

AIR QUALITY PERMIT

Permit No.
3714-297-0038-B-01-0

Effective Date
January 11, 2016

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: **Hitachi Automotive Systems Americas, Inc.**

Mailing Address: 1000 Unisia Drive
Monroe, Georgia 30655

is issued a Permit for the following:

The operation of an automobile parts manufacturing facility including spray paint booth and air pollution control equipment.

Facility Location: 1000 Unisia Drive
Monroe, Georgia 30655 (Walton County)

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 23555 dated October 2, 2015; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages.

[Signed]

Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.
- 2.2 The Permittee shall not cause, let, permit, suffer, or allow the rate of emissions from each manufacturing process particulate matter in total quantities equal to or exceeding the allowable rate calculated as follows:

$$E = 4.1P^{0.67}; \text{ for process input weight rate up to and including 30 tons per hour}$$
$$E = 55 P^{0.11} - 40; \text{ for process input weight rate above 30 tons per hour}$$

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Where

E = emission rate in pounds per hour

P = process input weight rate in tons per hour, excluding moisture

- 2.3 The Permittee shall comply with the 40 CFR 60, Subpart A "General Provisions" and 40 CFR 60, Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" for operation of the spark ignition emergency generators manufactured on or after January 1, 2009; including generator GEN1.

[40 CFR 60, Subparts A and JJJJ]

- 2.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the diesel generators with (Source Code GEN1), emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) in an amount exceeding the emissions standards specified in Table 1 of 40 CFR 60 Subpart JJJJ, 40 CFR 60.4233(e), as indicated in Table 2.8-1:

Table 2.8-1: NSPS 40 CFR Part 60. Subpart JJJJ Emission Standards For Stationary 2009 and later Model Year Spark Injection With A Maximum Power Of Larger Than 130 HP, with emission limits in terms of g/kW-hr (lb/HP-hr)

Emergency Generator GEN1 (149HP, (113 kW))

Pollutant →	NO _x	CO	VOC
Emission Limit →	2.0 (0.00441)	4.0 (0.00882)	1.0 (0.0022)

- 2.5 The accumulated non-emergency service (maintenance checks and readiness testing) time for each emergency generator covered in Permit Condition 2.3 shall not exceed 100 hours per year. Any operation other than emergency operation, maintenance checks and readiness testing is prohibited.

[40 CFR 60.4211(f) and 40 CFR 60.4243(d)]

- 2.6 The Permittee shall comply with all applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of generators that are not classified as exempt under 40 CFR 63.6585(f)(3).

[40 CFR 63, Subparts A and ZZZZ]

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3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.
- 3.2 The Permittee shall comply with Georgia Air Quality Control Rule 391-3-1-.02 (2)(n), "Fugitive Dust", for the entire processing facility including all roadways and processing equipment not otherwise subject to any other rule or regulation governing fugitive visible emissions. Subject to this rule, the Permittee shall not cause, let, permit, suffer or allow visible emissions from any fugitive source to equal or exceed 20% opacity.

4. Process & Control Equipment

- 4.1 Emergency generator covered in Permit Condition 2.3 shall be operated and maintained according to the manufacturer's written specifications/instructions or procedures developed by the Permittee that are approved by the engine manufacturer, over the entire life of the engine.
[40 CFR 60.4211(a) and 40 CFR 60.4234]

5. Monitoring

- 5.1 The Permittee shall monitor and record the water discharge pressure from the water pumps supplying the water curtain controlling the PM emissions from Paint Booth Oven (PB1) once per day of operation. The pressure monitoring device(s)/system(s) shall meet the applicable performance specifications of the Division's monitoring requirements.
- 5.2 The Permittee shall install, calibrate, maintain, and operate a non-resettable continuous monitoring system (or device) for each emergency generator to track the hours operated during emergency service and the hours of operation in non-emergency service (maintenance and/or testing), to record the reason the engine was in operation during those time, and to record the cumulative total hours of operation. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[40 CFR 60.4209, 40 CFR 60.4237 and 391-3-1-.02(6)(b)1]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
 - a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

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- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall report any incident that the water discharge pressure from any of the pumps supplying water curtains as measured according to Condition 5.1 drifts outside its established working range, and is not corrected within twelve (12) hours of the occurrence.
- 7.2 The Permittee shall maintain monthly operating records for each emergency generator in emergency and non-emergency service, as recorded on the non-resettable hour meter required for generator GEN1 in Condition 5.2. The Permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. Records shall be maintained for a period of five (5) years in a format suitable for inspection by or submission to the Division.
[Avoidance of 40 CFR 70 and 391-3-1-.02(6)(b)1]
- 7.3 The Permittee shall use monthly emergency and non-emergency service operating time data required by Condition 7.2 to calculate monthly the twelve-month rolling total of the emergency and non-emergency service operating time for each generator for each consecutive twelve-month period. All the calculations shall be kept as part of the records required in Condition 7.2. The Permittee shall notify the Division in writing within 15 days if any of the twelve-month rolling total service operating time equals or exceeds 100 hours. This notification shall include an explanation of how the Permittee intends to attain future compliance with Condition 2.5.
[391-3-1-.02(6)(b)1]

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 All Georgia Air Quality Permits previously issued to this facility, including Air Quality Permit No. 3714-147-12500, are hereby revoked in their entirety.