Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-26-006

Clark Material Handling Company
700 Enterprise Drive
Lexington, KY 40510

February 18, 2026
Nathan Cox, Reviewer

SOURCE ID:	21-067-00181
AGENCY INTEREST:	70953
ACTIVITY:	APE20250001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 3537, Industrial Trucks, Tractors, Trailers, and Stackers (except metal pallets and metal air cargo containers).

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: Fayette
Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead
If yes, list Classification: N/A

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No
If yes, list which pollutant(s): Xylenes

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

*PTE does not include self-imposed emission limitations.

Description of Facility:
Clark Material Handling Company performs modifications and coating operations on fork lifts that are manufactured at other Clark locations. The facility also assembles and performs coating operation for golf carts.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-26-006 Activity: APE20250001

Application Received: October 23, 2025 Application Complete Date(s): December 22, 2025

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

Construction/Modification Requested? ☐Yes ☒No

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

Description of Action:

- Renewal of the conditional major air permit.
- Change of spray gun type and transfer efficiency for EP02.
- Updated transfer efficiency for EP02 due to change in spray gun type.
- Updated transfer efficiency for EP03, and EP07 based on updated engineering estimates.
- Updated coating emission factors for EP02, EP03, and EP07 based on updated data on coatings used.

F-26-006 Emission Summary		
Pollutant	2025 Actual (tpy)	PTE F-26-006 (tpy)
CO	0.09	2.26
NOx	0.10	2.69
PT	0.02	1.17
PM_{10}	0.02	1.17
$PM_{2.5}$	0.01	1.17
SO_2	0.004	0.016
VOC	3.38	267.11*
Lead	5.2E-7	1.35E-05
Greenhouse Gases (GHGs)		
Carbon Dioxide	124	2,715
Methane	0.002	0.05
Nitrous Oxide	0.002	0.05
CO_2 Equivalent (CO_2e)	125	2,718
Hazardous Air Pollutants (HAPs)		
Ethyl Benzene	0.12	5.58
Methyl Isobutyl Ketone	0	1.67
Toluene	0.01	7.92
Xylenes (Total)	2.08	33.28*
Combined HAPs:	2.21	48.51*

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

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Units 02, 03 and 07 Paint Booths				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Source-wide 90 tpy	401 KAR 52:030	Material Balance & SDS	Recordkeeping, 12-month rolling total
Single HAP	Source-wide 9 tpy	401 KAR 52:030	Material Balance & SDS	Recordkeeping, 12-month rolling total
Combined HAP	Source-wide 22.5 tpy	401 KAR 52:030	Material Balance & SDS	Recordkeeping, 12-month rolling total
PM	2.34 lbs/hr	401 KAR 59:010, Section 3(2)	Material Balance & SDS with 60% Transfer Efficiency	Panel Fabric Filters, 98.8% C.E., Manufacturer's guarantee
	20% Opacity	401 KAR 59:010, Section 3(1)	N/A	Weekly visual observation

Initial Construction Date: See below

Process Description:

EP 02 Paint Booth #1 (Main Paint Booth)
One HVLP Spray Gun
Capacity: 50.64 lbs/ hr.
Estimated transfer efficiency 60%
Date of Commenced: January 2004

EP 03 Paint Booth #2 (Touch-Up Booth)
One HVLP Spray Gun
Capacity: 27.26 lbs/ hr.
Estimated transfer efficiency 60%
Date of Commenced: December 2015

EP 07 Paint Booth #3 (Counterweight Booth)
One HVLP Spray Gun
Capacity: 27.26 lbs/ hr.
Estimated transfer efficiency 60%
Date of Commenced: March 2019

Applicable Regulations:

401 KAR 59:010, *New process operations.* This regulation is applicable to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to 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 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.

Emission Units 02, 03 and 07 Paint Booths

Comments:

- 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products was deemed not to apply because the facility is not a major source.
- 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, was deemed not to apply because the coatings in use do not contain the target HAP: chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories; was deemed not to apply as this source does not belong to one of the nine source categories.

The process uses a blend of Xylene and other substances as cleanup solvent.

The transfer efficiency of the HVLP spray guns (EP03 and EP07) was reduced from 65% to 60% in APE20250001. This value is within the range of reasonable estimates for transfer efficiency of HVLP spray guns according to EPA's *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings* and is a more conservative estimate than the previous value of 65%.

The transfer efficiency of EP02 was reduced to 60% in APE2025001 based on the unit's switch from an electrostatic spray gun to a conventional HVLP spray gun.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	401 KAR 52:030, *Federally-enforceable permits for nonmajor sources*	Source-wide
9.0 tpy of individual HAP emissions	401 KAR 52:030, *Federally-enforceable permits for nonmajor sources*	Source-wide
22.5 tpy of combined HAP emissions	401 KAR 52:030, *Federally-enforceable permits for nonmajor sources*	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, *New process operations*	EU 02, EU 03, EU 07
401 KAR 63:020, *Potentially hazardous matter or toxic substances*	EU 02, EU 03, EU 07

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 51:017, *Prevention of significant deterioration of air quality*	Source-wide
401 KAR 52:020, *Title V Permits*	Source-wide

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 modeling of potentially hazardous matter or toxic substances that may be emitted by the facility using SCREEN View on February 18, 2026 (Ethyl Benzene, Methyl Isobutyl Ketone, Toluene, and Xylenes) and AERMOD on June 24, 2026 (Ethyl Benzene) 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 ensure compliance with the requirements of 401 KAR 63:020.

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Single Source Determination

N/A

SECTION 5 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
S-13-009	Minor Source-Initial	APE20130001	2/4/2013	3/15/2013	Initial Construction Permit	N/A
S-13-009 R1	Minor Source - Revision	APE20130002	4/3/2013	4/24/2013	Minor Source-Revision	N/A
F-15-046	Cond. Major Initial	APE20150001	11/16/2015	4/11/2016	Addition of Spray Booth (EU03) and Insignificant Activities	Syn Minor
F-15-046 R1	Cond. Major - Minor Revision	APE20190001	3/22/2019	6/1/2019	Addition of Spray Booth (EU07) and Insignificant Activities	N/A
F-15-046 R2	Cond. Major - Minor Revision	APE20190002	7/31/2019	12/8/2019	Minor modification to Monitoring and Recordkeeping Requirements	N/A
F-20-046	Renewal	APE20200001	12/7/2021	4/25/2021	Renewal Permit	N/A

SECTION 6 – PERMIT APPLICATION HISTORY

N/A

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