Final Determination on the Application of
DaikyoNishikawa USA, Inc. (DNUS) – OSP-4
Huntsville, AL
7-08-P391-Z408
Prevention of Significant Deterioration of Air Quality Permit

The Department proposes issuing DaikyoNishikawa USA, Inc. (DNUS; OSP-4), one (1) new Prevention of Significant Deterioration (PSD) of Air Quality permit for the ongoing construction on an automobile manufacturing campus. The permit is for the DNUS facility only (no modifications are included in this permitting effort for the JV Facility or other On-Site Providers (OSPs)). Future request(s) to modify any operation covered under any of the permits held by DNUS, the MTMUS JV facility, or any other 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 for this permitting effort was held from August 9, 2021, until September 8, 2021. No comments were received during the public comment period. The only changes made to the draft permit package after the end public comment period are minor corrections detailed in Attachment 1. The proposed final permit can be found in Attachment 2 of this document. I recommend that the Air Permit with the attached permit provisos in Attachment 2 be issued as proposed.

Scott Cardno

Date

September 27, 2021
ATTACHMENT 1
<table>
<thead>
<tr>
<th>DOCUMENT</th>
<th>PROVISO/SECTION</th>
<th>REASON FOR CHANGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>7-08-P391-Z408</td>
<td>Cover Page - Description of Source</td>
<td>Removed &quot;Toyota Line&quot; from Description of Source as the permit is for touch-up booths for both the Mazda and Toyota Lines.</td>
</tr>
<tr>
<td>III.A.3 &amp; III.A.4</td>
<td></td>
<td>Added since DRAFT to cover possible future use of HAP-containing materials.</td>
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<tr>
<td>III.E.1(D)</td>
<td></td>
<td>Removed &quot;and demonstrated destruction efficiency of the thermal oxidizers.&quot; from the first sentence. No thermal oxidizers were proposed for this source or referenced in any other part of the DRAFT permit. This was a template error.</td>
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ATTACHMENT 2
CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: DaikyoNishikawa USA, Inc. (DNUS)

Location: 9000 Greenbrier Parkway NW, Unit #95

Huntsville, Alabama 35756

Permit Number(s)  Description of Source(s)
7-08-P391-2408 ON SITE PARTNER (OSP-4): Plastic Shop

Touch-Up Coating Booths
(Unit OSP-4-SMTUB, OSP-4-PPTUB)

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.

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Date of Issuance: September 27, 2021

Scott Cordino
DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA
PSD AIR PERMIT
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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.


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 standards.

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

3. Hazardous Air Pollutant (HAP) containing materials are not proposed for use at this source. Should HAP-containing materials be incorporated in the future, this source will become subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP).

4. HAP-containing materials are not proposed for use at this source. Should HAP-containing materials be incorporated in the future, this source will become subject to 112g emission limitations.

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Unit OSP-4-SMTUB and Unit OSP-4-PPTUB) shall not exceed 11.5 tons per year (TPY) in any consecutive rolling 12-month period.

2. 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.

3. VOC BACT: This source 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 VOC content by weight of each 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.

2. The HAP content by weight of each 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.

3. 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.

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.

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. The 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 be used to determine proper control device operation.

3. Whenever maintenance checks required in proviso III.D.2 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.

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-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 limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC 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 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. A log book or electronic records of the twice weekly maintenance checks required in proviso III.D.2 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.3.