Final Determination on the Application of
DaikyoNishikawa USA, Inc. (DNUS) – OSP-4
Huntsville, AL
7-08-P391-Z401, Z402, Z403, & Z404
Prevention of Significant Deterioration of Air Quality Permit

The Department proposes issuing DaikyoNishikawa USA, Inc. (DNUS; OSP-4), four (4) revised Prevention of Significant Deterioration (PSD) of Air Quality permits 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 31, 2021, until September 30, 2021. No comments were received during the public comment period. No changes were made to the draft permit package after the end public comment period. The proposed final permits can be found in Attachment 1 of this document. I recommend that the Air Permit with the attached permit provisos in Attachment 1 be issued as proposed.

Scott Cardno

October 7, 2021
Date
ATTACHMENT 1
CITY OF HUNTSVILLE
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION

PSD AIR PERMIT

Issued to: DaihyouNishikawa USA, Inc. (DNUS)

Location: 9000 Greenbrier Parkway NW, Unit #95
          Huntsville, Alabama 35756

Permit Number(s) Description of Source(s)

7-08-P391-Z401 ON SITE PARTNER (OSP-1): Plastic Shop Toyota Line

Plastic Parts Spray Booth and Oven with Thermal Oxidizer
   (Waterborne Option) (Unit OSP-1-T3)

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: October 7, 2021

[Signature]
DIRECTOR
NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA
I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

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II. FACILITY SPECIFIC PERMIT CONDITIONS

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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
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.

(F) 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 limitations.

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

3. This source is 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) as a “New Source”.

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

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Waterborne) (Unit OSP-4-T3) shall not exceed 143.5 tons per year (TPY) in any consecutive rolling 12-month period.

2. This source (Plastic Parts Spray Booths)(OSP-4-T3) is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581 to include §63.4490 (a)(1) (0.22 pounds VHAP/gallon of coating solids/each 12-month compliance period).

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>MONTHLY VOC EMISSION LIMIT lb./vehicle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Toyota Line (Waterborne) (Unit OSP-4-T3)</td>
<td>1.15</td>
</tr>
<tr>
<td>Plastic Parts Primer Booth, Basecoat Booth, Clearcoat Booth, and Curing Oven (Unit OSP-4-NG5)</td>
<td></td>
</tr>
<tr>
<td>and Thermal Oxidizer (Unit OSP-4-NG6)</td>
<td></td>
</tr>
</tbody>
</table>
4. This source is subject to the BACT limits below:

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>VOC BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Parts Exhaust Thermal Oxidizer</td>
<td>95% Removal Efficiency</td>
</tr>
<tr>
<td>(Unit OSP-4-NG6)</td>
<td></td>
</tr>
</tbody>
</table>

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) shall not emit greater than 0.44 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) shall not emit greater than 0.36 pounds of NOx/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

5. 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.

6. The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) 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.

7. The following units will be captured and directed to the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6):

   Toyota Line (Waterborne) (Unit OSP-4-T3):
   Plastic Parts Clearcoat Booth and Curing Oven (Unit OSP-4-NG5)

   OSP-4 may change the number of thermal oxidizers and specific zones of Units OSP-4-T3 exhausted to the thermal oxidizers; however, OSP-4 must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

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

   The source 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.
9. 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.

10. VOC BACT: The 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.

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>PARTICULATE BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Toyota Line Waterborne Plastic Parts Spray Booth (Unit OSP-4-T3)</td>
<td>0.3</td>
</tr>
</tbody>
</table>

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 approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method 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 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 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 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 Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) at intervals not to exceed 5 years 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, or equivalent methods as approved by the Department, as appropriate and as required by the Department.

3. A continuous recorder for the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) 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 applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

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 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 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.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer. 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 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 (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. This source is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

7. 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.

8. 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 by the process operation.

(D) The estimated averaged destruction efficiency of the thermal oxidizer.
(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer 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: DaikyoNishikawa USA, Inc. (INUS)

Location: 9000 Greenbrier Parkway NW, Unit #95
Huntsville, Alabama 35756

Permit Number(s) Description of Source(s)

7-08-P391-Z402 ON SITe PARTNER (OFP-4): Plastic Shop Toyota Line

Plastic Parts Spray Booth and Oven with Thermal Oxidizer (Solvent-borne Option) (Unit OFP-4-T3)

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: October 7, 2021

[Signature]
DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA
PSD AIR PERMIT
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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 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) as a “New Source”.

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

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Toyota Line (Solventborne) (Unit OSP-4-T3) shall not exceed 173.0 tons per year (TPY) in any consecutive rolling 12-month period.

2. This source (Plastic Parts Spray Booths)(OSP-4-T3) is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581 to include §63.4490 (a)(1) (0.22 pounds VHAP/gallon of coating solids/each 12-month compliance period).

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>MONTHLY VOC EMISSION LIMIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Toyota Line (Solventborne) (Unit OSP-4-T3)</td>
<td>1.38</td>
</tr>
<tr>
<td>Plastic Parts Primer Booth, Basecoat Booth, Clearcoat Booth, and Curing Oven (Unit OSP-4-NG5) and Thermal Oxidizer (Unit OSP-4-NG6)</td>
<td></td>
</tr>
</tbody>
</table>

5
4. This source is subject to the BACT limits below:

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>VOC BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6)</td>
<td>95% Removal Efficiency</td>
</tr>
</tbody>
</table>

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) shall not emit greater than 0.48 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) shall not emit greater than 0.52 pounds of NOx/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

5. 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.

6. The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) 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.

7. The following units will be captured and directed to the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6):

   Toyota Line (Solventborne) (Unit OSP-4-T3):
   Plastic Parts Clearcoat Booth and Curing Oven (Unit OSP-4-NG5)

   OSP-4 may change the number of thermal oxidizers and specific zones of Units OSP-4-T3 exhausted to the thermal oxidizers; however, OSP-4 must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

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

   The source 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.
9. 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.

10. VOC BACT: The 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.

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

| OPERATION                                                      | PARTICULATE BACT |
|                                                               | #/hour           |
| Toyota Line Solventborne Plastic Parts Spray Booth (Unit OSP-4-T3) | 0.3              |

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 approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method 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 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 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 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 Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) at intervals not to exceed 5 years 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, or equivalent methods as approved by the Department, as appropriate and as required by the Department.

3. A continuous recorder for the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG6) 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 be 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 applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

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 provisions 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 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 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 must have an 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.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer. 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 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 (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. This source is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

7. 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.

8. 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 by the process operation.

(D) The estimated averaged destruction efficiency of the thermal oxidizer.
(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer 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: DaikyoNishikawa USA, Inc. (DNUS)

Location: 9000 Greenbrier Parkway NW, Unit #95
Huntsville, Alabama 35756

Permit Number(s) Description of Source(s)

7-08-P391-Z403 ON SITE PARTNER (OSP-4): Plastic Shop Mazda Line
Plastic Parts Spray Booth and Oven with Thermal Oxidizer
(Waterborne Option) (Unit OSP-4-M4)

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.

Page 1 of 13 pages

Date of Issuance: October 7, 2021

[Signature]
DIRECTOR

NATURAL RESOURCES AND ENVIRONMENTAL
MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA
PSD AIR PERMIT
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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 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) as a "New Source".

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

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Waterborne) (Unit OSP-4-M4) shall not exceed 143.6 tons per year (TPY) in any consecutive rolling 12-month period.

2. This source (Plastic Parts Spray Booths)(OSP-4-M4) is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581 to include §63.4490 (a)(1) (0.22 pounds VHAP/gallon of coating solids/each 12-month compliance period).

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>MONTHLY VOC EMISSION LIMIT</th>
</tr>
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<tbody>
<tr>
<td>Mazda Line (Waterborne) (Unit OSP-4-M4)</td>
<td>1.15</td>
</tr>
<tr>
<td>Plastic Parts Primer Booth, Basecoat Booth, Clearcoat Booth, and Curing Oven (Unit OSP-4-NG12) and Thermal Oxidizer (Unit OSP-4-NG13)</td>
<td></td>
</tr>
</tbody>
</table>

5
4. This source is subject to the BACT limits below:

**OPERATION**

VOC BACT

Plastic Parts Exhaust 95% Removal Efficiency
Thermal Oxidizer (Unit OSP-4-NG13)

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) shall not emit greater than 0.46 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) shall not emit greater than 0.45 pounds of NOx/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

5. 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.

6. The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) 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.

7. The following units will be captured and directed to the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13):

- Mazda Line (Waterborne) (Unit OSP-4-M4):
- Plastic Parts Clearcoat Booth and Curing Oven (Unit OSP-4-NG12)

OSP-4 may change the number of thermal oxidizers and specific zones of Unit OSP-4-M4 exhausted to the thermal oxidizers; however, OSP-4 must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

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

The source 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.
9. 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.

10. VOC BACT: The 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.

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>PARTICULATE BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mazda Line Waterborne Plastic Parts Spray Booth (Unit OSP-4-M4)</td>
<td>0.4</td>
</tr>
</tbody>
</table>

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 approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method 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 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 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 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 Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) at intervals not to exceed 5 years 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, or equivalent methods as approved by the Department, as appropriate and as required by the Department.

3. A continuous recorder for the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) 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 be 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 applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

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 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 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.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer. 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 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 (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. This source is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

7. 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.

8. 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 by the process operation.

(D) The estimated averaged destruction efficiency of the thermal oxidizer.
(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer 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: Daikyo Nishikawa USA, Inc. (DNUS)

Location: 9000 Greenbrier Parkway NW, Unit #95
Huntsville, Alabama 35756

Permit Number(s) Description of Source(s)
7-08-P391-2404 ON SITE PARTNER (OSP-4): Plastic Shop Mazda Line
Plastic Parts Spray Booth and Oven with Thermal Oxidizer (Solvent-borne Option) (Unit OSP-4-M4)

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 72-155, 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.

Page 1 of 13 pages

Date of Issuance: October 7, 2021

[Signature]
DIRECTOR
NATURAL RESOURCES AND ENVIRONMENTAL MANAGEMENT DIVISION
CITY OF HUNTSVILLE, ALABAMA
I. GENERAL (FACILITY-WIDE) PERMIT CONDITIONS

GENERAL AIR POLLUTION CONTROL REQUIREMENTS ................. 1

II. FACILITY SPECIFIC PERMIT CONDITIONS

..................................................................................... 5
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 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) as a "New Source".

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

III.B. Emission Standards

1. Emission of Volatile Organic Compounds (VOCs) from this Unit, Mazda Line (Solventborne) (Unit OSP-4-M4) shall not exceed 172.3 tons per year (TPY) in any consecutive rolling 12-month period.

2. This source (Plastic Parts Spray Booths)(OSP-4-M4) is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581 to include §63.4490 (a)(1) (0.22 pounds VHAPl/gallon of coating solids/each 12-month compliance period).

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

<table>
<thead>
<tr>
<th>OPERATION</th>
<th>MONTHLY VOC EMISSION LIMIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mazda Line (Solventborne) (Unit OSP-4-M4)</td>
<td>1.38</td>
</tr>
<tr>
<td>Plastic Parts Primer Booth, Basecoat Booth, Clearcoat Booth, and Curing Oven (Unit OSP-4-NG12) and Thermal Oxidizer (Unit OSP-4-NG13)</td>
<td></td>
</tr>
</tbody>
</table>
4. This source is subject to the BACT limits below:

**OPERATION**

<table>
<thead>
<tr>
<th>Plastic Parts Exhaust</th>
<th>VOC BACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thermal Oxidizer (Unit OSP-4-NG13)</td>
<td>95% Removal Efficiency</td>
</tr>
</tbody>
</table>

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) shall not emit greater than 0.52 pounds of CO/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 10, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) shall not emit greater than 0.68 pounds of NOx/hour as measured in accordance with 40 CFR Part 60, Appendix A, Method 7, 7E, or equivalent method approved by the Department, if required to test by the Department (3-hour arithmetic average).

5. 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.

6. The Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) 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.

7. The following units will be captured and directed to the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13):

- Mazda Line (Solventborne) (Unit OSP-4-M4): Plastic Parts Clearcoat Booth and Curing Oven (Unit OSP-4-NG12)

OSP-4 may change the number of thermal oxidizers and specific zones of Unit OSP-4-M4 exhausted to the thermal oxidizers; however, OSP-4 must provide accurate descriptions of the zones going to the thermal oxidizers and must receive updated air permits prior to commencement of operation.

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

The source 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.
9. 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.

10. VOC BACT: The 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.

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

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<th>OPERATION</th>
<th>PARTICULATE BACT</th>
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</thead>
<tbody>
<tr>
<td>Mazda Line Solventborne Plastic Parts Spray Booth (Unit OSP-4-M4)</td>
<td>0.4</td>
</tr>
</tbody>
</table>

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 approved by the Department, shall be used in the determination of particulate emissions from the stack.

4. Method 7 or 7E as defined in 40 CFR 60, Appendix A, or equivalent method 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 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 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 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 Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) at intervals not to exceed 5 years 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, or equivalent methods as approved by the Department, as appropriate and as required by the Department.

3. A continuous recorder for the Plastic Parts Exhaust Thermal Oxidizer (Unit OSP-4-NG13) 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 be 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 applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (P PPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

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 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 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 must have an 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.

4. A recording-type temperature measuring device shall be used to measure and record the temperature in the combustion chamber of the thermal oxidizer. 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 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 (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. This source is subject to the applicable emissions standards of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) Emissions from Surface Coating of Plastic Parts and Products (PPPP) as defined in 40 CFR 63, Subpart PPPP §63.4480-4581.

7. 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.

8. 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 by the process operation.

   (D) The estimated averaged destruction efficiency of the thermal oxidizer.
(E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.

(F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer 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.