

October 23, 2003

United Airlines S.F. Maintenance Center
Maintenance Base Bldg 49-2 - SFOMP
San Francisco International Airport
San Francisco, CA 94128-3800

Attention: Mr. Gregory Hall, Senior V.P. Engineering & Maintenance

Application Number: 1870
Plant Number: A0051
Equipment Location: Same as above

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Mr. Hall:

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

The requirement for public and EPA review of the proposed significant revision to your Major Facility Review Permit has been completed. No comments from the public were received. EPA submitted a comment letter, dated May 29, 2003. The District has decided to issue the permit with the following changes in response to comments.

MARIN COUNTY
Harold C. Brown, Jr.

Following is the District's response to your request for changes to the permit.

NAPA COUNTY
Brad Wagenknecht

Response to Comments:

A summary of each of your comments is listed below, followed by the District's position and any changes that will be made to the permit as a result of the comment.

SAN FRANCISCO COUNTY
Willie Brown, Jr.
Chris Daly
Jake McGoldrick

Comment #1: The responsible official should be changed from Ron Utecht to Gregory Hall.

- District's Position:
The District is not opposed to this request.

SAN MATEO COUNTY
Jerry Hill
Marland Townsend
(Vice-Chairperson)

- Changes to the Permit:
Gregory Hall, Senior V.P. Engineering & Maintenance is now listed as the responsible official on the Title V permit.

SANTA CLARA COUNTY
Liz Kniss
Julia Miller
Dena Mossar
(Vacant)

Comment #2: Is it necessary to have both an emission limit (90.0 tpy NOx) and a fuel usage limit (764,000 gal/yr) for S-90, Test Cell #5?

- District's Position:
The 90.0 tpy NOx emissions limit is tied to New Source Review issues such as Prevention of Significant Deterioration (PSD) and Emission Offsets. The 764,000 gal/yr fuel usage limit is the basis for the calculated emissions of all other criteria air pollutants and toxic air contaminants at S-90. Therefore, both limits are necessary and require monitoring.

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

William C. Norton
EXECUTIVE OFFICER/APCO

- Changes to the Permit:
None.

A minor change was made to the permit in response to EPA's comments. In order to make it clear why the Aerospace NESHAP (40 CFR 63 Subpart GG) does not apply to the Miscellaneous Coating Paint Booths S-137 and S-149 Permit Condition #20887 has been added as follows:

For Sources: 137, 149 (Miscellaneous Coating Paint Booths)

The Miscellaneous Coating Paint Booths S-137 and S-149 shall not be used to coat parts and assemblies critical to aircraft structural integrity or flight performance. (basis: 40 CFR 63.741(f))

Table IV – M has been updated accordingly.

Enclosed for your information is a copy of the final MFR permit, the comments submitted by the USEPA and the District's response letter to those comments. If you have any questions regarding this permit, please call Ted Hull, Air Quality Engineer II, at (415) 749-4919.

Sincerely yours,

William C. Norton
Executive Officer / APCO

WCN:RTH:myl

CC: EPA
CARB

Enclosures

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