

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

Title V, Construction / Operating
Permit: V-24-041
Holley Performance Products, Inc.
442 Century Street
Bowling Green, Kentucky 42101
1/14/2025
Vahid Bakhtiari, Reviewer

SOURCE ID:	21-227-00213
AGENCY INTEREST:	136460
ACTIVITY:	APE20240001

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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: Warren

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

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

*PTE does not include self-imposed emission limitations.

Description of Facility:

Holley Performance Products (Holley) will operate a welding, surface coating, and assembly facility for automotive engine components like carburetors, fuel pumps, and muffler components. Partially finished parts and raw materials are received at the Century Facility where they undergo cutting, welding, surface coating, cleaning, polishing, assembly, quality control testing, and packaging for shipment or storage.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-4-041

Activities: APE20240001

Received: November 11, 2024

Application Complete Date(s): December 16, 2024

Permit Action: ☒ Initial ☐ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☒ Yes ☐ No NSR Applicable? ☐ Yes ☒ No

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

Description of Action:

Holley performance products submitted an application on November 11, 2024, for construction of a new manufacturing facility located in Warren County, Kentucky. Holley will be relocating some of its operations from their Russellville Road location (AI 4116) to this new Century Street Facility. Several of the currently permitted and insignificant emission sources listed on Title V Operating Permit No. V-21-008 (AI 4116) will not be relocated and will be removed from Russellville Road facility.

On December 23, 2024, the Division required Holley to provide a Reasonable, Available, and Practical (RAP) analysis for VOC emissions for EP 01 (Test Stands) pursuant to 401 KAR 50:012. On January 13, 2025, Holley submitted the RAP analysis for EP 01. The work standard operating procedures associated with RAP analysis have been incorporated into Section B of the permit. Per Holley's RAP analysis, similar facilities do not have control devices for VOC emissions associated with Test Stands for carburetors.

Holley is a major source as defined in 401 KAR 52:001. The plant is a Title V source because the potential emissions of VOC exceed the major source thresholds. Therefore, an initial Title V permit V-24-041 is being issued. The facility does not have a PTE that exceeds 250 tpy and is therefore a minor source under PSD. The initial construction permit will contain the following Emission Points:

- Emission Point 01 – 10 Carburetor Test Stands and 2 Master-Flow Test Stands
- Emission Point 02 – 3 Cold Cleaners
- Emission Point 03 – 1 "Sticks" Surface Coating Booth

V-24-041 Emission Summary		
Pollutant	2024 Actual (tpy)	⁽¹⁾ PTE V-24-041 (tpy)
CO	---	0
NO _x	---	0
PT	---	1.89
PM ₁₀	---	1.89
PM _{2.5}	---	1.89
SO ₂	---	0
VOC	---	124.33
Lead	---	0
Greenhouse Gases (GHGs)		

V-24-041 Emission Summary		
Pollutant	2024 Actual (tpy)	⁽¹⁾ PTE V-24-041 (tpy)
Carbon Dioxide	---	0
Methane	---	0
Nitrous Oxide	---	0
CO ₂ Equivalent (CO ₂ e)	---	0
Hazardous Air Pollutants (HAPs)		
Chromium	---	0.52
Chromium IV and Compounds	---	0.17
Ethyl Benzene	---	0.18
Manganese, Total	---	1.03
Nickel (and Compounds)	---	0.14
Toluene	---	0.83
Xylenes (Total)	---	0.46
Combined HAPs	---	3.33

(1) This includes controlled emissions as required by the permit.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

EP 01 (12) – 10 Carburetor Test Stands and 2 Master-Flow Test Stands

Initial Construction Date: 2/2025

Process Description:

Holley Built Test Stands are used to test new and reconditioned carburetors. Incidental testing is conducted throughout the facility on carburetors and other parts using Solve-A-Clean 155. All the test stands are vented to a single stack.

Maximum Annual Capacity: 38,807 gallons/yr of solvent

Construction Commenced: 2025

Control Equipment: None

Applicable Regulation:

401 KAR 50:012, General application. Pursuant to 401 KAR 50:012, Section 1(2), in the absence of a standard specified in these administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

Comments:

Emissions are calculated using MSDS provided by the applicant.

The facility has the PTE more than 100 tpy of VOC EP 01 and it is not subject to a standard for VOC elsewhere in 401 KAR. Pursuant to 401 KAR 50:012, Section 1(2), in the absence of a standard specified in these administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical. In response to the Division's request, the facility submitted a RAP analysis and the Division incorporated work standard operating procedures into the permit.

EP 02 [02(a, b, and c)] – 3 Cold Cleaners

Initial Construction Date: 2/2025

Process Description:

Three cold cleaning units used to clean casting parts or completed carburetors.

EP #	Process Description
02(a)	One cold cleaner unit utilizes a stream of solvent to clean incoming parts to be reconditioned.
02(b)	One cold cleaner unit is used in the maintenance shop. It utilizes a pump to flow solvent Carburetor Cleaner through a brush to clean parts.
02(c)	One cold cleaner unit utilizes a water and soap solution.

Maximum Usage: 1,369 gallons/yr

Control Equipment: None

Applicable Regulation:

401 KAR 59:185, New solvent metal cleaning equipment

EP 02 [02(a, b, and c)] – 3 Cold Cleaners

Comments:

Emissions are calculated using MSDS provided by the applicant.

EP 03 – 1 "Sticks" Surface Coating Booth

Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
Opacity	20%	401 KAR 59:010, Section 3(1)	N/A	Monthly qualitative observations; monitoring; recordkeeping
PM	$P \leq 0.5$ tph $E = 2.34$ lb/hr $0.5 < P \leq 30$ tph $E = 3.59P^{0.62}$ lb/hr $P > 30$ tph $E = 17.31 \times P^{0.16}$ lb/hr	401 KAR 59:010, Section 3(2)	Material Balance & MSDS	Monthly calculations; monitoring; recordkeeping
VOC	< 20 tpy	401 KAR 59:225, Section 6(3)	Material Balance & MSDS	Monthly calculations; monitoring; recordkeeping

Initial Construction Date: 2/2025

Process Description:

Surface spray coating booth coating metal automotive piping (“Sticks”) using L-800 Black HT coating. Automotive piping is cut and welded prior to surface coating. The emissions are controlled by a dry filter with 95% control efficiency. The coated piping is then sent to an electric curing oven (0.41 MMBtu/hr) to cure the coatings. These activities constitute a “coating line” as defined in 401 KAR 59:225.

Maximum Annual Capacity: 432.65 gallons/yr

Construction Commenced: 2025

Control Equipment: Dry Filter

Applicable Regulation:

401 KAR 59:010, *New process operations*, 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 Requirement:

401 KAR 63:020, *Potentially hazardous matter or toxic substances*. This regulation is applicable to each affected facility which emits or may potentially emit hazardous matter or toxic substances, applies to Toluene, Ethylbenzene, and Xylene.

Precluded Regulation:

401 KAR 59:225, *New miscellaneous metal parts and products surface coating operations*, precluded by taking a limit on VOC emissions from EP 03.

EP 03 – 1 "Sticks" Surface Coating Booth

Comments:

PM, HAP, and VOC emissions are calculated using their content of coating material as listed in MSDS provided by the applicant.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

The source, at the time of permit V-24-041, has not been required to perform any emissions testing.

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A – Group Requirements:

Emission and Operating Limit	Regulation	Emission Point
20 tpy of VOC emissions	To preclude 401 KAR 59:225	03

Table B – Summary of Applicable Regulations:

Applicable Regulations	Emission Point
401 KAR 59:010, <i>New process operations</i> , applies 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.	03
401 KAR 50:012, <i>General application</i> . The facility is a major source of VOCs and it is not subject to a standard for VOC elsewhere in 401 KAR, pursuant to 401 KAR 50:012, Section 1(2), in the absence of a standard specified in these administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.	01
401 KAR 59:185, <i>New metal cleaning equipment</i> , applies to each cold cleaners that utilize VOCs to remove soluble impurities from metal surfaces which commenced operation on or after June 29, 1979.	02
401 KAR 63:020, <i>Potentially hazardous matter or toxic substances</i> , applies 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.	03

Table C – Summary of Precluded Regulations:

Applicable Regulation	Emission Point
401 KAR 59:225, <i>New miscellaneous metal parts and products surface coating operations</i> . The facility is exempt from this administrative regulation pursuant to 401 KAR 59:225, Section 6(3).	03

Table D – Summary of Non Applicable Regulations:

N/A

Air Toxic Analysis

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

The Division for Air Quality (Division) has performed SCREEN View on December 9, 2024 of potentially hazardous matter or toxic substances (Toluene, Ethyl Benzene, and Xylenes) 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
NPR	Insignificant Source	APE20210001	6/10/2021	7/7/2021	Operation of Welding Equipment	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