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April 9, 2025

Kentucky Department for Environmental Protection
Division of Air Quality, Permit Review Branch
300 Sower Boulevard, 2nd Floor
Frankfort, KY 40601

Subject: Conditional Major Operating Permit Renewal
Akebono Brake Corporation, Elizabethtown Plant
Conditional Major Air Permit ID No. F-20-031 R1
Agency Interest No. 1645
Source ID No. 21-093-00054

Attention: Ms. Samantha Hoffman
Permit Review Branch

Dear Ms. Hoffman,

This letter serves as a request to renew the existing Conditional Major Operating Permit No. F-20-031 R1 for the Akebono Brake Corporation (Akebono) manufacturing facility in Elizabethtown, Kentucky. The current permit expires on October 4, 2025.

Please be advised that this facility has been undergoing many changes and because it is not clear how the facility will be operated in the future, we are only asking that the existing air permit be renewed identically as it is now. Additional applications for changes in the future will be issued to the Kentucky Division for Air Quality (DAQ) as required by regulation. Akebono hopes to include DAQ in conversations about these changes as appropriate.

Please let us know if you require any additional information. Should you have any further questions, please do not hesitate to call me at (502) 836-9145, or Mr. Bill Riley of Akebono at (270) 261-3851.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Trent Browne'.

J. Trent Browne, P.E.
Project Manager

Attachments: Completed DEP7007AI Form

Cc: Mr. Bill Riley (Akebono)

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007AI

Administrative Information

- ☐ Section AI.1: Source Information
☐ Section AI.2: Applicant Information
☐ Section AI.3: Owner Information
☐ Section AI.4: Type of Application
☐ Section AI.5: Other Required Information
☐ Section AI.6: Signature Block
☐ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

☐ Additional Documentation attached

Source Name: Akebono Brake Corporation (d/b/a Akebono Brake, Elizabethtown Plant)

KY EIS (AFS) #: 21-093-00054

Permit #: F-20-031, R1

Agency Interest (AI) ID: 1645

Date: 4/9/2025

Section AI.1: Source Information

Physical Location	Street:	<u>300 Ring Road</u>		
Address:	City:	<u>Elizabethtown</u>	County:	<u>Hardin</u>
	Street or			
Mailing Address:	P.O. Box:	<u>SAME</u>		
	City:		State:	
			Zip Code:	<u>42701</u>

Standard Coordinates for Source Physical Location

Longitude: 85.58583 (decimal degrees) Latitude: 37.68167 (decimal degrees)

Primary (NAICS) Category: Motor Vehicle Brake System Manufacturing Primary NAICS #: 336340

Classification (SIC) Category:		<u>Brake and Brake Parts</u>		Primary SIC #: <u>3714</u>	
Briefly discuss the type of business conducted at this site:		<u>The site produces automotive and truck brake systems including drum brakes, disc brakes, and calipers..</u>			
Description of Area Surrounding Source:	<input type="checkbox"/> Rural Area <input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Park <input checked="" type="checkbox"/> <u>Industrial Area</u>	<input type="checkbox"/> Residential Area <input type="checkbox"/> Commercial Area	Is any part of the source located on federal land? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> <u>No</u>	Number of Employees: <div style="border: 1px solid black; padding: 2px; display: inline-block;"><u>1,300</u></div>
Approximate distance to nearest residence or commercial property:		<u>400 ft</u>		Property Area: <u>55 Acres</u>	Is this source portable? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> <u>No</u>
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?					
NPDES/KPDES: <input checked="" type="checkbox"/> <u>KY-0089672</u> <input type="checkbox"/> Need <input type="checkbox"/> N/A					
Solid Waste: <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> <u>N/A</u>					
RCRA: <input checked="" type="checkbox"/> <u>KYD-981-753-197</u> <input type="checkbox"/> Need <input type="checkbox"/> N/A					
UST: <input type="checkbox"/> Currently Hold <input type="checkbox"/> Need <input checked="" type="checkbox"/> <u>N/A</u>					
Type of Regulated Waste Activity: <input type="checkbox"/> Mixed Waste Generator <input checked="" type="checkbox"/> <u>Generator</u> <input type="checkbox"/> Recycler <input type="checkbox"/> Other: _____ <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Transporter <input type="checkbox"/> Treatment/Storage/Disposal Facility <input type="checkbox"/> N/A					

Section AI.2: Applicant Information**Applicant Name:** Akebono Brake Corporation (d/b/a Akebono Brake, Elizabethtown Plant)**Title:** (if individual) _____**Mailing Address:** **Street or P.O. Box:** 300 Ring Road**City:** Elizabethtown **State:** KY **Zip Code:** 42701**Email:** (if individual) _____**Phone:** 270-737-4906**Technical Contact****Name:** Bill Riley**Title:** Environmental Engineer**Mailing Address:** **Street or P.O. Box:** 300 Ring Road**City:** Elizabethtown **State:** KY **Zip Code:** 42701**Email:** bill.riley@akebono-usa.com**Phone:** 270-261-3851**Air Permit Contact for Source****Name:** SAME AS TECHNICAL CONTACT**Title:** _____**Mailing Address:** **Street or P.O. Box:** _____**City:** _____ **State:** _____ **Zip Code:** _____**Email:** _____**Phone:** _____

Section AI.3: Owner Information**XX Owner same as applicant**

Name: _____

Title: _____

Mailing Address: Street or P.O. Box: _____
City: _____ State: _____ Zip Code: _____

Email: _____

Phone: _____

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name

Position

Akebono Brake Corporation

100%

Section AI.4: Type of Application

Current Status:	<input type="checkbox"/> Title V	<input checked="" type="checkbox"/> XX Conditional Major	<input type="checkbox"/> State-Origin	<input type="checkbox"/> General Permit	<input type="checkbox"/> Registration	<input type="checkbox"/> None
	<input type="checkbox"/> Name Change	<input type="checkbox"/> Initial Registration	<input type="checkbox"/> Significant Revision	<input type="checkbox"/> Administrative Permit Amendment		
Requested Action:	<input checked="" type="checkbox"/> XX Renewal Permit	<input type="checkbox"/> Revised Registration	<input type="checkbox"/> Minor Revision	<input type="checkbox"/> Initial Source-wide Operating Permit		
<i>(check all that apply)</i>	<input type="checkbox"/> 502(b)(10) Change	<input type="checkbox"/> Extension Request	<input type="checkbox"/> Addition of New Facility	<input type="checkbox"/> Portable Plant Relocation Notice		
	<input type="checkbox"/> Revision	<input type="checkbox"/> Off Permit Change	<input type="checkbox"/> Landfill Alternate Compliance Submittal	<input type="checkbox"/> Modification of Existing Facilities		
	<input type="checkbox"/> Ownership Change	<input type="checkbox"/> Closure				
Requested Status:	<input type="checkbox"/> Title V	<input checked="" type="checkbox"/> XX Conditional Major	<input type="checkbox"/> State-Origin	<input type="checkbox"/> PSD	<input type="checkbox"/> NSR	<input type="checkbox"/> Other: _____

Is the source requesting a limitation of potential emissions?

☒ **XX Yes**

☐ No

Pollutant:

Requested Limit:

Pollutant:

Requested Limit:

☒ **XX Particulate Matter**

90 ton/12 mo.

☐ Single HAP

☒ **XX Volatile Organic Compounds (VOC)**

90 ton/12 mo.

☐ Combined HAPs

☐ Carbon Monoxide

☐ Air Toxics (40 CFR 68, Subpart F)

☐ Nitrogen Oxides

☐ Carbon Dioxide

☐ Sulfur Dioxide

☐ Greenhouse Gases (GHG)

☐ Lead

☐ Other

For New Construction:

Proposed Start Date of Construction:

(MM/YYYY)

Not Applicable

Proposed Operation Start-Up Date: *(MM/YYYY)*

Not Applicable

For Modifications:

Proposed Start Date of Modification:

(MM/YYYY)

Not Applicable

Proposed Operation Start-Up Date: *(MM/YYYY)*

Not Applicable

Applicant is seeking coverage under a permit shield.

☐ Yes

☒ **XX No**

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

<input type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines	<input type="checkbox"/> DEP7007CC Compliance Certification
<input type="checkbox"/> DEP7007B Manufacturing or Processing Operations	<input type="checkbox"/> DEP7007DD Insignificant Activities
<input type="checkbox"/> DEP7007C Incinerators and Waste Burners	<input type="checkbox"/> DEP7007EE Internal Combustion Engines
<input type="checkbox"/> DEP7007F Episode Standby Plan	<input type="checkbox"/> DEP7007FF Secondary Aluminum Processing
<input type="checkbox"/> DEP7007J Volatile Liquid Storage	<input type="checkbox"/> DEP7007GG Control Equipment
<input type="checkbox"/> DEP7007K Surface Coating or Printing Operations	<input type="checkbox"/> DEP7007HH Haul Roads
<input type="checkbox"/> DEP7007L Mineral Processes	<input type="checkbox"/> Confidentiality Claim
<input type="checkbox"/> DEP7007M Metal Cleaning Degreasers	<input type="checkbox"/> Ownership Change Form
<input type="checkbox"/> DEP7007N Source Emissions Profile	<input type="checkbox"/> Secretary of State Certificate
<input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems	<input type="checkbox"/> Map or Drawing Showing Location (Appendix A)
<input type="checkbox"/> DEP7007R Emission Offset Credit	<input type="checkbox"/> Digital Line Graphs (DLG) files of buldings, roads, etc.
<input type="checkbox"/> DEP7007S Service Stations	<input type="checkbox"/> Emission Point Location Drawing Appendix B
<input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations	<input type="checkbox"/> Process Flow Diagram and Description
<input type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activities	<input type="checkbox"/> Expected PTE & Actual Emission Calculation Sheets (Appendix C)
<input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination	<input type="checkbox"/> Safety Data Sheet (SDS) (Appendix E)
<input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units	<input type="checkbox"/> Other: Suggested Permit Language (Appendix D)
<input type="checkbox"/> DEP7007BB Certified Progress Report	<input type="checkbox"/> Other: Responsible Official Certification (Appendix E)

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Chris Cooper

Authorized Signature

Chris Cooper

Type or Printed Name of Signatory

4/9/2025

Date

Plant Manager

Title of Signatory

*Responsible official as defined by 401 KAR 52:001.