

From: [Air.Pollution.Control](#)
To: [APC Permitting](#)
Subject: FW: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188
Date: Monday, March 18, 2024 11:03:34 AM
Attachments: [image062.png](#)
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[image064.png](#)
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[image066.png](#)
JEF - CN-1397 Responsible Official Signature Page - OSK Man Signed 2024-02-01.pdf

From: Julie Verissimo <Julie.Verissimo@tn.gov>
Sent: Monday, March 18, 2024 10:40 AM
To: Air.Pollution.Control <Air.Pollution.Control@tn.gov>
Cc: Michael Vergamini <Michael.Vergamini@tn.gov>
Subject: FW: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

For Facility 45-0188, Permit Number 981761

From: Michael Zeiders <mzeiders@libertyenviro.com>
Sent: Tuesday, February 27, 2024 7:16 AM
To: Michael Vergamini <Michael.Vergamini@tn.gov>
Cc: Julie Verissimo <Julie.Verissimo@tn.gov>; John Fuss <John.Fuss@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: [EXTERNAL] RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

Per our discussions, attached is an updated APC1 form. As we discussed, the existing owner is Oshkosh Manufacturing, LLC. The plan was to transfer the facility to JLG Industries, Inc. on January 1, 2024. That is why the application lists JLG Industries, Inc. as the "organization's legal name". Due to contractual obligations, the plan is now to not transfer the operations to JLG Industries, Inc. until 2025. The facility will continue to be operated by Oshkosh Manufacturing, LLC until that time. Both Oshkosh Manufacturing, LLC and JLG Industries, Inc. are subsidiaries of Oshkosh Corporation and all parties (Oshkosh Corporation, Oshkosh Manufacturing and JLG Industries) are registered with Tennessee Secretary of State.

Please call or email with any questions.

Sincerely,



Michael D. Zeiders
Project Manager

Direct: 610.288.1540 Office: 610.375.9301
mzeiders@libertyenviro.com
505 Penn Street, Suite 400 Reading PA 19601



ENVIRONMENT | ENERGY | GEOTECH

From: Michael Vergamini <Michael.Vergamini@tn.gov>
Sent: Thursday, February 22, 2024 4:48 PM
To: Michael Zeiders <mzeiders@libertyenviro.com>
Cc: Julie Verissimo <Julie.Verissimo@tn.gov>; John Fuss <John.Fuss@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Michael, thank you for reaching out.

The draft permit is under technical review, and when my manager is satisfied with the draft permit, we will send a copy to you and the field office for external review.

I do remember from our correspondence in December 2023 that JLG Industries will be operating under Oshkosh Manufacturing LLC, and that we would be expecting a revised (signed) APC 1 and index form in January to formally document the change in ownership. That should be included with any other issues we may identify in the permit review.

I did prepare a letter in November 2023 to confirm that your response to the additional information request dated October 23, 2023 was received and considered satisfactory, and I'm not sure it got out during the holiday season, so I'm including a copy for your records.

You're welcome to call or email me if you have any other questions. Thank you for your patience,



Mike Vergamini | EPS2
Air Pollution Control – Surface Coating Permit Section
Tennessee Tower, 15th Floor
312 Rosa L. Parks Blvd.
Nashville, TN 37243
p. 615-532-0068
Michael.Vergamini@tn.gov

From: Michael Zeiders <mzeiders@libertyenviro.com>
Sent: Wednesday, February 21, 2024 8:17 AM
To: Michael Vergamini <Michael.Vergamini@tn.gov>
Cc: Julie Verissimo <Julie.Verissimo@tn.gov>; John Fuss <John.Fuss@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: [EXTERNAL] RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

I just wanted to check in on the status of the draft permit. Early on in our communications with TNDEC we had some USPSL communications go missing and I just wanted to ensure that you hadn't sent us something and we never received it.

Please call or email with any questions.

Sincerely,



Michael D. Zeiders
Project Manager

Direct: 610.288.1540 Office: 610.375.9301
mzeiders@libertyenviro.com
505 Penn Street, Suite 400 Reading PA 19601



ENVIRONMENT | ENERGY | GEOTECH

From: Michael Zeiders
Sent: Tuesday, January 30, 2024 1:18 PM
To: 'Michael Vergamini' <Michael.Vergamini@tn.gov>
Cc: Julie Verissimo <Julie.Verissimo@tn.gov>; John Fuss <John.Fuss@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Michael,

If you have a draft permit with the XXXXXX requirements included we would welcome the opportunity to review it. FYI, none of the current surface coatings contain the target HAPs.

Please call or email with any questions.

Sincerely,



Michael D. Zeiders
Project Manager

Direct: 610.288.1540 Office: 610.375.9301
mzeiders@libertyenviro.com
505 Penn Street, Suite 400 Reading PA 19601



ENVIRONMENT | ENERGY | GEOTECH

From: Michael Vergamini <Michael.Vergamini@tn.gov>
Sent: Thursday, January 18, 2024 10:22 AM
To: Michael Zeiders <mzeiders@libertyenviro.com>
Cc: Julie Verissimo <Julie.Verissimo@tn.gov>; John Fuss <John.Fuss@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Hi Michael,

Thank you for your response. I'd like to respond specifically concerning Subpart XXXXXX applicability. EPA published a revised Q&A document to Subpart 6X effective June 20, 2020 (attached), which provides updated guidance on determining applicability to the Subpart. Most notable is that EPA has removed all statements that applicability of Subpart XXXXXX is limited to only those facilities with a SIC/NAICS code combination listed in the Q&A document and on EPA's website. This is a significant change from the November 2011 Q&A document. This revision emphasizes the Preamble's statement that Table 1 is not meant to be exhaustive, but rather provide a guide, and that applicability to this Subpart should be determined based on whether a source performs activities that match the category's description rather than a specific NAICS code (see Question 12):

12. Q: Should permit writers base their applicability determinations solely on the NAICS codes provided in the rule preamble? The preambles to the proposed and final rule for 6X state that the table is not intended to be exhaustive, but rather provide a guide for readers regarding entities likely to be affected by this action. That being said; why would a source with the NAICS code 3353 (Electrical Equipment Manufacturing) be subject to the NESHAP, and not a source with the NAICS 3351 (Electric Lighting Equipment Manufacturing), if both sources have potential to emit metal fabrication and finishing HAP (MFHAP) through processes identified as having management practices under subpart 6X?

A: Permit writers should use the descriptions of the source categories in the rule for applicability and use the NAICS as a guide. The second question is regarding emissions from sources similar to the Metal Fabrication and Finishing rule. It is correct that there are many other sources with the same operations and the same emissions, but they are not covered by subpart 6X. The explanation for this lies in the history of the statutory requirements for this rule, which are described in the preambles to the proposed and final rules with more detail found in the proposed rule preamble (available at <http://www.epa.gov/ttn/atw/area/fr03ap08.pdf>). More information on the rule background can be found on the EPA urban air toxics website as well. In 1990, Congress and the EPA identified the primary sources of urban air pollution, and emissions from these 9 metal fabrication sources contributed to emissions in urban areas at that time. Therefore, the EPA was required by law to develop this area source rule. In the 2000's, most sources in the 9 metal fabrication area source categories had begun to control their emissions, either because of OSHA rules, from regulations by states, or from general industry awareness of their impact on the environment. Therefore, there was no net gain in emissions reductions attributed to this rule. Because of this background of the rule, the EPA did not see a need to expand the rule to include similar sources because: (a) we were not required by law to do so; and (b) it is likely that these sources are also similarly controlled.

To that end, the facility's description of the source as an "aerial lift and telescopic material handling manufacturing facility" falls within the description of "Industrial Machinery and Equipment Finishing Operations," which also references sources covered under SIC Code 3531.

Industrial Machinery and Equipment Finishing Operations.	333120, 333132, 333911	stoves, domestic unit heaters (except electric), and wall heaters (except electric). Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plan overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also included in this industry are establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment industry sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.
Iron and Steel Foundries	332411	Establishments primarily engaged in the forging manufacturing process, where roughhead iron

Metal Fabrication and Finishing Category	SIC Code	Source Category Description
Industrial Machinery and Equipment Finishing Operations.	3531	Establishments primarily engaged in construction machinery manufacturing that includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plan overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also included in this industry are establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes and capstans, aerial work platforms, and automobile wrecker hoists.
	3533	Establishments primarily engaged in oil and gas field machinery manufacturing; that includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs.
	3561	Establishments primarily engaged in pumps and pumping equipment manufacturing that includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps
Iron and Steel	3324	Establishments primarily engaged in the forging manufacturing process, where roughhead iron and steel metal is

If you have any other additional information that may indicate that this source is not primarily engaged in construction machinery manufacturing, I'd be happy to consider it, but otherwise the Division believes this facility is subject to Subpart 6X, and it would affect both the abrasive blasting sources and the welding operations, which would be added a source on the construction permit.

This could also affect any future manual spray coating operations that may contain one or more of the targeted HAPs, and any machining, dry grinding, or dry polishing associated with the proposed expansion.

Please call or email me if you have any other questions. Thank you,



Mike Vergamini | EPS2
Air Pollution Control – Surface Coating Permit Section
Tennessee Tower, 15th Floor
312 Rosa L. Parks Blvd.
Nashville, TN 37243
p. 615-532-0068
Michael.Vergamini@tn.gov

From: Michael Zeiders <mzeiders@libertyenviro.com>
Sent: Wednesday, January 17, 2024 1:28 PM
To: Michael Vergamini <Michael.Vergamini@tn.gov>
Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: [EXTERNAL] RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

Pursuant to our phone conversation of 01/09/2024, I have pulled together responses to your information requests. Please see below.

Attachment A – PFD

Q: Is the Frame and Boom Line conveyORIZED or are parts added and removed between booths?

A: The line is conveyORIZED with the parts proceeding through the processes (e.g., shot blast, pre-treatment wash, drying, spray booths and oven) sequentially.

Q: Are there particulate matter emissions associated with the flash tunnel stacks (S-02-02, S-03-02)

A: The flash tunnels are located after each of the spraying operations and allow for the flash-off of the solvent components of the coatings. No spraying takes place in the tunnels. Consequently, the only particulate matter emissions potentially associated with the flash tunnel stacks would be products of combustion (natural gas) from the booth air make-up units (AMUs).

40 CFR 63 Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Q: Is 40 CFR 63 Subpart XXXXXX applicable to JLG's proposed operations?

A: The Metal Fabrication and Finishing NESHAP (40 CFR 63 Subpart XXXXXX) does not apply to the Jefferson City facility because it is not "primarily engaged" in any of the nine (9) source categories regulated by this regulation. Specifically, the Jefferson City facility's primary operations are described by the SIC Code 3531 (Manufacturing – Construction Machinery) and the NAICS code 333923. EPA guidance titled "Nine Metal Fabrication and Finishing Area Source Categories, 40 CFR Part 63 Subpart XXXXXX (6X) NESHAP Questions & Answers November 2011" (attached) lists the SIC/NAICS code combinations subject to the regulation and states (See question #6) that "If the SIC/ NAICS code combination used to describe the facility's primary activities is not one of those specifically listed..., the facility is not subject to the rule." The Jefferson City facility's combination of SIC/NAICS codes are not listed in the guidance document.

Equipment Produced

Q: What type of equipment will be manufactured at the JLG facility?

A: The equipment to be manufactured at the facility will consist primarily of telescopic material handlers (See photo below).



Steel Type

Q: What type of steel will be used to manufacture the lifts?

A: Mild carbon steel.

Shot Blast Abrasive Waste Rate

Q: What is the usage (waste) rate for the abrasive used in the shot blast booth?

A: The shot blast operation are equipped with 12, 20 HP blast wheels at 650 lbs shot/minute, each. (7,800 lbs/minute, total). The supplier indicates that shot is consumed (breaks down into fines) at a rate of 0.5 lbs/hp-hr. The booth is equipped with a vibratory reclaim system to collect all abrasive/fines. The reclaim system is equipped with an airwash separation system to remove the fines as they are generated (See Attachment F of the application for additional detail). The cleaned abrasive is reused in the shot blast operation.

Pretreatment Wash

Q: Do the wash solutions contain any Manganese?

A: No. The pretreatment wash solutions do not contain any manganese.

Please call or email with any questions.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

LIBERTY ENVIRONMENTAL, INC. | www.libertyenviro.com

Reading: 505 Penn Street, Suite 400 Reading PA 19601 **610.375.9301**

Lancaster: 315 West James Street, Suite 205, Lancaster, PA 17603 **717.517.5000**

Philadelphia: Three Westlakes, 1055 Westlakes Drive, 3rd Floor, Berwyn, PA 19312 **610.727.3848**

New York City: 600 Third Avenue, Second Floor, New York, NY 10016 **212.255.0374**

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Vergamini <Michael.Vergamini@tn.gov>

Sent: Tuesday, January 9, 2024 1:14 PM

To: Michael Zeiders <mzeiders@libertyenviro.com>

Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Michael, is there a good time to talk today or later this week? I've got some questions from my manager's initial look at my draft permit, and wanted to follow up. Please let me know when would be best for you.

Thank you,



Mike Vergamini | EPS2

Air Pollution Control – Surface Coating Permit Section

Tennessee Tower, 15th Floor

312 Rosa L. Parks Blvd.

Nashville, TN 37243

p. 615-532-0068

Michael.Vergamini@tn.gov

From: Michael Zeiders <mzeiders@libertyenviro.com>

Sent: Friday, December 22, 2023 3:30 PM

To: Michael Vergamini <Michael.Vergamini@tn.gov>

Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>

Subject: [EXTERNAL] RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

Thank you for returning my call regarding the status of the air permit application. Per our conversation, it is my understanding that the permit application was determined to be complete on October 23, 2023 and that the anticipated issuance date is on or about February 15, 2024. As we discussed, I would welcome the opportunity to review a draft permit prior to its issuance.

We also discussed some changes to the company information listed in the permit application. The existing owner is Oshkosh Manufacturing, LLC. The plan was to transfer the facility to JLG Industries, Inc. on January 1, 2024. That is why the application lists JLG Industries, Inc. as the "organization's legal name". Due to contractual obligations, the plan is now to not transfer the operations to JLG Industries, Inc. until 2025. The facility will continue to be operated by Oshkosh Manufacturing, LLC until that time. Both Oshkosh Manufacturing, LLC and JLG Industries, Inc. are subsidiaries of Oshkosh Corporation and all parties (Oshkosh Corporation, Oshkosh Manufacturing and JLG Industries) are registered with Tennessee Secretary of State.

Per your request, we will be forwarding a revised an APC 1 (CN-1398) form listing Oshkosh Manufacturing, LLC as the company name and a revised APC Index (CN-1397) form signed by an Oshkosh responsible official certifying the application. The primary technical/billing contact at JLG/Oshkosh will remain Jason Sharpe, as detailed in the original form. We anticipate these forms will be ready in January due to the holidays.

Should you have any questions or require any additional information, please do not hesitate to contact me or Jason (cc'd on this email).

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

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New York City: 600 Third Avenue, Second Floor, New York, NY 10016 **212.255.0374**

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Zeiders

Sent: Tuesday, December 19, 2023 2:13 PM

To: 'Michael Vergamini' <Michael.Vergamini@tn.gov>

Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>

Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

I would like to check on the status of the JLG air permit application. I want to ensure that you have all the information that you need. I would also like to discuss some potential changes to the ownership information for the facility. Please give me a call at your convenience. 610-375-9301 ext. 2009.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

LIBERTY ENVIRONMENTAL, INC. | www.libertyenviro.com
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Philadelphia: Three Westlakes, 1055 Westlakes Drive, 3rd Floor, Berwyn, PA 19312 **610.727.3848**
New York City: 600 Third Avenue, Second Floor, New York, NY 10016 **212.255.0374**

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Vergamini <Michael.Vergamini@tn.gov>

Sent: Friday, November 17, 2023 9:19 AM

To: Michael Zeiders <mzeiders@libertyenviro.com>

Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>

Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Good morning Michael,

I'm sorry for not getting back to you sooner. I'm still reviewing the application and additional information. I'm hoping to have a formal answer soon.

Thank you for your patience,



Mike Vergamini | EPS2
Air Pollution Control – Surface Coating Permit Section
Tennessee Tower, 15th Floor
312 Rosa L. Parks Blvd.
Nashville, TN 37243
p. 615-532-0068
Michael.Vergamini@tn.gov

From: Michael Zeiders <mzeiders@libertyenviro.com>

Sent: Wednesday, November 15, 2023 9:53 AM

To: Michael Vergamini <Michael.Vergamini@tn.gov>

Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>

Subject: [EXTERNAL] RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

I am just checking in again to ensure that we have provided you with the information that you need to continue review of the JLG permit application. If you could drop me an email just to confirm that things are on track, I would appreciate it. As mentioned below, mail/hard copy correspondence has proved problematic so we would prefer the main avenue of conversation to be via email.

Please call or email with any questions.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

LIBERTY ENVIRONMENTAL, INC. | www.libertyenviro.com
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New York City: 600 Third Avenue, Second Floor, New York, NY 10016 **212.255.0374**

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Zeiders
Sent: Wednesday, November 8, 2023 10:17 AM
To: 'Michael Vergamini' <Michael.Vergamini@tn.gov>
Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>
Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Mr. Vergamini,

I just wanted to check in with you regarding the information that we sent you on 10/23 to ensure that we have addressed your information request. As noted below, written correspondence has proved problematic so we ask that any concerns/questions that you may have be transmitted to Jason and me via email.

Please do not hesitate to reach out to us with any questions or concerns that you may have.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

LIBERTY ENVIRONMENTAL, INC. | www.libertyenviro.com
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New York City: 600 Third Avenue, Second Floor, New York, NY 10016 **212.255.0374**

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Vergamini <Michael.Vergamini@tn.gov>
Sent: Monday, October 23, 2023 1:27 PM
To: Michael Zeiders <mzeiders@libertyenviro.com>
Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>; Julie Verissimo <Julie.Verissimo@tn.gov>
Subject: RE: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Received. Thank you for your response. I'm reviewing now. We will provide a formal response to the additional information request letter.

Thank you,



Mike Vergamini | EPS2
Air Pollution Control – Surface Coating Permit Section
Tennessee Tower, 15th Floor
312 Rosa L. Parks Blvd.
Nashville, TN 37243
p. 615-532-0068
Michael.Vergamini@tn.gov

From: Michael Zeiders <mzeiders@libertyenviro.com>
Sent: Monday, October 23, 2023 11:56 AM
To: Michael Vergamini <Michael.Vergamini@tn.gov>
Cc: 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>
Subject: [EXTERNAL] FW: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Dear Mr. Vergamini,

Attached is a response to the information request letter sent by TN regarding JLG's Construction Permit Application (see below). I misspelled your email address in my original correspondence (see below). My apologies.

Please call or email with any questions.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

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New York City: 600 Third Avenue, Second Floor, New York, NY 10016 212.255.0374

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

From: Michael Zeiders

Sent: Monday, October 23, 2023 12:40 PM

To: 'Air.Pollution.Control@TN.gov' <Air.Pollution.Control@TN.gov>

Cc: 'Michael.Veragami@tn.gov' <Michael.Veragami@tn.gov>; 'Jason M. Sharpe - Unit #1 Management' <jmsharpe@jlg.com>

Subject: JLG Industries, Inc. - Construction Permit Application - Facility ID 45-0188

Dear Sirs,

This email is in response to your letter of October 2, 2023 (attached) requesting additional information for JLG's Construction Permit Application for our aerial lift manufacturing facility located in Jefferson City, TN. Your questions and our responses are highlighted in the text below. In the future, JLG requests that correspondence be conducted via email to Jason M. Sharpe, Principal Environmental Engineer, JLG, Inc. as the letter of October 2, 2023 took approximately two (2) weeks to arrive via USPS.

Your questions and our responses follow below. If you require any further information, please do not hesitate to contact Jason Sharpe (cc'd on this email) or me.

Sincerely,

Michael D. Zeiders | Project Manager | mzeiders@libertyenviro.com | 610.375.9301

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Reading: 505 Penn Street, Suite 400 Reading PA 19601 610.375.9301

Lancaster: 315 West James Street, Suite 205, Lancaster, PA 17603 717.517.5000

Philadelphia: Three Westlakes, 1055 Westlakes Drive, 3rd Floor, Berwyn, PA 19312 610.727.3848

New York City: 600 Third Avenue, Second Floor, New York, NY 10016 212.255.0374

Air Quality|Natural & Water Resources|Regulatory Compliance|Site Assessment & Remediation

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.

See Attachment D. Particulate matter emissions from the surface coating operations were recalculated using coating composition information and anticipated maximum throughputs. Blast booth emissions were recalculated using manufacturer supplied emission factors.

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.

See Attachment D. Particulate matter emissions were calculated using USEPA emission factors and anticipated maximum throughputs. PM/PM10 emissions are 2.42 tpy (pre-control) and 0.24 tpy (post-control) which are below the insignificant activity thresholds.

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.

See Attachment D. VOC and HAP emissions from the surface coating operations were recalculated using coating composition information and anticipated maximum throughputs.

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.

See Attached SDS. The rust inhibitor material (ITW Pro Brands – LPS) is supplied in small handheld aerosol cans and is used in post-assembly operations to protect non-coated parts (e.g., bolts, pins, etc.) Maximum annual usage is estimated to be approximately 80 gallons. It has a density of 7.28 lbs/gal and a VOC content of 62.8% resulting in anticipated maximum VOC emissions of 365.7 lbs/yr which is below the insignificant activity threshold.

5. Provide a list of the tanks that comprise the pretreatment wash process and the contents of each tank, including names of chemicals added.

See Attached SDS. There are six (6) tanks in total. Tanks 2, 3, 5, & 6 are all water rinse tanks. Tank 1 is the wash tank (Alkaline Cleaner – Ultrax 32) and Tank 4 is the zirconium sealer (Xbond 4000 either SM or SR depending on which works best) with a phosphate additive (Zircobond Add P). Ultramax 32 is a water-based KOH solution. XBOND/Zircobond are acidic/phosphate solutions. All materials are added to water at <5%.

Tank Capacity

Stage	Gallons	Width	Solution Height	Length	Tank Material
1st	3,590	16'-0"	2'-6"	12'-0"	3/16" 304 SS
2nd	2,400	16'-0"	2'-6"	8'-0"	3/16" 304 SS
3rd	2,400	16'-0"	2'-6"	8'-0"	3/16" 316 SS
4th	3,590	16'-0"	2'-6"	12'-0"	3/16" 316 SS
5th	2,400	16'-0"	2'-6"	8'-0"	3/16" 316 SS
6th	1,800	16'-0"	2'-6"	6'-0"	3/16" 316 SS

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC Index

TITLE V PERMIT APPLICATION INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	1

Section 2: Emission Source Description Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	1
	APC Form 4, Fuel Burning Non-Process Equipment	1
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	1
	APC Form 6, Storage Tanks	
	APC Form 7, Incinerators	
	APC Form 8, Printing Operations	
	APC Form 9, Painting and Coating Operations	1
	APC Form 10, Miscellaneous Processes	1
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	
	APC Form 34, Open Burning	

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	1
	APC Form 13, Adsorbers	
	APC Form 14, Catalytic or Thermal Oxidation Equipment	
	APC Form 15, Cyclones/Settling Chambers	
	APC Form 17, Wet Collection Systems	
	APC Form 18, Baghouse/Fabric Filters	1

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Section 4: Compliance Demonstration Forms

		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	2
	APC Form 20, Continuous Emissions Monitoring	
	APC Form 21, Portable Monitors	
	APC Form 22, Control System Parameters or Operating Parameters of a Process	
	APC Form 23, Monitoring Maintenance Procedures	1
	APC Form 24, Stack Testing	
	APC Form 25, Fuel Sampling and Analysis	
	APC Form 26, Record Keeping	1
	APC Form 27, Other Methods	
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	1
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form 30, Current Emissions Requirements and Status	2
	APC Form 31, Compliance Plan and Compliance Certification	1
	APC Form 32, Air Monitoring Network	

Section 5: Statement of Completeness and Certification of Compliance

I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of 1 pages and they are numbered from page 1 to 139. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.

Name and Title of Responsible Official

Telephone Number with Area Code

Ignacio A. Cortina, EVP & Chief Legal Officer

920-502-3023 x22404

Signature of Responsible Official

Date of Application

Initially submitted 08/29/2023

(For definition of responsible official, see instructions for APC Form 1)

State of Tennessee
 Department of Environment and Conservation
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APC 1

TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

SITE INFORMATION			
1. Organization's legal name Oshkosh Manufacturing, LLC		For APC Use Only	APC company point no.
2. Site name (if different from legal name) Oshkosh Manufacturing, LLC - Jefferson City			APC Log/Permit no.
3. Site address (St./Rd./Hwy.) 1400 Flat Gap Road		NAICS or SIC Code 333923	
City or distance to nearest town Jefferson City	Zip code 37760	County name Jefferson	
4. Site location (in Lat./Long)	Latitude 36.106348 N	Longitude 83.4928388 W	
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)			
5. Responsible official contact Ignacio A. Cortina		Phone number with area code 920-502-3023 x22404	
6. Mailing address (St./Rd./Hwy.) 1917 Four Wheel Drive		Fax number with area code N/A	
City Oshkosh	State WI	Zip code 54902	Email address icortina@oshkoshcorp.com
CONTACT INFORMATION (TECHNICAL)			
7. Principal technical contact Jason M. Sharpe		Phone number with area code 717-485-6423	
8. Mailing address (St./Rd./Hwy.) 1 JLG Drive		Fax number with area code N/A	
City McConnellsburg	State PA	Zip code 17233	Email address jmsharpe@jlg.com
CONTACT INFORMATION (BILLING)			
11. Billing contact Jason M. Sharpe		Phone number with area code 717-485-6423	
12. Mailing address (St./Rd./Hwy.) 1 JLG Drive		Fax number with area code N/A	
City McConnellsburg	State PA	Zip code 17233	Email address jmsharpe@jlg.com
TYPE OF PERMIT REQUESTED			
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>13. Permit requested for:</p> <p>Initial application to operate : <input checked="" type="checkbox"/></p> <p>Permit renewal to operate : <input type="checkbox"/></p> <p>Administrative permit amendment : <input type="checkbox"/></p> </div> <div style="width: 45%;"> <p>Minor permit modification : <input type="checkbox"/></p> <p>Significant modification : <input type="checkbox"/></p> <p>Construction permit : <input checked="" type="checkbox"/></p> </div> </div>			

(OVER)

HAZARDOUS AIR POLLUTANTS, DESIGNATIONS, AND OTHER PERMITS ASSOCIATED WITH FACILITY

14. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?

☐

Yes

☒

No

If the answer is Yes, are you in compliance with the provisions of Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?

☐

Yes

☐

No

15. If facility is located in an area designated as "Non-Attainment" or "Additional Control", indicate the pollutant(s) for the designation.

N/A - IN attainment

16. List all valid Air Pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)].

None.

17. Page number :

Revision number:

Date of revision: