Final Determination on the Application of

Mazda Toyota Manufacturing U.S.A., Inc.

Huntsville, AL

7-08-P391-Z001 through Z007, Z204, Z301, Z304, Z407, Z701, & Z702

Prevention of Significant Deterioration of Air Quality Permits

The Department proposes issuing Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS), nine (9) modified and four (4) new Prevention of Significant Deterioration (PSD) of Air Quality permits for the ongoing construction of an automobile manufacturing campus. The modified permits for the campus include seven (7) for the MTMUS facility (permits Z001 through Z007) as well as two (2) for the On-Site Partners (OSPs) (permits Z301 & Z407). The four (4) new permits for the campus are for the OSPs (permits Z204, Z304, Z701, & Z702). Future request(s) to modify any operation covered under any of the permits held by MTMUS or the OSPs holding air permits would require a PSD determination, as all operations covered under these permits underwent an initial PSD applicability determination as a single source. A public comment period was held from May 6, 2020, until June 5, 2020. No comments were received during the public comment period. A list of changes made to the draft permits after the end public comment period are documented in Attachment 1. This tabular list of changes is considered the only amendment to the Preliminary Determination/Engineering Analysis submitted at the time of the public comment period. The changes listed in Attachment 1 do not significantly affect potential emissions from the campus and are due to MTMUS's rescission of previously requested modifications documented in the application and subsequent revisions submitted with the revision request. All changes documented in Attachment 1 are reflected in the proposed final permits found in Attachment 2. I recommend that Air Permits with the attached permit provisos in Attachment 2 be issued as proposed.

Scott Cardno

July 27, 2020

Scott Cardno

Date

ATTACHMENT 1

Permit/ Proviso #	As Presented in DRAFT/Public Notice Package	As Permitted 7/27/2020
Z003/Proviso III.B.12 (Changed due to rescission of Change #3)*	This source is subject to the BACT limits below: **OPERATION** — **VOC BACT** Topcoat Exhaust T-CCRO (Unit 1500-14) — 95% Removal Efficiency – Thermal Oxidizer 85% Removal Efficiency – Carbon Concentrator The Topcoat Exhaust T-CCRO (Unit 1500-14) shall not emit greater than 0.49 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust T-CCRO (Unit 1500-14) shall not emit greater than 0.84 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).	This source is subject to the BACT limits below: **OPERATION** — **VOC BACT** Topcoat Exhaust TO-T2 (Unit 1500-14) — 95% Removal Efficiency Topcoat Exhaust TO-T3 (Unit 1500-16) — 95% Removal Efficiency The Topcoat Exhaust TO-T2 (Unit 1500-14) and TO-T3 (Unit 1500-16) shall not emit greater than 1.33 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust TO-T2 (Unit 1500-14) and TO-T3 (Unit 1500-16) shall not emit greater than 1.16 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).
Z003/Proviso III.B.16 (Changed due to rescission of Change #3)*	The Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), and Topcoat Exhaust T-CCRO (Unit 1500-14) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.	The Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Topcoat Exhaust TO-T2 (Unit 1500-14), and Topcoat Exhaust TO-T3 (Unit 1500-16) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.
Z003/Proviso III.B.17	VOC BACT for Unit 300-T4: An On Board Vapor Recovery (OBVR) system shall be installed and used during filling of the gas tank for each vehicle with the exception of	VOC BACT for Unit 300-T4: A Stage II vapor control system or On Board Vapor Recovery system shall be installed and used during filling of the gas tank for each vehicle.

(Changed due to rescission of Change #6)*	up to 50,000 vehicles to be shipped overseas (not requiring OBVR) from the combined plantwide vehicle production from MTMUS.	
Z003/Proviso III.B.20 (Changed due to rescission of Change #3)*	The following units will be captured and directed to the Topcoat Exhaust T-CCRO (Unit 1500-14), which consists of a carbon concentrator and recuperative thermal oxidizer: Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-T4) Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-T4) Topcoat Curing Oven (Unit 200-1500-15) MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-T4 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.	The following units will be captured and directed to the Topcoat Exhaust TO-T2 (Unit 1500-14) and Topcoat Exhaust TO-T3 (Unit 1500-16): Heated Flash (Unit 1500-13) Topcoat Booth Waterborne Basecoat (Interior and Exterior) (Unit 200-T4) Heated Flash (Unit 1500-13) Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-T4) Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-T4) Heated Flash (Unit 1500-13) and Topcoat Curing Oven (Unit 200-1500-15) MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-T4 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.
Z003/Proviso III.D.2 (Changed due to rescission of Change #3)*	Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), and Primer/Topcoat Exhaust T-CCRO (Unit 1500-14) using the EPA Protocol specified in proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of initial	Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Primer/Topcoat Exhaust TO-T2 (Unit 1500-14), and Primer/Topcoat Exhaust TO-T3 (Unit 1500-16) using the EPA Protocol specified in proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of

	compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.	initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.
Z003/Proviso III.D.3 (Changed due to rescission of Change #3)*	A continuous recorder for the emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), and Primer/Topcoat Exhaust T-CCRO (Unit 1500-14) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.	A continuous recorder for the emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Primer/Topcoat Exhaust TO-T2 (Unit 1500-14), and Primer/Topcoat Exhaust TO-T3 (Unit 1500-16) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.
Z004/Proviso III.B.12 (Changed due to rescission of Change #3)*	This source is subject to the BACT limits below: **OPERATION** — **VOC BACT** Topcoat Exhaust — 95% Removal Efficiency-Thermal Oxidizer M-CCRO (Unit 1500-27) — 85% Removal Efficiency Carbon Concentrator The Topcoat Exhaust M-CCRO (Unit 1500-27) shall not emit greater than 0.45 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust M-CCRO (Unit 1500-27) shall not emit greater than 0.69 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E,	This source is subject to the BACT limits below: **OPERATION** — **VOC BACT** Topcoat Exhaust TO-M2 (Unit 1500-27) — 95% Removal Efficiency Topcoat Exhaust TO-M3 (Unit 1500-29) — 95% Removal Efficiency The Topcoat Exhaust TO-M2 (Unit 1500-27) shall not emit greater than 0.98 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust TO-M3 (Unit 1500-29) shall not emit greater than 1.25 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent

	or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).	method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust TO-M2 (Unit 1500-27) shall not emit greater than 0.87 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average). The Topcoat Exhaust TO-M3 (Unit 1500-29) shall not emit greater than 0.84 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).
Z004/Proviso III.B.16 (Changed due to rescission of Change #3)*	The Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), and Topcoat Exhaust M-CCRO (Unit 1500-27) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.	The Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.
Z004/Proviso III.B.17 (Changed due to rescission of Change #6)*	VOC BACT for Unit 300-M4: An On Board Vapor Recovery (OBVR) system shall be installed and used during filling of the gas tank for each vehicle with the exception of up to 50,000 vehicles to be shipped overseas (not requiring OBVR) from the combined plantwide vehicle production from MTMUS.	VOC BACT for Unit 300-M4: A Stage II vapor control system or On Board Vapor Recovery system shall be installed and used during filling of the gas tank for each vehicle.
Z004/Proviso III.B.20	The following units will be captured and directed to the Topcoat Exhaust M-CCRO (Unit 1500-27), which consists of a carbon concentrator and recuperative thermal oxidizer:	The following units will be captured and directed to the Topcoat Exhaust TO-M2 (Unit 1500-27) and Topcoat Exhaust TO-M3 (Unit 1500-29): Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-M3) Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-M3)

(Changed due to rescission of Change #3)*	Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-M3) Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-M3) Topcoat Curing Oven (Unit 200-1500-28) MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-M3 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.	and Topcoat Curing Oven (Unit 200-1500-28) MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-M3 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.
Z004/Proviso III.D.2 (Changed due to rescission of Change #3)*	Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), and Topcoat Exhaust M-CCRO (Unit 1500-27) using the EPA Protocol specified in proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.	Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) using the EPA Protocol specified in proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.

Z004/Proviso III.D.3 (Changed due to rescission of Change #3)*	A continuous recorder for the emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), and Topcoat Exhaust M-CCRO (Unit 1500-27) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.	A continuous recorder for the emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.
Z005/Proviso III.B.3 (Changed due to rescission of Change #3)*	This source is subject to the BACT limits below: **OPERATION** — **NO_X BACT Lb./MMBtu of heat input** Process Ovens 0.072 Spare Parts Oven 0.10 Carbon Concentrator/Recuperative Oxidizer System & Thermal Oxidizers 0.33 Jig Cleaning/Miscellaneous Devices 0.10 All Other Process Devices 0.06 Natural Gas Fired Units w/ Low NOx burners (Unit 1500 HVAC) 0.06	This source is subject to the BACT limits below: **OPERATION** — **NO_X BACT Lb./MMBtu of heat input** Process Ovens 0.072 Spare Parts Oven 0.10 Thermal Oxidizers 0.05 Jig Cleaning/Miscellaneous Devices 0.10 All Other Process Devices 0.06 Natural Gas Fired Units w/ Low NOx burners (Unit 1500 HVAC) 0.06
Z204/Permit Cover Page (Administrative Change)	ON SITE PARTNER (OSP-2): Metal Parts Manufacturing	ON SITE PARTNER (OSP-2): Steel Center

*NOTE: The changes presented in this table reflect rescission of two changes (Change #3 and Change #6) presented in the Revision Request #2 application and subsequently in the Draft/Public Notice package issued on May 6, 2020. The rescission of these two changes do not significantly affect the campus-wide potential emissions.

ATTACHMENT 2

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z001	Manufacturing of Automobiles: Toyota Line Stamping Operations (Unit 100) Welding Operations (Unit 150)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit 100-T1, Unit 100-T2, Unit 150-T1, and Unit 150-T2) shall not exceed 73.4 tons per year (TPY) in any consecutive rolling 12-month period.

2. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

3. This Unit, Toyota Line (Stamping Shop Unit 100-T1) shall not use Rust Preventive Oil with a Volatile Organic Compounds (VOCs) content greater than 4.50 pounds/gallon (as utilized).

4. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. VOC BACT: MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize rust preventative oil, cleaning materials, sealers, and adhesive usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal

of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers.

III.C. Compliance and Performance Test Methods and Procedures

1. The HAP content by weight of each HAP-containing material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance.

2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or an alternative method approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

3. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent methods as approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent methods as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

5. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent methods as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) The type, quantity in gallons, and weight in pounds of each VOC or VHAP containing material used during each calendar month.

(B) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(C) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(D) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(E) Complete inventories of the VOC and VHAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(F) The amount of VOCs emitted per calendar month from the rust preventative materials and cleaning operations in units of pounds and tons.

(G) The rolling 12-month total of VOCs emitted from the rust preventative materials and cleaning operations in units of pounds and tons.

(H) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(I) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z002	Manufacturing of Automobiles: Mazda Line Stamping Operations (Unit 100) Welding Operations (Unit 150)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

Scott Cazalas

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 100-M1, Unit 100-M2, Unit 150-M1, and Unit 150-M2) shall not exceed 68.0 tons per year (TPY) in any consecutive rolling 12-month period.

2. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

3. This Unit, Mazda Line (Unit 100-M1) shall not use Rust Preventive Oil with a Volatile Organic Compounds (VOCs) content greater than 4.50 pounds/gallon (as utilized).

4. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. VOC BACT: MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize rust preventative oil, cleaning materials, sealers, and adhesive usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal

of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers.

III.C. Compliance and Performance Test Methods and Procedures

1. The HAP content by weight of each HAP-containing material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance.

2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or an alternative method approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

3. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

5. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) The type, quantity in gallons, and weight in pounds of each VOC or VHAP containing material used during each calendar month.

(B) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(C) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(D) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(E) Complete inventories of the VOC and VHAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(F) The amount of VOCs emitted per calendar month from the rust preventative and cleaning operations in units of pounds and tons.

(G) The rolling 12-month total of VOCs emitted from the rust preventative and cleaning operations in units of pounds and tons.

(H) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(I) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z003	Manufacturing of Automobiles: Toyota Line Paint Shop Operations (Unit 200) Assembly Shop Operations (Unit 300)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This source is subject to the New Source Performance Standards (NSPS) as defined in 40 CFR 60, Subpart MM and the General Provisions in Subpart A.

3. This unit is subject to the opacity emission rate limits.

4. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light-Duty Trucks Operations (IIII) as a "New Source".

5. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as a "New Source".

6. This source is subject to 112g emission limitations.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit 200-T1, Unit 200-T2, Unit 200-T4, Unit 200-T6, Unit 200-T7, Unit 200-T8, Unit 200-T9, and Unit 200-T13) shall not exceed 343.2 tons per year (TPY) in any consecutive rolling 12-month period.

2. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

3. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit 200-T10) from all Miscellaneous Cleaning Materials shall not exceed 48.2 tons per year (TPY) in any consecutive rolling 12-month period.

4. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit 200-T11) from all Purge Materials shall not exceed 169.6 tons per year (TPY) in any consecutive rolling 12-month period.

5. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line Unit 200-T12) from all Wiping Solvents shall not exceed 18 tons per year (TPY) in any consecutive rolling 12-month period.

6. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line Unit 300-T1) from all Wax Applications shall not exceed 20.5 tons per year (TPY) in any consecutive rolling 12-month period.

7. This source (Wax Application)(300-T1) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981 to include §63.3890 (a) on a calendar monthly average (1.9 pounds VHAP/gallon of coating solids/12-month compliance period).

8. This source is subject to the applicable emissions standards of New Source Performance Standards (NSPS) as defined in 40 CFR 60, Subpart MM §60.392 to include §60.392 (a), (b), and (c) on a calendar monthly average.

OPERATION	**VOC EMISSION LIMIT lb./gal ACS**
Primecoat: E-coat (Unit 200-T1)	1.34
Topcoat: Basecoat (Unit 200-T4) & Clearcoat (Unit 200-T4)	12.27

9. This source is subject to the BACT limits below:

OPERATION	**MONTHLY VOC EMISSION LIMIT lb./gal ACS**
Primecoat: E-coat (Unit 200-T1)	0.1
Topcoat: Basecoat Booth (Unit 200-T4) & Clearcoat Booth and Oven (Unit 200-T4) (Wet on Wet System)	4.80
Blackout (Unit 200-T6)	1.00 lb./gal, as applied
Sealer/Deadener (Unit 200-T2)	0.30 lb./gal, as applied
Wax Application (Unit 300-T1) (monthly average)	4.0 lb./gal, as applied

10. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Ecoat Exhaust TO-T1 (Unit 1500-10)	95% Removal Efficiency

The Ecoat Exhaust TO-T1 (Unit 1500-10) shall not emit greater than 0.26 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Ecoat Exhaust TO-T1 (Unit 1500-10) shall not emit greater than 0.39 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

11. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Sealer Oven Exhaust TO-T4 (Unit 1500-35)	95% Removal Efficiency

The Sealer Oven Exhaust TO-T4 (Unit 1500-35) shall not emit greater than 0.12 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Sealer Oven Exhaust TO-T4 (Unit 1500-35) shall not emit greater than 0.16 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

12. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Topcoat Exhaust TO-T2 (Unit 1500-14)	95% Removal Efficiency
Topcoat Exhaust TO-T3 (Unit 1500-16)	95% Removal Efficiency

The Topcoat Exhaust TO-T2 (Unit 1500-14) and TO-T3 (Unit 1500-16) shall not emit greater than 1.33 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Topcoat Exhaust TO-T2 (Unit 1500-14) and TO-T3 (Unit 1500-16) shall not emit greater than 1.16 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

13. This source is subject to the BACT limits below:

OPERATION	**PARTICULATE BACT #/hour**
Toyota Line Topcoat Booth (Unit 200-T4)	0.6
Toyota Line Blackout Booth (Unit 200-T6)	0.2
Toyota Line Cavity Wax Booth (Unit 200-T7)	0.02
Toyota Line Offline Repair Booth (Unit 200-T8)	0.1
Toyota Line Underbody Touch-Up Booth (Unit 200-T9)	0.001

14. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

15. This source (Phosphate/E-Coat)(200-T1), (Sealer/Misc. Body Coatings)(200-T2), (Topcoat System)(200-T4), (Miscellaneous Cleaning)(200-T10), (Purge Materials)(200-T11), (Wiping Solvents)(200-T12), (Assembly Final Repair Area)(300-T2), and (Windshield Installation)(300-T3) is/are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176 to include §63.3890 (a), (b), (c), (d), and (f) on a calendar monthly average.

16. The Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Topcoat Exhaust TO-T2 (Unit 1500-14), and Topcoat Exhaust TO-T3 (Unit 1500-16) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.

17. VOC BACT for Unit 300-T4: A Stage II vapor control system or On Board Vapor Recovery system shall be installed and used during filling of the gas tank for each vehicle.

18. The following units will be captured and directed to the Ecoat Exhaust TO-T1 (Unit 1500-10):
E-Coat Tank (Unit 200-T1)
and Curing Oven (Unit 200-1500-8)

19. The following units will be captured and directed to the Sealer Oven Exhaust TO-T4 (Unit 1500-35):
Sealer Oven (Unit 200-1500-9)

20. The following units will be captured and directed to the Topcoat Exhaust TO-T2 (Unit 1500-14) and Topcoat Exhaust TO-T3 (Unit 1500-16):
Heated Flash (Unit 1500-13)
Topcoat Booth Waterborne Basecoat (Interior and Exterior) (Unit 200-T4)
Heated Flash (Unit 1500-13)
Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-T4)
Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-T4)
Heated Flash (Unit 1500-13)
and Topcoat Curing Oven (Unit 200-1500-15)

MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-T4 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

21. The following (112g) emission limits are applicable:

MTMUS shall implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established.

22. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

23. VOC BACT: MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize coating materials and clean-up/purge/general solvent usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers.

III.C. Compliance and Performance Test Methods and Procedures

1. The HAP content by weight of each HAP-containing material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance.

2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or an alternative method

approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

3. EPA document *"Protocol for Determining Daily VOC Emission Rate of Automobile and Light Duty Truck Topcoat Operations", June 10, 1988*, and revisions thereafter, shall be used to determine transfer efficiencies, booth/oven splits, and control efficiencies for compliance with the VOC BACT Determinations. The transfer efficiencies listed in 40 CFR 60, Subpart MM or approved by the Administrator, shall be used to determine compliance with the NSPS limits in Proviso Number III.B.7 of this permit.

4. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

5. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

6. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

7. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

8. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements in addition to those listed below.

2. Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Primer/Topcoat Exhaust TO-T2 (Unit 1500-14), and Primer/Topcoat Exhaust TO-T3 (Unit 1500-16) using the EPA Protocol specified in proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the

Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.

3. A continuous recorder for the emission points: Ecoat Exhaust TO-T1 (Unit 1500-10), Sealer Oven Exhaust TO-T4 (Unit 1500-35), Primer/Topcoat Exhaust TO-T2 (Unit 1500-14), and Primer/Topcoat Exhaust TO-T3 (Unit 1500-16) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.

4. The wet/dry filtration system(s) for this unit(s) shall be inspected for proper operation twice weekly. The manufacturer's suggested rates for the control equipment shall used to determine proper control device operation.

5. Whenever maintenance checks required in proviso III.D.4 are out of normal operational range, corrective action to minimize emissions shall be taken within 48 hours, followed by an additional maintenance check(s) to confirm that emissions are reduced to normal.

6. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981.

7. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) The type, quantity in gallons, and weight in pounds of each VOC or VHAP containing material used during each calendar month.

(B) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(C) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(D) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories and demonstrated destruction efficiency of the RTOs . Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(E) Complete inventories of the VOC and VHAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(F) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.

(G) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

(H) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(I) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. The minimum operational temperature of the combustion chamber of the thermal oxidizer(s) for the process equipment shall be determined by test. Following testing, the temperature corresponding to an acceptable VOC destruction efficiency shall be established as the minimum operation temperature of the combustion chamber. This minimum operation temperature will be calculated on a consecutive 3-hour averaging time period. A temperature reading must be normally be taken at least every five minutes. The temperature data must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature. The record must be maintained for at least five years following the data recording.

3. The thermal oxidizer(s) must have audible alarm or easily detectable signal which will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. The time, duration, cause(s), and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least five years. If the 3 hour rolling average falls below the minimum operational temperature for more than 15 minutes, the facility will cease introducing bodies to each respective coating process, but may finish processing bodies already coated through each respective flash-off/oven area.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer(s). The recording instrument will be located for convenient reference and be of the type which provides direct reading and recording in degrees Fahrenheit. The combustion chamber temperature of the thermal oxidizer(s) will be recorded for all system operations and the recordings will be maintained in a form suitable for inspection for a period of five years.

5. When any bypassing of the thermal oxidizer(s) (TO) occurs, the time, date, or duration, estimated VOC emissions, and equipment process(es) bypassed will be recorded. Records will be maintained of any malfunction or non-operation of the TO, which results in an increase in the VOC emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of five years.

6. A log book or electronic records of the twice weekly maintenance checks required in proviso III.D.4 shall be retained for at least five years and available for inspection upon request. This log book or electronic records should also include the nature and date of any maintenance actions taken to correct maintenance episodes as required in III.D.5.

7. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981.

8. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176.

9. A report summarizing the following information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance. The report shall provide the following information for the thermal oxidizer(s), as applicable.

(A) The quantity of the solvents of VOCs in the coatings applied.

(B) The VOCs not released or exhausted into the atmosphere by the thermal oxidizer(s).

(C) The VOCs vented to the thermal oxidizer(s) by the process operation.

(D) The estimated averaged destruction efficiency of the thermal oxidizer(s).

(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer(s).

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer(s) is below the three hour average temperature recorded during the

most recent performance test which complied with the required overall VOC emission reduction.

(G) The cumulative or total quantity of VOCs released or exhausted into the atmosphere by the machines and thermal oxidizer control units during the applicable month and previous eleven months.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z004	Manufacturing of Automobiles: Mazda Line Paint Shop Operations (Unit 200) Assembly Shop Operations (Unit 300)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 7

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This source is subject to the New Source Performance Standards (NSPS) as defined in 40 CFR 60, Subpart MM and the General Provisions in Subpart A.

3. This unit is subject to the opacity emission rate limits.

4. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light-Duty Trucks Operations (IIII) as a "New Source".

5. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as a "New Source".

6. This source is subject to 112g emission limitations.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 200-M1, Unit 200-M2, Unit 200-M3, Unit 200-M5, Unit 200-M6, Unit 200-M7, Unit 200-M8, and Unit 200-M12) shall not exceed 294.3 tons per year (TPY) in any consecutive rolling 12-month period.

2. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

3. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 200-M9) from all Miscellaneous Cleaning Materials shall not exceed 72.4 tons per year (TPY) in any consecutive rolling 12-month period.

4. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 200-M10) from all Purge Materials shall not exceed 169.6 tons per year (TPY) in any consecutive rolling 12-month period.

5. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 200-M11) from all Wiping Solvents shall not exceed 13.5 tons per year (TPY) in any consecutive rolling 12-month period.

6. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Unit 300-M1) from all Wax Applications shall not exceed 30.7 tons per year (TPY) in any consecutive rolling 12-month period.

7. This source (Wax Application)(300-M1) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981 to include §63.3890 (a) on a calendar monthly average (1.9 pounds VHAP/gallon of coating solids/12-month compliance period).

8. This source is subject to the applicable emissions standards of New Source Performance Standards (NSPS) as defined in 40 CFR 60, Subpart MM §60.392 to include §60.392 (a), (b), and (c) on a calendar monthly average.

OPERATION	**VOC EMISSION LIMIT lb./gal ACS**
Primecoat: E-coat (Unit 200-M1)	1.34
Topcoat: Basecoat (Unit 200-M3) & Clearcoat (Unit 200-M3)	12.27

9. This source is subject to the BACT limits below:

OPERATION	**MONTHLY VOC EMISSION LIMIT lb./gal ACS**
Primecoat: E-coat (Unit 200-M1)	0.1
Guidecoat: Basecoat Booth (Unit 200-M3) & Clearcoat Booth and Oven (Unit 200-M3)	4.80
Blackout (Unit 200-M5)	1.00 lb./gal, as applied
Sealer/Deadener (Unit 200-M2)	0.30 lb./gal, as applied
Wax Application (Unit 300-M1) (monthly average)	4.0 lb./gal, as applied

10. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Ecoat Exhaust TO-M1 (Unit 1500-23)	95% Removal Efficiency

The Ecoat Exhaust TO-M1 (Unit 1500-23) shall not emit greater than 0.26 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Ecoat Exhaust TO-M1 (Unit 1500-23) shall not emit greater than 0.39 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

11. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Sealer Oven Exhaust TO-M4 (Unit 1500-36)	95% Removal Efficiency

The Sealer Oven Exhaust TO-M4 (Unit 1500-36) shall not emit greater than 0.29 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Sealer Oven Exhaust TO-M4 (Unit 1500-36) shall not emit greater than 0.24 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

12. This source is subject to the BACT limits below:

OPERATION	VOC BACT
Topcoat Exhaust TO-M2 (Unit 1500-27)	95% Removal Efficiency
Topcoat Exhaust TO-M3 (Unit 1500-29)	95% Removal Efficiency

The Topcoat Exhaust TO-M2 (Unit 1500-27) shall not emit greater than 0.98 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Topcoat Exhaust TO-M3 (Unit 1500-29) shall not emit greater than 1.25 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Topcoat Exhaust TO-M2 (Unit 1500-27) shall not emit greater than 0.87 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Topcoat Exhaust TO-M3 (Unit 1500-29) shall not emit greater than 0.84 pounds of NO_x/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method as approved by the Department, if required to test by the Department (3-hour arithmetic average).

13. This source is subject to the BACT limits below:

OPERATION	**PARTICULATE BACT #/hour**
Mazda Line Topcoat Booth (Unit 200- M3)	0.6
Mazda Line Blackout Booth (Unit 200-M5)	0.1
Mazda Line Cavity Wax Booth (Unit 200-M6)	0.02
Mazda Line Offline Repair Booth (Unit 200-M7)	0.02
Mazda Line Underbody Touch-Up Booth (Unit 200-M8)	0.003

14. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

15. This source (Phosphate/E-Coat)(200-M1), (Sealer/Misc. Body Coatings)(200-M2), (Topcoat System)(200-M3), (Miscellaneous Cleaning)(200-M9), (Purge Materials)(200-M10), (Wiping Solvents)(200-M11), (Assembly Final Repair Area)(300-M2), and (Windshield Installation)(300-M3) is/are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176 to include §63.3890 (a), (b), (c), (d), and (f) on a calendar monthly average.

16. The Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) shall be operated at or above the temperature (3-run arithmetic average) at which compliance is demonstrated during the initial performance test, or subsequent tests which demonstrate compliance.

17. VOC BACT for Unit 300-M4: A Stage II vapor control system or On Board Vapor Recovery system shall be installed and used during filling of the gas tank for each vehicle.

18. The following units will be captured and directed to the Ecoat Exhaust TO-M1 (Unit 1500-23):
E-Coat Tank (Unit 200-M1)
and Curing Oven (Unit 200-1500-21)

19. The following units will be captured and directed to the Sealer Oven Exhaust TO-M4 (Unit 1500-36):
Sealer Oven (Unit 200-1500-22)

20. The following units will be captured and directed to the Topcoat Exhaust TO-M2 (Unit 1500-27) and Topcoat Exhaust TO-M3 (Unit 1500-29):
Topcoat Booth Solventborne Clearcoat (Interior) (Unit 200-M3)
Topcoat Booth Solventborne Clearcoat (Exterior) (Unit 200-M3)
and Topcoat Curing Oven (Unit 200-1500-28)

MTMUS may change the number of thermal oxidizers and specific zones of Unit 200-M3 exhausted to the thermal oxidizers; however, MUMUS must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

21. The following (112g) emission limits are applicable:

MTMUS shall implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established.

22. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

23. VOC BACT: MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize coating materials and clean-up/purge/general solvent usage in all operations. Coatings, solvents, and other VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, coating, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage. Coatings and other fresh or spent VOC coating material will be stored in closed containers.

III.C. Compliance and Performance Test Methods and Procedures

1. The HAP content by weight of each HAP-containing material used shall be determined using vendor provided material safety data sheets or technical data sheets that contain a listing of individual regulated HAP ingredients expressed as a percent by weight. Should

the Department request verification of formulation data, the HAP content of coatings shall be determined on a random basis using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or an alternative method approved in advance.

2. The VOC content by weight of each VOC containing material used shall be determined using EPA Test Method 24, as defined in 40 CFR 60, Appendix A, or an alternative method approved in advance. Equivalent vendor data based on this method is an appropriate substitute. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

3. EPA document *"Protocol for Determining Daily VOC Emission Rate of Automobile and Light Duty Truck Topcoat Operations", June 10, 1988*, and revisions thereafter, shall be used to determine transfer efficiencies, booth/oven splits, and control efficiencies for compliance with the VOC BACT Determinations. The transfer efficiencies listed in 40 CFR 60, Subpart MM or approved by the Administrator, shall be used to determine compliance with the NSPS limits in Proviso Number III.B.7 of this permit.

4. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

5. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

6. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

7. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

8. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements in addition to those listed below.

2. Emissions tests to demonstrate removal and destruction efficiency for the control devices are to be conducted for VOCs (for emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) using the EPA Protocol specified in

proviso number III.C.3), transfer efficiencies, booth splits, control efficiencies, for the coatings used in coating operations using Method 24 or 311, or equivalent methods as approved by the Department, as appropriate and other items as determined at intervals not to exceed 3 years or if a significant model change occurs (as determined by the Department) following the date of initial compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing, unless an extension is granted by the Department. Emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, Method 18 or 25, 24 or 311 as appropriate as required by the Department.

3. A continuous recorder for the emission points: Ecoat Exhaust TO-M1 (Unit 1500-23), Sealer Oven Exhaust TO-M4 (Unit 1500-36), Topcoat Exhaust TO-M2 (Unit 1500-27), and Topcoat Exhaust TO-M3 (Unit 1500-29) shall be installed, calibrated, and maintained to record the combustion temperature in a permanent form suitable for inspection upon request. The records shall be retained for at least five years following the date of such measurement.

4. The wet/dry filtration system(s) for this unit(s) shall be inspected for proper operation twice weekly. The manufacturer's suggested rates for the control equipment shall used to determine proper control device operation.

5. Whenever maintenance checks required in proviso III.D.4 are out of normal operational range, corrective action to minimize emissions shall be taken within 48 hours, followed by an additional maintenance check(s) to confirm that emissions are reduced to normal.

6. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981.

7. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of VOCs, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) The type, quantity in gallons, and weight in pounds of each VOC or VHAP containing material used during each calendar month.

(B) The percent by weight of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(C) The percent by volume of VOCs, water, solids, VHAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.

(D) Compliance with VOC and VHAP limits shall be based upon monthly material use inventories and demonstrated destruction efficiency of the RTOs . Emissions may be adjusted for VOC and VHAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

(E) Complete inventories of the VOC and VHAP containing materials (their usage, VOC content and VHAP content) shall be made at the end of each calendar month.

(F) The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.

(G) The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

(H) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(I) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. The minimum operational temperature of the combustion chamber of the thermal oxidizer(s) for the process equipment shall be determined by test. Following testing, the temperature corresponding to an acceptable VOC destruction efficiency shall be established as the minimum operation temperature of the combustion chamber. This minimum operation temperature will be calculated on a consecutive 3-hour averaging time period. A temperature reading must be normally be taken at least every five minutes. The temperature data must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature. The record must be maintained for at least five years following the data recording.

3. The thermal oxidizer(s) must have audible alarm or easily detectable signal which will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. The time, duration, cause(s),

and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least five years. If the 3 hour rolling average falls below the minimum operational temperature for more than 15 minutes, the facility will cease introducing bodies to each respective coating process, but may finish processing bodies already coated through each respective flash-off/oven area.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer(s). The recording instrument will be located for convenient reference and be of the type which provides direct reading and recording in degrees Fahrenheit. The combustion chamber temperature of the thermal oxidizer(s) will be recorded for all system operations and the recordings will be maintained in a form suitable for inspection for a period of five years.

5. When any bypassing of the thermal oxidizer(s) (TO) occurs, the time, date, or duration, estimated VOC emissions, and equipment process(es) bypassed will be recorded. Records will be maintained of any malfunction or non-operation of the TO, which results in an increase in the VOC emissions from any or all process equipment. These records will be maintained in a form suitable for inspection for a period of five years.

6. A log book or electronic records of the twice weekly maintenance checks required in proviso III.D.4 shall be retained for at least five years and available for inspection upon request. This log book or electronic records should also include the nature and date of any maintenance actions taken to correct maintenance episodes as required in III.D.5.

7. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Miscellaneous Metal Parts and Products (MMMM) as defined in 40 CFR 63, Subpart MMMM §63.3880-3981.

8. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Automobiles and Light Duty Trucks (IIII) as defined in 40 CFR 63, Subpart IIII §63.3080-3176.

9. A report summarizing the following information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance. The report shall provide the following information for the thermal oxidizer(s), as applicable.

(A) The quantity of the solvents of VOCs in the coatings applied.

(B) The VOCs not released or exhausted into the atmosphere by the thermal oxidizer(s).

(C) The VOCs vented to the thermal oxidizer(s) by the process operation.

(D) The estimated averaged destruction efficiency of the thermal oxidizer(s).

(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer(s).

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer(s) is below the three hour average temperature recorded during the most recent performance test which complied with the required overall VOC emission reduction.

(G) The cumulative or total quantity of VOCs released or exhausted into the atmosphere by the machines and thermal oxidizer control units during the applicable month and previous eleven months.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z005	Manufacturing of Automobiles: Toyota Line and Mazda Line Miscellaneous Natural Gas Fired Combustion Sources (Unit 1500)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. This source is currently subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Industrial, Commercial, and Institutional Boilers and Process Heaters (DDDDD) as a "New Source". MTMUS and the Department will review and determine applicability of this subpart based on final engineering equipment designs.

4. This unit is subject to the particulate emission rate limits for Process Industries - General sources.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

2. This source is subject to the BACT limits below:

OPERATION	PARTICULATE BACT (PM/PM10/PM2.5) Lb./MMBtu of heat input
Natural Gas Fired Units (Unit 1500)	0.0005

3. This source is subject to the BACT limits below:

OPERATION	NOx BACT Lb./MMBtu of heat input
Process Ovens	0.072
Spare Parts Oven	0.10
Thermal Oxidizers	0.05
Jig Cleaning/Miscellaneous Devices	0.10
All Other Process Devices	0.06
Natural Gas Fired Units w/ Low NOx burners (Unit 1500 HVAC)	0.06

4. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NOx and other pollutants in all operations. Periodic maintenance of each listed burner in the section: Natural Gas Fired Units (Unit 1500) will occur at a minimum as suggested by the manufacturer of the unit.

7. This unit shall not discharge into the atmosphere particulate matter in excess of: $E = 1.38H^{-0.44}$, where H is the heat input in millions of BTU/hr.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

2. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 10 microns from the stack.

3. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 2.5 microns from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

5. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

6. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

7. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements in addition to those listed below.

2. When operating, each listed burner in the section: Natural Gas Fired Units (Unit 1500) shall be visually observed a minimum of once monthly for greater than normal visible emissions as determined by previous observations.

3. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal. Records shall be recorded in a permanent form suitable for inspection upon request and retained for at least five years following the date of such measurement.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of natural gas, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) Usage of natural gas by MTMUS in the previous month.

(B) Calculations of criteria pollutants based on natural gas used in the previous month using established emission factors.

(C) The amount of VOCs and other criteria pollutants emitted per calendar month in units of tons.

(D) The rolling 12-month total of VOCs and other criteria pollutants in units of tons.

(E) A report summarizing the above information shall be submitted each calendar quarter by

the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(F) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. A log book of the monthly visible observations required in proviso III.D.2 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z006	Manufacturing of Automobiles: Toyota Line and Mazda Line Gasoline Storage w/ Stage I Vapor Recovery Sources (Unit 1600-5) Windshield Washer Fluid Storage (Unit 1600-4)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. These units (Unit 1600-5) (4-15,000 gallon unleaded gasoline storage tanks) shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification commenced after July 23, 1984 (Kb) as defined in 40 CFR Part 60, Subpart (Kb) §60.110b-117b.

3. These units (Unit 1600-4) (2-9,500 gallon windshield washer fluid storage tanks) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline)(EEEE) as a "New Source".

III.B. Emission Standards

1. A properly maintained Stage I vapor recovery system and submerged fill pipes/bottom filling must be operated on this source (Unit 1600-5) (4-15,000 gallon unleaded gasoline storage tanks).

2. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

3. Submerged fill pipes/bottom filling must be operated on this source (Unit 1600-4) (2-9,500 gallon windshield washer fluid storage tanks).

4. These units (Unit 1600-4) (2-9,500 gallon windshield washer fluid storage tanks) shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline)(EEEE) as a "New Source" which may include an internal or external floating roof or equivalent alternatives approved by the Department.

5. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize VOC usage in all operations. VOC containing material will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Closed containers shall be used for the storage and disposal of cloth or other material used for VOC containing material cleanup or usage.

III.C. Compliance and Performance Test Methods and Procedures

1. None.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements in addition to those listed below.

2. This source shall comply with the compliance and monitoring requirements set forth in 40 CFR §60.116b.

III.E. Recordkeeping and Reporting Requirements

1. This source shall comply with the recordkeeping requirements set forth in 40 CFR §60.115b.

2. This source shall comply with the reporting requirements set forth in 40 CFR §60.115b.

3. Readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the vessel shall be kept for the life of the vessel at the facility.

4. These storage tanks (Unit 1600-5) (4-15,000 gallon unleaded gasoline storage tanks) shall store gasoline only. Records will be kept showing the contents of each storage tank. These will be available for inspection.

5. These units (Unit 1600-4) (2-9,500 gallon windshield washer fluid storage tanks) shall comply with the applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutants (HAP) Organic Liquids Distribution (Non-Gasoline)(EEEE) as a "New Source".

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z007	Manufacturing of Automobiles: Toyota and Mazda (MTMUS) Lines Two (2) Diesel-Fired Emergency Generators, Three (3) Natural Gas-Fired Emergency Generators & One (1) Emergency Fire Pump Engine (Unit 1700)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. These units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Stationary Reciprocating Internal Combustion Engines (ZZZZ) as a "New Source".

4. The diesel-fueled units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

5. The natural gas-fueled units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines (JJJJ) as defined in 40 CFR Part 60, Subpart (JJJJ) §60.4230-4248.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from the combined plantwide emissions from MTMUS (Permits Z001-Z007) shall not exceed 1,367 tons per year (TPY) in any consecutive rolling 12-month period.

2. These units shall be operated and maintained in accordance with the manufacturers' written instructions.

3. The Emergency stationary CI RICE unit(s) shall:
a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

d. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

4. Only Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel-fueled emergency generator(s) and/or the diesel fueled emergency fire pump.

5. Only natural gas may be used as fuel in the natural gas-fueled emergency generators with the exception that propane may be used for a maximum of 100 hours per year as an alternative fuel only during emergency operations.

6. Each emergency generator and fire pump engine must be equipped with a non-resettable hour meter.

7. Only one single emergency generator or emergency fire pump may be operated on any calendar day for maintenance or testing purposes. This proviso does not apply to emergency use purposes.

8. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

9. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize diesel usage in all operations. Diesel fuel will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Fresh or spent diesel fuel will be stored in closed containers.

10. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219 or Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (JJJJ) as defined in 40 CFR Part 60, Subpart (JJJJ) §60.4230-4248 as applicable.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Records of engine usage must be kept in a permanent form suitable for inspection. These records should record if the usage was for emergency, maintenance checks, readiness checks, or other usage. The records shall be retained for at least five years from the date of generation and available upon request.

2. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219 or Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (JJJJ) as defined in 40 CFR Part 60, Subpart (JJJJ) §60.4230-4248 as applicable.

3. Billing statements from supplier(s) may be used to record the sulfur content of diesel fuel supplied. Such records shall be maintained and prepared in a form suitable for inspection within thirty (30) days of the end of the calendar month during which the fuel was received.

4. The following federal requirements apply to these unit(s):

(A) *Requirements for emergency stationary ICE.* If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (2)(i) through (iii) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (2)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (2)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for

periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2)(ii) of this section. Except as provided in paragraph (3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
(D) The power is provided only to the facility itself or to support the local transmission and distribution system.
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z204	ON SITE PARTNER (OSP-2): Steel Center One (1) Diesel-Fired Emergency Generator (Unit OSP-2-EG1)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

Scott Cardino

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. These units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Stationary Reciprocating Internal Combustion Engines (ZZZZ) as a "New Source".

4. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.B. Emission Standards

1. The Emergency stationary CI RICE unit(s) shall:
a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
d. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

2. Only Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel fueled emergency generator(s) and/or the diesel fueled emergency fire pump(s).

3. Each emergency generator and fire pump engine must be equipped with a non-resettable hour meter.

4. Only one single diesel fueled emergency generator or diesel fueled emergency fire pump(s) may be operated on any calendar day for maintenance or testing purposes. This proviso does not apply to emergency use purposes.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize diesel usage in all operations. Diesel fuel will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Fresh or spent diesel fuel will be stored in closed containers.

7. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Records of engine usage must be kept in a permanent form suitable for inspection. These records should record if the usage was for emergency, maintenance checks, readiness checks, or other usage. The records shall be retained for at least five years from the date of generation and available upon request.

2. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

3. Billing statements from supplier(s) may be used to record the sulfur content of diesel fuel supplied. Such records shall be maintained and prepared in a form suitable for inspection within thirty (30) days of the end of the calendar month during which the fuel was received.

4. The following federal requirements apply to these unit(s):

(A) *Requirements for emergency stationary ICE.* If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (2)(i) through (iii) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (2)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (2)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2)(ii) of this section. Except as provided in paragraph (3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income

for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
(D) The power is provided only to the facility itself or to support the local transmission and distribution system.
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z301	ON SITE PARTNER (OSP-3): Metal Parts Manufacturing Miscellaneous Natural Gas Fired Combustion Sources (Unit OSP-3-NG)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

Scott Gardno

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. This source is currently subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Industrial, Commercial, and Institutional Boilers and Process Heaters (DDDDD) as a "New Source". MTMUS and the Department will review and determine applicability of this subpart based on final engineering equipment designs.

4. This unit is subject to the particulate emission rate limits for Process Industries - General sources.

III.B. Emission Standards

1. This source is subject to the BACT limits below:

OPERATION	PARTICULATE BACT (PM/PM10/PM2.5) Lb./MMBtu of heat input
Natural Gas Fired Unit(s) (Units OSP-3-NG)	0.0005

2. This source is subject to the BACT limits below:

OPERATION	NO_X BACT Lb./MMBtu of heat input
Process Ovens	0.05
Thermal Oxidizers	0.05
Natural Gas Fired Boilers	0.1
Natural Gas Fired Unit(s) w/ Low NOx burners (Unit OSP-3-NG1 HVAC)	0.06

3. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

4. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

5. OSP-3 shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NOx and other pollutants in all operations. Periodic maintenance of each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-3-NG) will occur at a minimum as suggested by the manufacturer of the unit.

6. This unit shall not discharge into the atmosphere particulate matter in excess of: $E = 1.38H^{-0.44}$, where H is the heat input in millions of BTU/hr.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

2. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 10 microns from the stack.

3. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 2.5 microns from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

5. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

6. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

7. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements in addition to those listed below.

2. When operating, each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-3-NG) shall be visually observed a minimum of once monthly for greater than normal visible emissions as determined by previous observations.

3. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal. Records shall be recorded in a permanent form suitable for inspection upon request and retained for at least five years following the date of such measurement.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of natural gas, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) Usage of natural gas by this unit: Natural Gas Fired Unit(s) (Unit OSP-3-NG) in the previous month.

(B) Calculations of criteria pollutants based on natural gas used in the previous month using established emission factors.

(C) The amount of VOCs and other criteria pollutants emitted per calendar month in units of tons.

(D) The rolling 12-month total of VOCs and other criteria pollutants in units of tons.

(E) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(F) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. A log book of the monthly visible observations required in proviso III.D.2 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z304	ON SITE PARTNER (OSP-3): Metal Parts Manufacturing One (1) Diesel-Fired Emergency Generator (Unit OSP-3-EG1)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. **GENERAL (FACILITY-WIDE) PERMIT CONDITIONS**

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. **FACILITY SPECIFIC PERMIT CONDITIONS**

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. These units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Stationary Reciprocating Internal Combustion Engines (ZZZZ) as a "New Source".

4. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.B. Emission Standards

1. The Emergency stationary CI RICE unit(s) shall:
a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
d. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

2. Only Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel fueled emergency generator(s) and/or the diesel fueled emergency fire pump(s).

3. Each emergency generator and fire pump engine must be equipped with a non-resettable hour meter.

4. Only one single diesel fueled emergency generator or diesel fueled emergency fire pump(s) may be operated on any calendar day for maintenance or testing purposes. This proviso does not apply to emergency use purposes.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize diesel usage in all operations. Diesel fuel will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Fresh or spent diesel fuel will be stored in closed containers.

7. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Records of engine usage must be kept in a permanent form suitable for inspection. These records should record if the usage was for emergency, maintenance checks, readiness checks, or other usage. The records shall be retained for at least five years from the date of generation and available upon request.

2. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

3. Billing statements from supplier(s) may be used to record the sulfur content of diesel fuel supplied. Such records shall be maintained and prepared in a form suitable for inspection within thirty (30) days of the end of the calendar month during which the fuel was received.

4. The following federal requirements apply to these unit(s):

(A) *Requirements for emergency stationary ICE.* If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (2)(i) through (iii) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (2)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (2)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2)(ii) of this section. Except as provided in paragraph (3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income

for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
(D) The power is provided only to the facility itself or to support the local transmission and distribution system.
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z407	ON SITE PARTNER (OSP-4): Plastic Shop Miscellaneous Natural Gas Fired Combustion Sources (Unit OSP-4-NG)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. **GENERAL (FACILITY-WIDE) PERMIT CONDITIONS**

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. **FACILITY SPECIFIC PERMIT CONDITIONS**

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. This source is currently subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Industrial, Commercial, and Institutional Boilers and Process Heaters (DDDDD) as a "New Source". MTMUS and the Department will review and determine applicability of this subpart based on final engineering equipment designs.

4. This unit is subject to the particulate emission rate limits for Process Industries - General sources.

III.B. Emission Standards

1. This source is subject to the BACT limits below:

OPERATION	PARTICULATE BACT (PM/PM10/PM2.5) Lb./MMBtu of heat input
Natural Gas Fired Unit(s) (Unit OSP-4-NG)	0.0005

2. This source is subject to the BACT limits below:

OPERATION	NO_X BACT Lb./MMBtu of heat input
Process Ovens	0.05
Thermal Oxidizers	0.05
Jig Cleaning	0.05
All Other Process Devices	0.05
Natural Gas Fired Unit(s) w/ Low NOx burners (Unit OSP-4-NG1 HVAC)	0.06

3. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

4. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

5. OSP-4 shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NOx and other pollutants in all operations. Periodic maintenance of each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-4-NG) will occur at a minimum as suggested by the manufacturer of the unit.

6. This unit shall not discharge into the atmosphere particulate matter in excess of: $E = 1.38H^{-0.44}$, where H is the heat input in millions of BTU/hr.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

2. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 10 microns from the stack.

3. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 2.5 microns from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

5. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

6. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

7. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements in addition to those listed below.

2. When operating, each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-4-NG) shall be visually observed a minimum of once monthly for greater than normal visible emissions as determined by previous observations.

3. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal. Records shall be recorded in a permanent form suitable for inspection upon request and retained for at least five years following the date of such measurement.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of natural gas, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) Usage of natural gas by this unit: Natural Gas Fired Unit(s) (Unit OSP-4-NG) in the previous month.

(B) Calculations of criteria pollutants based on natural gas used in the previous month using established emission factors.

(C) The amount of VOCs and other criteria pollutants emitted per calendar month in units of tons.

(D) The rolling 12-month total of VOCs and other criteria pollutants in units of tons.

(E) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(F) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. A log book of the monthly visible observations required in proviso III.D.2 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z701	ON SITE PARTNER (OSP-7): Cross Dock / Warehouse Miscellaneous Natural Gas Fired Combustion Sources (Unit OSP-7-NG1)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. This source is currently subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Industrial, Commercial, and Institutional Boilers and Process Heaters (DDDDD) as a "New Source". MTMUS and the Department will review and determine applicability of this subpart based on final engineering equipment designs.

4. This unit is subject to the particulate emission rate limits for Process Industries - General sources.

III.B. Emission Standards

1. This source is subject to the BACT limits below:

OPERATION	PARTICULATE BACT (PM/PM10/PM2.5) Lb./MMBtu of heat input
Natural Gas Fired Unit(s) (Unit OSP-7-NG1)	0.0005

2. This source is subject to the BACT limits below:

OPERATION	NO_X BACT Lb./MMBtu of heat input
Natural Gas Fired Unit(s) w/ Low NOx burners (Unit OSP-7-NG1)	0.06

3. Only natural gas may be used as fuel in the combustion equipment with the exception of the diesel fueled emergency generator(s), diesel fueled emergency fire pump(s), and gasoline engines.

4. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

5. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize emissions of NOx and other pollutants in all operations. Periodic maintenance of each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-7-NG1) will occur at a minimum as suggested by the manufacturer of the unit.

6. This unit shall not discharge into the atmosphere particulate matter in excess of: $E = 1.38H^{-0.44}$, where H is the heat input in millions of BTU/hr.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 5 or 5a as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions from the stack.

2. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 10 microns from the stack.

3. Method 201a and 202 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of particulate emissions less than 2.5 microns from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Nitrogen oxides emissions from the stack.

5. Method 10 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Carbon Monoxide emissions from the stack.

6. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

7. Method 18 or 25, as determined by the Department, as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of Volatile Organic Compound emissions from the stack. The test method will be determined by the Department before testing.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E.--Recordkeeping and Reporting Requirements in addition to those listed below.

2. When operating, each listed burner in the section: Natural Gas Fired Unit(s) (Unit OSP-7-NG1) shall be visually observed a minimum of once monthly for greater than normal visible emissions as determined by previous observations.

3. Whenever observed visible emissions are greater than normal, corrective action to minimize emissions shall be taken within 24 hours, followed by an additional observation to confirm that emissions are reduced to normal. Records shall be recorded in a permanent form suitable for inspection upon request and retained for at least five years following the date of such measurement.

III.E. Recordkeeping and Reporting Requirements

1. Accurate and understandable records of consumption of natural gas, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this permit. These records shall contain the following information:

(A) Usage of natural gas by this unit: Natural Gas Fired Unit(s) (Unit OSP-7-NG1) in the previous month.

(B) Calculations of criteria pollutants based on natural gas used in the previous month using established emission factors.

(C) The amount of VOCs and other criteria pollutants emitted per calendar month in units of tons.

(D) The rolling 12-month total of VOCs and other criteria pollutants in units of tons.

(E) A report summarizing the above information shall be submitted each calendar quarter by the 30th day of the month following the end of the quarter, in a format approved by the Department in advance.

(F) By the 30th day of the month following the end of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Department must be notified in writing within ten (10) days of the identification of the exceedance.

2. A log book of the monthly visible observations required in proviso III.D.2 shall be retained for at least five years and available for inspection upon request. This log book should also include the nature and date of any maintenance actions taken to correct excess opacity episodes.

CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: Mazda Toyota Manufacturing U.S.A., Inc.(MTMUS)

Location: 9000 Greenbrier Parkway NW

Huntsville, Alabama 35756

Permit Number(s)	Description of Source(s)
7-08-P391-Z702	ON SITE PARTNER (OSP-7): Cross Dock / Warehouse One (1) Diesel-Fired Emergency Generator (Unit OSP-7-EG1) & One (1) Fire Pump Engine (Unit OSP-7-FP1)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, 22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and the City of Huntsville Air Pollution Control Rules and Regulations, Ordinance 72-156, as amended ("COHRAR") and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to operate the equipment, device(s) or other article(s) described above.

Pursuant to the Clean Air Act of 1990, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management ("ADEM"), the City of Huntsville Division of Natural Resources and Environmental Management ("the Department"), and citizens in general. Those provisions which are not required under the Clean Air Act of 1990 are considered to be local permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

Date of Issuance: July 27, 2020

DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA

PSD AIR PERMIT
TABLE OF CONTENTS

I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..... 5

Mazda Toyota Manufacturing U.S.A., Inc. (MTMUS)
9000 Greenbrier Parkway NW
Huntsville, Alabama 35756

I. FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

I.A. General Air Pollution Control Requirements

1. Duty to Comply

The permittee shall comply with all conditions of the City of Huntsville Rules and Regulations (COHRAR). Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and COHRAR, and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance or modification; or denial of a permit renewal application by the permittee.

2. Operation of Capture and Control Devices

All air pollution control devices and capture systems for which this Permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emissions of air contaminants shall be established.

3. Circumvention

The permittee shall not cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate this Permit or COHRAR.

I.B. General Monitoring, Inspection, Record-Keeping and Reporting Requirements

1. Monitoring, Records and Reporting

(A) The Director may require the permittee to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions in accordance with such methods, at such locations and intervals, and using such procedures and provide such emissions reports as are prescribed by the Director to demonstrate compliance with the terms of this Permit and with COHRAR.

(B) Records and Reports as the Director shall prescribe on air contaminants or fuel shall be recorded, compiled, and submitted on forms provided by the Director or in formats approved by the Director.

(C) All required sampling and testing shall be made and the results calculated in accordance with sampling and testing procedures and methods approved by the Director. All required

samples and tests shall be made under the direction of persons qualified by training and/or experience in the field of air pollution control. To the extent practicable, test methods and procedures established by Part 60, Part 61, and Part 63 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised, shall be employed.

(D) Sampling and testing facilities adequate to facilitate sampling and testing as required under section I.B.1(C) above will be provided and maintained by the permittee.

2. Inspection and Entry

(A) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the City of Huntsville Division of Natural Resources & Environmental Management ("the Department") to enter upon the permittee's premises on or at which an air contaminant source is located or is being constructed, installed, or established at any reasonable time to ascertain the state of compliance with this Permit and the COHRAR.

(B) No person shall obstruct, hamper, or interfere with any such inspection initiated under I.B.2(A) above.

(C) If requested, the owner or operator shall receive a report from the Director which sets forth the findings of the inspection initiated under I.B.2(A) above with respect to compliance status.

3. Display of Permit

The permittee shall keep this Permit under file or on display at all times at the permitted facility and shall make this Permit available for inspection by any and all persons who may request to see it.

4. Equipment Maintenance or Breakdown

(A) In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least twenty-four (24) hours prior to the planned shut-down. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.

(B) In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, the person responsible for such equipment shall notify the Department within an additional twenty-four (24) hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.

I.C. Permit Modification, Renewal, and Termination

1. Transfer

This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another.

2. New Air Pollution Sources

(A) A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

(B) Every application for a permit shall be filed in the manner and form prescribed by the Director and shall give all the information necessary to enable the Director to make the determination required by COHRAR Part 3.3.

3. Revocation for Cause

This Permit may be revoked for any of the following causes:

(A) Failure to comply with any condition of this Permit or COHRAR.

(B) Failure to notify the Director prior to operation of any article, machine, equipment, or other contrivance subject to the requirements of COHRAR § 3.1.2(a).

(C) Failure to establish and maintain such records, make such reports, or install, use, or maintain such monitoring equipment or methods; and sample such emissions in accordance with such methods at such locations, intervals and procedures as the Director may prescribe in accordance with COHRAR § 1.9.2.

(D) Failure to allow the Director or his authorized representative upon proper identification to:

(1) enter any premises, at reasonable times, where any article, machine, equipment, or other contrivance described in COHRAR § 3.1.2 is located or in which any records required to be kept by this Permit or by COHRAR are located;

(2) have access to and copy any records required to be kept by this Permit or by COHRAR;

(3) inspect any monitoring equipment or practices being maintained pursuant to this Permit or COHRAR; OR

(4) have access to and sample any discharge of air contaminants resulting directly or indirectly from the operation of any article, machine, equipment or other contrivance described in COHRAR § 3.1.2.

(E) Failure to comply with the provisions of an administrative order issued by the Director concerning the permitted facility.

(F) For any other cause, after a hearing which establishes, in the judgment of the Director, that continuance of this Permit is not consistent with the purpose of the Act or regulations under it, or is not consistent with the purposes of the Federal Clean Air Act or regulations under it.

4. Major Source Operating Permit Application

As the facility subject to this Permit is also subject to the requirements of 40 CFR Part 70, application for issuance of the facility's initial Major Source Operating Permit (MSOP) must be made within twelve (12) months of startup of the process equipment identified in this Permit.

I.D. Emergency Provisions

1. Emergency Procedure

The permittee shall comply with the provisions of an emergency order to immediately reduce or discontinue the emission of air contaminants, if the Director finds that such action is necessary to protect human health or safety, in accordance with COHRAR § 2.9.

2. Emission Reduction Standby Plan

Within thirty (30) days of receipt of a written request from the Director, the permittee shall prepare and submit a standby plan for reducing the emissions of air contaminants during periods of an Episode Alert, Warning, and Emergency. The standby plan is subject to approval by the Director.

I.E. Authority of Department

Nothing in the permit or conditions thereto shall negate any authority granted to the Division of Natural Resources or the Alabama Department of Environmental Management pursuant to the Alabama Environmental Management Act or regulations issued thereunder. [§ 22-28-23, Code of AL 1975, as amended]

II. NON-FEDERALLY ENFORCEABLE GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

II.A. Objectionable Odors

This permit is issued with the condition that the operation of this facility by the owner or operator will not result in the emission of objectionable odors as defined in COHRAR Part 6.7.

III. FACILITY-SPECIFIC FEDERALLY ENFORCEABLE PERMIT CONDITIONS

III.A. Applicability

1. This source is subject to PSD-BACT emission limitations.

2. This unit is subject to the opacity emission rate limits.

3. These units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Stationary Reciprocating Internal Combustion Engines (ZZZZ) as a "New Source".

4. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.B. Emission Standards

1. The Emergency stationary CI RICE unit(s) shall:
a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
d. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

2. Only Low Sulfur Diesel Fuel (15 ppm) with a sulfur content of 15 ppm or less may be used as fuel in the diesel fueled emergency generator(s) and/or the diesel fueled emergency fire pump(s).

3. Each emergency generator and fire pump engine must be equipped with a non-resettable hour meter.

4. Only one single diesel fueled emergency generator or diesel fueled emergency fire pump(s) may be operated on any calendar day for maintenance or testing purposes. This proviso does not apply to emergency use purposes.

5. The stack(s) associated with this (these) source(s) shall not exhibit greater than 10% opacity measured in accordance with 40 CFR Part 60, Appendix A, Method 9 per COHRAR § 6.1.2. If opacity of 5% or greater is observed from a stack, the operator shall investigate the cause and make any necessary corrective actions.

6. MTMUS shall utilize good work practices that are practically and economically feasible that reasonably minimize diesel usage in all operations. Diesel fuel will be handled in such a way as to minimize VOC emissions from storage, handling, and cleanup. Fresh or spent diesel fuel will be stored in closed containers.

7. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

III.C. Compliance and Performance Test Methods and Procedures

1. Method 9 as defined in 40 CFR 60, Appendix A, or equivalent method as approved by the Department, shall be used in the determination of the opacity of the stack emissions.

III.D. Emission Monitoring

1. The monitoring requirements in this permit shall be as required in Section III.E--Recordkeeping and Reporting Requirements.

III.E. Recordkeeping and Reporting Requirements

1. Records of engine usage must be kept in a permanent form suitable for inspection. These records should record if the usage was for emergency, maintenance checks, readiness checks, or other usage. The records shall be retained for at least five years from the date of generation and available upon request.

2. These units shall comply with the applicable requirements of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (IIII) as defined in 40 CFR Part 60, Subpart (IIII) §60.4200-4219.

3. Billing statements from supplier(s) may be used to record the sulfur content of diesel fuel supplied. Such records shall be maintained and prepared in a form suitable for inspection within thirty (30) days of the end of the calendar month during which the fuel was received.

4. The following federal requirements apply to these unit(s):

(A) *Requirements for emergency stationary ICE.* If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (2)(i) through (iii) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (2)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (2)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2)(ii) of this section. Except as provided in paragraph (3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income

for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;
(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
(D) The power is provided only to the facility itself or to support the local transmission and distribution system.
(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.