

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

Conditional Major, Operating
Permit: F-26-001

Hendrickson USA, L.L.C.
565 Pin Oak Drive
Somerset, KY 42501

Dec 27, 2025
Qinyi Wang, Reviewer

SOURCE ID: 21-199-00104
AGENCY INTEREST: 82897
ACTIVITY: APE20250001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3714, Motor Vehicle Parts and Accessories

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

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

28 Source Category Yes No If Yes, Category:

County: Pulaski

Nonattainment Area N/A PM₁₀ PM_{2.5} CO NO_x SO₂ Ozone Lead

If yes, list Classification: N/A

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

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

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

If yes, for what pollutant(s)?

PM₁₀ PM_{2.5} CO NO_x SO₂ VOC

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

If yes, list which pollutant(s): N/A

PTE* greater than 25 tpy for combined HAP Yes No

*PTE does not include self-imposed emission limitations.

Description of Facility:

Hendrickson USA, LLC makes air ride suspensions for trailers. The trailer suspensions are for the Class 8 heavy duty transportation industry and include axles and trailing arms.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-001

Activity: APE20250001

Application Received: 9/29/2025

Application Complete Date(s): 12/31/2025

Permit Action: Initial Renewal Significant Rev Minor Rev Administrative

Construction/Modification Requested? Yes No

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

Description of Action:

On September 29, 2025, an application was received from Hendrickson USA, LLC for the renewal of their current conditional major permit (F-20-018). The Enamel Spray Booth #3 (EP05) emission unit was never constructed and is to be removed from this permit renewal. The facility proposes to replace certain existing units listed in Section C of the permit. The water heater has been converted from fuel-fired operation to electric operation. In addition, the tube heaters are no longer in service. The source also requested delegation of responsible official authority for the facility to Mr. Devin Reynolds.

F-26-001 Emission Summary		
Pollutant	2024 Actual (tpy)	PTE F-26-001 (tpy)
CO	0.50	14.81
NOx	0.59	17.64
PT	2.34	21.78
PM ₁₀	2.34	21.78
PM _{2.5}	0.44	5.13
SO ₂	0.004	0.11
VOC	39.18	462.62*
Lead	0.000003	8.82E-05
Greenhouse Gases (GHGs)		
Carbon Dioxide	711.06	21,162
Methane	0.014	0.41
Nitrous Oxide	0.013	0.39
CO ₂ Equivalent (CO ₂ e)	715.28	21,288
Hazardous Air Pollutants (HAPs)		
Ethyl Benzene	0.10	0.17
Methanol	0.10	0.17
Toluene	0.58	1.01
Xylenes	0.10	0.17
Combined HAPs:	0.88	1.52

**Emissions limited by federally-enforceable emission limitations to ensure the source remains below major source thresholds.*

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #01and 02 Surface Coating Operations				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Source wide 90 tpy	To Preclude 401 KAR 52:020 & 401 KAR 51:017	SDS/ Mass Balance	Recordkeeping, 12 month rolling total
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	SDS/ Mass Balance, Transfer Efficiency 65% and 85%	Dry filters, 98% C.E., Manufacturer's guarantee
	20% opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly Visual Observation

Initial Construction Date: *See below*

Process Description:

EP 1 Enamel Spray Booth #1 (EU-01)

Spray operation system: electrostatic airless gun (model REA90A by Ransburg) with Transfer efficiency 65%

Coating usage rate: 15.0 gals/ hr

Clean- up solvent usage rate: 0.027 gal/ hr

Control Equipment: Dry filter 90% C.E

Date of Commenced: July 2007

EP 2 Enamel Spray Booth #2 (EU-02)

Spray operation system: electrostatic airless gun (model REA90A by Ransburg) with Transfer efficiency 85%

Coating usage rate: 15 gals/ hr

Clean- up solvent usage rate: 0.027 gal/ hr

Control Equipment: Dry filter 98% C.E

Date of Commenced: May 2011

Applicable Regulation:

401 KAR 59:010, This regulation is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975.

State-Origin Requirements:

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*, is applicable to each affected facility or source which emits or may emit potentially hazardous matter or toxic substances provided such emissions are not subject to another emission standard with respect to hazardous matter emissions commenced after April 9, 1972.

Precluded Regulations:

401 KAR 52:020, *Title V Permits*, is precluded by the source-wide VOC emission limit of 90 tons per year for each twelve (12) consecutive months.

401 KAR 51:017, *Prevention of Significant Deterioration of Air Quality*.

Emission Unit #01and 02 Surface Coating Operations

Comments:

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations do not apply as Pulaski county is an attainment area and the source is not a major source for VOC as defined in 401 KAR 59:001.

401 KAR 63:002 Section 2(4) (rrr) 40 C.F.R. 63.3880 through 63.3981, Tables 1 through 4, and Appendix A (Subpart MMMM), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable since the facility is not a major source.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements/Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
N/A										

Footnotes:

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	To Preclude 401 KAR 52:020 & 401 KAR 51:017	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, <i>New process operations.</i>	EU 01 & 02
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances.</i>	EU 01 & 02

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 52:020, <i>Title V Permits.</i>	Source-wide
401 KAR 51:017, <i>Prevention of Significant Deterioration of Air Quality.</i>	Source-wide

Table D - Summary of Non Applicable Regulations:

Non Applicable Regulations	Emission Unit
N/A	

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*

The Division for Air Quality (Division) has performed modeling using SCREEN View on December 15, 2025 of potentially hazardous matter or toxic substances (Toluene, Ethyl Benzene, Methanol, Methyl Ethyl Ketone and Xylene) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination

N/A

SECTION 5 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
S-07-041	Mnr Source-Initial	APE20070002	1/10/2007	3/2/2007	Initial Construction Permit	N/A
F-11-016	Cond Mjr-Initial	APE20110002	4/2/2011	6/1/2011	Initial, Add EP#2	N/A
F-16-018	Cond Mjr-Renewal	APE20150001	3/18/2016	5/31/2016	Renewal	N/A
F-20-018	Cond Mjr-Renewal	APE20200001 & APE20210001	1/15/2021 2/24/2021	5/31/2021	Renewal Added spray booth #3 (EU5)	N/A

SECTION 6 – PERMIT APPLICATION HISTORY
N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

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