



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/06/97

CERTIFIED MAIL

06-79-02-0076

RE: Final Permit To Operate

The Gradall Company
Joyce A. Kolakowski
406 Mill Avenue, S.W.
New Philadelphia, OH 44663-3870

Dear Joyce A. Kolakowski

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (614) 385-8501

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 03/06/97

Facility ID: 06-79-02-0076

Expiration Date: 03/06/00

FINAL ISSUE

This document constitutes issuance for: The Gradall Company
406 Mill Avenue , S.W.
New Philadelphia, OH 44663-3870

of a permit to operate for:

R001 (Sheet Metal North - 769)
Sheet Metal North, Spray Paint Booth, Dept 769, EQ 31721

PART I General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

**Southeast District Office
2195 Front Street
Logan, OH 43138
(614) 385-8501**

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sheet Metal North, Spray Paint Booth, Dept 769, EQ 31721	OAC Rule 3745-35-07	<p>Pursuant to OAC rule 3745-35-07(B)(2), the following terms and conditions are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.</p> <p>Combined annual emissions from emissions units R001, R002, R003, R004, and R005 shall not exceed the following as rolling 12-month summations: 95.7 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.92 tons of any individual HAP.</p>

2. Additional Terms and Conditions

None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for R001, R002, R003, R004, and R005 combined:
 - (a) The name and identification number of each coating, thinner, or cleanup material
 - (b) The VOC content of each coating, thinner, and cleanup material in pounds per gallon
 - (c) The total HAP content of each coating, thinner, and cleanup material in pounds per gallon
 - (d) The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - (e) The number of gallons of each coating, thinner, and cleanup material employed
 - (f) The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (g) The total HAP emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (h) The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (i) The rolling, 12-month summations of the data required in each of items (f), (g) and (h) above

D. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.1. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which include the following information:
 - (a) The total VOC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (b) The total HAP emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (c) The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.

These reports shall be submitted by January 31 of each year and shall include information for each month during the previous calendar year.

E. Testing Requirements

1. Compliance with the rolling, 12-month emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

Monthly records shall be maintained of coating, thinner, and cleanup material usage (as required in Section C.1.(e)); volatile organic compound (VOC) content of each coating, thinner, and cleanup material (as required in Section C.1.(b)); and hazardous air pollutant (HAP) content of each coating, thinner, and cleanup material (as required in Sections C.1.(c) and (d)). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings, thinners, and cleanup materials. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials. The VOC and individual HAP emission rates for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate VOC or HAP content determined for that material. The VOC, individual HAP, and total HAP emission rates for each month shall be calculated by adding the emission rates for all coatings, thinners, and cleanup materials employed during that time. The rolling, 12-month summations for VOC, individual HAP, and total HAPs shall be calculated each month by adding the emission rate for that month to the emission rate for the previous 11 calendar months.

F. Miscellaneous Requirements

None



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P.O. Box 1049
Columbus, OH 43216-1049

03/06/97

CERTIFIED MAIL

06-79-02-0076

RE: Final Permit To Operate

The Gradall Company
Joyce A. Kolakowski
406 Mill Avenue, S.W.
New Philadelphia, OH 44663-3870

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Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date

Facility ID: 06-79-02-0076

Expiration Date: 03/06/00

FIN ISSU

This document constitutes issuance for The Gradall Company

406 Mill Avenue, S.W.
New Philadelphia, OH 466 3870

of a permit to operate f

R002 (Final Paint 76)
Final Paint Booth line 776, IQ 31246

PAR General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Final Paint Booth - Line 776, EQ 31246	OAC Rule 3745-35-07	Pursuant to OAC rule 3745-35-07(B)(2), the following terms and conditions are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit their potential to emit and, therefore, avoid Title V applicability. Combined annual emissions from emissions units R001, R002, R003, R004, and R005 shall not exceed the following as rolling 12-month summations: 95.7 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.92 tons of any individual HAP.

2. Additional Terms and Conditions

None

B Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for R001, R002, R003, R004, and R005 combined:
 - (a) The name and identification number of each coating, thinner, or cleanup material
 - (b) The VOC content of each coating, thinner, and cleanup material in pounds per gallon
 - (c) The total HAP content of each coating, thinner, and cleanup material in pounds per gallon
 - (d) The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon
 - (e) The number of gallons of each coating, thinner, and cleanup material employed
 - (f) The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (g) The total HAP emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons
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D. Reporting Requirements

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2. The permittee shall also submit annual reports which include the following information:
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E. Testing Requirements

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F. Miscellaneous Requirements

None



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03/06/97

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The Gradall Company
Joyce A. Kolakowski
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Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date:

Facility ID: 06-79-02-0076

Expiration Date: 03/06/00

FINAL ISSUE

This document constitutes issuance for: **The Gradall Company**
406 Mill Avenue, S.W.
New Philadelphia, OH 44663-3870

of a permit to operate for:

R003 (Large Parts - 769)
Structural Paint Large, Spray Paint Booth, Dept 769, EQ 31237

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

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<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Structural Paint Large, Spray Paint Booth, Dept 769, EQ 31237	OAC Rule 3745-35-07	<p>Pursuant to OAC rule 3745-35-07(B)(2), the following terms and conditions are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.</p> <p>Combined annual emissions from emissions units R001, R002, R003 R004, and R005 shall not exceed the following as rolling 12-month summations: 95.7 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.92 tons of any individual HAP.</p>

2. Additional Terms and Conditions

None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

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 - (i) The rolling, 12-month summations of the data required in each of items (f), (g) and (h) above

D. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing emissions in excess of the rolling 12-month limitation specified in A.1. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which include the following information:
 - (a) The total VOC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (b) The total HAP emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (c) The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.

These reports shall be submitted by January 31 of each year and shall include information for each month during the previous calendar year.

E Testing Requirements

1. Compliance with the rolling, 12-month emission limitations in Section A. of these terms and conditions shall be determined in accordance with the following method:

Monthly records shall be maintained of coating, thinner, and cleanup material usage (as required in Section C.1.(e)); volatile organic compound (VOC) content of each coating, thinner, and cleanup material (as required in Section C.1.(b)); and hazardous air pollutant (HAP) content of each coating, thinner, and cleanup material (as required in Sections C.1.(c) and (d)). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings, thinners, and cleanup materials. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials. The VOC and individual HAP emission rates for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate VOC or HAP content determined for that material. The VOC, individual HAP, and total HAP emission rates for each month shall be calculated by adding the emission rates for all coatings, thinners, and cleanup materials employed during that time. The rolling, 12-month summations for VOC, individual HAP, and total HAPs shall be calculated each month by adding the emission rate for that month to the emission rate for the previous 11 calendar months.

F. Miscellaneous Requirements

None



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/06/97

06-79-02-0076

The Gradall Company
Joyce A. Kolakowski
406 Mill Avenue, S.W.
New Philadelphia, OH 44663-3870

CERTIFIED MAIL

RE: Final Permit To Operate

Dear Joyce A. Kolakowski

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (614) 385-8501

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date

Facility ID: 06-79-02-0076

Expiration Date: 03/06/00

FINAL ISSUE

This document constitutes issuance for: **The Gradall Company**
406 Mill Avenue , S.W.
New Philadelphia, OH 44663-3870

of a permit to operate for

R004 (Small Parts - 769)
Structural Paint Small, Spray Paint Booth, Dept 769, EQ 31238

PART I General Terms & Conditions

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3 Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

**Southeast District Office
2195 Front Street
Logan, OH 43138
(614) 385-8501**

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Structural Paint Small, Spray Paint Booth, Dept 769, EQ 31238	OAC Rule 3745-35-07	<p>Pursuant to OAC rule 3745-35-07(B)(2), the following terms and conditions are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.</p> <p>Combined annual emissions from emissions units R001, R002, R003, R004, and R005 shall not exceed the following as rolling 12-month summations: 95.7 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.92 tons of any individual HAP.</p>

2. Additional Terms and Conditions

None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for R001, R002, R003, R004, and R005 combined:
 - (a) The name and identification number of each coating, thinner, or cleanup material
 - (b) The VOC content of each coating, thinner, and cleanup material in pounds per gallon
 - (c) The total HAP content of each coating, thinner, and cleanup material in pounds per gallon
 - (d) The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon
 - (e) The number of gallons of each coating, thinner, and cleanup material employed
 - (f) The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons
 - (g) The total HAP emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons
 - (h) The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in pounds or tons
 - (i) The rolling, 12-month summations of the data required in each of items (f), (g) and (h) above.

D. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.1. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which include the following information:
 - (a) The total VOC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (b) The total HAP emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (c) The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.

These reports shall be submitted by January 31 of each year and shall include information for each month during the previous calendar year.

E. Testing Requirements

1. Compliance with the rolling, 12-month emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

Monthly records shall be maintained of coating, thinner, and cleanup material usage (as required in Section C.1.(e)); volatile organic compound (VOC) content of each coating, thinner, and cleanup material (as required in Section C.1.(b)); and hazardous air pollutant (HAP) content of each coating, thinner, and cleanup material (as required in Sections C.1.(c) and (d)). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings, thinners, and cleanup materials. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials. The VOC and individual HAP emission rates for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate VOC or HAP content determined for that material. The VOC, individual HAP, and total HAP emission rates for each month shall be calculated by adding the emission rates for all coatings, thinners, and cleanup materials employed during that time. The rolling, 12-month summations for VOC, individual HAP, and total HAPs shall be calculated each month by adding the emission rate for that month to the emission rate for the previous 11 calendar months.

F. Miscellaneous Requirements

None



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

03/06/97

CERTIFIED MAIL

06-79-02-0076

RE: Final Permit To Operate

The Gradall Company
Joyce A. Kolakowski
406 Mill Avenue, S.W.
New Philadelphia, OH 44663-3870

Dear Joyce A. Kolakowski

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (614) 385-8501

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date:

Facility ID: 06-79-02-0076

Expiration Date: 03/06/00

FINAL ISSUE

This document constitutes issuance for: The Gradall Company

406 Mill Avenue , S.W.
New Philadelphia, OH 44663-3870

of a permit to operate for:

R005 (Sheet Metal South - 769)
Sheet Metal South, Spray Paint Booth, Dept 769, EQ 31722

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance in violation of OAC rule 3745-15-07

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(614) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director _____

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sheet Metal South, Spray Paint Booth, Dept 769, EQ 31722	OAC Rule 3745-35-07	<p>Pursuant to OAC rule 3745-35-07(B)(2), the following terms and conditions are federally enforceable. The applicant has requested that such restrictions be imposed in order to limit the potential to emit and, therefore, avoid Title V applicability.</p> <p>Combined annual emissions from emissions units R001, R002, R003, R004, and R005 shall not exceed the following as rolling 12-month summations: 95.7 tons of volatile organic compounds (VOC); 24.9 tons of all hazardous air pollutants (HAP); and 9.92 tons of any individual HAP.</p>

2. Additional Terms and Conditions

None

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for R001, R002, R003, R004, and R005 combined:
 - (a) The name and identification number of each coating, thinner, or cleanup material.
 - (b) The VOC content of each coating, thinner, and cleanup material in pounds per gallon.
 - (c) The total HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - (d) The individual HAP content of each coating, thinner, and cleanup material in pounds per gallon.
 - (e) The number of gallons of each coating, thinner, and cleanup material employed.
 - (f) The total VOC emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (g) The total HAP emissions from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (h) The total emissions of each individual HAP from all coatings, thinners, and cleanup materials employed, in pounds or tons.
 - (i) The rolling, 12-month summations of the data required in each of items (f), (g) and (h) above.

D. Reporting Requirements

1. The permittee shall notify the Director of any monthly record showing emissions in excess of the rolling, 12-month limitation specified in A.1. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall also submit annual reports which include the following information:
 - (a) The total VOC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (b) The total HAP emissions from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.
 - (c) The total emissions of each individual HAP from the coatings, thinners, and cleanup materials employed in R001, R002, R003, R004, and R005, in tons, for each month and each rolling 12-month period.

These reports shall be submitted by January 31 of each year and shall include information for each month during the previous calendar year.

E. Testing Requirements

1. Compliance with the rolling, 12-month emission limitations in Section A. of these terms and conditions shall be determined in accordance with the following method:

Monthly records shall be maintained of coating, thinner, and cleanup material usage (as required in Section C.1.(e)); volatile organic compound (VOC) content of each coating, thinner, and cleanup material (as required in Section C.1.(b)); and hazardous air pollutant (HAP) content of each coating, thinner, and cleanup material (as required in Sections C.1.(c) and (d)). Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings, thinners, and cleanup materials. Formulation data shall be used to determine the HAP contents of the coatings, thinners, and cleanup materials. The VOC and individual HAP emission rates for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate VOC or HAP content determined for that material. The VOC, individual HAP, and total HAP emission rates for each month shall be calculated by adding the emission rates for all coatings, thinners, and cleanup materials employed during that time. The rolling, 12-month summations for VOC, individual HAP, and total HAPs shall be calculated each month by adding the emission rate for that month to the emission rate for the previous 11 calendar months.

F. Miscellaneous Requirements

None