



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
(615) 532-0554 Voice or (615) 532-0614 FAX

October 2, 2023

Certified Article Number

9414 7266 9904 2212 9411 90

SENDER'S RECORD

Mr. Shawn Knox, Vice President
JLG Industries, Inc.
13712 Crayton Boulevard
Hagerstown, MD 21742

Re: Construction Permit Application
1400 Flat Gap Road, Jefferson City, TN 37760
Emission Source Reference No. 45-0188/Permit No. 981761

Dear Mr. Knox:

Your construction permit application dated August 29, 2023, for an aerial lift and telescopic material handling manufacturing process was received on September 1, 2023. The required application processing fee was received on September 18, 2023. Please be advised that construction or modification of the source cannot begin until you are in receipt of the issued construction/modification permit. A determination has been made that the application is incomplete for the following reason(s):

Additional information is needed as follows:

1. Particulate matter emission calculations are determined in Appendix B for sources 01, 02, 03, and 05 solely by the airflow rating of the exhaust point and a grain loading factor described in TAPCR 1200-03-07-.04(1). While this is appropriate for calculation of the allowable PM emission limit at each exhaust point, the actual emissions and maximum uncontrolled emissions of these sources are not adequately described in the emission calculations. Please provide complete actual and maximum uncontrolled emission calculations for each of these sources, based on maximum hourly abrasive used and mass balances of surface coatings, as appropriate.
2. No emission calculations are provided for welding emissions. Please provide maximum uncontrolled emission calculations for welding emissions that demonstrate that the emissions are below the insignificant activity thresholds and may be considered an insignificant source of emissions.
3. Surface coating emissions are assumed using the 3.5 lbs/gallon VOC limit listed in TAPCR 1200-03-18-.20(2), not necessarily the VOC content of the coatings described in the safety data sheets (SDS) provided or the APC 9 form. Please provide updated calculations for the VOC and HAP emissions from surface coating.
4. A coating is defined in TAPCR 1200-03-18-.01(11) as "a material applied onto or impregnated into a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealants, adhesives, maskants, and temporary protective coatings." This also

- includes rust inhibitor materials. Provide a copy of the SDS for the rust inhibitor used and calculations of emissions from the rust inhibitor application process.
5. Provide a list of the tanks that comprise the pretreatment wash process and the contents of each tank, including names of chemicals added.

Please submit the additional information to the Technical Secretary at the letterhead address or email the information to Air.Pollution.Control@TN.gov in Adobe pdf format within 60 days of receipt of this letter so that the Division can review the revised application for completeness. If additional deficiencies are identified, you will be able to correct them within the remainder of the 180-day-period that begins on the date you received this letter, as provided in subparagraph 1200-03-26-.02(4)(d) of the Tennessee Air Pollution Control Regulations.

It is the express intent of the Tennessee Air Pollution Control Board that the 180-day permit application correction period is not to be construed by an applicant as permission to construct or modify a source without the permit required by Division Rules. If you fail to submit a complete application within this 180-day time period, all construction permits shall be denied and any fees forfeited.

If you have any questions concerning this correspondence, please contact Mr Michael Vergamini at 615.532.0068 or Michael.Vergamini@tn.gov. Your Facility ID is **45-0188**, please reference this number in any further correspondence with the Division.

Sincerely,



James P. Johnston, P.E.
Deputy Director
Permitting & Regulatory Development