch line and the fire safety team investigated to modify the sprinkler line to disconnect the fire alarm with the booth system so that the booth does not get affected by any similar accident going forward.	5/11/2022	In Compliance	SPS
A-30181					
A-30182					
A-30183/S-4039	There was an unforeseen malfunction at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. . The loss in temperature was caused by a power outage which caused all incinerator burners to fault resulting in a loss of production.	The root cause was a power outage. As a preventative action Tesla has investigated the power systems and continues to monitor the system for anomalies.	5/13/2022	In Compliance	SPS
S-3008					
S-3014	There was an unforeseen breakdown/malfunction event at the NPS which affected the RTO (temperature dropped just below 1400 °F) and caused the bypass damper for the booths/ovens to open. The outage was caused by a stuck combustion motor damper which controls the RTO burner.	The damper was manually actuated into the position and production started up again. As a preventative action, a new damper valve has been ordered and installed during the July 4th shutdown.	5/14/2022	In Compliance	NPS
S-3016	Upon investigation of the issue maintenance and engineers found that the damper had faulted out and was stuck and unable to open or close on it's own.				
S-3015					
S-4006					
S-3009					
S-32010					
A-30182	There was an unforeseen malfunction at the Clearcoat TO A-30182 of the 3 wet-system at the South Paint Shop. The TO (A-30182) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30182) to drop below the permitted temperature of 1400 °F. The loss in temperature was determined to be caused by 2 tripped circuit breakers. The tripped breakers caused the system to lose power and enter an emergency shutdown.	The breakers were reset, the faults were cleared and the system was restarted. As a preventative action Tesla will continue to monitor circuit breakers and energy systems.	5/14/2022	In Compliance	SPS
S-3008					
S-3014	There was an unforeseen breakdown/malfunction event at the NPS which caused the bypass damper for the booths/ovens to open. The root cause of the event was an overheated drive cabinet that caused the RTO exhaust air fan drive to shut down.	As a corrective action Tesla replaced the filter to promote more air flow into the cabinet. As a preventative action Tesla is reducing the frequency between filter changes to ensure the cabinets maintain adequate air flow.	5/21/2022	In Compliance	NPS
S-3016					
S-3015					
S-4006					
S-3009					
S-32010					
A-30183/S-4039	There were unforeseen malfunctions at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. The malfunctions resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was suspected to be caused by a faulty air flow switch.	Tesla has replaced all air flow switches on the system on 6/12/22. Upon replacing all air flow switches Tesla found that the bladder of a removed air flow switch to be torn preventing the air flow switch from functioning properly. Tesla has replaced all 4 air flow switches and added signal wires to the air flow switch which will allow Tesla to diagnose which air flow switch is faulting in the future.	5/28/2022	In Compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. There were 24 units in the 3 wet oven during this event. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a fault air flow switch.	As an immediate corrective action controls adjusted the air flow switch, and the 3 Wet oven was able to restart. Tesla has increased the frequency of checks and preventative maintenance of the air flow switches. Tesla is work with controls, maintenance, and facilities to address issues around the air flow switches. This includes evaluating replacing the air flow switches with a more robust solid-state device or any additional controls that can be added to the process.	6/3/2022	In Compliance	SPS
A-30183/S-4039	There were three unforeseen malfunctions at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a defective flame detector.	The team was able to restart the oven and the incinerator after the first two events. After the third event, the maintenance team replaced the flame detector the same day on June 4th. As a preventative action, Tesla has implemented maintenance plan on a quarterly basis to inspect the flame detector. The maintenance checklist includes cleaning the sight glass, checking on sight tube for debris, vacuuming the sight tube, and inspecting the flame controller for flame signal.	6/4/2022	In Compliance	SPS
A-30183/S-4039	There were unforeseen malfunctions at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a fault air flow switch.	Controls adjusted the air flow switch, and the 3 Wet oven was able to restart. After a couple of hours the air flow switch faulted again. As a corrective action to the 2nd event Tesla bypassed the suspected faulty air flow switch and the 3 Wet oven was able to restart. As a corrective action Tesla has replaced all 4 air flow switches and added signal wires to the air flow switch which will allow Tesla to diagnose which air flow switch is faulting in the future.	6/8/2022	In Compliance	SPS
S-3008					
S-3014	There was an unforeseen breakdown/malfunction event at the North Paint Shop (NPS) which caused the booths/ovens dampers to open. The RTO (A-3008) temperature remained above 1400 F during the event. The root cause was a broken air line for the absorption wheel collecting duct damper.	The maintenance team found that the air line had split next to the coupling. As a corrective action, the team cut back the damaged/fatigue section of the line and reconnected it. As a preventative action, the maintenance team replaced the whole air line for the absorption wheel during the next system shutdown.	6/9/2022	In Compliance	NPS
S-3016					
S-3015					
S-4006					
S-3009					
S-32010					

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
S-1002/A-30192	There was an unforeseen malfunction at the South Paint Shop E-coat Thermal Oxidizer (TO). The malfunction was traced back to a faulty air flow switch that caused the E-Coat TO to lose temperature. The root cause of the event was due to a thick tar like-substance (plasticizer) build up within the air flow line switches.	Two air flow switches were bypassed to allow the system to be restarted. As a preventative action Tesla installed a moisture trap as well as cleaned out the air flow switch lines every weekend to prevent a reoccurrence of this event.	6/13/2022	In Compliance	SPS
A-30183/S-4039	There were two unforeseen malfunctions at the TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. The malfunctions resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was suspected to be caused by a sight glass issue which resulted in flame failure.	After the first event, the maintenance team cleaned out the sight glass of the flame detector and was able to restart the oven and achieve production release. After the second event, upon a more detailed examination of the flame detector, maintenance found excessive burn mark at the center of the secondary sight glass. The team cleaned out the secondary sight glass and restarted the oven and incinerator. Tesla rerouted the compressed air line to the flame detector sight glass to keep the flame detector sight glass and secondary sight glass clear of debris. Tesla is also doing more frequent maintenance on a quarterly basis to inspect the flame detector and tubing.	6/14/2022 / 6/15/2022	In Compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. The malfunctions resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was suspected to be caused by a faulty wire feeding the PLC panel from the flame detector system.	Upon investigation of the issue, technicians believed the issue to be a part of the flame detector system. Upon inspecting the detector and cleaning the sight glass, maintenance found that the flame detector was not signaling the system correctly. After some follow up tests, maintenance decided to wire a new connection from the flame detector to the controller and bypass the old wiring which allowed the system to restart.	6/15/2022	In Compliance	SPS
S-3008	There was an unforeseen breakdown/malfunction event at the North Paint Shop (NPS) which caused the booths/ovens dampers to open. The RTO (A-3008) briefly lost temperature but remained above 1378 F during the event. The root cause was a broken air line for the absorption wheel collecting duct damper.	Upon investigation of the issue, the maintenance team found that the airline had split next to the coupling. As a corrective and preventative action, the maintenance team decided to replace the exposed portion of the line with a brand-new weather resistant line. Tesla has provided documentation of the replacement and repair to the district inspector.	6/20/2022	In Compliance	NPS
S-3014					
S-3016					
S-3015					
S-4006					
S-3009					
S-32010					
A-30183/S-4039	There was an unforeseen malfunction at the TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a faulty air flow switch of the 3 wet oven.	The controls team adjusted the air flow switch, and the 3 wet oven was able to restart. As a preventative action, Tesla has added signal wires to the air flow switch which will allow Tesla to diagnose which air flow switch is faulting in the future. In addition, Tesla has increased the frequency of checks and preventative maintenance of the air flow switches. As a long-term corrective action, Tesla is evaluating replacing the air flow switches with a more robust solid-state device or any additional controls that can be added to the process.	6/21/2022	In Compliance	SPS
A-30183	There were unforeseen breakdown/malfunction events at the South Paint Shop that caused the TO (A-30183) of the 3 Wet Oven (S-4039) to lose temperature. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by an exhaust fan motor fault which was due to a sticking relay.	As a preventative action contractors replaced the relay on the exhaust fan motor. Documentation of the replacement has been provided to the air district in a separate data request.	6/24/2022	In Compliance	SPS
A-30183	There were unforeseen breakdown/malfunction events at the South Paint Shop that caused the TO (A-30183) of the 3 Wet Oven (S-4039) to lose temperature. This malfunction resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The shutdown was triggered by a faulted air flow switch.	Controls adjusted the air flow switch, and the 3 Wet oven was able to restart. Tesla inspected all the air flow switches during the facility-wide shut down and found that the tubing of the 3 wet oven incinerator air flow switch was degraded. The team repaired all the damaged copper tubing for the air flow switches on July 4th. As a preventative action, Tesla has increased the frequency of checks and preventative maintenance of the air flow switches. In addition, Tesla has added signal wires to the air flow switch which will allow Tesla to diagnose which air flow switch is faulting in the future.	6/30/2022	In Compliance	SPS

Notes

1. For deviations associated with the paint shops; it is important to recognize that all systems are programmed in a manner where all production is stopped and cannot restart until the issue has been cleared. All production is instantly stopped during these breakdown events; Production only restarts after abatement is back online and all safety criteria is met.
2. Tesla would like to note that the South Paint Shop body line would remain well under the permitted emission limits of 36.36 tons/month and 290.87 tons/year inclusive of the de-minimis emissions from the aforementioned events
3. Tesla would like to note that the North Paint Shop would remain under the permitted POC emission limits of 603.02 tpy inclusive of the de-minimis emissions from the aforementioned events.



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ATTACHMENT 3: LIST OF DEVIATIONS DURING THIS PERIOD (JULY 1ST, 2022 THRU DECEMBER 31ST, 2022)

**Attachment 3 -
Deviations List**

Time Period July 1, 2022 through December 31, 2022

Source No	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
A-30183/S-4039	There was an unforeseen breakdown/malfunction events at the South Paint Shop that caused the Clear Coat (CC) oven TO (A-30183) of the 3 Wet Oven (S-4039) to lose temperature. The malfunctions resulted in the temperature of the TO (A-30183) to drop below the permitted temperature of 1400 °F. The root cause of this event is the flame amplifier shutter fault which faulted out the incinerator and the 3 wet oven.	As a corrective action, maintenance team removed the flame detector and thoroughly inspected it. The flame detector was newly replaced on June 6, 2022. To further prevent the issue, Tesla replaced the flame detector on July 10, 2022.	7/6/2022	In compliance	SPS
S-4039					
S-3008, S-3014, S-3016, S-3015, S-4006 (S-32006), S-3009, S-32010	There was unforeseen breakdown/malfunction events related to an unknown/ hidden faulty signal at the North Paint Shop (NPS) which caused the booths/ovens dampers to oven. Due to the efforts to identify the root cause and resolve the issue there was an event on 8/2/22 that required maintenance to backtrack on adjustments. The root cause was a faulty pressure switch that was extremely difficult in nature to pin point.	Controls team troubleshooted analog and digital sensors and adjusted set points to make window of acceptable values larger based on data received by system and cleared faults. Issue persisted so control engineers monitored over 80 control signals to further investigate and pinpoint root cause. As soon as controls was able to pinpoint the issue with WA 511 BD 32 sensor, replacement process began. The set points (LV4592 VA306 BD32, LV4591 VA306 BV27 and LV4592 VA306 BV27) were readjusted and the temperature of the bed began to regulate within specification again.	7/20/2022	In compliance	NPS
A-30182	There were unforeseen malfunctions at the Clearcoat (CC) Wheel/TOs (Zone 3) of the 3 wet system at the South Paint Shop. The TO (A-30182) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30182) to drop below the permitted temperature of 1400°F and the VOCs were recirculated back to the boot instead of being routed to abatement systems.	The first and second shutdown was triggered by a VFD fault because of an overload on the KZR motor. Upon further investigation, maintenance found a tripped breaker in the PLC communication card. The breaker was reset. Electrical checks of the KZR motor were conducted. As a preventative action, a check on the KZR motor was scheduled during the next downtime.	8/5/2022	In compliance	SPS
S-3009/A-3008	There was an unforeseen malfunction event at the North Paint Shop (NPS) which caused the primer oven bypass dampers to open. During the event, the RTO (A-3008) temperature maintained above 1400°F. The root cause was the tripped exhaust fan at the primer oven.	As a preventative plan, only controls engineers and the maintenance managers will be granted access to the system control panel for process changes. The controls team will be required to consult with engineering and maintenance teams before making changes to the system to ensure correct processing parameters.	8/24/2022	In compliance	NPS
S-3008, S-3014, S-3016, S-3015; S-4006(S-32006), S-3009, S-32010	There was an unforeseen breakdown/malfunction at the North Paint Shop (NPS) which caused the booths/ovens dampers to open. The RTO (A-3008) briefly lost temperature but remained above 1400°F during the event. The root cause was overload on the exhaust motor due to excessive external heat affecting the Fremont area.	Tesla is working with the manufacturer (Siemens) to recommend modifications to the system to prevent future occurrences when external temperature exceed 100 °F for an extended amount of time.	9/6/2022	In compliance	NPS
A-30183/S-4039	There was an unforeseen malfunction at the Prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This resulted in the temperature of TO to drop below 1400 °F. The shutdown was triggered by a faulty electrical cabinet.	As an immediate corrective plan, the controls team inspected the electrical cabinet and found two blown fuses and one damaged thermal relay. As a preventative plan, the maintenance team will thoroughly inspect electrical cabinet during the weekend shutdown.	9/6/2022	In compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the Prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This resulted in the temperature of TO to drop below 1400 °F. The shutdown was triggered by a faulty air flow switch.	As an immediate corrective action, the team cleared the air flow switch line and inspected the air flow switch. As a preventative action, Tesla replaced air flow switch on 09/18/22. Tesla has increased the frequency of check and preventative maintenance of the air flow switches. As a long term corrective action, Tesla is evaluating replacing the air flow switches with a more robust solid state device or any additional controls that can be added to the process.	9/15/2022	In compliance	SPS
A-30183/S-4039	There was an unforeseen parametric monitoring excursion event at the prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) temperature erroneously appeared to read below 1400 °F. In actuality the TO was operating above 1400 temperature with no unabated emissions being released to the atmosphere. The root cause was a faulty thermocouple that was recently replaced.	As a corrective and preventative action the controls team replaced the faulty thermocouple on September 25, 2022.	9/18/2022	In compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the Prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production, which triggered an emergency shutdown. This resulted in the temperature of TO to drop below 1400 °F. The shutdown was triggered by a loose screw on a contactor as part of the relay system for the air flow switch at the 3 wet oven zone 2.	As an immediate corrective action, the team checked the contactor and tightened the screw to prevent future faults of the 3 wet oven. As a preventative action to this rare malfunction, Tesla inspected all contractors for loose screws during the subsequent Sunday shutdown.	9/19/2022	In compliance	SPS
S-4045, S-4046	Tesla exceeded permitted NOx limits at the castings operation. Tesla tuned the burners at both furnaces during commissioning and operational fine tuning activities and subsequently conducted a new source test in Sept/October 2021. The source test demonstrated a 27% and 29% reduction in NOx at Furnace 1 and Furnace 2 respectively. On analysis of annual emissions data during September 2022 (Post October 2021), it was identified that the daily limit specified in BAAQMD regulation 2 rule 2 of 10 pounds per day were potentially exceeded on 73 days at Furnace 1 and 23 days at Furnace 2.	Tesla has reached out to multiple vendors and the furnace manufacturer to assist in identifying options for further NOx reduction. All third-party vendors and the manufacturer confirmed that the current NOx ppm as achieved during the most recent source test is the lowest achievable for stack melter type furnaces with the equipment available. Tesla is now in process of working with a 3rd party vendor to design, install and test an oxygen burner at Furnace 1 to reduce NOx generation and reduce total natural gas consumption. Tesla has submitted and is waiting on approval of an application for a temporary PTO for Furnace 1 and 2.	9/20/2022	Interim compliance	Castings

A-30181	There was an unforeseen malfunction at the 3 Wet Oven System 2 of the 3 wet system at the South Paint Shop. The TO (A-30181) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO (A-30181) to drop below 1400 and the VOCs were recirculated back to the booth instead of being routed to abatement systems. The shutdown was triggered by a faulty thermocouple that triggered the high temperature alarm.	As a corrective and preventative action, Tesla replaced the thermocouple on October 2, 2022.	9/26/2022	In compliance	SPS
A-30194, S-4045/A-30193	The Annual emission calculations indicate potential non compliance with the regulation/citation limits. These exceedances may have been due to a structural integrity issue of the filter house.	Tesla is working with a new vendor to overhaul the filter house structure for Filter House A-30193. These fixes will be implemented in October 2022 and it is expected that the source testing scheduled in November 2022 for Filter House A-30193 will show marked improvement and resolve any permit limit exceedances. Tesla is also evaluating a long term solution of replacement of filter houses with baghouses.	10/12/2022	Interim compliance	Castings
A-30192	There was a malfunction at the E-Coat TO (A-30192). The TO lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of the TO to drop below 1400 °F. The shutdown was triggered due to attempts to trouble shoot the fresh air VFD fan that brings fresh air to the incinerator.	To prevent any additional shutdowns during troubleshooting, Tesla decided to allow the fan to operate at 37 Hz until the weekend shutdown when the issue can be fully diagnosed and resolved. The issue was resolved on October 30, 2022	10/26/2022	In compliance	SPS
TBD	There was an unforeseen malfunction event at the Plastics Paint Line. The air line which provides air pressure to the exhaust damper of the RTO began leaking air causing the damper to shut and this opened the bypass damper. The TO maintained a temperature greater than 1400°F the entire duration of the event. The root cause of the air leak was due to the air lines being exposed to the environment and becoming brittle.	As an immediate corrective action, leaking part of the air line was replaced. As a preventative action, Tesla has scheduled air line inspections annually to identify and replace any air lines that seem compromised.	10/28/2022	In compliance	PPS
A-30181	There was an unforeseen malfunction at the 3 Wet Oven System 2 of the 3 Wet system at the South Paint Shop. The temperature of the TO (A-30181) dropped below 1400 °F while the bypass damper stayed closed the whole time during the event. The shutdown was triggered by a motor failure of the solvent laden air fan at the air house.	As a corrective action, the motor was replaced on the following Saturday during the planned weekend system shutdown.	10/28/2022	In compliance	SPS
A-30183/S-4039	There was an unforeseen malfunction at the Prime and Clear Coat (CC) oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. The TO (A-30183) lost temperature during production which triggered an emergency shutdown. This malfunction resulted the temperature of TO to drop below 1400 °F. The shutdown was triggered by a faulty air flow switch of the 3 wet oven caused by a contractor.	As an immediate corrective action, the team inspected the air flow switch and restarted the 3 wet oven and incinerator. As a preventative action, the team further inspected the air flow switch during the weekend shutdown.	11/8/2022	In compliance	SPS
A-30182	There was an unforeseen malfunction at the 3 Wet Oven System 2 of the 3 Wet system at the South Paint Shop. The temperature of the TO (A-30182) dropped below 1400 °F while the bypass damper stayed closed the whole time during the event. The shutdown was triggered by 2 tripped circuit breakers in the main panel for system 3.	As a corrective action, the circuit breakers were replaced. Tesla believes the circuit breaker trips were due to a system overload and Tesla plans to implement better overload protection to prevent future trips.	11/19/2022	In compliance	SPS
A-30182	There was an unforeseen malfunction at the 3 Wet Oven System 3 of the 3 wet-system at the South Paint Shop. The temperature of the TO (A-30182) dropped below 1400, while the bypass damper stayed closed the whole time during the event. The shutdown was triggered by a tripped circuit breakers in the main panel for system 3.	As a corrective action, the circuit breakers were reset. Tesla believes the circuit breaker trips were due to a device connected to an input card started to fail causing the circuit breaker to short. Tesla plans to implement better overload protection to prevent future trips for the circuit breaker.	11/22/2022	In compliance	SPS
S-4006, S-4010, S-3009	There were unforeseen breakdown/malfunction events at the North Paint Shop (NPS) which was due to an inverter fault. It caused the ovens dampers to open. The root cause was clogged air fins inside the cabinet preventing proper air flow causing a fault.	As a preventative action, Tesla is working with Siemens to set up a yearly cleaning of the air fins as part of a preventative maintenance plan.	11/19/2022, 11/29/2022, 12/2/2022, 12/4/2022	In compliance	NPS
A-30182	There were two unforeseen malfunctions at the 3 wet system at the South Paint Shop. On 12/5/2022, temperature of TO dropped below 1400°F while the bypass damper stayed closed during the event. On 12/7/2022, the TO temperature (A-30180, A-30181, A-30182) dropped below 1400°F and emergency dampers opened during the event. Both the shutdowns were triggered by a tripped circuit breaker in the main panel for system 3 which caused the system to lose power.	As a corrective action, the team isolated the short of the cable and reset the circuit breaker. As a preventative action, the maintenance team will replace the cable and inspect all cables in the control panel during the weekend system shutdown.	12/5/2022, 12/7/2022	In compliance	SPS
A-30182	There was an unforeseen malfunction at the 3 wet system at the South Paint Shop. The TO temperature dropped below 1400°F while the bypass damper stayed closed during the event. The shutdown was triggered by a tripped circuit breaker in the main panel for system 3 which caused the system to lose power.	As a corrective action, Tesla isolated the shorted wire to prevent future events with a tentative plan in place to replace the wire over the next shutdown.	12/13/2022	In compliance	SPS
S-4045, S-4046	Tesla exceeded permitted NOx limits at the castings operation. Tesla tuned the burners at both furnaces during commissioning and operational fine tuning activities and subsequently conducted a new source test in Sept/October 2021. The source test demonstrated a 27% and 29% reduction in NOx at Furnace 1 and Furnace 2 respectively. On analysis of annual emissions data during September 2022 (Post October 2021), it was identified that the daily limit specified in BAAQMD regulation 2 rule 2 of 10 pounds per day were potentially exceeded on 103 days at Furnace 1 and 28 days at Furnace 2.	Tesla has reached out to multiple vendors and the furnace manufacturer to assist in identifying options for further NOx reduction. All third-party vendors and the manufacturer confirmed that the current NOx ppm as achieved during the most recent source test is the lowest achievable for stack melter type furnaces with the equipment available. Tesla is now in process of working with a 3rd party vendor to design, install and test an oxygen burner at Furnace 1 to reduce NOx generation and reduce total natural gas consumption. Tesla has submitted and is waiting on approval of an application for a temporary PTO for Furnace 1 and 2.	12/16/2022	Interim compliance	Castings
A-1007	There was an unforeseen malfunction at the Sealer Oven TO at the South Paint Shop. The TO temperature dropped below 1400°F. The shutdown was triggered by a stuck "dog" - a transporter that allows cars to move through the oven. Tesla estimates no unabated emissions were released during this event.	After multiple efforts to rectify the situation, maintenance determined the unit would have to go offline and cool down to allow for a prolonged repair. Maintenance then initiated a controlled shutdown of the oven and TO to allow for prolonged work within the oven.	12/16/2022	In compliance	SPS
S-32006	There was an unforeseen breakdown/malfunction event at the North Paint Shop (NPS) which caused the E-Coat ovens dampers to open. The RTO (A-3008) temperature maintained above 1400 °F during the event. The root cause was a thermal event that was caused when a failed sensor was struck causing an arching that ignited oil on the drive chain.	As a corrective action, the thermal event was contained and system was brought back to service. As a preventative action, maintenance has extended its maintenance window to ensure cleaning of the oven, sensor and chains. Additionally, production will trial a new sensor that may be more capable of preventing such events.	12/17/2022	In compliance	NPS



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

ATTACHMENT 4: ANNUAL COMPLIANCE CERTIFICATION (2022)



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

ATTACHMENT 3: LIST OF DEVIATIONS DURING THIS PERIOD (JANUARY 1ST, 2023 THRU JUNE 30TH, 2023)

Attachment 3 - Deviations List**Time Period** January 1, 2023 through June 30, 2023

Source No.	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
S-1007/A-1007	Unforeseen malfunction at the Sealer Oven and TO (S-1007/A-1007) at the South Paint Shop. The Sealer Oven TO (A-1007) lost temperature during production which triggered an emergency shutdown. This malfunction resulted in the temperature of TO to drop below 1400°F. The root cause of the event is a faulty flame detector on the sealer TO which was intermittently reading a flame when no flame was present.	As a corrective action the flame detector was replaced with an available spare. The flame detector was last switched out approximately 2 years ago, the average life span of a flame detector is expected to be 5 years. As a preventative action Tesla will conduct more frequent inspections of the flame detector and conduct change outs as necessary.	1/5/2023	In compliance	SPS
S-4045	S-4045 was not tested for NOx and CO in CY2022 due to issues with equipment and source test scheduling.	Tesla plans to source test S-4045 for CO and NOx early in 2023 based on the availability of source testers and equipment maintenance schedule.	1/6/2023	In compliance (Source Test Completed)	Castings
A-30181	Unforeseen malfunction at the System 2 of the 3 wet-system at the South Paint Shop caused bypass dampers at A-30181 to open momentarily. The shutdown was triggered by a technician who restarted the system instead of resetting a fault at the air flow switch.	Improved training for technicians; Tesla believes emissions related to solvent laden air within the booth at the time of the damper opening to be minimal. Tesla also notes that the South Paint Shop body line are under the permitted emission limits of 36.36 tons/month and 290.87 tons/year inclusive of these events.	1/10/2023	In compliance	SPS
A-30192	Unforeseen malfunction at the E coat oven TO (A-30192) of the 3 wet system at the SPS. This malfunction resulted the temperature of TO to drop below 1400°F. The shutdown was due to troubleshooting events at E-coat oven to improve production and product quality.	To prevent any additional shutdowns due to trouble shooting, the controls team changed the pressure differential set point to allow operation of the system at the minimum pressure differential value without triggering alarm or system shutdown.	1/19/2023	In compliance	SPS
A-30192	Unforeseen malfunction at the E coat oven TO (A-30192) of the 3 wet system at the SPS. This malfunction resulted the temperature of TO to drop below 1400°F. The shutdown was triggered by a mechanical obstruction on the pressure differential signal.	The controls team cleaned out the air supply line, inspected the wiring and removed the filter. The pressure was increased to 7.0 inWC and the system was able to restart afterwards. As a preventative action, the controls team is going to implement additional monitoring by adding different setpoints of pressure differential to the controls system for early detection.	2/6/2023	In compliance	SPS
A-30183	A-30183 exceeds permitted NOx Emissions of 0.1 lb/MMBtu per source test submitted on February 13, 2023	Tesla sourced and replaced the A-30183 TO burner with a new burner and conducted a source re-test. An application has been submitted in December 2022 to permit a back-up TO which would then enable A-30183 to be taken down for maintenance	2/13/2023	Pending changeover to back-up TO (Source retest with new burner showed in compliance for NO _x and not in compliance for CO)	SPS
S-4045/S-4046	Tesla conducted Air District approved source testing for metals & PM on Furnace 1/Abatement Filter (S-4045/A-30193) and NOx & CO on Furnace 2 (S-4046) during December 2022. Non compliance with the permitted metal limits for As (Hourly) and As, Be, Cd, Mg and Se were observed (Annual) in addition to NOx daily limit exceedance for S-4046	Tesla will be conducting a follow up source test for metals from Furnace-1 (S-4045) in March 2023 using another source testing vendor (Montrose) to validate these results, evaluate if updates to permitted limits for metals are required and evaluate further fixes to the filter house in the interim. Tesla is also in the process of finalizing a vendor to replace these filter houses with baghouses	2/17/2023	Pending Source Test Review	Castings
A-30183 / S-4039	Unforeseen malfunction at the Prime and Clear Coat Oven TO (A-30183) of the 3 wet oven (S-4039) at the South Paint Shop. External contractors were working on installing a new device for automated pressure drop monitoring across the filters at the 3 wet oven. The air flow switch and the filter pressure drop monitor uses the same airline, therefore during the installation – the system faulted and shutdown the oven/TO system. The contractors were not aware of the configuration of the system and that it could result in a shutdown	As an immediate corrective action, the team inspected the air flow switch and restarted the 3 wet oven and incinerator. As a preventative action, all future installations will be scheduled only during periods of downtime and not during production.	4/2/2023	In compliance	SPS
S-4037	Unforeseen malfunction at the basecoat booth (S-4037) at the South Paint Shop. Tesla had external contractors installing devices for automated pressure drop monitoring across the various filters at SPS Body Line, around the vicinity of ASH (Air Supply House) #3. The ventilation at ASH #3 was found off, which is the only way to shut the system off. A probable cause is that an external contractor may have turned off the recirculating fan for the basecoat booth by mistake thereby forcing a complete system restart by the maintenance/controls team	The bypass damper of the basecoat booth opened as part of the restart process. As a preventative action, all future installations will be scheduled only during periods of downtime and not during production.	4/2/2023	In compliance	SPS
S-4037	Unforeseen malfunction at the Basecoat Booth (S-4037) of the 3 wet process at the South Paint Shop. The shutdown was triggered by a VFD fault which caused a loss of the production release to the 3 wet system. The cause of this fault was due to an internal issue with the PLC rack	Maintenance is not a factor due to the nature of the equipment (no moving parts/motors). Replacing the entire PLC rack would prevent similar fault events from occurring due to this PLC rack - which was completed during the weekend shutdown. Tesla would like to reiterate that the breakdown was not a result of negligence or improper operation of the equipment from Tesla team.	4/6/2023	In compliance	SPS
S-4038	Unforeseen malfunction at the CC Booth (S-4038) of the 3 wet booth system. Overload fault on a (VFD) associated with the CC ASH (#4). This shut off the supply fan which automatically shuts off two additional exhaust motors for safety reasons. The entire system was restarted which caused the bypass damper on the Clearcoat booth to open for less than one minute. TO temperature was not affected during this event.	Tesla has incorporated the following immediate and preventative corrective action: Contracted with ACE electrical who performed a site inspection and worked on the supply fan which included tensioning the fan belts, switching out the motor, and aligning the sheaves; Tesla's internal SPS team deactivated the "Zone Start" function from the logic, which will prevent future zone restart sequences from the control panel; and Implemented training for Technicians to run specific restart sequences in responses to similar faults, instead of zone restarts.	4/18/2023	In compliance	SPS
S-4045	Source testing on Furnace 1 (NO _x Exceedance)	Tesla had a third-party vendor install and test an oxy-fuel burner at Furnace 1 (S-4045), as authorized under the temporary permit (App #31592). Tesla is also in discussions with Striko and additional third-party vendors to evaluate the burners and potentially trial a different burner at Furnace-1/or install a wet scrubber system at Furnace-1.	4/21/2023	Interim Compliance	Castings (Source Test)

Attachment 3 - Deviations List

Time Period January 1, 2023 through June 30, 2023

Source No.	Deviation Summary	Resolution Summary	Date of Discovery	Compliance Status	Shop/Area
A-3008	The RTO bed temperature sensor lost signal which caused the RTO to shut down. As a result, the Ecoat oven (S-4006/S-32006), Clearcoat oven (S-4010/S-32010), and Prime oven (S-3009) along with booths lost production release and the bypass dampers opened for each oven along with the desorb damper	During the following weekend's shutdown, the faulty I/O card was replaced with a new card to prevent potential future faults that may occur due to this I/O card. A photo of the I/O card that was replaced was included in the response to BAAQMD's follow-up data request sent via e-mail on May 4th, 2023. In this instance, a PM check will be instituted for inspecting the housing of the mid bed thermocouple on a semi-annual basis to check for condensation.	4/25/2023	In compliance	NPS
S-3009,S-3008					
S-4006					
S-4010, S-3014, S-3015 and S-3016					
S-1002 / A-30192	Thermal event and smoke was observed from the roof of the Ecoat oven at the South Paint Shop. Tesla's internal fire safety team instructed the team to shutdown the TO for inspection. A probable root cause was investigated due to a new installation on the E-coat oven (additional fans were installed to provide recirculated heat to a section of the e-coat oven along with installation of cladding)).	Since the event, Durr (external vendor for the new installation project) and Tesla have actively evaluated the event and determined that there were no changes to oven and thermal oxidizer setpoints i.e. no process changes made to the temperatures or air flow in/out of oven system. Additional corrective action taken following the event were to replace or repair insulation and cladding where thermal event occurred, surrounding areas of "bulb turn" on the ceiling and around the newly installed ducts. The fans have not been turned on post this event.	5/3/2023	In compliance	SPS
S-4006	The E-coat oven lost production release. Extensive troubleshooting determined the suspected root cause was a faulty communication port that led to loss of control voltage feedback signals and subsequent loss of production release	The Controls team reengaged communications as an immediate corrective action. Due to the nature of the root cause, it would not be possible to implement future preventative maintenance. However, the likelihood of a similar event occurring is exceptionally low. Tesla would like to reiterate that this deviation was not caused by faulty or improper operation of the booths, ovens, or abatement devices.	5/3/2023	In compliance	NPS
A-3008	The RTO bed temperature sensor lost signal which caused the RTO to shut down. As a result, the Ecoat oven (S-4006/S-32006), Clearcoat oven (S-4010/S-32010), and Prime oven (S-3009), along with booths lost production release and the bypass dampers opened for each oven along with the desorb damper	This correlates to the deviation on 4/25/2023, but replacing the I/O card did not fix the issue. The team moved onto inspect the WA511 temperature sensor. The temperature sensor housing was removed to inspect the wiring and condensation was observed which had damaged the wiring. The wiring was fixed and the issue resolved. In this instance, a PM check will be instituted for inspecting the housing of the mid bed thermocouple on a semi-annual basis to check for condensation.	5/8/2023	In compliance	NPS
S-3009,S-3008					
S-4006					
S-4010, S-3014, S-3015 and S-3016					
S-1002 / A-30192	Ecoat TO went into emergency shutdown due to an overcurrent fault on the combustion fan VFD. The overcurrent shorted housing to the blower's motor.	Performed immediate troubleshooting protocol, including: reset and restart of the TO that resulted in an immediate fault, placed the unit in disconnect and locked out, removed the peckerhead cover to find a burnt terminal connection, megged the motor (good), tested continuity (passed), tested short to ground (passed). Immediate corrective actions: the burnt part of wiring was cut off and wiring was stripped back. Motor and power leads were reconnected using an insulation lug. Connections were taped. Reset and restarted the TO. TO went through purge reignited with no issues. Preventative corrective action: a new motor was staged near the TO for rapid lineside repair if needed in the future.	6/3/2023	In compliance	SPS
S-4036	Prime Booth - Actuator had a loose linkage going to a valve that controls volume of gas going into the burner. Insufficient gas volume was going into the burner.	Tesla implemented immediate corrective action by tightening the nuts on the linkage. SPS has not previously encountered loose linkage resulting in a burner fault, and will implement inspections of nuts/linkages into preventative maintenance moving forward.	6/4/2023	In compliance	SPS
S-4045/A-30193	Retest was conducted on Furnace-1 (S-4045/A-30193) in March 2023 using another source testing contractor (Montrose Air Quality Services, LLC) and results submitted to the source test Division on June 14, 2023. Source test results show marked improvement to the metal emission limits outlined under Part 4 and Part 5 of the permit condition 27327; however, the exceedance in the PM limit was observed for Furnace-1	The exceedance to the PM limit when the metal limits were in compliance is surprising and does seem to be an unexplained outlier, as prior source testing values were below the permitted PM limit of 0.040 lb PM10/ton Al (December 2022 testing; a value of 0.0120 lb PM10/ton Al was observed). A further round of source testing for PM (at both inlet and outlet of the filter-house) will be scheduled in the upcoming quarter for Furnace-1 to evaluate the root-cause of the PM exceedance along with further filter house checks. Tesla has also received quotes from vendors to replace these filter houses with baghouses and is waiting on one more quote to proceed with finalizing the vendor	6/14/2023	Pending Source Test Review	Castings
S-4036	ASH-1 (Air supply house for prime booth) experienced a fault, which necessitated a reset of the system and the bypass damper for the prime booth opening.	Immediate inspection found the motor for the prime booth exhaust fan (BEF 101) was down and the associated breaker had been tripped. Typically, a ground VFD fault indicated damage to the motor which would require a replacement. However, a physical inspection of BEF 101 found no mechanical or electrical issues. During the following weekend's shutdown, an insulation test was performed on both the motor and connected cable, which both passed.	6/25/2023	In compliance	SPS

Notes

1. No active production during any malfunction events associated with the paint shops which have been reported above (residual offgassing only)

Exhibit B

PRR NOV Information

Tesla, Inc
45500 Fremont Blvd
Fremont CA 94538

Total Number of Results: 163

Violation No.	Site No.	Sitename	Issuance Date	Regulatory Citation	Comments from Enforcement
A58777	A1438	Tesla, Inc	2/25/2021	2-6-307	s-1002 not abated at all times by SPS TO A-30192; POC emissions at NPS not abated at all times.
A60205	A1438	Tesla, Inc	4/13/2021	2-1-307	S-1002 was not abated at all times of operation by A-30192 (RCA #07Y57)
A60209	A1438	Tesla, Inc	5/25/2021	2-6-307	Late submittal of source test report for NPS, SPS body, and plastics pain line.
A60210	A1438	Tesla, Inc	5/25/2021	2-6-307	Source test exceedance os-7733 NST-6211, OS-7996 NST-6211B, and OST-7997 NST-6247B.
A60213	A1438	Tesla, Inc	7/28/2021	2-6-307	S-1002 was not abated at all times of operation by A-30192 (RCA# 08A40 & 08A41).
A60214	A1438	Tesla, Inc	7/28/2021	2-6-307	Furnace hourly throughput exceedance (Dev #6422)
A60215	A1438	Tesla, Inc	9/14/2021	2-6-307	S-4039 was not abated at all times of operation by A-30183 (RCA #08B28-29)
A60216	A1438	Tesla, Inc	10/7/2021	2-6-307	s-4039 was not abated at all times of operation by a-30183 rcas 08B56-57, 08B65-66, 08B68-69, 08B77.
A60217	A1438	Tesla, Inc	10/12/2021	2-6-307	RCA 08B80, 81 S-4036, 4037 & 4038 were not abated at all times of operation by the respective TO
A60218	A1438	Tesla, Inc	10/29/2021	1-523.3	Parametric monitor excursion at TO A-30181 was not reported to the District within 96 hours.
A60219	A1438	Tesla, Inc	11/8/2021	2-6-307	Missing daily pressure drop records at A-30186 & A-30187 per PC #27161.
A60220	A1438	Tesla, Inc	11/8/2021	2-6-307	NPOC emissions limit exceeded per PC #26999, Part 2.b.
A60222	A1438	Tesla, Inc	11/30/2021	2-6-307	Annual emissions exceedances per PC #27327 part 7.
A60223	A1438	Tesla, Inc	12/7/2021	2-6-307	s-4039 was not abated at all times of operation by a-30183 rca 08C28-29.
A60224	A1438	Tesla, Inc	12/21/2021	2-6-307	Title V Requirement/Permit Condition Violation. S4039 was not abated at all times of operation.
A61153	A1438	Tesla, Inc	2/7/2022	2-6-307	Failure to meet Permit Condition. Emissions from the bumper booths and ovens not abated (RCA 08D56)
A61154	A1438	Tesla, Inc	2/24/2022	2-6-307	S-1002 was not abated at all times of operation by a-30192 (RCA# 08E30 + 08E31)
A61155	A1438	Tesla, Inc	4/25/2022	2-6-307	S-4039 was not abated at all times of operation by A-30183 (RCA# 08G03-04).
A61156	A1438	Tesla, Inc	4/25/2022	2-6-307	S-1007 was not abated at all times of operation by A-1007 (RCA# 08G20).
A61157	A1438	Tesla, Inc	4/28/2022	2-6-307	NPS ovens and booths not abated at all times of operation RCA#08F57-58.
A61158	A1438	Tesla, Inc	4/28/2022	2-6-307	Oven not abated at all times of operation RCA 08F69.
A61159	A1438	Tesla, Inc	4/28/2022	2-6-307	Oven not abated at all times of operation RCA#08F78-79.
A61604	A1438	Tesla, Inc	5/2/2022	2-6-307	POC/NPOC emissions were not abated at all times of operation.
A61160	A1438	Tesla, Inc	5/12/2022	2-6-307	NPS ovens & booths not abated at all times of operation (RCA# 08G83 & 08G84).
A61161	A1438	Tesla, Inc	6/1/2022	2-6-307	s-1002 was not abated at all times of operation 08H45-46.
A61162	A1438	Tesla, Inc	6/1/2022	2-6-307	S-4036 4037 and 4038 were not abated at all times of operation RCA 08H52-53.
A61163	A1438	Tesla, Inc	6/16/2022	2-6-307	S-4039 was not abated at all times of operation by A-30183 (RCA 08H37 - 38).
A61164	A1438	Tesla, Inc	6/16/2022	2-6-307	S-4039 was not abated at all times of operation by A-30183 (RCA 08H64-65)
A61165	A1438	Tesla, Inc	6/16/2022	2-6-307	NPS ovens and booths not abated at all times of operation (RCA 08H84 - 85).
A61166	A1438	Tesla, Inc	6/27/2022	2-6-307	S-4039 was not abated at all times of operation (RCA 08H95-96, 08J13-14, 08J25-26)
A61167	A1438	Tesla, Inc	7/12/2022	2-6-307	s-4039 was not abated at all times of operation rca08J15-16 & 35-36.
A61168	A1438	Tesla, Inc	7/12/2022	2-6-307	NPS ovens and booths not abated at all times of operation rca08J27-28 and 48-49
A61169	A1438	Tesla, Inc	7/12/2022	2-6-307	s-1002 was not abated at all times of operation rca 08J31-32.
A61170	A1438	Tesla, Inc	7/12/2022	2-6-307	S-4039 was not abated at all times of operation RCA 08J58-59
A61174	A1438	Tesla, Inc	9/12/2022	2-6-307	S-4039 was not abated at all times of operation RCA#08J95-96

A61175	A1438	Tesla, Inc	9/12/2022	2-6-307	NPS ovens/booths not abated at all times RCA#08K36-43, 08K47-48, 08K50-51, 08K56-59.
A61177	A1438	Tesla, Inc	9/22/2022	2-6-307	S-3009 not abated at all times of operation (RCA 08L22)
A61753	A1438	Tesla, Inc	10/11/2022	2-6-307	s-4039 not abated at all times of operation rca 08L88-89.
A61754	A1438	Tesla, Inc	10/17/2022	2-6-307	S-4039 was not abated at all times of operation RCA 08M09
A61756	A1438	Tesla, Inc	11/14/2022	2-6-307	S-1002 was not abated at all times of operation RCA #08M75-76
A61757	A1438	Tesla, Inc	11/14/2022	2-6-307	Emissions from bumper booths & ovens not abated (RCA# 08M83)
A61758	A1438	Tesla, Inc	12/7/2022	2-6-307	S-4039 was not abated at all times of operation RCA #08N16
A61759	A1438	Tesla, Inc	12/14/2022	2-6-307	NPS ovens / booths not abated at all times (RCA #08N49-50, #08N85-86, #08N91-92, #08N93-94).
A61761	A1438	Tesla, Inc	1/11/2023	2-6-307	Missed annual source test for NOx & CO
A61763	A1438	Tesla, Inc	2/8/2023	2-6-307	S-4036, S-4037. S-4038 were not abated at all times of operation (RCA 08P06).
A61769	A1438	Tesla, Inc	4/3/2023	2-6-307	S-4037 was not abated at all times of operation RCA 08Q02
A61770	A1438	Tesla, Inc	4/3/2023	2-6-307	S-1002 was not abated at all times of operation RCA 08Q24 08Q25
A61771	A1438	Tesla, Inc	4/3/2023	2-6-307	S-1002 was not abated at all times of operation RCA 08Q58 08Q59
A61774	A1438	Tesla, Inc	4/26/2023	2-6-307	S4037 was not abated at all times of operation (RCA#08R91 & 08R92)
A61775	A1438	Tesla, Inc	4/26/2023	2-6-307	S4039 was not abated at all times of operation
A61777	A1438	Tesla, Inc	5/16/2023	2-6-307	N/A
A62128	A1438	Tesla, Inc	5/23/2023	2-6-307	S-4038 was not abated at all times of operation (RCA 08S19).
A62129	A1438	Tesla, Inc	6/12/2023	2-6-307	NPS booths & ovens were not abated at all times of operation (Dev #7496 & #7520).
A62132	A1438	Tesla, Inc	6/22/2023	2-6-307	S-1002 was not abated at all times of operation (RCA #08S41 & 08S42)
A62133	A1438	Tesla, Inc	6/22/2023	2-6-307	S-4006 was not abated at all times of operation (RCA #08S45)
A62134	A1438	Tesla, Inc	7/13/2023	2-6-307	S1002 was not abated at all times of operation (RCA #08S94)
A62135	A1438	Tesla, Inc	7/13/2023	2-6-307	S4038 was not abated at all times of operation (RCA #08S95)
A62137	A1438	Tesla, Inc	7/19/2023	8-13-309.2	Open containers of solvent at spray gun washer.
A62137	A1438	Tesla, Inc	7/19/2023	8-13-309.3	Open containers of solvent at spray gun washer.
A62138	A1438	Tesla, Inc	7/19/2023	2-6-307	S-4006 not abated at all times of operation and deviation not reported per standard condition F.
A62139	A1438	Tesla, Inc	7/19/2023	2-6-307	S-3009 not abated at all times of operation and deviation not reported per standard condition F.
A62140	A1438	Tesla, Inc	7/19/2023	2-6-307	S-4010 not abated at all times of operation and deviation not reported per standard condition F.
A62141	A1438	Tesla, Inc	7/19/2023	2-6-307	S-3008 not abated at all times of operation and deviation not reported per standard condition F.
A62142	A1438	Tesla, Inc	7/19/2023	2-6-307	s-3014 not abated at all times of operation and deviation not reported per standard condition F.
A62143	A1438	Tesla, Inc	7/19/2023	2-6-307	S-3016 not abated at all times of operation and deviation not reported per standard condition F.
A62145	A1438	Tesla, Inc	8/4/2023	2-6-307	S4036 was not abated at all times of operation (RCA# 08T22)
A62146	A1438	Tesla, Inc	8/4/2023	2-6-307	S4036, S4037 & S4038 was not abated at all times of operation (Dev #7557)
A62147	A1438	Tesla, Inc	8/4/2023	2-6-307	S1002 was not abated at all times of operation (RCA# 08T48 & 08T49)
A62148	A1438	Tesla, Inc	8/4/2023	2-6-307	S4039 was not abated at all times of operation (RCA# 08T55 & 08T56)
A62150	A1438	Tesla, Inc	8/21/2023	2-6-307	S4006 not abated at all times of operation & deviation not reported per condition F
A62151	A1438	Tesla, Inc	8/21/2023	2-6-307	S3009 not abated at all times of operation & deviation not reported per condition F
A62152	A1438	Tesla, Inc	8/21/2023	2-6-307	S4010 not abated at all times of operation & deviation not reported per condition F
A62828	A1438	Tesla, Inc	8/21/2023	2-6-307	S3008 not abated at all times of operation & deviation not reported per condition F
A62829	A1438	Tesla, Inc	8/21/2023	2-6-307	S3014 not abated at all times of operation & deviation not reported per condition F
A62830	A1438	Tesla, Inc	8/21/2023	2-6-307	S3016 not abated at all times of operation & deviation not reported per condition F
A62831	A1438	Tesla, Inc	8/23/2023	CCR	Description of reason bypass opened and/or duration of bypass event not reported in Title V semi.
A62831	A1438	Tesla, Inc	8/23/2023	2-6-307	Description of reason bypass opened and/or duration of bypass event not reported in Title V semi.
A62832	A1438	Tesla, Inc	8/29/2023	2-1-320	NPS sources not operated in conformance w/throughput, emissions, & production representations
A62834	A1438	Tesla, Inc	8/31/2023	1-441.3	Information requested in the 1-441 letter was not provided in full by due date.
A62835	A1438	Tesla, Inc	9/14/2023	2-6-307	Failure to maintain records for at least 5yrs per Standard Condition E and PC 26027

A62835	A1438	Tesla, Inc	9/14/2023	2-6-501	Did not meet records keeping regulation for APCO review
A62836	A1438	Tesla, Inc	9/14/2023	2-6-307	Failure to maintain records for at least 5yrs per Standard Condition E and PC 27161
A62836	A1438	Tesla, Inc	9/14/2023	2-6-501	Did not meet records keeping regulation for APCO review
A62837	A1438	Tesla, Inc	9/14/2023	2-6-307	Failure to maintain records for at least 5yrs per Standard Condition E
A62837	A1438	Tesla, Inc	9/14/2023	2-6-501	Did not meet records keeping regulation for APCO review
A62838	A1438	Tesla, Inc	9/21/2023	2-6-307	Bypass event descriptions& durations not included in monthly compliance rpts & title V semiannual
A62838	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62839	A1438	Tesla, Inc	9/21/2023	2-6-307	Bypass event descriptions& durations not included in monthly compliance rpts & title V semiannual
A62839	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62840	A1438	Tesla, Inc	9/21/2023	2-6-307	Bypass event descriptions& durations not included in monthly compliance rpts & title V semiannual
A62840	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62841	A1438	Tesla, Inc	9/21/2023	2-6-307	Bypass event descriptions& durations not included in monthly compliance rpts & title V semiannual
A62841	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62842	A1438	Tesla, Inc	9/21/2023	2-6-307	S4037 not abated at all times of operation & events not reported in monthly & title V reports
A62842	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62843	A1438	Tesla, Inc	9/21/2023	2-6-307	S4038 not abated at all times of operation & events not reported in monthly & title V reports
A62843	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3168(b)(2)
A62844	A1438	Tesla, Inc	9/21/2023	2-6-307	HAP emissions from oven not abated by TO
A62844	A1438	Tesla, Inc	9/21/2023	10	40 CFR part 63 3092(b)
A62850	A1438	Tesla, Inc	10/2/2023	2-6-307	S-4039 not abated at all times of operation, non-compliance not reported
A62849	A1438	Tesla, Inc	10/2/2023	2-6-307	S-4038 not abated at all times of operation, non-compliance not reported
A62848	A1438	Tesla, Inc	10/2/2023	2-6-307	S-4037 not abated at all times of operation, non-compliance not reported
A62847	A1438	Tesla, Inc	10/2/2023	2-6-307	S-4036 not abated at all times of operation, non-compliance not reported
A62846	A1438	Tesla, Inc	10/2/2023	2-6-307	S-1007 not abated at all times of operation, non-compliance not reported
A62845	A1438	Tesla, Inc	10/2/2023	2-6-307	S-1002 not abated at all times of operation, non-compliance not reported
A62851	A1438	Tesla, Inc	10/17/2023	2-6-307	S-1002 was not abated at all times of operation RCA 08U61
A62852	A1438	Tesla, Inc	10/17/2023	2-6-307	S-4039 was not abated at all times of operation RCA 08U76-77
A63003	A1438	Tesla, Inc	10/24/2023	9-7-506	Annual emissions testing at S-80 not conducted in 2021
A63004	A1438	Tesla, Inc	10/24/2023	9-7-506	Annual emissions testing at S-81 not conducted in 2021
A63005	A1438	Tesla, Inc	11/8/2023	2-6-307	Missed annual source test for silica; deviation not reported per Standard Condition F
A63006	A1438	Tesla, Inc	11/8/2023	2-6-307	Bypass system was used for reasons other than emergency or maintenance
A63007	A1438	Tesla, Inc	11/8/2023	2-6-307	Bypass system was used for reasons other than emergency or maintenance
A63008	A1438	Tesla, Inc	11/9/2023	10	40 CFR 63.3100(d) Failure to meet the general duty to minimize emissions at NPS
A63008	A1438	Tesla, Inc	11/9/2023	10	40 CFR 60.11(d) Failure to meet the general duty to minimize emissions at NPS
A63009	A1438	Tesla, Inc	11/9/2023	2-6-307	Throughput and POC emissions limits exceeded; late deviation reporting per Standard Condition F
A63010	A1438	Tesla, Inc	11/16/2023	2-6-307	POC emissions exceeded daily limit of 10 lb/day; late deviation reporting per standard condition F.
A63011	A1438	Tesla, Inc	11/16/2023	2-6-307	Annual POC emissions exceedance; late deviation reporting per standard condition F.
A63012	A1438	Tesla, Inc	11/22/2023	2-6-307	S-4006 not abated at all times of operation and deviation not reported per standard condition F.
A63013	A1438	Tesla, Inc	11/22/2023	2-6-307	S-3009 not abated at all times of operation and deviation not reported per standard condition F.
A63014	A1438	Tesla, Inc	11/22/2023	2-6-307	S-4010 not abated at all times of operation and deviation not reported per standard condition F.
A63015	A1438	Tesla, Inc	11/22/2023	2-6-307	S-3008 not abated at all times of operation and deviation not reported per standard condition F.
A63016	A1438	Tesla, Inc	11/22/2023	2-6-307	S-3014 not abated at all times of operation and deviation not reported per standard condition F.
A63017	A1438	Tesla, Inc	11/22/2023	2-6-307	S-3016 not abated at all times of operation and deviation not reported per standard condition F.
A63018	A1438	Tesla, Inc	11/29/2023	2-6-307	S-4036, S-4037 and S-4038 were not abated at all times of operation (RCA #08V03-04)
A63019	A1438	Tesla, Inc	11/29/2023	2-6-307	S-4039 was not abated at all times of operation (RCA #08V41-42)

A63020	A1438	Tesla, Inc	11/29/2023	2-6-307	S-4039 was not abated at all times of operation (RCA #08V45-46)
A63021	A1438	Tesla, Inc	12/5/2023	2-6-307	Failed to provide accurate monthly emissions reports from January-April 2023
A63022	A1438	Tesla, Inc	12/8/2023	8-13-503	Failure to maintain monthly record of the qty of coating applied daily to NPS, SPS & Plastics Paint
A63025	A1438	Tesla, Inc	12/18/2023	2-6-307	s-4006 was not abated at all times of operation (RCA #08V67).
A63027	A1438	Tesla, Inc	12/28/2023	2-6-307	S-4006 not abated at all times of operation and deviation not reported per standard condition F.
A63028	A1438	Tesla, Inc	12/28/2023	2-6-307	S-3009 not abated at all times of operation and deviation not reported per standard condition F.
A63029	A1438	Tesla, Inc	12/28/2023	2-6-307	S-4010 not abated at all times of operation and deviation not reported per standard condition F.
A63030	A1438	Tesla, Inc	12/28/2023	2-6-307	S-3008 not abated at all times of operation and deviation not reported per standard condition F.
A63031	A1438	Tesla, Inc	12/28/2023	2-6-307	S-3014 not abated at all times of operation and deviation not reported per standard condition F.
A63032	A1438	Tesla, Inc	12/28/2023	2-6-307	S-3016 not abated at all times of operation and deviation not reported per standard condition F.
A63033	A1438	Tesla, Inc	1/3/2024	2-6-307	S-4036, S-4037 & S-4038 were not abated at all times of operation (RCA #08V70-71)