



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

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 Astemo Americas, Inc.
Facility Address: 1000 Unisia Drive
Monroe, Georgia 30655 Walton County
Mailing Address: 1000 Unisia Drive
Monroe, Georgia 30655
Facility AIRS Number: 04-13-297-00038

is issued a Permit for the following:

Operation of an automobile parts manufacturing facility and for the construction and operation of a new paint booth PB1 to replace a previous booth and change of paint.

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. 28827 dated April 18, 2023; 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 6 pages.



Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division

**State of Georgia
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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.
[391-3-1-.02(2)(b)1.]

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2.2 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)1.]

- a. $E = 4.1P^{0.67}$, for process input weight rate up to and including 30 tons per hour;
- b. $E = 55P^{0.11} - 40$, for process input weight rate in excess of 30 tons per hour.

Where:

E = allowable emission rate in pounds per hour;
P = process input weight rate in tons per hour.

2.3 The Permittee shall not burn any fuel other than natural gas at the facility.
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g) (subsumed)]

3. Fugitive Emissions

3.1 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any operation, process, handling, and transportation or storage facility. The opacity from any fugitive dust source shall not equal or exceed twenty percent. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:
[391-3-1-.02(2)(n)]

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open-bodied trucks, transporting materials likely to give rise to airborne dust; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.

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4. Process & Control Equipment

- 4.1 Routine maintenance shall be performed on all air pollution control equipment. The Permittee shall record and maintain records of routine maintenance in a form suitable for inspection or submittal to the Division.
- 4.2 The Permittee shall ensure emissions from the Paint Booth PB1 is controlled by the air filter at all times the associated spray booth is in operation. The Permittee shall perform filter changes for the spray booth within 24 hours of whenever the static pressure drop across the filter system falls outside the manufacturer's recommended value.
[391-3-1-.02(a)(10)]
- 4.3 The Permittee shall ensure emissions from the Paint Booth PB2 is controlled by the water curtain at all times the associated spray booth is in operation. The Permittee shall perform maintenance for this spray booth within 24 hours of whenever the pressure drop across the filter systems falls outside the manufacturer's recommended value.
[391-3-1-.02(a)(10)]
- 4.4 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions, and shall store all VOC-laden cleaning materials – including shop towels, rags and mop heads – in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition.
[391-3-1-.02(2)(a)10]

5. Monitoring

- 5.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1]
 - a. Pressure drop across the filter for Paint Booth PB1. Data shall be recorded daily, if operated.
 - b. Water discharge pressure from the water pumps supplying the water curtain controlling the PM emissions from Paint Booth PB2. Data shall be recorded daily, if operated.

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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.
 - 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 maintain monthly usage records of all materials used at the facility that contain volatile organic compounds (VOC). These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the volatile content of any material disposed as waste provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1.]
- 7.2 The Permittee shall use the monthly usage records required in Condition 7.2 to calculate the total monthly VOC emissions from the facility, using the following equation:
[391-3-1-.02(6)(b)1.]
- a. $VOC_i \text{ (lbs)} = \text{Material used (lbs)} * (\% \text{weight VOC}); \text{ or}$
 - b. $VOC_i \text{ (lbs)} = \text{Material used (gallons)} * (\text{VOC Content lbs/gallon});$

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- c. $VOC_w \text{ (lbs)} = \text{Waste Material (lbs)} * (\% \text{weight VOC}); \text{ or}$
- d. $VOC_w \text{ (lbs)} = \text{Waste Material (gallons)} * (\text{VOC Content lbs/gallon})$
- e. $\text{Total VOC (lbs)} = (\sum_{i=1}^n VOC_i - \sum_{w=1}^n VOC_w)$

All variables used in the calculation, including any Division-approved emission factors, or control efficiencies shall be kept as part of the monthly records.

- 7.3 The Permittee shall use the monthly emissions calculated in Condition 7.2 to calculate total monthly emissions of VOC emitted from the entire facility. All variables used in the calculations, including any Division-approved emission factors, control efficiencies or coating transfer efficiencies, shall be kept as part of the monthly records.
[391-3-1-.02(6)(b)1]
- 7.4 The Permittee shall use the monthly emissions calculated in accordance with Condition 7.3 to determine the total VOC emissions from the entire facility for the consecutive twelve-month period ending in each calendar month. The Permittee shall notify the Division in writing if, during any consecutive twelve-month period, the VOC emissions equal or exceed 100 tons. This notification shall be postmarked by the fifteenth day of the following month.
[391-3-1-.02(6)(b)1]
- 7.5 The Permittee shall maintain monthly usage records of all materials used at the facility that contain one or more listed hazardous air pollutants (HAP). These records shall include the total weight of each material used and the amount of each listed HAP contained in each material (expressed as a weight percentage). The Permittee may subtract from the monthly usage the individual HAP content of any material disposed as waste provided that the total weight, the individual HAP content (expressed as a weight percentage), and documentation of the method for determining the individual HAP content of any such waste material be included as part of the record. All other calculations used to determine usages should also be kept as part of the monthly record.
[391-3-1-.02(6)(b)1.]
- 7.6 The Permittee shall use the records required by Condition 7.5 to determine the hazardous air pollutant emissions from the entire facility for each month, using the following equation:
[391-3-1-.02(6)(b)1.]

- a. $HAP_i \text{ (lbs)} = \text{Material used (lbs)} * (\% \text{weight HAP}); \text{ or}$
- b. $HAP_i \text{ (lbs)} = \text{Material used (gallons)} * (\text{HAP Content lbs/gallon});$
- c. $HAP_w \text{ (lbs)} = \text{Waste Material (lbs)} * (\% \text{weight HAP}); \text{ or}$
- d. $HAP_w \text{ (lbs)} = \text{Waste Material (gallons)} * (\text{HAP Content lbs/gallon})$

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e. Total Individual HAP (lbs) = $(\sum_{i=1}^n HAP_i - \sum_{w=1}^n HAP_w)$

All variables used in the calculation, including any Division-approved emission factors, or control efficiencies shall be kept as part of the monthly records.

- 7.7 The Permittee shall use the monthly emissions calculated in Condition 7.6 to calculate total monthly individual and combined hazardous air pollutant emissions from the entire facility. All variables used in the calculations, including any Division-approved emission factors, control efficiencies or coating transfer efficiencies, shall be kept as part of the monthly records.

[391-3-1-.02(6)(b)1]

- 7.8 The Permittee shall use the calculations required by Condition 7.7 to determine the total individual and combined hazardous air pollutant emissions from the entire facility for each twelve consecutive month period. The Permittee shall notify the Division in writing if, during any twelve consecutive month period, the emissions of any individual hazardous air pollutant equal or exceed 10 tons, or if the emissions of all listed hazardous air pollutants combined equal or exceed 25 tons. This notification shall be postmarked by the fifteenth day of the following month.

[391-3-1-.02(6)(b)1.]

- 7.9 The Permittee shall maintain a log of the pressure drop monitoring required by Condition 5.1a. As a minimum, the record shall include the date and time of the observation, the filter manufacturer's recommended maximum pressure drop, the observed pressure drop, and note if the filter media was changed.

[391-3-1-.02(2)(a)10]

- 7.10 The Permittee shall maintain a log of the water discharge pressure from the water pumps supplying the water curtain required by Condition 5.1b. As a minimum, the record shall include the date and time of the observation, the filter manufacturer's recommended maximum pressure drop, the observed pressure drop, and note if the filter media was changed.

[391-3-1-.02(2)(a)10]

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.

- 8.3 All Georgia Air Quality Permits previously issued to this facility, including Air Quality Permit No. 3714-297-0038-B-02-0 and its amendments, are hereby revoked in their entirety.