

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

Conditional Major, Operating
Permit: F-26-022

Summit Polymers, Inc.
160 Clarence Drive
Mt. Sterling, KY 40353

May 4, 2026
Nathan Cox, Reviewer

SOURCE ID:	21-173-00024
AGENCY INTEREST:	3196
ACTIVITY:	APE20260001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3089, Plastics Products, NEC (except plastics pipe fittings, inflatable plastics life jackets, plastics furniture parts, and plastics sausage casings)

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: Montgomery

Nonattainment Area ☒ N/A ☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ Ozone ☐ Lead
If yes, list Classification:

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): Ethyl Benzene, Xylenes

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

*PTE does not include self-imposed emission limitations.

Description of Facility:

Summit Polymers is a manufacturer of small plastic parts for the automotive industry. Products include air conditioning/heating vent dampers, cup holders, etc. The source operates injection molding machines that produce various automotive parts. These parts are then trimmed, inspected, and assembled. The mold “tree” and some rejected pieces and parts are then ground and recycled back through the molding system. Some of the parts, depending upon the desired final product, are sent to a series of paint booths. Painted parts are cured in a small infrared oven attached to the paint booths.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-022

Activity: APE20260001

Application Received: January 16, 2026

Application Complete Date(s): March 21, 2026

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:

- Renewal of the Conditional Major, Operating permit.
- Remove EU04-3, one robotic paint booth and updated description of emission unit 04.
- Updated description of emission unit 06.
- Update coating process emission factors for EU06 Robotic Paint Booths.

F-26-022 Emission Summary				
Pollutant	2025 Actual (tpy)	Previous PTE F-21-003 R1 (tpy)	Change (tpy)	Revised PTE F-26-022 (tpy)
CO	0	0.72	0	0.72
NO _x	0	0.86	0	0.86
PT	1.53	14.69	3.26	17.94
PM ₁₀	1.53	14.69	3.26	17.94
PM _{2.5}	1.19	9.02	3.27	12.29
SO ₂	0	0.005	0	0.005
VOC	55.56	393.83	67.96	461.79*
Lead	0	0.00	8.59E-06	8.58E-05
Greenhouse Gases (GHGs)				
Carbon Dioxide	0	1030	-1	1,029
Methane	0	0.02	0	0.02
Nitrous Oxide	0	0.02	-0.18	0.002
CO ₂ Equivalent (CO ₂ e)	0	1037	-7	1,030
Hazardous Air Pollutants (HAPs)				
Cumene	0.001	0.10	0.82	0.92
Butyl Acetate**	0	0	90.00	90.00***
Ethyl Benzene	0.000001	8.34E-5	12.13	12.13***
Glycol Ethers	0	0	4.78	4.78
Methyl Isobutyl Ketone	0	2.91	-2.14	0.77
Toluene	0.58	8.11	0	8.11
Triethyl Amine	0.07	0.97	0	0.97
Xylenes	0	0	30.33	30.33*
Combined HAPs:	0.65	12.39	52.55	64.94*

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

**Non-HAP Toxic Air Pollutant

***Emissions limited for compliance with 401 KAR 63:020.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit #3 (03-4) One Manual Paint Booth Process Emission Unit #4 (04-1) and 04-2 Two Robotic Paint Booth Processes Emission Unit #6 (06) One Robotic Paint Booth Process				
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 51:017 and 401 KAR 52:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
Single HAP Except Ethyl Benzene	Source-wide 9 tpy	To preclude 401 KAR 52:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
Combined HAPs	Source-wide 22.5 tpy	To preclude 401 KAR 52:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
Ethyl Benzene	Source-wide 8.13 tpy	401 KAR 63:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
Butyl Acetate	Source-wide 16.26 tpy	401 KAR 63:020	Material Balance & SDS	Monthly emission calculations and a new rolling 12-month total
PM	20% Opacity	401 KAR 59:010, Section 3(1)a	N/A	Recordkeeping of weekly visual observations
	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS with 50% Transfer Efficiency	Fabric Filters, 90% C.E.
Initial Construction: 2009, 2015, and 2022 Process Description: Plastic parts, depending upon the desired final product, are sent to the paint booths. Painted parts are cured in a small infrared oven attached to the paint booths. Applicable Regulation: 401 KAR 59:010, New Process Operations. This regulation is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulate matter, commenced on or after July 2, 1975. The particulate matter emissions from the solids content of the coatings trigger the applicability of this regulation. State-Origin Requirements: 401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances. This regulation is applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances, provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality. The combustion emissions of the curing oven and some of the coatings used in this process have the potential to emit such matter.				

Emission Unit #3 (03-4) One Manual Paint Booth Process
Emission Unit #4 (04-1) and 04-2 Two Robotic Paint Booth Processes
Emission Unit #6 (06) One Robotic Paint Booth Process

Precluded Regulations:

401 KAR 63:002 Section 2(4)(uuu) 40 C.F.R. 63.4480 through 63.4581, Tables 1 through 5, and Appendix A (Subpart PPPP), *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products* is precluded because the facility has taken a limit on HAP emissions below a major source threshold.

Comments:

401 KAR 63:002 Section 2(4)(iiii) 40 C.F.R. 63.11169 through 63.11180, Table 1 (Subpart HHHHHH), *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* does not apply because the spray coatings do not contain chromium, lead, manganese, nickel or cadmium, collectively referred to as target HAPs [40 CFR 63.11170(a)(3)].

EU03: (03-4) One Manual Paint Booth Process

- One Manual Paint Booth Process
- Maximum applicator rate per booth: 2.0 gal/hr
- Control equipment: Fabric filters with an estimated control efficiency of 90%
- Estimated transfer efficiency of 50% due to coating of small parts
- Emission factors determined from SDSs
- Construction dates: 2009
- Potential to emit (PTE) calculations are based on 8760 operating hours per year

EU04: (04-1 and 04-2) Two Robotic Paint Booth Processes (located in area designated Facility Booth 7)

- Two Robotic Paint Booths
- Maximum applicator rate per booth: 4.0 gals/hr and 0.8 gal/hr
- Control equipment: Fabric filters with an estimated control efficiency of 90%
- Stacks: #9 and #6
- Estimated transfer efficiency of 50% due to coating of small parts
- Emission factors determined from SDSs
- Construction dates: 2009, 2015 and 2021
- Potential to emit (PTE) calculations are based on 8760 operating hours per year
- EP04-1 installed in: APE20090001 – Minor Revision
- EP04-2 installed in APE20150001 – Off-Permit Change
- EP04-3 installed in APE20210001 – Renewal

EU06: (06) One Robotic Paint Booth Process (located in an area designated Facility Booth 10)

- One Robotic Paint Booth
- Maximum applicator rate: 7.9 gals/hr
- Control equipment:
- Stack: 5-1
- Estimated transfer efficiency of 50%
- Emission factors determined from SDSs. Updated in APE20260001.
- Construction date: 2022
- Potential to emit (PTE) calculations are based on 8760 operating hours per year
- 3-1 coating to hardener ratio.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results:

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	401 KAR 52:030, <i>Federally-enforceable permits for nonmajor sources</i>	Source-wide
9.0 tpy of individual HAP emissions, except ethyl benzene	401 KAR 52:030, <i>Federally-enforceable permits for nonmajor sources</i>	Source-wide
22.5 tpy of combined HAP emissions	401 KAR 52:030, <i>Federally-enforceable permits for nonmajor sources</i>	Source-wide
16.26 tpy of Butyl Acetate emissions	401 KAR 63:020, <i>Potentially hazardous matter or toxic substances</i>	Source-wide
8.13 tpy of Ethyl Benzene emissions	401 KAR 63:020, <i>Potentially hazardous matter or toxic substances</i>	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, <i>New Process Operations</i>	EU 03, 04, 06
401 KAR 63:020, <i>Potentially Hazardous Matter or Toxic Substances.</i>	EU 03, 04, 06

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 51:017, <i>Prevention of significant deterioration of air quality.</i>	Source-wide
401 KAR 52:020, <i>Title V Permits</i>	Source-wide
401 KAR 63:002 Section 2(4)(uuu) 40 C.F.R. 63.4480 through 63.4581, Tables 1 through 5, and Appendix A (Subpart PPPP), <i>National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products</i>	EU 03, 04, 06

Table D - Summary of Non Applicable Regulations:

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Air Toxic Analysis

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

The Division for Air Quality (Division) has performed modeling of potentially hazardous matter or toxic substances that may be emitted by the facility using SCREEN View on April 27, 2026 (for 1,6-Hexamethylene Diisocyanate; 4-Methyl-2-Pentanol; Acetone; Acetonitrile; Acrylonitrile; Butyl Acetate; Carbon Black; Cumene; Ethyl Acetate; Ethyl Alcohol; Ethyl Benzene; Formaldehyde; Glycol Ethers; Hexane; N-Hexane; Isopropanol; Methyl Ethyl Ketone; Methyl Isobutyl Ketone; Styrene; Toluene; Triethyl Amine; and Xylenes) and AERMOD on May 4, 2026 (for Ethyl Benzene and Butyl Acetate) 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
F-98-020	Initial Permit	F607/F741	7/21/1998	9/21/1998	Initial Permit Issuance	N/A
F-05-045	Renewal Permit	APE20040001	8/30/2003	9/15/2006	Renewal	N/A
F-05-045 R1	Permit Minor Revision	APE20070001	11/28/2007	12/18/2007	Remove 2 Injection Molders, 1 Paint Booth	N/A
F-05-045 R2	Permit Minor Revision	APE20080001	11/21/2008	12/18/2008	Addition of 2 Injection Molding Machines	N/A
F-05-045 R3	Permit Minor Revision	APE20090001	3/10/2009	3/30/2009	Addition of Paint Booth (EP04)	N/A
F-05-045 R4	Permit Minor Revision	APE20090002	9/16/2009	9/30/2009	Addition of Injection Molding Machine	N/A
F-11-018	Renewal	APE20110002	4/26/2011	8/5/2011	Renewal	N/A
F-11-018 R1	Revision	APE20150003	9/28/2015	10/16/2015	Minor Revision to add 8 grinders	N/A
F-16-013	Renewal	APE20160001	2/25/2016	6/1/2016	Renewal Permit	N/A
F-21-003	Renewal	APE20210001	1/20/2021	7/18/2021	Renewal Permit	N/A
F-21-003 R1	Permit Minor Revision	APE20220001	4/25/2022	9/26/2022	Add EU06 one robotic paint booth	N/A

SECTION 6 – PERMIT APPLICATION HISTORY

None

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO _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