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**MERITOR**

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SEP 10 2024

Permit Review Branch  
Division for Air Quality

**88 Steadmantown Lane  
Frankfort, KY. 40601**

September 5, 2024

Michelle McCloskey  
Department for Environmental Protection  
Division of Air Quality  
300 Sower Boulevard  
Frankfort, KY 40601



RE: Reports required by Permit F-19-035 R1, AI 3983

Dear Ms. McCloskey,

Please find attached a signed copy of the air emissions reports for a permit renewal.

All documents to support the data are kept on file at Meritor. If you have any questions concerning either of these reports, please give me a call at 502-695-5948.

Respectfully,

Allison Toney  
HSE Specialist

Division for Air Quality  
 300 Sower Boulevard  
 Frankfort, KY 40601  
 (502) 564-3999

**DEP7007A**  
**Indirect Heat Exchangers and Turbines**  
 \_\_\_ Section A.1: General Information  
 \_\_\_ Section A.2: Operating and Fuel Information  
 \_\_\_ Section A.3: Notes, Comments, and Explanations

**Additional Documentation**  
 \_\_\_ Complete DEP7007A1, DEP7007N, DEP7007V, and DEP7007GG.  
 \_\_\_ Manufacturer's specifications

**Source Name:** Mentor Heavy Braking Systems (U.S.A.), Inc.  
**KY EIS (AFS) #:** 21-213-00015  
**Permit #:** F-19-035 R1  
**Agency Interest (AI) ID:** 3983  
**Date:** 7/31/2024

**Section A.1: General Information**

| Emission Unit # | Emission Unit Name  | Process ID | Process Name | Identify General Type:<br>Indirect Heat Exchanger, Gas Turbine, or Combustion Turbine | Indirect Heat Exchanger Configuration | Manufacturer | Model No./ Serial No. | Proposed/Actual Date of Construction Commencement (MM/YYYY) | SCC Code | SCC Units | Control Device ID | Stack ID |
|-----------------|---|------------|--------------|---|---------------------------------------|--------------|-----------------------|---|----------|-----------|-------------------|----------|
| 21              | AO Smith Boiler   |            |              | Indirect Heat Exchanger   |                                       | AO Smith     |                       | 1996  |          |           |                   |          |
| 22              | Cummins Model GTYA8.3G2 Natural Gas-fired Emergency Generator |            |              | Industrial Engine (Emergency only)  |                                       | Cummins      | GTYA8.3G2             | 1997  |          |           |                   |          |
| 03              | Wash & Rinse Tanks  |            |              | Indirect Heat Exchanger   |                                       | FMT          |                       | 1997  |          |           |                   |          |
| 02              | Borax Rinse Tank  |            |              | Indirect Heat Exchanger   |                                       | FMT          |                       | 1997  |          |           |                   |          |
| 20              | Air Make Up Units   |            |              | Indirect Heat Exchanger   |                                       |              |                       |   |          |           |                   |          |

| Section A.2: Operating and Fuel Information |   |              |       |           |                                      |                             |   |  |                                       |   |                    |  |                         |                 |                    |
|---|---|--------------|-------|-----------|--------------------------------------|-----------------------------|---|--|---------------------------------------|---|--------------------|--|-------------------------|-----------------|--------------------|
| Emission Unit #                             | If multipurpose unit, identify the percentage of use by purpose |              |       |           | Rated Capacity Heat Input (MMBTU/hr) | Rated Capacity Power Output |   | Describe Operating Scenario (only if this unit will be used in different configurations) | Classify Fuel as Primary or Secondary | Identify Fuel Type: Coal, Natural Gas, Wood, Biomass, Landfill/Digester Gas, Fuel Oil # (specify 1-6), or Other | Heat Content (HHV) |  | Maximum Operating Hours | Ash Content (%) | Sulfur Content (%) |
|   | Space Heat  | Process Heat | Power | Emergency |                                      |                             | (Specify units: hp, MW, or lb steam/hr) |  |                                       |   |                    | (Specify units: Btu/lb, Btu/gal, or Btu/scf) |                         |                 |                    |
| 21  |   | 100          |       |           | 0.225                                |                             |   |  |                                       | Natural Gas   | 1020               | btu/scf                                      | 8736                    | Negligible      | Negligible         |
| 22  |   |              |       | 100       |                                      | 750                         | hp                                      |  |                                       | Natural Gas   | 1020               | btu/scf                                      | 26                      | Negligible      | Negligible         |
| 03  |   | 100          |       |           | 0.95                                 |                             |   |  |                                       | Natural Gas   | 1020               | btu/scf                                      | 8736                    | Negligible      | Negligible         |
| 02  |   | 100          |       |           | 0.475                                |                             |   |  |                                       | Natural Gas   | 1020               | btu/scf                                      | 8736                    | Negligible      | Negligible         |
| 20  |   | 100          |       |           | 1.25                                 |                             |   |  |                                       | Natural Gas   | 1020               | btu/scf                                      | 8736                    | Negligible      | Negligible         |

| <b>Section A.3: Notes, Comments, and Explanations</b> |
|---|
| N/A   |
|   |
|   |
|   |
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|   |

Division for Air Quality

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

DEP7007AI

Administrative Information

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

Additional Documentation

Additional Documentation attached

Source Name: Meritor Heavy Braking Systems (U.S.A), Inc.

KY EIS (AFS) #: 21- 213-00015

Permit #: F-19-035 R1

Agency Interest (AI) ID: 3983

Date: 31-Jul-24

Section AI.1: Source Information

|                   |           |                         |           |                 |
|-------------------|-----------|-------------------------|-----------|-----------------|
| Physical Location | Street:   | <u>115 Ogles Avenue</u> |           |                 |
| Address:          | City:     | <u>Franklin</u>         | County:   | <u>Simpson</u>  |
|                   | Street or | <u>115 Ogles Avenue</u> |           |                 |
| Mailing Address:  | P.O. Box: |                         |           |                 |
|                   | City:     | <u>Franklin</u>         | State:    | <u>Kentucky</u> |
|                   |           |                         | Zip Code: | <u>42134</u>    |

Standard Coordinates for Source Physical Location

Longitude: -86.5747 (decimal degrees)      Latitude: 36.7394 (decimal degrees)

Primary (NAICS) Category: Iron Foundries      Primary NAICS #: 331511

Classification (SIC) Category:

Grey Iron Foundry

Primary SIC #: 3321

Briefly discuss the type of business conducted at this site:

Meritor manufactures heavy vehicle axles and components for trucks and trailers. Products include hydraulic discs and drum brakes. Other parts are brought in from other facilities with final assembly and painting occurring at the Franklin facility.

Description of Area Surrounding Source:

- Rural Area
- Industrial Park
- Residential Area
- Urban Area
- Industrial Area
- Commercial Area

Is any part of the source located on federal land?  Yes  No

Number of Employees:

55

Approximate distance to nearest residence or commercial property:

100 feet

Property Area:

14 acres

Is this source portable?  Yes  No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:  Currently Hold  Need  N/A

Solid Waste:  Currently Hold  Need  N/A

RCRA:  Currently Hold  Need  N/A

UST:  Currently Hold  Need  N/A

Type of Regulated Waste Activity:

- Mixed Waste Generator
- Generator
- Recycler
- Other: \_\_\_\_\_
- U.S. Importer of Hazardous Waste
- Transporter
- Treatment/Storage/Disposal Facility
- N/A

**Section AI.2: Applicant Information****Applicant Name:** Meritor Heavy Braking Systems (U.S.A.), Inc.**Title:** (if individual) \_\_\_\_\_**Mailing Address:** **Street or P.O. Box:** 115 Ogles Avenue  
**City:** Franklin **State:** KY **Zip Code:** 42134**Email:** (if individual) \_\_\_\_\_**Phone:** 270-586-2833**Technical Contact****Name:** Jason McMillen**Title:** Plant Manager**Mailing Address:** **Street or P.O. Box:** 115 Ogles Avenue  
**City:** Franklin **State:** KY **Zip Code:** 42134**Email:** Jason.McMillen@cummins.com**Phone:** 270-586-2833**Air Permit Contact for Source****Name:** Jason McMillen**Title:** Plant Manager**Mailing Address:** **Street or P.O. Box:** 115 Ogles Avenue  
**City:** Franklin **State:** KY **Zip Code:** 42134**Email:** Jason.McMillen@cummins.com**Phone:** 270-586-2833



**Section AI.3: Owner Information**

**Owner same as applicant**

**Name:** Meritor Heavy Vehicle Systems, LLC

**Title:** \_\_\_\_\_

**Mailing Address:** **Street or P.O. Box:** 2135 West Maple Road

**City:** Troy **State:** MI **Zip Code:** 40601

**Email:** \_\_\_\_\_

**Phone:** 248-435-1530

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

**Name**

**Position**

N/A

**Section AI.4: Type of Application**

**Current Status:**       Title V    Conditional Major    State-Origin                       General Permit                       Registration                       None

**Requested Action:**       Name Change       Initial Registration       Significant Revision                       Administrative Permit Amendment  
*(check all that apply)*       Renewal Permit       Revised Registration       Minor Revision                       Initial Source-wide Operating Permit  
 502(b)(10)Change       Extension Request       Addition of New Facility                       Portable Plant Relocation Notice  
 Revision                       Off Permit Change       Landfill Alternate Compliance Submittal       Modification of Existing Facilities  
 Ownership Change       Closure

**Requested Status:**       Title V    Conditional Major       State-Origin       PSD       NSR                       Other: \_\_\_\_\_

**Is the source requesting a limitation of potential emissions?**                       Yes                       No

| <b>Pollutant:</b>   | <b>Requested Limit:</b> | <b>Pollutant:</b>  | <b>Requested Limit:</b> |
|---|-------------------------|--|-------------------------|
| <input type="checkbox"/> Particulate Matter               | _____                   | <input type="checkbox"/> Single HAP                        | _____                   |
| <input type="checkbox"/> Volatile Organic Compounds (VOC) | _____                   | <input type="checkbox"/> Combined HAPs                     | _____                   |
| <input type="checkbox"/> Carbon Monoxide                  | _____                   | <input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F) | _____                   |
| <input type="checkbox"/> Nitrogen Oxides                  | _____                   | <input type="checkbox"/> Carbon Dioxide                    | _____                   |
| <input type="checkbox"/> Sulfur Dioxide                   | _____                   | <input type="checkbox"/> Greenhouse Gases (GHG)            | _____                   |
| <input type="checkbox"/> Lead                             | _____                   | <input type="checkbox"/> Other                             | _____                   |

**For New Construction:**

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

(MM/YYYY)                      \_\_\_\_\_                      \_\_\_\_\_

**For Modifications:**

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

(MM/YYYY)                      \_\_\_\_\_                      \_\_\_\_\_

**Applicant is seeking coverage under a permit shield.**                       Yes                       No                      **Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.**

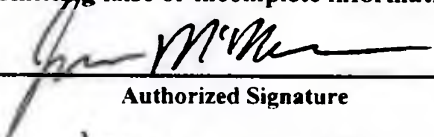
## Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> DEP7007A Indirect Heat Exchangers and Turbines             | <input checked="" type="checkbox"/> DEP7007CC Compliance Certification            |
| <input checked="" type="checkbox"/> DEP7007B Manufacturing or Processing Operations            | <input checked="" type="checkbox"/> DEP7007DD Insignificant Activities            |
| <input type="checkbox"/> DEP7007C Incinerators and Waste Burners                               | <input type="checkbox"/> DEP7007EE Internal Combustion Engines                    |
| <input type="checkbox"/> DEP7007F Episode Standby Plan   | <input type="checkbox"/> DEP7007FF Secondary Aluminum Processing                  |
| <input type="checkbox"/> DEP7007J Volatile Liquid Storage                                      | <input type="checkbox"/> DEP7007GG Control Equipment                              |
| <input type="checkbox"/> DEP7007K Surface Coating or Printing Operations                       | <input type="checkbox"/> DEP7007HH Haul Roads                                     |
| <input type="checkbox"/> DEP7007L Mineral Processes  | <input type="checkbox"/> Confidentiality Claim                                    |
| <input type="checkbox"/> DEP7007M Metal Cleaning Degreasers                                    | <input type="checkbox"/> Ownership Change Form                                    |
| <input checked="" type="checkbox"/> DEP7007N Source Emissions Profile                          | <input type="checkbox"/> Secretary of State Certificate                           |
| <input type="checkbox"/> DEP7007P Perchloroethylene Dry Cleaning Systems                       | <input checked="" type="checkbox"/> Flowcharts or diagrams depicting process      |
| <input type="checkbox"/> DEP7007R Emission Offset Credit                                       | <input type="checkbox"/> Digital Line Graphs (DLG) files of buldings, roads, etc. |
| <input type="checkbox"/> DEP7007S Service Stations   | <input type="checkbox"/> Site Map   |
| <input type="checkbox"/> DEP7007T Metal Plating and Surface Treatment Operations               | <input type="checkbox"/> Map or drawing depicting location of facility            |
| <input checked="" type="checkbox"/> DEP7007V Applicable Requirements and Compliance Activities | <input checked="" type="checkbox"/> Safety Data Sheet (SDS)                       |
| <input type="checkbox"/> DEP7007Y Good Engineering Practice and Stack Height Determination     | <input type="checkbox"/> Emergency Response Plan                                  |
| <input type="checkbox"/> DEP7007AA Compliance Schedule for Non-complying Emission Units        | <input type="checkbox"/> Other: _____   |
| <input type="checkbox"/> DEP7007BB Certified Progress Report                                   |   |

## Section AI.6: Signature Block

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

  
 \_\_\_\_\_  
 Authorized Signature

JASON McMILLEN  
 \_\_\_\_\_  
 Type or Printed Name of Signatory

9-5-24  
 \_\_\_\_\_  
 Date

PLANT MANAGER  
 \_\_\_\_\_  
 Title of Signatory

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



|  |  |  |
|--|--|--|
| Division for Air Quality<br><br>300 Sower Boulevard<br>Frankfort, KY 40601<br>(502) 564-3999 | <b>DEP7007B</b><br><br><b>Manufacturing or Processing Operations</b><br><input type="checkbox"/> Section B.1: Process Information<br><input type="checkbox"/> Section B.2: Materials and Fuel Information<br><input type="checkbox"/> Section B.3: Notes, Comments, and Explanations | <b>Additional Documentation</b><br><input type="checkbox"/> Complete DEP7007AI, DEP7007N,<br>DEP7007V, and DEP7007GG.<br><input type="checkbox"/> Attach a flow diagram<br><input type="checkbox"/> Attach SDS |
|--|--|--|

**Source Name:** Meritor Heavy Braking Systems (U.S.A.), Inc  
**KY EIS (AFS) #:** 21- 213-00015  
**Permit #:** F-19-035 R1  
**Agency Interest (AI) ID:** 3983  
**Date:** July 31, 2024

**Section B.1: Process Information**

| Emission Unit # | Emission Unit Name            | Describe Emission Unit                                    | Process ID | Process Name       | Manufacturer | Model No. | Proposed/Actual Date of Construction Commencement (MM/YYYY) | Is the Process <u>Continuous</u> or <u>Batch</u> ? | Number of Batches per 24 Hours (if applicable) | Hours per Batch (if applicable) |
|-----------------|-------------------------------|---|------------|--------------------|--------------|-----------|---|--|--|---------------------------------|
| 04              | Scrap & Charge Handling       | Handling and charging of scrap metal to the melt furnaces |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 05              | #1 Induction Furnace          | Electric induction furnace                                |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 06              | #2 Induction Furnace          | Electric induction furnace                                |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 07              | Transfer to Ladle             | Transfer of molten metal from furnace to pouring ladle    |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 09              | Pouring & Cooling             | Casting and cooling of molten metal                       |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 12              | Shotblast                     | Shot blast  |            | Foundry Operations |              |           | 1996  | Continuous   |  |                                 |
| 16              | Holding Pressure Pour Furnace | One primary electric pressure pour furnace                |            | Foundry Operations |              |           | 2003  | Continuous   |  |                                 |

| Emission Unit # | Emission Unit Name           | Describe Emission Unit  | Process ID | Process Name             | Manufacturer  | Model No.                                | Proposed/Actual Date of Construction Commencement (MM/YYYY)          | Is the Process Continuous or Batch? | Number of Batches per 24 Hours (if applicable) | Hours per Batch (if applicable) |
|-----------------|------------------------------|---|------------|--------------------------|---|--|--|-------------------------------------|--|---------------------------------|
| 17              | Backup Pressure Pour Furnace | One backup electric pressure pour furnace   |            | Foundry Operations       |   |  | 2003   | Continuous                          |  |                                 |
| 18              | Paint Spray Booth            | One paint booth capable of operating with various paints using a Kremlin HVLP spray gun.  |            | Paints/Coatins           | Kremlin   | Kremlin HVLP spray gun                   | 1997   | Continuous                          |  |                                 |
| 22              | Emergency Generator          | Generac Model SG150 spark ignition emergency generator 4-stroke, nch-burn natural gas fueled engine with a displacement of less than 30 liters per cylinder |            | Generator                | Generac   | SG150 spark ignition emergency generator | 2001   | Continuous                          |  |                                 |
| 2               | Borax Rinse Tank             | Borax Rinse Tank & Heat Exchanger (FMT) using cleaning solution and natural gas   |            | Insignificant Activities | FMT   |  | 1997   | Continuous                          |  |                                 |
| 3               | Wash and Rinse Tanks         | Wash and Rinse Tanks Heat Exchanger (FMT) using cleaning solution and natural gas   |            | Insignificant Activities | FMT   |  | 1997   | Continuous                          |  |                                 |
| 10              | Drying Oven (Heater)         | Drying Oven Natural Gas (Cincinnati Ind Mach)   |            | Insignificant Activities | Cincinnati Industrial Machinery   |  | 2000   | Continuous                          |  |                                 |
| 11              | Wet Machining                | 9 pieces equipment: machining centers, turning machines, drills using coolant   |            | Insignificant Activities | Hitachi Seiki #1<br>Hitachi Seiki #2<br>Hitachi Seiki #3<br>Hessapp<br>Old Twin Spindle Motch<br>New Twin Spindle Motch<br>Drill #1<br>Drill #2<br>Drill #3 |  | 2001<br>2001<br>2001<br>1998<br>2002<br>2012<br>2002<br>2003<br>2003 | Continuous                          |  |                                 |

| Emission Unit # | Emission Unit Name             | Describe Emission Unit                | Process ID | Process Name             | Manufacturer | Model No. | Proposed/Actual Date of Construction Commencement (MM/YYYY) | Is the Process Continuous or Batch? | Number of Batches per 24 Hours (if applicable) | Hours per Batch (if applicable) |
|-----------------|--------------------------------|---------------------------------------|------------|--------------------------|--------------|-----------|---|-------------------------------------|--|---------------------------------|
| 14              | Miscellaneous                  | Roads - Paved                         |            | Insignificant Activities |              |           |   |                                     |  |                                 |
| 15              | Drum Washer                    | Drum Washer, Model # 1000, 1000, 1000 |            | Insignificant Activities | Ranshoff     |           | 1998  | Continuous                          |  |                                 |
| 20              | Air Make-Up Units, Natural Gas | Air Make-Up Units, Natural Gas        |            | Insignificant Activities |              |           |   | Continuous                          |  |                                 |

| Emission Unit # | Emission Unit Name            | Describe Emission Unit        | Process ID | Process Name             | Manufacturer | Model No. | Proposed/Actual Date of Construction Commencement (MM YYYY) | Is the Process <u>Continuous</u> or <u>Batch</u> ? | Number of Batches per 24 Hours (if applicable) | Hours per Batch (if applicable) |
|-----------------|-------------------------------|-------------------------------|------------|--------------------------|--------------|-----------|---|--|--|---------------------------------|
| 21              | A.O. Smith Natural Gas Boiler | A.O. Smith Natural Gas Boiler |            | Insignificant Activities |              |           | 1996  | Continuous   |  |                                 |
| 22              | Automated Drum Turning Unit   | Automated Drum Turning Unit   |            | Insignificant Activities |              |           |   | Continuous   |  |                                 |



| <b>Section B.2: Materials and Fuel Information</b>   |                               |                             |   |                    |   |                            |   |                    |             |                                |                 |                                |                 |                    |                 |
|--|-------------------------------|-----------------------------|---|--------------------|---|----------------------------|---|--------------------|-------------|--------------------------------|-----------------|--------------------------------|-----------------|--------------------|-----------------|
| <i>*Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.</i> |                               |                             |   |                    |   |                            |   |                    |             |                                |                 |                                |                 |                    |                 |
| Emission Unit #  | Emission Unit Name            | Name of Raw Materials Input | Maximum Quantity of Each Raw Material Input |                    | Total Process Weight Rate for Emission Unit (tons/hr) | Name of Finished Materials | Maximum Quantity of Each Finished Material Output |                    | Fuel Type   | Maximum Hourly Fuel Usage Rate |                 | Maximum Yearly Fuel Usage Rate |                 | Sulfur Content (%) | Ash Content (%) |
|  |                               |                             |   | (Specify Units/hr) |   |                            |   | (Specify Units/hr) |             |                                | (Specify Units) |                                | (Specify Units) |                    |                 |
| 04   | Scrap & Charge Handling       | various metals              |   |                    | 7.86  | various metals             |   |                    | n/a         | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 05   | #1 Induction Furnace          | various metals              |   |                    | 3.93  | various metals             |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 06   | #2 Induction Furnace          | various metals              |   |                    | 3.93  | various metals             |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 07   | Transfer to Ladle             | various metals              |   |                    | 7.86  | various metals             |   |                    | n/a         | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 09   | Pouring & Cooling             | various metals              |   |                    | 7.86  | brake drums                |   |                    | n/a         | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 12   | Shotblast                     | brake drums                 |   |                    | 9.9   | brake drums                |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 16   | Holding Pressure Pour Furnace | n/a                         |   |                    | 7.86  | n/a                        |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 17   | Backup Pressure Pour Furnace  | n/a                         |   |                    | 7.86  | n/a                        |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 13   | Paint Spray Booth             | various paints              |   |                    | 6.1 gal/hr  | brake drums                |   |                    | electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 22   | Emergency Generator           | Natural Gas                 |   |                    | 232 HP<br>1.84 MMBtu/hr                               | n/a                        |   |                    | Natural Gas | n/a                            | n/a             | n/a                            | n/a             | Negligible         | Negligible      |

| Emission Unit # | Emission Unit Name             | Name of Raw Materials Input        | Maximum Quantity of Each Raw Material Input |                      | Total Process Weight Rate for Emission Unit (tons/hr) | Name of Finished Materials | Maximum Quantity of Each Finished Material Output |                    | Fuel Type   | Maximum Hourly Fuel Usage Rate |                 | Maximum Yearly Fuel Usage Rate |                 | Sulfur Content (%) | Ash Content (%) |
|-----------------|--------------------------------|------------------------------------|---|----------------------|---|----------------------------|---|--------------------|-------------|--------------------------------|-----------------|--------------------------------|-----------------|--------------------|-----------------|
|                 |                                |                                    |   | (Specify Units/hr)   |   |                            |   | (Specify Units/hr) |             |                                | (Specify Units) |                                | (Specify Units) |                    |                 |
| 02              | Borax Rinse Tank               | Borax Water                        | 165<br>300                                  | lbs/week<br>gal/week | 0.475 MMBtu/hr  | Brake drums                | 120   | drums/hr           | Natural Gas | 466                            | scf/hr          | 4,082,160                      | scf             | Negligible         | Negligible      |
| 03              | Wash and Rinse Tanks           | Sodium hydroxide/water solution    | 300   | gal/week             | 0.95 MMBtu/hr   | Brake drums                | 120   | drums/hr           | Natural Gas | 1078                           | scf/hr          | 9,443,280                      | scf             | Negligible         | Negligible      |
| 10              | Drying Oven (Heater)           |                                    |   |                      | 0.4 MMBtu/hr  | brake drums                | 120   | drums/hr           | Natural Gas | 392                            | scf/hr          | 3,433,920                      | scf             | Negligible         | Negligible      |
| 11              | Wet Machining                  | Coolant - Trim Cut SC520           | 150   | gallons/month        | n/a   | Brake drums                | 120   | drums/hr           | n/a         | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 14              | Miscellaneous (Roads - paved)  | n/a                                | n/a   | n/a                  | n/a   | n/a                        | n/a   | n/a                | n/a         | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 15              | Drum Washer                    | Water Rust Inhibitor (Eco-Kor 430) | 300<br>150                                  | gallons/month        | n/a   | Brake drums                | 120   | drums/hr           | Electric    | n/a                            | n/a             | n/a                            | n/a             | n/a                | n/a             |
| 20              | Air Make-Up Units, Natural Gas | Natural Gas                        |   |                      | 2.5 MMBtu/hr<br>6.3 MMBtu/hr<br>6.3 MMBtu/hr          |                            |   |                    | Natural Gas | n/a                            | n/a             | n/a                            | n/a             | Negligible         | Negligible      |
| 21              | A.O. Smith Natural Gas Boiler  | Natural Gas                        |   |                      | 0.225 MMBtu/hr  |                            |   |                    | Natural Gas | n/a                            | n/a             | n/a                            | n/a             | Negligible         | Negligible      |
| 22              | Automated Drum Turning Unit    | brake drums                        |   |                      |   |                            |   |                    |             | n/a                            | n/a             | n/a                            | n/a             |                    |                 |



|  |  |
|--|--|
| Division for Air Quality<br>300 Sower Boulevard<br>Frankfort, KY 40601<br>(502) 564-3999 | <h2 style="margin: 0;">DEP7007DD</h2> <h3 style="margin: 0;">Insignificant Activities</h3> <p style="margin: 0;">___ Section DD.1: Table of Insignificant Activities</p> <p style="margin: 0;">___ Section DD.2: Signature Block</p> <p style="margin: 0;">___ Section DD.3: Notes, Comments, and Explanations</p> |
| <b>Source Name:</b>  | <u>Meritor Heavy Braking Systems (U.S.A.), Inc</u>   |
| <b>KY EIS (AFS) #:</b>   | <u>21- 213-00015</u>   |
| <b>Permit #:</b>   | <u>F-19-035 RI</u>   |
| <b>Agency Interest (AI) ID:</b>  | <u>3983</u>  |
| <b>Date:</b>   | <u>7/31/2024</u>   |

**Section DD.1: Table of Insignificant Activities**

\*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

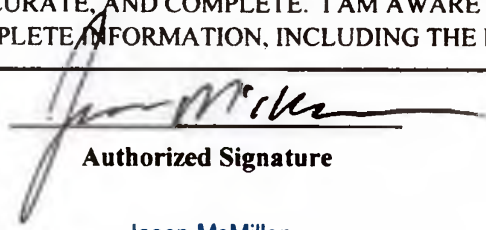
| Insignificant Activity # | Description of Activity including Rated Capacity    | Serial Number or Other Unique Identifier | Applicable Regulation(s)         | Calculated Emissions |
|--------------------------|---|--|----------------------------------|----------------------|
| IA1                      | Borax Rinse Tank, natural gas,<br>0.475 MMBtu/hr    | Emission Unit (02)                       | 401 KAR 59:010<br>401 KAR 63:020 | See attachments      |
| IA2                      | Wash and Rinse Tanks, natural gas,<br>1.11 MMBtu/hr | Emission Unit (03)                       | 401 KAR 59:010                   | See attachments      |
| IA3                      | Wet Machining                                       | Emission Unit (11)                       | 401 KAR 59:010                   | Negligible           |
| IA4                      | Roads - Paved                                       | Emission Unit (14)                       | 401 KAR 63:010                   | Negligible           |
| IA5                      | Drum Washer, rust inhibitor treatment               | Emission Unit (15)                       | 401 KAR 59:010                   | See attachments      |

| Insignificant Activity # | Description of Activity including Rated Capacity             | Serial Number or Other Unique Identifier | Applicable Regulation(s)         | Calculated Emissions |
|--------------------------|--|--|----------------------------------|----------------------|
| IA6                      | Air Make-up Units (2.5, 6.3, and 6.3 MMBtu/hr, respectively) | Emission Unit (20)                       | 401 KAR 59:010                   | See attachments      |
| IA7                      | Drying Oven, natural gas, 0.4 MMBtu/hr                       | Emission Unit (10)                       | 401 KAR 59:010                   | See attachments      |
| IA8                      | A.O. Smith Boiler, natural gas, 0.225 MMBtu/hr               | Emission Unit (21)                       | 401 KAR 59:010<br>401 KAR 63:020 | See attachments      |
| IA9                      | Automated Drum Turning Unit                                  | Emission Unit (22)                       | 401 KAR 59:010                   | Negligible           |
|                          |  |  |                                  |                      |
|                          |  |  |                                  |                      |

**Section DD.2: Signature Block**

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

By:



Authorized Signature

Jason McMillen

Type/Print Name of Signatory

9-5-24

Date

Plant Manager

Title of Signatory

**Section DD.3: Notes, Comments, and Explanations**

N/A

**Division for Air Quality**

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

**DEP7007N**

**Source Emissions Profile**

- Section N.1: Emission Summary
- Section N.2: Stack Information
- Section N.3: Fugitive Information
- Section N.4: Notes, Comments, and Explanations

Additional Documentation

Complete DEP7007AI

**Source Name:** Meritor Heavy Braking Systems (U.S.A.), Inc.

**KY EIS (AFS) #:** 21- 213-00015

**Permit #:** F-19-035 R1

**Agency Interest (AI) ID:** 3983

**Date:** 31-Jul-24

**N.1: Emission Summary**

| Emission Unit # | Emission Unit Name      | Process ID | Process Name       | Control Device Name | Control Device ID | Stack ID | Maximum Design Capacity (SCC Units/Year) | Pollutant       | Uncontrolled Emission Factor (lb/SCC Units) | Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance) | Capture Efficiency (%) | Control Efficiency (%) | Hourly Emissions               |                              | Annual Emissions                 |                                |
|-----------------|-------------------------|------------|--------------------|---------------------|-------------------|----------|--|-----------------|---|---|------------------------|------------------------|--------------------------------|------------------------------|----------------------------------|--------------------------------|
|                 |                         |            |                    |                     |                   |          |  |                 |   |   |                        |                        | Uncontrolled Potential (lb/hr) | Controlled Potential (lb/hr) | Uncontrolled Potential (tons/yr) | Controlled Potential (tons/yr) |
| 04              | Scrap & Charge Handling |            | Foundry Operations |                     |                   |          | 1.86 tons/hr                             | See attachments |   |   |                        |                        |                                |                              |                                  |                                |
| 05              | #1 Induction Furnace    |            | Foundry Operations | Baghouse            |                   |          | 3.73 tons/hr                             | See attachments |   |   |                        |                        |                                |                              |                                  |                                |
| 06              | #2 Induction Furnace    |            | Foundry Operations | Baghouse            |                   |          | 3.93 tons/hr                             | See attachments |   |   |                        |                        |                                |                              |                                  |                                |

| Emission Unit # | Emission Unit Name            | Process ID | Process Name       | Control Device Name | Control Device ID | Stack ID | Maximum Design Capacity (SCC Units/hr) | Pollutant       | Uncontrolled Emission Factor (lb/SCC Units) | Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance) | Capture Efficiency (%) | Control Efficiency (%) | Hourly Emissions               |                              | Annual Emissions                 |                                |  |
|-----------------|-------------------------------|------------|--------------------|---------------------|-------------------|----------|--|-----------------|---|---|------------------------|------------------------|--------------------------------|------------------------------|----------------------------------|--------------------------------|--|
|                 |                               |            |                    |                     |                   |          |  |                 |   |   |                        |                        | Uncontrolled Potential (lb/hr) | Controlled Potential (lb/hr) | Uncontrolled Potential (tons/yr) | Controlled Potential (tons/yr) |  |
| 07              | Transfer to Ladle             |            | Foundry Operations |                     |                   |          | 7.86 tons/hr                           | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 09              | Pouring & Cooling             |            | Foundry Operations |                     |                   |          | 7.86 tons/hr                           | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 12              | Shotblast                     |            | Foundry Operations | Baghouse            |                   |          | 9.9 tons/hr                            | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 16              | Holding Pressure Pour Furnace |            | Foundry Operations |                     |                   |          | 7.86 tons/hr                           | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 17              | Backup Pressure Pour Furnace  |            | Foundry Operations |                     |                   |          | 7.86 tons/hr                           | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 13              | Paint Spray Booth             |            | Paints/Coatings    | Panel filter        |                   | 13       | 6.1 gal/hr                             | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |
| 22              | Emergency Generator           |            | Generator          |                     |                   |          | 1.84 MMBTU/hr<br>232 HP                | See attachments |   |   |                        |                        |                                |                              |                                  |                                |  |



| Emission Unit # | Emission Unit Name             | Process ID | Process Name             | Control Device Name | Control Device ID | Stack ID | Maximum Design Capacity (SCC Units/hour)       | Pollutant | Uncontrolled Emission Factor (lb/SCC Units) | Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance) | Capture Efficiency (%) | Control Efficiency (%) | Hourly Emissions               |                              | Annual Emissions                 |                                |  |  |
|-----------------|--------------------------------|------------|--------------------------|---------------------|-------------------|----------|--|-----------|---|---|------------------------|------------------------|--------------------------------|------------------------------|----------------------------------|--------------------------------|--|--|
|                 |                                |            |                          |                     |                   |          |  |           |   |   |                        |                        | Uncontrolled Potential (lb/hr) | Controlled Potential (lb/hr) | Uncontrolled Potential (tons/yr) | Controlled Potential (tons/yr) |  |  |
| 02              | Borax Rinse Tank               |            | Insignificant Activities |                     |                   | 02       | 0.475 MMBTU/hr<br>120 drums/hr<br>300 gal/week |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
| 03              | Wash and Rinse Tanks           |            | Insignificant Activities |                     |                   | 03       | 0.95 MMBTU/hr<br>120 drums/hr<br>300 gal/week  |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
| 10              | Drying (Paint Booth)           |            | Insignificant Activities |                     |                   | 10       | 0.95 MBTU/hr                                   |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
| 14              | Washing                        |            | Insignificant Activities |                     |                   | 15       | 120 drums/hr                                   |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
| 20              | Air Make-Up Units, Natural Gas |            | Insignificant Activities |                     |                   |          | 2.5 MMBTU/hr<br>6.3 MMBTU/hr<br>6.3 MMBTU/hr   |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
| 21              | A.O. Smith Natural Gas Boiler  |            | Insignificant Activities |                     |                   |          | 0.225 MMBTU/hr                                 |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
|                 |                                |            |                          |                     |                   |          |  |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
|                 |                                |            |                          |                     |                   |          |  |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |
|                 |                                |            |                          |                     |                   |          |  |           |   |   |                        |                        |                                |                              |                                  |                                |  |  |

**Section N.2: Stack Information**

UTM Zone:

| Stack ID | Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack   | Stack Physical Data      |             |                     | Stack UTM Coordinates |             | Stack Gas Stream Data |                  |                        |
|----------|--|--------------------------|-------------|---------------------|-----------------------|-------------|-----------------------|------------------|------------------------|
|          |  | Equivalent Diameter (ft) | Height (ft) | Base Elevation (ft) | Northing (m)          | Easting (m) | Flowrate (acfm)       | Temperature (°F) | Exit Velocity (ft/sec) |
| 15       | The drum washer has a stack that is approximately 15 ft tall. Per the June 2016 Off-Permit/Section 502(b)(10) Change Notification, the stack no longer exahusts into the building. The emission point is a port out of the roof. | 0.5                      | 18          |                     |                       |             |                       |                  |                        |
| 10. 13   | The drying oven stack (Emission Point 10) connects to the main stack for the paint booth (Emission Point 13).  | 0.5                      | 30          |                     |                       |             |                       |                  |                        |
| 02. 03   | The borax tank, wash tank, and rinse tank each have their own separate pipes that vent to a common stack.  | 4                        |             |                     |                       |             | Ambient               |                  |                        |
|          |  |                          |             |                     |                       |             |                       |                  |                        |
|          |  |                          |             |                     |                       |             |                       |                  |                        |
|          |  |                          |             |                     |                       |             |                       |                  |                        |
|          |  |                          |             |                     |                       |             |                       |                  |                        |

| Stack ID | Identify all Emission Units<br>(with Process ID) and<br>Control Devices that Feed<br>to Stack | Stack Physical Data                   |                       |                                  | Stack UTM Coordinates  |                       | Stack Gas Stream Data     |                            |                                  |
|----------|---|---------------------------------------|-----------------------|----------------------------------|------------------------|-----------------------|---------------------------|----------------------------|----------------------------------|
|          |   | Equivalent<br>Diameter<br><i>(ft)</i> | Height<br><i>(ft)</i> | Base<br>Elevation<br><i>(ft)</i> | Northing<br><i>(m)</i> | Easting<br><i>(m)</i> | Flowrate<br><i>(acfm)</i> | Temperature<br><i>(°F)</i> | Exit Velocity<br><i>(ft/sec)</i> |
|          |   |                                       |                       |                                  |                        |                       |                           |                            |                                  |
|          |   |                                       |                       |                                  |                        |                       |                           |                            |                                  |



| <b>Section N.4: Notes, Comments, and Explanations</b> |
|---|
| See attachments for emissions                         |
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