

Commonwealth of Kentucky  
Division for Air Quality  
***STATEMENT OF BASIS / SUMMARY***

Title V, Construction/Operation  
Permit: V-26-045

Adient US LLC - Georgetown Plant  
824 Lemons Mill Road, Georgetown, KY 40324

August 21, 2026  
Colby Freeman, Reviewer

Source ID: 21-209-00020  
Agency Interest #: 3911  
Activity ID: APE20260001

**Table of Contents**

|                                                                         |           |
|-------------------------------------------------------------------------|-----------|
| <b>SECTION 1 - SOURCE DESCRIPTION .....</b>                             | <b>2</b>  |
| <b>SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM .....</b>  | <b>3</b>  |
| <b>SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS .....</b>               | <b>4</b>  |
| <b>SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS .....</b>            | <b>10</b> |
| <b>SECTION 5 – COMPLIANCE ASSURANCE MONITORING .....</b>                | <b>11</b> |
| <b>SECTION 6 - PERMITTING HISTORY .....</b>                             | <b>12</b> |
| <b>SECTION 7 – PERMIT APPLICATION HISTORY .....</b>                     | <b>13</b> |
| <b>APPENDIX A – ABBREVIATIONS AND ACRONYMS .....</b>                    | <b>14</b> |
| <b>APPENDIX B – INDIRECT HEAT EXCHANGER EMISSIONS LIMITATIONS .....</b> | <b>15</b> |

## SECTION 1 - SOURCE DESCRIPTION

SIC Code and description: 3714, Motor vehicle parts and accessories

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☐ Yes ☒ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Scott

Nonattainment Area ☒ N/A ☐ PM<sub>10</sub> ☐ PM<sub>2.5</sub> ☐ CO ☐ NO<sub>x</sub> ☐ SO<sub>2</sub> ☐ Ozone ☐ Lead  
If yes, list Classification:

PTE\* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM<sub>10</sub> ☐ PM<sub>2.5</sub> ☐ CO ☐ NO<sub>x</sub> ☐ SO<sub>2</sub> ☒ VOC

PTE\* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM<sub>10</sub> ☐ PM<sub>2.5</sub> ☐ CO ☐ NO<sub>x</sub> ☐ SO<sub>2</sub> ☒ VOC

PTE\* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No

If yes, list which pollutant(s):

PTE\* greater than 25 tpy for combined HAP ☐ Yes ☒ No

\*PTE does not include self-imposed emission limitations.

### Description of Facility:

The source produces polyurethane foam automotive seat cushions using carousel manufacturing lines. Before the start of the molding operation, the interior surface of the molds is prepared so as to prevent the finished parts from sticking to the surface. A mixture of chemicals is poured into the molds, which are then sealed. The ensuing reaction generates carbon dioxide gas, which causes spatial expansion (blowing), resulting in the production of foam in the shape of the mold. The process does not require use of blowing agents. Once the foam is properly cured at room temperature, the part is removed and inspected for any tears and voids. These are repaired by application of a water-based adhesive glue and/or "cold foam" which is a cold curing formulation for filling voids. The facility is a major source for its Potential to Emit (PTE) of Volatile Organic Compounds (VOC), a non-hazardous, regulated air pollutant.

## SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-26-045

Activity: APE20260001

Application Received: 4/30/2026

Application Complete: 6/29/2026

Permit Action: ☐Initial ☒Renewal ☐Significant Rev. ☐Minor Rev. ☐Administrative

Construction/Modification Requested? ☐Yes ☒No NSR Applicable? ☐Yes ☒No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐Yes ☒No

### Description of Action:

On April 30, 2026, the Division for Air Quality received an application from Adient US LLC for a renewal of the Title V operating permit for its Georgetown Plant. The application seeks to add an insignificant activity, a 0.165 MMBtu/hr natural gas fired dryer, which was not previously represented in the permit. The Division made minor updates to the permit formatting and regulatory references.

| V-26-045 Emission Summary                      |                   |                    |
|------------------------------------------------|-------------------|--------------------|
| Pollutant                                      | 2025 Actual (tpy) | PTE V-26-045 (tpy) |
| CO                                             | 1.47              | 40.06              |
| NO <sub>x</sub>                                | 1.60              | 53.33              |
| PT                                             | 0.16              | 8.41               |
| PM <sub>10</sub>                               | 0.16              | 8.47               |
| PM <sub>2.5</sub>                              | 0.16              | 8.43               |
| SO <sub>2</sub>                                | 0.01              | 0.52               |
| VOC                                            | 99.70             | 291.72             |
| Greenhouse Gases (GHGs)                        |                   |                    |
| Carbon Dioxide                                 | 1,821             | 48,831             |
| Methane                                        | 0.04              | 0.97               |
| Nitrous Oxide                                  | 0.03              | 0.88               |
| CO <sub>2</sub> Equivalent (CO <sub>2</sub> e) | 1,830             | 49,092             |
| Hazardous Air Pollutants (HAPs)                |                   |                    |
| 2,4-Toluene Diisocyanate                       | 0.003             | 0.74               |
| Acrylonitrile                                  | 0.002             | 0.56               |
| Diethanolamine                                 | 0.0007            | 0.18               |
| Furan                                          | 0.003             | 0.68               |
| Hexane; N-Hexane                               | 0.02              | 0.72               |
| Methylene Diphenyl Diisocyanate                | 0.000003          | 0.001              |
| Styrene                                        | 0.005             | 1.13               |
| Combined HAPs:                                 | 0.037             | 3.73               |

### SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

| Emission Units 001-004 (EP01-EP04), Foam Production Carousels                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                      |                                                 |                                |                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------|--------------------------------------------------------------------|
| Pollutant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Emission Limit or Standard                                                           | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method                                                  |
| PM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | For $P \leq 0.50$ :<br>$E = 2.34$ ;<br>For $0.5 < P \leq 30$ :<br>$E = 3.59P^{0.62}$ | 401 KAR 59:010,<br>Section 3(2)                 | 0.0002 lb/lb, Mass balance     | Calculating hourly PM emission rate for each line on a daily basis |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 20% Opacity                                                                          | 401 KAR 59:010,<br>Section 3(1)(a)              | NA                             | Weekly Qualitative visual observations                             |
| <p><b>Initial Construction Date:</b> 01 and 02: November 1993, 03: March 1994, 04: May 1994.</p> <p><b>Process Description:</b><br/>Four (4) foam production carousels consisting of a demold/prep/paste area, a spray mold release station, a foam pour area, and a foam crushing station. EU 01 and 02 have a maximum operating rate of 1,159 lb/hr, while EU 03 and 04 have a maximum operating rate of 1,418 lb/hr. There are no control devices associated with these processes.</p> <p><b>Applicable Regulation:</b><br/><b>401 KAR 50:012</b>, <i>General application</i>.<br/><b>401 KAR 59:010</b>, <i>New process operations</i>.<br/><b>401 KAR 63:002</b>, Section 2(4)(nnnnn), 40 C.F.R. 63.11414 through 63.11420, Table 1 (<b>Subpart OOOOOO</b>), <i>National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources</i>.</p> <p><b>Comments:</b><br/>Particulate emissions are estimated from the foam production process via material balance of the mold release spray operation, and accounting for the particulate content in the sprayed solution as well as the transfer efficiency of the mold release agent. 2,4-Toluene Diisocyanate (TDI) emissions are estimated using a stack test performed at a sister plant. VOC and all other HAPs are calculated using mass balance from the material safety data sheets (MSDS) and the respective weight percentages.</p> <p>For compliance with 40 CFR 63, Subpart OOOOOO, material containing methylene chloride shall not be used as an equipment cleaner or in the mold release agent.</p> <p>For compliance with 401 KAR 50:012, the permittee submitted an analysis demonstrating control procedures that are reasonable, available and practical that was approved by the Division on November 9, 2011. As part of this plan, the permittee shall:</p> <ol style="list-style-type: none"> <li>1. Use gravity fed mold release agent supply system for feeding mold release compound to the carousel mold release station.</li> <li>2. Use hand held, high volume, low pressure spray application equipment for spray applied mold release agents at the carousel mold release station.</li> <li>3. Use programmed robots (to the extent possible) for mold release agent application.</li> <li>4. Deploy and use precise foam component metering and delivery at the foam pour station.</li> <li>5. Use non-VOC, mechanical foam shot clearing and purging for the cleaning step following foam</li> </ol> |                                                                                      |                                                 |                                |                                                                    |

**Emission Units 001-004 (EP01-EP04), Foam Production Carousels**

pouring.

For compliance with 401 KAR 59:010, the permittee performs qualitative visual observations on a weekly basis to determine compliance with the 20% opacity limit and calculate the monthly PM emissions to determine compliance with the lb/hr limits listed above.

**Emission Units 05a (EP05a) Diesel Fired Emergency Fire Pump Engine**

| Pollutant              | Emission Limit or Standard     | Regulatory Basis for Emission Limit or Standard                | Emission Factor Used and Basis                                               | Compliance Method                                                                                                                            |
|------------------------|--------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| NMHC + NO <sub>x</sub> | 4.0 g/KW-hr<br>(3.0 g/HP-hr)   | 40 CFR 60.4205(c)<br>and Table 4 to 40<br>CFR 60, Subpart IIII | VOC: 47.95 lb/Mgal<br>NO <sub>x</sub> : 604.17 lb/Mgal;<br>AP-42 Table 3.3-1 | Certified engine installed<br>and configured<br>according to the<br>manufacturer's<br>emission-related<br>specifications or<br>60.4211(g)(2) |
| CO                     | 3.5 g/KW-hr<br>(2.6 g/HP-hr)   |                                                                | 130.15 lb/Mgal;<br>AP-42 Table 3.3-1                                         |                                                                                                                                              |
| PM                     | 0.20 g/KW-hr<br>(0.15 g/HP-hr) |                                                                | 42.47 lb/Mgal;<br>AP-42 Table 3.3-1                                          |                                                                                                                                              |

**Initial Construction Date:** August 2024

**Process Description:**

**EP 05a:**

Model: Clarke (John Deere 6068) JU6H-UFADMG

Power output: 175 hp

Controls: None

**Applicable Regulation:**

**401 KAR 60:005, Section 2(2)(oooo)**, 40 C.F.R. 60.4200 through 60.4219, Tables 1 through 8 (**Subpart IIII**), *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.

**401 KAR 63:002, Section 2(4)(pppp)**, 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

**Comments:**

Potential emissions from the emergency engine calculated using AP-42 Chapter 3.3 tables 1 and 2. According to the Clarke Engine Sheet submitted with APE20240001, the engine has 6 cylinders and a total displacement of 6.8 L.

| <b>Emission Unit 006 (EP06) Diesel Fired Emergency Generator</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |  |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| <b>Initial Construction Date:</b> 2001                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |
| <b>EP 06:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |  |  |  |
| Model: Cummins, KTA50-G9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |  |  |  |
| Maximum hourly capacity: 14 mmBtu/hr (102.2 gal/hr)                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |  |  |
| Power output: 2000 hp                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |  |  |  |
| Controls: None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |  |  |  |
| <b>Applicable Regulation:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |  |  |  |
| <b>401 KAR 63:002, Section 2(4)(eeee)</b> , 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A ( <b>Subpart ZZZZ</b> ), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> .                                                                                                                                                                                                                                          |  |  |  |  |
| <b>Comments:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |  |  |  |
| Potential emissions from the emergency engines are calculated using AP-42 Chapter 3.3, Tables 3.2-1 and 3.2-2.                                                                                                                                                                                                                                                                                                                                                                                                  |  |  |  |  |
| For compliance with 40 CFR 63, ZZZZ the permittee shall change the oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, and replace as necessary and inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, and replace as necessary. |  |  |  |  |

| Emission Unit 19 (EP19), Natural Gas Fired Emergency Engine |                            |                                                 |                                |                                                                                |
|-------------------------------------------------------------|----------------------------|-------------------------------------------------|--------------------------------|--------------------------------------------------------------------------------|
| Pollutant                                                   | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method                                                              |
| CO                                                          | 4.0 g/hp-hr                | 40 CFR 60.4243(e)                               | 0.90 g/bhp-hr, (See Comments)  | Certified engine must be operated and maintained according to the manufacturer |
| NO <sub>x</sub>                                             | 2.0 g/hp-hr                |                                                 | 0.16 g/bhp-hr, (See Comments)  |                                                                                |
| VOC                                                         | 1.0 g/hp-hr                |                                                 | 0.42 g/bhp-hr, (See Comments)  |                                                                                |

**Initial Construction Date:** August 2019

**Process Description:**

**EP 19:**

Model: Generac, QT100 (Engine Family: KGNXB06.82C1, EPA Cert: KGNXB06.82C1-042)

Manufacture Date: May 16, 2019

Maximum hourly capacity: 1.24 mmBtu/hr (1260 scf/hr)

Power output: 149 hp (111 kW)

Controls: 3-way Catalyst (manufacturer installed) for the 4 Stroke Rich Burn Engine

**Applicable Regulation:**

**401 KAR 60:005, Section 2(2)(pppp)**, 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (**Subpart JJJJ**), *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*.

**401 KAR 63:002, Section 2(4)(eeee)**, 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and

**Emission Unit 19 (EP19), Natural Gas Fired Emergency Engine**

Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

**Comments:**

CO, NO<sub>x</sub>, and VOC are calculated using manufacturer emissions data. GHG's are calculated using 40 CFR 98, Subpart C Tables 1 and 2. All other emissions are calculated using AP-42 Chapter 3.2, Table 3.2-3.

This engine is located in the storage warehouse located at 840 Lemons Mill Road, not in the main production building.

**Emission Unit 20 (EP20), Natural Gas Fired Emergency Engine**

| Pollutant       | Emission Limit or Standard | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis   | Compliance Method                                                              |
|-----------------|----------------------------|-------------------------------------------------|----------------------------------|--------------------------------------------------------------------------------|
| CO              | 4.0 g/hp-hr                | 40 CFR 60.4243(e) and Table 1 of Subpart JJJJ   | 4.0 g/bhp-hr, Subpart JJJJ Limit | Certified engine must be operated and maintained according to the manufacturer |
| NO <sub>x</sub> | 2.0 g/hp-hr                |                                                 | 2.0 g/bhp-hr, Subpart JJJJ Limit |                                                                                |
| VOC             | 1.0 g/hp-hr                |                                                 | 1.0 g/bhp-hr, Subpart JJJJ Limit |                                                                                |

**Initial Construction Date:** August 2025 (Proposed)

**Process Description:**

Model: Generac, RG 15090 (Engine Family: SGNXB08.92N4)

Model Year: 2025

Maximum hourly capacity: 2.08 mmBtu/hr (2042 scf/hr)

Power output: 228 hp (168 kW)

**Applicable Regulation:**

**401 KAR 60:005, Section 2(2)(pppp)**, 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (**Subpart JJJJ**), *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*.

**401 KAR 63:002, Section 2(4)(eeee)**, 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*.

**Comments:**

CO, NO<sub>x</sub>, and VOC PTE are calculated based on the Subpart JJJJ limits for emergency engines with a maximum engine power of greater than or equal to 130 hp found in Table 1 of Subpart JJJJ. GHG's are calculated using 40 CFR 98, Subpart C Tables 1 and 2. All other emissions are calculated using AP-42 Chapter 3.2, Table 3.2-3.

This engine is intended to supply electrical power to Building 2 in emergency events only.

| Emission Units 7-1 to 7-12, 008 and 009, Indirect Heat Exchangers                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                    |                                                 |                                |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------|--------------------------------|-----------------------------------|
| Pollutant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Emission Limit or Standard         | Regulatory Basis for Emission Limit or Standard | Emission Factor Used and Basis | Compliance Method                 |
| SO <sub>2</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7-1 to 7-12 and 008: 1.27 lb/mmBtu | 401 KAR 59:015, Section 5(1)(c)1                | 0.6 lb/mmscf, AP-42 Ch 1.4     | Assumed while burning Natural Gas |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 009: 1.26 lb/mmBtu                 |                                                 |                                |                                   |
| PM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 0.34 lb/mmBtu                      | 401 KAR 59:015, Section 4(1)(c)                 | 7.6 lb/mmscf, AP-42 Ch. 1.4    |                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 20% Opacity                        | 401 KAR 59:015, Section 4(2)                    | NA                             |                                   |
| <b>Initial Construction Date:</b> 7-1 to 7-12 and 008: 1999, 009: 2001                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                    |                                                 |                                |                                   |
| <b>Process Description:</b><br><b>EP 7-1 to EP 7-12: Twelve (12) Make-up air units used for Seasonal Space/Comfort Heating</b><br>Maximum hourly capacity: 6.48 mmBtu/hr each<br>Controls: None<br><br><b>EP 008: One Make-up air unit used for Seasonal Space/Comfort Heating</b><br>Maximum hourly capacity: 3.24 mmBtu/hr<br>Controls: None<br><br><b>EP 009: Back-up boiler</b><br>This boiler is used as an emergency heat supply to keep the fire suppression tank water from freezing.<br>Maximum hourly capacity: 1.2 mmBtu/hr<br>Controls: None                                                                      |                                    |                                                 |                                |                                   |
| <b>Applicable Regulation:</b><br><b>401 KAR 59:015</b> , <i>New indirect heat exchangers.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                    |                                                 |                                |                                   |
| <b>State-Origin Requirements:</b><br><b>401 KAR 63:020</b> , <i>Potentially Hazardous matter or toxic substances.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                    |                                                 |                                |                                   |
| <b>Comments:</b><br>GHG’s are calculated using 40 CFR 98, Subpart C Tables 1 and 2, all other emissions are calculated using AP-42 Chapter 1.4 Tables 1, 2 and 3.<br><br>To comply with 401 KAR 59:015, Section 7, the permittee shall keep records of manufacturer’s recommended procedures for startup and shutdown, or recommended procedures for a unit of similar design for which manufacturer’s recommended procedures are available, as approved by the Cabinet.<br><br>The permittee confirmed the make-up air units contain a heat exchanger and therefore are not direct fired in an email dated December 7, 2020. |                                    |                                                 |                                |                                   |

**Emission Unit 10 (EP10) Portable Generator Engine**

**Initial Construction Date:** 2007

**Process Description:**

**EP10: Portable Generator (with Welder)**

Power Rating: 23 HP

Fuel: Propane

Construction Date: 2007

Controls: None

**Applicable Regulation:**

**401 KAR 59:010, *New process operations*.** Applies to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates. Because 40 CFR 63, Subpart ZZZZ does not apply as explained below, there are no other applicable emission standards with respect to particulates and 401 KAR 59:010 applies.

**State-Origin Requirements:**

**401 KAR 63:020, *Potentially hazardous matter or toxic substances*.** Applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality. Because the combustion of propane emits HAPs and 40 CFR 63, Subpart ZZZZ does not apply as explained below, 401 KAR 63:020 applies.

**Non-Applicable Regulation:**

**401 KAR 63:002, Section 2(4)(eeee),** 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (**Subpart ZZZZ**), *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, does not apply as this is a portable engine, not a stationary engine.

**Comments:**

Pursuant to 401 KAR 52:020, Section 10, the permittee shall maintain a log, located with the engine at all times, specifying each location of the engine; including the initial date at that location, and the date moved from that location, in order to preclude being classified as “not a nonroad engine”.

**Testing Requirements/Results**

N/A

## SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

### Table A - Group Requirements:

N/A

### Table B - Summary of Applicable Regulations:

| Applicable Regulations                                                                                                                                                                                                                                                | Emission Unit             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>401 KAR 50:012</b> , <i>General application.</i>                                                                                                                                                                                                                   | 001, 002, 003, 004        |
| <b>401 KAR 59:010</b> , <i>New process operations.</i>                                                                                                                                                                                                                | 001, 002, 003, 004        |
| <b>401 KAR 59:015</b> , <i>New indirect heat exchangers.</i>                                                                                                                                                                                                          | 7-1 to 7-12, 008, 009     |
| <b>401 KAR 60:005, Section 2(2)(oooo)</b> , 40 C.F.R. 60.4200 through 60.4219, Tables 1 through 8 ( <b>Subpart IIII</b> ), <i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.</i>                                           | 05a                       |
| <b>401 KAR 60:005, Section 2(2)(pppp)</b> , 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 ( <b>Subpart JJJJ</b> ), <i>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.</i>                                                 | 19, 20                    |
| <b>401 KAR 63:002, Section 2(4)(eeee)</b> , 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A ( <b>Subpart ZZZZ</b> ), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</i> | 05a, 006, 19, 20          |
| <b>401 KAR 63:002, Section 2(4)(nnnnn)</b> , 40 C.F.R. 63.11414 through 63.11420, Table 1 ( <b>Subpart OOOOOO</b> ), <i>National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources.</i>          | 001, 002, 003, 004        |
| <b>401 KAR 63:020</b> , <i>Potentially hazardous matter or toxic substances.</i>                                                                                                                                                                                      | 7-1 to 7-12, 008, 009, 10 |

### Table C - Summary of Precluded Regulations:

None

### Table D - Summary of Non Applicable Regulations:

| Non Applicable Regulations                                                                                                                                                                                                                                            | Emission Unit |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>401 KAR 63:002, Section 2(4)(eeee)</b> , 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A ( <b>Subpart ZZZZ</b> ), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.</i> | 10            |

### Air Toxic Analysis

#### **401 KAR 63:020**, *Potentially hazardous matter or toxic substances*

The Division for Air Quality (Division) has performed AERMOD on January 19, 2021 of potentially hazardous matter or toxic substances (2,4-Toluene Diisocyanate) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. No changes were made to the affected facility and the RSL value for 2,4-Toluene Diisocyanate has not changed. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

### Single Source Determination

N/A

## SECTION 5 – COMPLIANCE ASSURANCE MONITORING

**40 CFR 64**, *Compliance assurance monitoring* (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

| Emission Unit | Criteria 1 (Y/N) | Criteria 2 (Y/N) | Criteria 3 (Y/N) | Does CAM apply?<br>If Y for criteria 1, 2, AND 3, then Yes, Otherwise, No. |
|---------------|------------------|------------------|------------------|----------------------------------------------------------------------------|
| 001           | Y                | N                | N                | No                                                                         |
| 002           | Y                | N                | N                | No                                                                         |
| 003           | Y                | N                | N                | No                                                                         |
| 004           | Y                | N                | N                | No                                                                         |
| 005a          | N                | N                | N                | No                                                                         |
| 006           | N                | N                | N                | No                                                                         |
| 7-1           | Y                | N                | N                | No                                                                         |
| 7-2           | Y                | N                | N                | No                                                                         |
| 7-3           | Y                | N                | N                | No                                                                         |
| 7-4           | Y                | N                | N                | No                                                                         |
| 7-5           | Y                | N                | N                | No                                                                         |
| 7-6           | Y                | N                | N                | No                                                                         |
| 7-7           | Y                | N                | N                | No                                                                         |
| 7-8           | Y                | N                | N                | No                                                                         |
| 7-9           | Y                | N                | N                | No                                                                         |
| 7-10          | Y                | N                | N                | No                                                                         |
| 7-11          | Y                | N                | N                | No                                                                         |
| 7-12          | Y                | N                | N                | No                                                                         |
| 008           | Y                | N                | N                | No                                                                         |
| 009           | Y                | N                | N                | No                                                                         |
| 10            | Y                | N                | N                | No                                                                         |
| 19            | N                | N                | N                | No                                                                         |
| 20            | N                | N                | N                | No                                                                         |

\* If Yes, CAM applies for any of the emission units above, then see further clarification for each listed emission unit in **Section 3**.

## SECTION 6 - PERMITTING HISTORY

| Permit      | Permit Type       | Activity #  | Complete Date | Issuance Date | Summary of Action                                          | PSD/Syn Minor |
|-------------|-------------------|-------------|---------------|---------------|------------------------------------------------------------|---------------|
| V-04-065    | Initial           | APE20040001 | 4/21/2005     | 7/26/2005     | Operating/<br>Construction<br>Title V                      | NA            |
| V-10-010    | Renewal           | APE20100001 | 5/12/2010     | 1/27/2011     | Removing<br>some emission<br>points                        | NA            |
| V-15-057    | Renewal           | APE20150001 | 6/10/2015     | 2/29/2016     | Renewal                                                    | NA            |
| V-15-057 R1 | Admin<br>Amend    | APE20160001 | 6/20/2016     | 6/20/2016     | Ownership<br>Change                                        | NA            |
| V-15-057 R2 | Minor<br>Revision | APE20190002 | 11/22/2019    | 3/3/2020      | Addition of<br>Emergency<br>Engine EP19                    | NA            |
| V-20-031    | Renewal           | APE20200001 | 11/16/2020    | 10/24/2021    | Renewal                                                    | NA            |
| V-20-031 R1 | Minor<br>Revision | APE20240001 | 9/12/2024     | 12/10/2024    | Replacement of<br>emergency<br>engine (EP05<br>with EP05a) | NA            |
| V-20-031 R2 | Minor<br>Revision | APE20250001 | 6/23/2025     | 7/29/2025     | Addition of<br>emergency<br>engine (EP 20)                 | NA            |

**SECTION 7 – PERMIT APPLICATION HISTORY:**

None

## **APPENDIX A – ABBREVIATIONS AND ACRONYMS**

|                   |                                                               |
|-------------------|---------------------------------------------------------------|
| AAQS              | – Ambient Air Quality Standards                               |
| BACT              | – Best Available Control Technology                           |
| Btu               | – British thermal unit                                        |
| CAM               | – Compliance Assurance Monitoring                             |
| CO                | – Carbon Monoxide                                             |
| Division          | – Kentucky Division for Air Quality                           |
| ESP               | – Electrostatic Precipitator                                  |
| GHG               | – Greenhouse Gas                                              |
| HAP               | – Hazardous Air Pollutant                                     |
| HF                | – Hydrogen Fluoride (Gaseous)                                 |
| MSDS              | – Material Safety Data Sheets                                 |
| mmHg              | – Millimeter of mercury column height                         |
| NAAQS             | – National Ambient Air Quality Standards                      |
| NESHAP            | – National Emissions Standards for Hazardous Air Pollutants   |
| NO <sub>x</sub>   | – Nitrogen Oxides                                             |
| NSR               | – New Source Review                                           |
| PM                | – Particulate Matter                                          |
| PM <sub>10</sub>  | – Particulate Matter equal to or smaller than 10 micrometers  |
| PM <sub>2.5</sub> | – Particulate Matter equal to or smaller than 2.5 micrometers |
| PSD               | – Prevention of Significant Deterioration                     |
| PTE               | – Potential to Emit                                           |
| SO <sub>2</sub>   | – Sulfur Dioxide                                              |
| TDI               | – 2,4-Toluene Diisocyanate                                    |
| TF                | – Total Fluoride (Particulate & Gaseous)                      |
| VOC               | – Volatile Organic Compounds                                  |

**APPENDIX B – INDIRECT HEAT EXCHANGER EMISSIONS LIMITATIONS**

| <b>EU</b> | <b>Fuel</b> | <b>Capacity<br/>(MMBtu/hr)</b> | <b>Construction<br/>Date</b> | <b>Notes/<br/>Removal Date</b> | <b>Basis for<br/>PM Limit</b> | <b>Total Heat Input<br/>Capacity for PM<br/>Limit (MMBtu/hr)</b> | <b>Basis<br/>for SO<sub>2</sub><br/>Limit</b> | <b>Total Heat Input<br/>Capacity for SO<sub>2</sub><br/>Limit (MMBtu/hr)</b> |
|-----------|-------------|--------------------------------|------------------------------|--------------------------------|-------------------------------|------------------------------------------------------------------|-----------------------------------------------|------------------------------------------------------------------------------|
| EP 7-1    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-2    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-3    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-4    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-5    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-6    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-7    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-8    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-9    | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-10   | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-11   | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 7-12   | Natural Gas | 6.48                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 008    | Natural Gas | 3.24                           | 1999                         | N/A                            | Section 4(1)(c)               | 81.0                                                             | Section 5(1)(c)2.                             | 81.0                                                                         |
| EP 009    | Natural Gas | 1.2                            | 2001                         | N/A                            | Section 4(1)(c)               | 82.2                                                             | Section 5(1)(c)2.                             | 82.2                                                                         |