Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division for Air Quality
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601
(502) 564-3999

Draft

AIR QUALITY PERMIT

Issued under 401 KAR 52:020

Permittee Name:	**Akebono Brake Corporation Glasgow Plant**
Mailing Address:	**1765 Cleveland Ave, Glasgow, KY 42141**
Source Name:	**Akebono Brake Corporation Glasgow Plant**
Mailing Address:	**1765 Cleveland Ave, Glasgow, KY 42141**
Source Location:	**Same as above**
Permit ID:	**V-25-019**
Agency Interest #:	**15685**
Activity ID:	**APE20250001**
Review Type:	**Title V, Operating**
Source ID:	**21-009-00067**
Regional Office:	**Bowling Green Regional Office** **2642 Russellville Road** **Bowling Green, KY 42101** **(270) 746-7475**
County:	**Barren**
Application Complete Date:	**May 1, 2025**
Issuance Date:	
Expiration Date:	

For Michael J. Kennedy, P.E.
Director
Division for Air Quality

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Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action
V-25-019	**Renewal**	**APE20250001**	**5/1/2025**		**Permit Renewal; updated 40 CFR 60, Subpart IIII & 40 CFR 63, Subpart ZZZZ; removed some equipment. See SOB for more details.**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Energy and Environment Cabinet (Cabinet) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

Definitions: The following definitions apply to all abbreviations and variables used in this permit:

CAM	– Compliance Assurance Monitoring
CO	– Carbon monoxide
Division	– Kentucky Division for Air Quality
HAP	– Hazardous Air Pollutants
Method 9	– 40 CFR 60, Appendix A: Reference Method 9
MMBtu	– Million British Thermal Units
PT	– Total particulate matter
PM_{10}	– Particulate matter equal to or smaller than 10 micrometers
$PM_{2.5}$	– Particulate matter equal to or smaller than 2.5 micrometers
PTE	– Potential to Emit
NO_x	– Nitrogen oxides
RICE	– Reciprocating Internal Combustion Engine
SO_2	– Sulfur dioxide
U.S. EPA	– United States Environmental Protection Agency
VOC	– Volatile Organic Compounds

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Group 1 – New Process Operations

EP #06 **Four (4) Mixing and Blending Systems (11, 31, 41, 51)**

Description:

Maximum Friction Material Usage:	1.918 tons per hour, total
Control Equipment:	For Mixer 11: Baghouse (Dust Collector 2) For Mixers 31 & 41: Baghouse (Dust Collector 3) For Mixer 51: Baghouse (Dust Collector 5)
Construction Commenced:	1/1/1995, 10/1/1996, and 6/1/2007

EP #27 **One (1) Slitter and Grinder (51 Comec)**

Description:

Maximum Processing Rate:	2,400 parts per hour
Control Equipment:	Baghouse (Dust Collector 7)
Construction Commenced:	5/1/2007

EP #29 **Two (2) Mixing and Blending Systems (61, 71)**

Description:

Maximum Friction Material Usage:	0.477 tons per hour, total
Control Equipment:	For Mixer 61: Baghouse (Dust Collector 5) For Mixer 71: Baghouse (Dust Collector 3)
Construction Commenced:	1/1/2005 (61), 10/1/2017 (71)

EP #30 **Aftermarket Line 2 Grinding (AM2)**

Description:

Maximum Processing Rate:	2,400 parts per hour
Control Equipment:	Baghouse (Dust Collector 6)
Construction Commenced:	9/1/2008; modified 2024

EP #38 **Module 7 Grinding Operations (71 Comec)**

Description:

Maximum Processing Rate:	2,400 parts per hour
Control Equipment:	Baghouse (Dust Collector 8)
Construction Commenced:	10/1/2011

EP #39 **Module 6 Grinding Operations (61 Comec)**

Description:

Maximum Processing Rate:	2,400 parts per hour
Control Equipment:	Baghouse (Dust Collector 6)
Construction Commenced:	6/5/2011

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP #46 **Grinding (81) & Aftermarket Line 1 Grinding (AM1)**

Description:

Maximum Processing Rate:	2,400 parts per hour, each
Control Equipment:	Baghouse (Dust Collector 8)
Construction Commenced:	4/1/2015; modified 2024

EP #52 **Aftermarket Line 3 Grinding**

Description:

Maximum Processing Rate:	720 parts per hour
Control Equipment:	Baghouse (Dust Collector 8)
Construction Commenced:	2/1/2017

APPLICABLE REGULATIONS:
401 KAR 59:010, *New process operations*
40 CFR 64, *Compliance Assurance Monitoring*

1. **Operating Limitations:**
   The associated control equipment for each emission unit shall operate according to manufacturer's specifications at all times when the corresponding emission unit is in operation.

   Compliance Demonstration Method:
   Refer to **Attachment A – Compliance Assurance Monitoring (CAM) Plan** and **7. Specific Control Equipment Operating Conditions**.

2. **Emission Limitations:**
   a. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]

      Compliance Demonstration Method:
      Refer to **4. Specific Monitoring Requirements (b)** and **5. Specific Recordkeeping Requirements (b)**.

   b. For emissions from a control device or stack, the permittee shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility which is in excess of the quantity specified below: [401 KAR 59:010, Section 3(2)]
      i. For process weight rates up to 0.5 ton/hr: $E = 2.34$
      ii. For process weight rates up to 30.0 tons/hr: $E = 3.59P^{0.62}$
      Where E is the rate of emission in lb/hr and P is the process weight rate in tons/hr.

      Compliance Demonstration Method:
      To demonstrate compliance with the particulate matter emission limitations specified in 401 KAR 59:010, the permittee shall monitor the amounts and types of process weight added to each emissions unit. The process weight rate shall be determined by dividing the tons of material added to each emission unit in a calendar month divided by total hours the unit operated that month. The average particulate emissions shall be calculated as follows:

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

$$PE = \left(\frac{PW \times EF^{*}}{H}\right) \times (1 - CE)$$

Where:
PE = particulate emissions in lb/hr;
PW = process weight in tons/month;
EF = particulate emission factor in lb/ton of process weight;
* The particulate emission factor shall be the number determined from AP-42, MSDS, the most recent Division approved stack test, or Division approved value.
H = total hours of operation in a month; and
CE = Control efficiency

3. Testing Requirements:
Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted if required by the Cabinet.

4. Specific Monitoring Requirements:

a. The permittee shall monitor of the following for each emission point: [401 KAR 52:020, Section 10]
   i. Total amount of material processed on a monthly basis.
   ii. Total monthly hours of operation.

b. The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack no less frequently than once every seven (7) calendar days while the affected facility is operating. If visible emissions from the stack are observed (not including condensed water in the plume), then the permittee shall determine the opacity using U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:020, Section 10]

c. The permittee shall monitor the pressure drop across each baghouse daily according to the requirements of **Attachment A – Compliance Assurance Monitoring Plan**.

d. Refer to **SECTION F** for general monitoring requirements.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep records of the following for each emission point: [401 KAR 52:020, Section 10]
   i. Total amount of material processed on a monthly basis.
   ii. Total monthly hours of operation.

b. The permittee shall retain records of the qualitative visual observations required by **4. Specific Monitoring Requirements (b)**, including the date, time, initials of observer, whether any emissions were observed (yes/no), any Method 9 readings taken, and any

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

corrective action taken including results due to observed emissions. [401 KAR 52:020, Section 10]

c. The permittee shall maintain a daily log of the pressure device observations required by **Attachment A – Compliance Assurance Monitoring Plan**.

d. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [40 CFR 64.9(b)(1)]

e. Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(1)]

f. Refer to **SECTION F** for general recordkeeping requirements.

6. Specific Reporting Requirements:

a. On and after the date specified in 40 CFR 64.7(a) by which the permittee must use monitoring that meets the requirements of 40 CFR 64, the permittee shall submit monitoring reports to the Division in accordance with **SECTION F**. [40 CFR 64.9(a)(1)]

b. A report for monitoring under 40 CFR 64 shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable: [40 CFR 64.9(a)(2)]
   i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [40 CFR 64.9(a)(2)(i)]
   ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [40 CFR 64.9(a)(2)(ii)]
   iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [40 CFR 64.9(a)(2)(iii)]

c. The threshold for requiring the implementation of a QIP is an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a semiannual reporting period. [40 CFR 64.8(a)]

d. Refer to Appendix A for reporting requirements under 40 CFR 64.

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e. Refer to **SECTION F** for general reporting requirements.

7. Specific Control Equipment Operating Conditions:

a. The permittee shall install, operate, and maintain the control device(s) associated with each emission unit according to the manufacturer's specifications and during all times that the associated emission unit is operating. [401 KAR 52:020, Section 10]

b. The permittee shall maintain records of pressure drop readings monitored for each fabric filter and calibration records for the monitoring device. [401 KAR 52:020, Section 10]

c. Refer to **Attachment A – Compliance Assurance Monitoring Plan**.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Group 2 – Spray Booths

EP #02 **Two (2) Primer Spray Booths (05, 06)**

Description:

Maximum Primer usage rate:	45 lb/hr
Control Equipment:	Dry Filter, Thermal Oxidizer 1
Construction Commenced:	1/1/95

EP #03 **Two (2) Adhesive Spray Booths (07, 08)**

Description:

Max. Adhesive chemical usage rate:	19.4 lb/hr
Control Equipment:	Dry Filter, Thermal Oxidizer 1
Construction Commenced:	1/1/95

APPLICABLE REGULATIONS:

401 KAR 59:010, *New process operations*

401 KAR 59:225, *New miscellaneous metal parts and products surface coating operations*

STATE-ORIGIN REQUIREMENT:

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

1. **Operating Limitations:**

   The associated control equipment for each emission unit shall operate according to manufacturer's specifications at all times when the corresponding emission unit is in operation.

   Compliance Demonstration Method:

   Refer to **7. Specific Control Equipment Operating Conditions**.

2. **Emission Limitations:**

   a. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity. [401 KAR 59:010, Section 3(1)(a)]

      Compliance Demonstration Method:

      Refer to **4. Specific Monitoring Requirements (b)** and **5. Specific Recordkeeping Requirements (b)**.

   b. For emissions from a control device or stack, the permittee shall not cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility which is in excess of 2.34 lb/hr. [401 KAR 59:010, Section 3(2)]

      Compliance Demonstration Method:

      To demonstrate compliance with the particulate matter emission limitations specified in 401 KAR 59:010, the permittee shall monitor the amounts and types of process weight added to each emissions unit. The process weight rate shall be determined by dividing the tons of material added to each emission unit in a calendar month divided by total hours the unit operated that month. The average particulate emissions shall be calculated as follows:

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

$$PE = \left(\frac{PW \times EF^{*}}{H}\right) \times (1 - CE)$$

Where:
PE = particulate emissions in lb/hr;
PW = process weight in tons/month;
EF = particulate emission factor in lb/tons of process weight;
* The particulate emission factor shall be the number determined from AP-42, MSDS, the most recent Division approved stack test, or Division approved value.
H = total hours of operation in a month; and
CE = Control efficiency

c. The permittee shall not cause, allow, or permit an affected facility to discharge into the atmosphere more than fifteen (15) percent by weight of the VOCs net input into the affected facility. [401 KAR 59:225, Section 3]

Compliance Demonstration Method:

A. Compliance shall be demonstrated by a material balance unless the Cabinet determines that a material balance is not possible. If a material balance is not possible, compliance shall be determined based upon an engineering analysis by the Cabinet of the control system design, control device efficiency, control system capture efficiency, and other factors that could influence the performance of the system. [401 KAR 59:225, Section 4(2)]
B. Compliance on each coating line shall be based on an averaging period of twenty-four (24) hours. [401 KAR 59:225, Section 4(5)]
C. Calculations demonstrating compliance shall be based on the mass of VOC per unit volume of coating less exempt solvent, water, or both. [401 KAR 59:225, Section 4(6)]
D. Refer to **7. Specific Control Equipment Operating Conditions**.

d. The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. [401 KAR 63:020, Section 3]

Compliance Demonstration Method:
The Cabinet determines that the source is in compliance with 401 KAR 63:020 when operating control devices, based on the rate of emissions of airborne toxics determined by the Cabinet using information provided in the application and any supplemental information submitted by the source.

3. Testing Requirements:

a. The permittee shall conduct performance testing once every five (5) years at the inlet and outlet of the thermal oxidizer to determine VOC destruction efficiency. Testing shall be performed using Method 25 from Appendix A to 40 CFR 60, Standards of Performance for New Stationary Sources or an alternative approved method by the Cabinet. The permittee shall also determine the capture efficiency during each of these tests using Method 204 of Appendix M to 40 CFR Part 51.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

b. The permittee shall calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each capture device. This average volumetric flow rate or duct static pressure is the minimum operating limit for the oxidizer. [401 KAR 52:020, Section 10]

c. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature. This average combustion temperature is the minimum set point for the thermal oxidizer. The minimum operating limit for the thermal oxidizer is 28°C (50°F) below the minimum set point temperature. [401 KAR 52:020, Section 10]

d. The permittee shall maintain records of the coating operation conditions during the required oxidizer performance test showing that the performance test was conducted under representative conditions. [401 KAR 52:020, Section 10]

e. During the required oxidizer performance test, the permittee shall record the combustion temperature at least once every fifteen (15) minutes during each of the three test runs. [401 KAR 52:020, Section 10]

f. Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted if required by the Cabinet.

4. Specific Monitoring Requirements:

a. The permittee shall monitor the following for each emission point: [401 KAR 52:020, Section 10]
   i. The VOC and HAP content of each material used;
   ii. The total monthly hours of operation.

b. The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack no less frequently than once every seven (7) calendar days while the affected facility is operating. The permittee shall also perform qualitative visible observations during any period of control device malfunction. If visible emissions from the stack are observed (not including condensed water in the plume), then the permittee shall determine the opacity using U.S. EPA Reference Method 9. In lieu of determining the opacity using U.S. EPA Reference Method 9, the permittee shall immediately perform a corrective action which results in no visible emissions (not including condensed water in the plume). [401 KAR 52:020, Section 10]

c. The permittee shall monitor, daily, the total coating usage of each unit [401 KAR 59:225 Section 4(8)].

d. The permittee shall monitor, continuously (at least once every fifteen minutes), the combustion chamber temperature of the thermal oxidizer. [401 KAR 52:020, Section 10]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

e. The permittee shall monitor, daily, the static pressure through the thermal oxidizer. [401 KAR 52:020, Section 10]

f. Refer to **SECTION F** for general monitoring requirements.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep records of the following for each emission point: [401 KAR 52:020, Section 10]
   i. The HAP content of each material used;
   ii. Total monthly hours of operation;
   iii. SDS for all chemicals or materials used.

b. The permittee shall retain records of the qualitative visual observations required by **4. Specific Monitoring Requirements (b)**, including the date, time, initials of observer, whether any emissions were observed (yes/no), any Method 9 readings taken, and any corrective action taken including results due to observed emissions. [401 KAR 52:020, Section 10]

c. The permittee shall maintain records of daily coating usage for each unit. Records shall include: [401 KAR 59:225 Section 4(8)]
   i. Applicable administrative regulation number; [401 KAR 59:225 Section 4(8)(a)]
   ii. Application method and substrate type; [401 KAR 59:225 Section 4(8)(b)]
   iii. Amount and type of adhesive, coating (including catalyst and reducer for multicomponent coatings), or solvent used at each point of application, including exempt compounds; [401 KAR 59:225 Section 4(8)(c)]
   iv. The VOC content as applied in each adhesive, coating, or solvent; [401 KAR 59:225 Section 4(8)(d)]
   v. The date for each application for adhesive, coating, or solvent; [401 KAR 59:225 Section 4(8)(e)]
   vi. The amount of surface preparation, cleanup, or wash-up solvent (including exempt compounds) used and the VOC content of each; and [401 KAR 59:225 Section 4(8)(f)]
   vii. Oven temperature, if applicable. [401 KAR 59:225 Section 4(8)(g)]

d. The permittee shall maintain records of the combustion chamber temperature observations. [401 KAR 52:020, Section 10]

e. The permittee shall maintain records of the daily static pressure observations through the thermal oxidizer. [401 KAR 52:020, Section 10]

f. The permittee shall record the data and documentation used to support that the capture system meets the criteria in Method 204 of Appendix M to 40 CFR Part 51 for a Permanent Total Enclosure and has a capture efficiency of 100 percent. [401 KAR 52:020, Section 10]

g. Refer to **SECTION F** for general recordkeeping requirements.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. Specific Reporting Requirements:
Refer to **SECTION F** for general reporting requirements.

7. Specific Control Equipment Operating Conditions:

a. The permittee shall maintain and operate the control equipment in accordance with manufacturer's written instructions. The permittee shall calibrate or replace the thermocouple in the combustion chamber at least annually. [401 KAR 52:020, Section 10]

b. The average combustion chamber temperature during any 3-hour period shall not fall more than 28°C (50°F) below the combustion chamber temperature limit established during the most recent performance test that demonstrated compliance. [401 KAR 52:020, Section 10]

Compliance Demonstration Method:
If the combustion chamber temperature observed during the observation required by **4. Specific Monitoring Requirements (d)** is more than 28°C (50°F) below the minimum combustion chamber temperature, the permittee shall monitor the combustion chamber temperature once every fifteen (15) minutes over a 3-hour period and determine the average. If the 3-hour average combustion chamber temperature is more than 28°C (50°F) below the minimum combustion chamber temperature, the incident is a deviation that shall be reported to the Division. Corrective action shall be taken to correct the upset condition. The permittee shall maintain records of the 3-hour averages and note the date and time of the incident, as well as any corrective actions taken.

c. The permittee shall maintain the average gas volumetric flow rate or duct static pressure at or above the average volumetric flowrate or duct static pressure established during the most recent performance test that demonstrated compliance. [401 KAR 52:020, Section 10]

Compliance Demonstration Method:
If the volumetric flowrate or duct static pressure observed during the observation required by **4. Specific Monitoring Requirements (e)** is below the minimum average volumetric flowrate or duct static pressure, the permittee shall monitor the volumetric flowrate or duct static pressure once every fifteen (15) minutes over a 1-hour period and determine the average. If the 1-hour average volumetric flowrate or duct static pressure is less than the minimum average volumetric flowrate or duct static pressure, the incident is a deviation that shall be reported to the Division. Corrective action shall be taken to correct the upset condition. The permittee shall maintain records of the 1-hour averages.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Group 3 – Natural Gas Fired Indirect Heat Exchangers

EP #21 (IA10) **Boiler 1**

Description:

Maximum Rating:	5.5 MMBtu/hr
Fuel:	Natural Gas
Date Constructed:	4/1/1997; replaced in 2025

EP #33 (IA20) **Boiler 3**

Description:

Maximum Rating:	4.5 MMBtu/hr
Fuel:	Natural Gas
Date Constructed:	9/1/2008

EP #34 (IA21) **Boiler 4**

Description:

Maximum Rating:	4.5 MMBtu/hr
Fuel:	Natural Gas
Date Constructed:	9/1/2008

APPLICABLE REGULATIONS:
401 KAR 59:015, *New indirect heat exchangers*

STATE-ORIGIN REQUIREMENT:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

1. **Operating Limitations:**
   During a startup period or shutdown period, the permittee shall comply with the work practice standards established in 401 KAR 59:015, Section 7. [401 KAR 59:015, Section 7]
   a. The permittee shall comply with 401 KAR 50:055, Section 2(5); [401 KAR 59:015, Section 7(1)(a)]

   b. The frequency and duration of startup periods or shutdown periods shall be minimized by the affected facility; [401 KAR 59:015, Section 7(1)(b)]

   c. All reasonable steps shall be taken by the permittee to minimize the impact of emissions on ambient air quality from the affected facility during startup periods and shutdown periods; [401 KAR 59:015, Section 7(1)(c)]

   d. The actions, including duration of the startup period, of the permittee during startup and shutdown periods, shall be documented in signed, contemporaneous logs or other relevant evidence; [401 KAR 59:015, Section 7(1)(d)]

   e. Startups and shutdowns shall be conducted according to either: [401 KAR 59:015, Section 7(1)(e)]
      i. The manufacturer's recommended procedures; or [401 KAR 59:015, Section 7(1)(e)1.]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

ii. Recommended procedures for a unit of similar design, for which manufacturer's recommended procedures are available, as approved by the cabinet based on documentation provided by the permittee. [401 KAR 59:015, Section 7(1)(e)2.]

Compliance Demonstration Method:
Compliance shall be demonstrated according to **5. Specific Recordkeeping Requirements (b).**

2. Emission Limitations:

a. The permittee shall not cause emissions of particulate matter in excess of: [401 KAR 59:015, Section 4(1)]
   i. For EP #21: 0.51 lb/MMBtu actual heat input; [401 KAR 59:015, Section 4(1)(c)]
   ii. For EPs #33 & #34: 0.52 lb/MMBtu actual heat input, each. [401 KAR 59:015, Section 4(1)(c)]

b. The permittee shall not cause emissions of particulate matter in excess of 20 percent opacity, except: [401 KAR 59:015, Section 4(2)]
   i. A maximum of 40 percent opacity shall be allowed for a maximum of 6 consecutive minutes in any 60 consecutive minutes during fire box cleaning or soot blowing; and [401 KAR 59:015, Section 4(2)(b)]
   ii. For emissions from an affected facility caused by building a new fire, emissions during the period required to bring the boiler up to operating conditions shall be allowed, if the method used is recommended by the manufacturer and the time does not exceed the manufacturer's recommendations. [401 KAR 59:015, Section 4(2)(c)]

c. The permittee shall not cause emissions of gases that contain sulfur dioxide in excess of: [401 KAR 59:015, Section 5(1)]
   i. For EP #21: 2.58 lb/MMBtu actual heat input; [401 KAR 59:015, Section 5(1)(c)]
   ii. For EPs #33 & #34: 2.65 lb/MMBtu actual heat input, each. [401 KAR 59:015, Section 5(1)(c)]

Compliance Demonstration Method:
Compliance with the 401 KAR 59:015 emission standards is assumed. [401 KAR 50:045, Section 4(3)(c)1.]

d. The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. [401 KAR 63:020, Section 3]

Compliance Demonstration Method:
Based upon the emission rates of toxics and hazardous air pollutants determined by the Cabinet using information provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

Pursuant to 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the reference methods specified in 401 KAR 50:015 shall be conducted if required by the Cabinet.

4. Specific Monitoring Requirements:

a. The permittee shall monitor the following for each emission point: [401 KAR 52:020, Section 10]
   i. The monthly natural gas usage in MMscf;
   ii. The total hours of operation on a monthly basis.

b. Refer to **SECTION F** for general monitoring requirements.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep records of the following for each emission point: [401 KAR 52:020, Section 10]
   i. The monthly natural gas usage in MMscf;
   ii. The total hours of operation on a monthly basis.

b. The permittee shall keep records of the manufacturer's recommended procedures for startup and shutdown, any instance in which the recommended procedures were not followed, and any corrective action taken. [401 KAR 52:020, Section 10]

c. Refer to **SECTION F** for general monitoring requirements.

6. Specific Reporting Requirements:

Refer to **SECTION F** for general reporting requirements.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP #23 Emergency Generator

Description:

Model:	Caterpillar 3406C
Rating:	459 HP
Displacement:	14.5 L
Fuel:	Diesel
Model year:	2000
Date Constructed:	9/1/2003

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 Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

1. **Operating Limitations:**
   a. The permittee must comply with the requirements in Table 2d to 40 CFR 63, Subpart ZZZZ that apply. [40 CFR 63.6603(a)]
      i. The permittee shall meet the following requirements, except during periods of startup: [40 CFR 63, Subpart ZZZZ, Table 2d]
         1) Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first; [40 CFR 63, Subpart ZZZZ, Table 2d(4)(a)]
         2) Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and [40 CFR 63, Subpart ZZZZ, Table 2d(4)(b)]
         3) Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary. [40 CFR 63, Subpart ZZZZ, Table 2d(4)(c)]
         4) Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2d of 40 CFR 63, Subpart ZZZZ. [40 CFR 63, Subpart ZZZZ, Table 2d, Footnote 1]
         5) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in table 2d of 40 CFR 63, Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63, Subpart ZZZZ, Table 2d, Footnote 2]
      ii. During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR 63, Subpart ZZZZ, Table 2d]

b. If the emergency CI stationary RICE operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), the permittee shall use diesel fuel that meets the requirements in 40 CFR 1090.305 for nonroad diesel fuel. [40 CFR 63.6604(b)]

c. The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR 63, Subpart ZZZZ that apply at all times. [40 CFR 63.6605(a)]

d. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

e. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)(3)]

f. The permittee shall install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]

g. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to 40 CFR 63, Subpart ZZZZ apply. [40 CFR 63.6625(h)]

h. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2d to 40 CFR 63, Subpart ZZZZ that apply according to methods specified in Table 6 to 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6640(a)]
   i. The permittee must demonstrate continuous compliance by operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or [40 CFR 63, Subpart ZZZZ, Table 6(9)(a)(i)]
   ii. Developing and following the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63, Subpart ZZZZ, Table 6(9)(a)(ii)]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

i. The permittee shall operate the emergency stationary RICE according to the requirements in 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) and (4), is prohibited. If the permittee does not operate the engine according to the requirements in 40 CFR 63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63, Subpart ZZZZ and must meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]
   i. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(1)]
   ii. The permittee may operate the emergency stationary RICE for the purpose specified in 40 CFR 63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by 40 CFR 63.6640(f)(2). [40 CFR 63.6640(f)(2)]
      1) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]
   iii. The permittee may operate the emergency stationary RICE for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in 40 CFR 63.6640(f)(2). Except as provided in 40 CFR 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 63.6640(f)(4)]
      1) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions in 40 CFR 63.6640(f)(4)(ii)(A) through (E) are met. [40 CFR 63.6640(f)(4)(ii)]

2. Emission Limitations:
N/A

3. Testing Requirements:
Pursuant to 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted if required by the Cabinet.

4. Specific Monitoring Requirements:
a. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil and filter change requirement in Table 2d to 40 CFR 63, Subpart ZZZZ. The

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

oil analysis shall be performed at the same frequency specified for changing the oil and filter in Table 2d to 40 CFR 63, Subpart ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil and filter. If any of the limits are exceeded, the permittee shall change the oil and filter within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil and filter within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil and filter changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [40 CFR 63.6625(i)]

b. Refer to **SECTION F** for general monitoring requirements.

5. Specific Recordkeeping Requirements:

a. The permittee shall keep the records described in 40 CFR 63.6655(a)(1) through (5). [40 CFR 63.6655(a)]
   i. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). [40 CFR 63.6655(a)(1)]
   ii. Records of the occurrence and duration (in hours) of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(2)]
   iii. Records of all required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(4)]
   iv. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)(5)]

b. The permittee shall keep the records required in Table 6 of 40 CFR 63, Subpart ZZZZ, to show continuous compliance with each emission or operating limitation that applies to the permittee. [40 CFR 63.6655(d)]

c. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan. [40 CFR 63.6655(e)]

d. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR 63.6655(f)]

e. Records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(a)]

f. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6660(b)]

g. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(c)]

h. Refer to **SECTION F** for general recordkeeping requirements.

6. Specific Reporting Requirements:

a. The permittee shall report each instance in which an applicable emission limitation or operating limitation in Table 2d to 40 CFR 63, Subpart ZZZZ, was not met. These instances are deviations from the emission and operating limitations in 40 CFR 63, Subpart ZZZZ. These deviations shall be reported according to the requirements in 40 CFR 63.6650. [40 CFR 63.6640(b)]

b. The permittee shall report each instance in which the requirements of Table 8 to 40 CFR 63, Subpart ZZZZ, that apply, have not been met. [40 CFR 63.6640(e)]

c. The permittee shall submit each report in Table 7 of 40 CFR 63, Subpart ZZZZ that applies. [40 CFR 63.6650(a)]

d. The permittee must report all deviations as defined in 40 CFR 63, Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to table 7 of 40 CFR 63, Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in 40 CFR 63, Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Division. The semiannual and annual compliance report required in table 7 of 40 CFR 63, Subpart ZZZZ must be submitted according to 40 CFR 63.6650(i). Only those elements required under 40 CFR 63, Subpart ZZZZ are required to be submitted according to 40 CFR 63.6650(i). [40 CFR 63.6650(f)]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

e. If the engine operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), the permittee shall submit an annual report according to the requirements in 40 CFR 63.6650(h)(1) through (3). [40 CFR 63.6650(h)]

f. Refer to **SECTION F** for general reporting requirements.

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP #49 Emergency Generator

Description:

Model:	Kohler 30REOZJB
Rating:	64 HP
Displacement:	2.9 L
Fuel:	Diesel
Date Constructed:	2013

APPLICABLE REGULATIONS:

401 KAR 60:005, Section 2(2)(dddd), 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)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

1. **Operating Limitations:**
   a. The permittee shall meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. No further requirements apply for such engines under 40 CFR 63, Subpart ZZZZ. [40 CFR 63.6590(c)]

   b. The permittee shall operate and maintain stationary CI ICE that achieves the emission standards as required in 40 CFR 60.4205 over the entire life of the engine. [40 CFR 60.4206]

   c. The permittee shall use diesel fuel that meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel. [40 CFR 60.4207(b)]

   d. The permittee must do all of the following, except as permitted under 40 CFR 60.4211(g): [40 CFR 60.4211(a)]
      i. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [40 CFR 60.4211(a)(1)]
      ii. Change only those emission-related settings that are permitted by the manufacturer; and, [40 CFR 60.4211(a)(2)]
      iii. Meet the requirements of 40 CFR part 1068, as they apply. [40 CFR 60.4211(a)(3)]

   e. The permittee shall operate the emergency stationary ICE according to the requirements in 40 CFR 60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 CFR 60, Subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 60.4211(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in 40 CFR 60.4211(f)(1) through (3), the engine will not be considered an emergency engine under 40 CFR 60, Subpart IIII, and must meet all requirements for non-emergency engines. [40 CFR 60.4211(f)]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

i. There is no time limit on the use of emergency stationary ICE in emergency situations. [40 CFR 60.4211(f)(1)]

ii. The permittee may operate the emergency stationary ICE for the purpose specified in 40 CFR 60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [40 CFR 60.4211(f)(2)]

1) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [40 CFR 60.4211(f)(2)(i)]

iii. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in 40 CFR 60.4211(f)(2). Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR 60.4211(f)(3)]

1) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions in 40 CFR 60.4211(f)(3)(i)(A) through (E) are met. [40 CFR 60.4211(f)(3)(i)]

f. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance according to 40 CFR 60.4211(g)(1). [40 CFR 60.4211(g)]

Compliance Demonstration Method:
The permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if the permittee does not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes the emission-related settings in a way that is not permitted by the manufacturer, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action. [40 CFR 60.4211(g)(1)]

SECTION B - EMISSION UNITS, EMISSION POINTS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations:

The permittee shall comply with the emission standards for new nonroad CI engines in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [40 CFR 60.4205(b)]

Compliance Demonstration Method:

The permittee must comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b), for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR 60.4211(g). [40 CFR 60.4211(c)]

3. Testing Requirements:

Pursuant to 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted if required by the Cabinet.

4. Specific Monitoring Requirements:

a. If the emergency stationary CI internal combustion engine does not meet the standards applicable to non-emergency engines, the permittee shall install a non-resettable hour meter prior to startup of the engine. [40 CFR 60.4209(a)]

b. The permittee shall monitor the amount of diesel usage and the hours of operation on a monthly basis. [401 KAR 52:020, Section 10]

c. Refer to **SECTION F** for general monitoring requirements.

5. Specific Recordkeeping Requirements:

a. The permittee is not required to submit an initial notification. If the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214(b)]

b. The permittee shall keep records of the amount of diesel usage and the hours of operation on a monthly basis. [401 KAR 52:020, Section 10]

c. Refer to **SECTION F** for general recordkeeping requirements.

6. Specific Reporting Requirements:

Refer to **SECTION F** for general reporting requirements.

SECTION C – INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

Description	Generally Applicable Regulation
1. After Cure Ovens: • EP 24 (Mod 5) – IA14: 4 each @ 1.2 MMBtu/hr • EP 31 (AM Line 1) – IA18: 1 @ 0.795 MMBtu/hr, 1 @ 0.317 MMBtu/hr • EP 32 (AM Line 2) – IA19: 2 each @ 0.795 MMBtu/hr • EP 37 (Mod 6) – IA26: 4 each @ 0.956 MMBtu/hr • EP 40 (Mod 7) – IA27: 4 each @ 0.956 MMBtu/hr • EP 47 (Mod 8): 4 each @ 0.956 MMBtu/hr • EP 51: AM Line 3 Cure Oven 1 @ 0.956 MMBtu/hr, 1 @ 1.1874 MMBtu/hr	401 KAR 59:010 401 KAR 63:020
2. ST Cure Ovens: • EP 05 (11) – IA02: 1.5 MMBtu/hr • EP 14 (21) – IA07: 1.5 MMBtu/hr • EP 36 (41) – IA25: 1.0 MMBtu/hr • EP 45 (51) – 1.0 MMBtu/hr	401 KAR 59:010 401 KAR 63:020
3. Scorchers: • EP 25 (OE 51 Fibermatte) – IA15: 2 each @ 4.76 MMBtu/hr • EP 41 (Mod 7, 71 and 72) – IA28: 2 each @ 4.76 MMBtu/hr • EP 42 (Mod 6, 61 and 62) – IA29: 2 each @ 4.76 MMBtu/hr • EP 48 (Mod 8): 2 each @ 4.76 MMBtu/hr	401 KAR 59:010 401 KAR 63:020
4. Surface Treatment: EP 43 (41) – IA30, EP 44 (51) (powder adhesive booth; 100% reclaim)	401 KAR 59:010
5. Hot Pressing Operations (HP31-34, HP51-54, HP61-64, HP 71-74, HP 81-84, AMHP1A, AMHP1B, AMHP2E, AMHP2F, AMHP3G, AMHP3)	N/A
6. EP 09 – IA04-5: 18 Air Make-up Units • 2 each @ 3.2 MMBtu/hr • 2 each @ 3.5 MMBtu/hr • 1 @ 6.3 MMBtu/hr • 5 each @ 6.6 MMBtu/hr • 1 @ 0.54 MMBtu/hr • 1 @ 6.6 MMBtu/hr	401 KAR 59:010 401 KAR 63:020

SECTION C – INSIGNIFICANT ACTIVITIES (CONTINUED)

- 2 each @ 2.93 MMBtu/hr
- 4 each @ 9.9 MMBtu/hr

7.	EP 18 – IA1213: 7 Powder Coat Marking/Painting Lines (Closed Loop System)	401 KAR 59:010
8.	Inkjet Printers	N/A
9.	EP 56: Side Paint Re-work Process	401 KAR 59:010 401 KAR 63:020

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. PM, SO_2, opacity, and VOC emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility 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 of the source.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b-IV-2 and 1a-8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020, Section 3(1)h, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit:
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020, Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken shall be submitted to the Regional Office listed on the front of this permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement does not identify a specific time frame for reporting deviations, prompt reporting, as required by Sections 1b-V, 3 and 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, shall be defined as follows:
   a. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
   b. For emissions of any regulated air pollutant, excluding those listed in F.8.a., that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
   c. All deviations from permit requirements, including those previously reported, shall be included in the semiannual report required by F.6.

9. Pursuant to 401 KAR 52:020, Title V permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
   a. Identification of the term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

f. The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the following addresses:

Division for Air Quality Bowling Green Regional Office 2642 Russellville Road Bowling Green, KY 42101	U.S. EPA Region 4 Air Enforcement Branch Atlanta Federal Center 61 Forsyth St. SW Atlanta, GA 30303-8960

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within 30 days of the date the Kentucky Emissions Inventory System (KYEIS) emissions survey is mailed to the permittee.

SECTION G - GENERAL PROVISIONS

1. General Compliance Requirements

   a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
      (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
      (2) The Cabinet or the United States Environmental Protection Agency (U. S. EPA) determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
      (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;
      (4) New requirements become applicable to a source subject to the Acid Rain Program.

      Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

   d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 7 and 8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:020, Section 3(1)(c)].

SECTION G – GENERAL PROVISIONS (CONTINUED)

f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3) b].

l. This permit does not convey property rights or exclusive privileges [Section 1a-9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

m. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3) d.].

o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3) a.].

SECTION G – GENERAL PROVISIONS (CONTINUED)

p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

q. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
(1) Applicable requirements that are included and specifically identified in this permit; and
(2) Non-applicable requirements expressly identified in this permit.

2. Permit Expiration and Reapplication Requirements

a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

b. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020, Section 8(2)].

3. Permit Revisions

a. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

4. Construction, Start-Up, and Initial Compliance Demonstration Requirements

No construction authorized by permit V-25-019.

SECTION G – GENERAL PROVISIONS (CONTINUED)

5. Testing Requirements

   a. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.

   b. Pursuant to 401 KAR 50:045, Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. If [When] the maximum production rate represents a source's highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.

   c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

6. Acid Rain Program Requirements

   a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

   b. The permittee shall comply with all applicable requirements and conditions of the Acid Rain Permit and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) incorporated into the Title V permit issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.

7. Emergency Provisions

   a. Pursuant to 401 KAR 52:020, Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
      (1) An emergency occurred and the permittee can identify the cause of the emergency;
      (2) The permitted facility was at the time being properly operated;

SECTION G – GENERAL PROVISIONS (CONTINUED)

(3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
(4) Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.1-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
(5) This requirement does not relieve the source of other local, state or federal notification requirements.

b. Emergency conditions listed in General Condition G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

8. Ozone Depleting Substances

a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
(1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
(2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
(3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.155.
(5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156 and 40 CFR 82.157.
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

9. Risk Management Provisions

a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk

SECTION G – GENERAL PROVISIONS (CONTINUED)

Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to U.S. EPA using the RMP*eSubmit software.

b. If requested, submit additional relevant information to the Division or the U.S. EPA.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

N/A

ATTACHMENT A

COMPLIANCE ASSURANCE MONITORING PLAN (CAM) 40 CFR 64

This CAM Plan is for control of particulate matter using fabric filters at Akebono Brake, an automotive brake pad manufacturer in Glasgow, KY. Particulate matter is generated from the raw material mixing process, as well as from grinding the cured brake pad material to the customers' required specifications.

I. BACKGROUND

A. Emission Units

Description: Slitters/Grinders (EPs 27, 30, 38, 39, 46, and 52)
Mixers/Blenders (EPs 6 and 29)

Facility: Akebono Brake - Glasgow
1765 Cleveland Ave.
Glasgow, KY 42141

B. Applicable Regulation, Emission Limit, Monitoring Requirements

Regulation: 401 KAR 59:010
Emission Limits:
Opacity: < 20%
Particulate Matter: 2.34 lb/hr

Monitoring requirements: Visible emissions, baghouse differential pressure

C. Control Technology

Six (6) pulse jet baghouses (DC2, DC3, DC4, DC5, DC6, DC7) which filter approximately 28,000 CFM of air each, one (1) baghouse (DC8) that filters approximately 83,000 CFM, and one (1) baghouse (DC5) that filters approximately 13,500 CFM, all operate under negative pressure. Pre-control potential emissions of PM are greater than 100 tons annually. Efficiency rated at 99.9%.

II. MONITORING APPROACH

	Visible emissions	**Differential Pressure**
A. Indicator & Measurement Approach	Visible emissions (VE) from the baghouse exhausts will be monitored weekly during routine maximum operating conditions using a VE-no VE check.	Differential pressure across the baghouses will be measured with Magnehelic gauges at each baghouse and recorded daily.

	Visible emissions	Differential Pressure
B. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger corrective action.	An excursion is defined as a differential pressure lower than the baseline or greater than 5 in. H_2O above the established baseline for each baghouse. The baseline is the initial reading after the last bag change. Excursions trigger corrective action. Readings less than or greater than the gauge's minimum/maximum range (respectively) require a system inspection.
C. QIP Threshold	Exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a semiannual reporting period	Exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a semiannual reporting period

III. PERFORMANCE CRITERIA

	Visible emissions	Differential Pressure
A. Data Representativeness	Measurements are made at the baghouse exhausts.	Pressure taps are located at the baghouse inlet and outlet. The gauges have a minimum accuracy of 0.25 in. H_2O.
B. Verification of Operational Status	NA	NA
C. QA/QC Practices and Criteria	The observer will be familiar with baghouse operations and visible emissions.	The pressure gauges are zeroed annually using a calibrated gauge that is third-party certified. Leak detector alarms are sounded when broken bags are detected.
D. Monitoring Frequency & Data Collection Procedure	The VE observation is documented by the observer and recorded weekly.	Differential pressure is manually recorded daily.

IV. Justification

A. Rationale for Selection of Performance Indicators

Visible emissions were selected as a performance indicator because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will be no visible emissions from the exhaust. Any increase in visible emissions indicates reduced performance of a particulate control device, therefore, the presence of visible emissions is used as a performance indicator.

In general, baghouses are designed to operate at a relatively constant differential pressure. Monitoring differential pressure provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in differential pressure can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, the bags are becoming inefficient, or the airflow has increased. A decrease in differential pressure may indicate broken or loose bags, but this is also indicated by the presence of visible emissions: Indicator No. 1. Pressure differential across the baghouse also serves to indicate that there is airflow through the control device.

B. Rationale for Selection of Indicator Ranges

The selected indicator range is the presence of no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported in the annual compliance certification required by **SECTION F** (9). An indicator range of "no visible emissions" was selected because an increase in visible emissions is indicative of an increase in particulate emissions.

The indicator range chosen for the baghouse differential pressure is from the established baseline to greater than 5 in. H_2O above the established baseline for each baghouse. The baseline is the initial reading after the last bag change. An excursion triggers corrective action. The gauge reading is recorded daily. The bags are typically changed yearly. This indicator is also used to monitor for bypass of the control devices. If the differential pressure falls below the baseline during normal process operation, the system's inlets and outlets are inspected, and the possibility of a bypass is investigated.