



1/17/2014

Certified Mail

Kevin Bruin  
Ford Motor Co.-Lima  
1155 Bible Road  
Lima, OH 45801

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
Yes	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0302020143  
Permit Number: P0115683  
Permit Type: Renewal  
County: Allen

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



## Response to Comments

Facility ID:	0302020143
Facility Name:	Ford Motor Co.-Lima
Facility Description:	Engine Manufacturing and Testing.
Facility Address:	1155 Bible Road Lima, OH 45801 Allen County
Permit:	P0115683, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 12/14/2013. The comment period ended on 01/13/2014.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

### 1. Topic: Permit Strategy Write Up

- a. Comment: Permit Strategy Write-Up, Item 7, references incorrect PTE TPY for NO<sub>x</sub>, CO, VOC, and PE. PTEs should be as follows: 94.2 TPY NO<sub>x</sub>, 68.0 TPY CO, 93.7 TPY VOC, & 21.4 TPY PE/PM<sub>10</sub>.
- b. Response: Ohio EPA agrees and will update this accordingly. Please note that this will not be included in the final issued permit.

### 2. Topic: Facility-wide Terms and Conditions GHG limit

- a. Comment: Conditions – Section 2)(c)(1)(b) –the statement that “all exceedances of the rolling, 12-month facility-wide CO<sub>2</sub>e emission limitation of 76,359 tons.” should be stricken. The facility has a restriction on natural gas, which in effect, limits CO<sub>2</sub>e to below the 100,000 TPY permit threshold. Therefore, there is no need to have a separate TPY limitation on GHG emissions.
- b. Response: The agency has modified the specified term to reflect that the 12-month facility-wide CO<sub>2</sub>e emission limitation refers to only natural gas combustion sources. Also, the CO<sub>2</sub>e PTE for the natural gas combustion sources was updated to 75,175 tpy.



**3. Topic: Typographical Errors**

- a. Comment: Sections b)(1)(a) and (b) reference Section b)(2)g which doesn't exist.
- b. Comment: Section d)(3) references maintaining records for 3 years. Should the record keeping period be 5 years?
- c. Comment: Pg. 40 – Section a)(1)(a) should reference d(3), d(4), and d(5)...not d(6)
- d. Response: We have removed the reference to b)(2)g. for P051, changed the records retention to 5 years. Additional Pg. 40 terms a)(1)(a) were updated to include the correct references.

**4. Topic: PTI References**

- a. Comment: Pg. 48 (P111) and Pg. 54 (P116) – Section b(3) should reference (PTI) P0105203...not 03-16010
- b. Response: The air toxics modeling was performed in the application for PTI 03-16010. While a modification was done and PTI P0105203 was issued, we must preserve and reference the permit in which the air toxics modeling was performed. This change cannot be accommodated.
- c. Comment: Pg. 76 (P106 and P107) – Section b)(1)a should list limits as 0.11 lb particulate emissions (PE)/hr; 0.48 ton PE/yr and 0.68 lb volatile organic compounds (VOC)/hr; 2.98 tons VOC/yr associated with a modified PTI issued.
- d. Response: The emission limits have been updated to reflect what is in the most recent modification of the PTI.

**5. Topic: Updates to Operation Descriptions**

- a. Comment: The operation descriptions on Pgs. 28, 34, 40, 46, 52 and 76 should be updated to reflect the emissions unit identification number.
- b. Response: As discussed with Ford we will update these descriptions as requested but they will also need to review the facility profile and make the appropriate changes.

**6. Topic: Additional Requirements**

- a. Comment: Pg. 67 (R005) – Sections d)(2 - 5) - must maintain documentation of manufacturer recommendations, operating manuals, etc. and conduct periodic and annual comprehensive inspections - are new requirements (i.e. not in our existing PTI). Is it necessary for these sections to remain in the permit? Ford would prefer to have these sections removed. Additionally, Ford expressed concern as to what a manufacturer specification would be since they manufactured the paint booth themselves.
- b. Response: The additional requirements have been added with the adoption of OAC rule 3745-17-11(C) into our SIP. Because Ford is the manufacturer of the control equipment, then the specifications established by Ford meets the requirements of this term.

**7. Topic: Visible Emissions Clarification**

- a. Comment: Confirm acceptability to continue with cadence of weekly inspections for dust/mist collectors that have an established VE history (i.e. no need to start over with daily inspections upon issuance of PTIO).
- b. Response: Ohio EPA concurs that the facility does not have to restart the daily emissions checks with the "renewal" of this permit. The facility has historical records to demonstrate



compliance with the visible emission check requirements and thus can show compliance without having to re-start with daily records. The agency will not add an additional term to reflect this in the permit but this response to comments document shall serve as a record for the facility to continue with its weekly VE checks until otherwise specified in the permit terms and conditions.

**8. Topic: Grouping Clarification**

- a. Comment: Grouping of mist/dust collectors appears to make permitting more efficient. Based on our review, it appears that several additional collectors could be grouped together based on the fact that the PTIO requirements are identical other than emission limitations and, in some instances, slight differences in the Additional Terms and Conditions. Ford proposes that Sources P108, P110, P111, P114 and P116 be grouped with Sources P106 and P107. Ford also proposes that P103 be grouped with Sources P104 and P105 and that Source P146 be grouped with P141-P145.
- b. Response: Grouping of emissions units is a new tool that our agency has which we utilize at our own discretion. We have grouped P103 with P104 and P105 but decline to group the others as suggested. Having multiple emissions units with varying emissions units and terms and conditions can become cumbersome for an inspector looking at the different emission limitations for each unit. While it was easy to combine some of the other units, Ohio EPA finds it inefficient to combine all machining operations with mist collection together for various reasons such as multiple emissions units with different emissions limitations, control equipment described differently, etc.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Ford Motor Co.-Lima**

Facility ID:	0302020143
Permit Number:	P0115683
Permit Type:	Renewal
Issued:	1/17/2014
Effective:	1/17/2014
Expiration:	1/17/2019





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Ford Motor Co.-Lima

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**Final Permit-to-Install and Operate**  
Ford Motor Co.-Lima  
**Permit Number:** P0115683  
**Facility ID:** 0302020143  
**Effective Date:** 1/17/2014

## Authorization

Facility ID: 0302020143  
Application Number(s): A0048275  
Permit Number: P0115683  
Permit Description: This is an FEPTIO renewal permit as the permittee has requested to transition from a Title V to a Synthetic Minor facility by taking natural gas and gasoline usage restrictions and requesting federally enforceable limitations for NOx, CO, VOC and GHGs.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 1/17/2014  
Effective Date: 1/17/2014  
Expiration Date: 1/17/2019  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Ford Motor Co.-Lima  
1155 Bible Road  
Lima, OH 45801

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

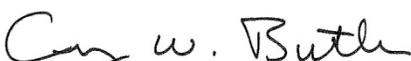
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Interim Director



## Authorization (continued)

**Permit Number:** P0115683  
**Permit Description:** This is an FEPTIO renewal permit as the permittee has requested to transition from a Title V to a Synthetic Minor facility by taking natural gas and gasoline usage restrictions and requesting federally enforceable limitations for NOx, CO, VOC and GHGs.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

- |                                   |   |
|-----------------------------------|---|
| <b>Emissions Unit ID:</b>         | <b>P051</b>   |
| Company Equipment ID:             | Dynamometer Test Cell (EAST SIDE)                   |
| Superseded Permit Number:         | 03-16144  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P103</b>   |
| Company Equipment ID:             | MC35 - Mist Collector for Machining Operations      |
| Superseded Permit Number:         | 03-13820  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P108</b>   |
| Company Equipment ID:             | P108 - MC AA-35 (D35 BLOCK 90-100)                  |
| Superseded Permit Number:         | 03-16010  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P110</b>   |
| Company Equipment ID:             | P110 - MC BB-28 (D35BLOCK 40-50)                    |
| Superseded Permit Number:         | 03-16010  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P111</b>   |
| Company Equipment ID:             | P111 - MC Y-26 (D35 BLOCK 120-130)                  |
| Superseded Permit Number:         | 03-16010  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P114</b>   |
| Company Equipment ID:             | P114 - MC BB-1 (D35 CRANK 70-100)                   |
| Superseded Permit Number:         | P0105203  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P116</b>   |
| Company Equipment ID:             | P116 - MC W-03 (D35 CRANK 10, 120 - 160, 200 & 220) |
| Superseded Permit Number:         | P0105203  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>P146</b>   |
| Company Equipment ID:             | DC 107  |
| Superseded Permit Number:         | P0109545  |
| General Permit Category and Type: | Not Applicable                                      |
| <b>Emissions Unit ID:</b>         | <b>R005</b>   |
| Company Equipment ID:             | Maintenance Paint Booth                             |
| Superseded Permit Number:         | 03-4515   |
| General Permit Category and Type: | Not Applicable                                      |

**Group Name: Engine Machines w/Collection 1**

<b>Emissions Unit ID:</b>	<b>P104</b>
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Company Equipment ID:	MC36 - Mist Collector for Machining Operations
Superseded Permit Number:	03-13820
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P105</b>
Company Equipment ID:	MC37 - Mist Collector for Machining Operations
Superseded Permit Number:	03-13820
General Permit Category andType:	Not Applicable

**Group Name: Engine Machines w/Collection 2**

<b>Emissions Unit ID:</b>	<b>P106</b>
Company Equipment ID:	P106 - MC AA-38 (D35 BLOCK 10-70-80)
Superseded Permit Number:	03-16010
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P107</b>
Company Equipment ID:	P107 - MC AA-29 (D35 BLOCK 60-110)
Superseded Permit Number:	03-16010
General Permit Category andType:	Not Applicable

**Group Name: Mist Collectors**

<b>Emissions Unit ID:</b>	<b>P141</b>
Company Equipment ID:	MC 100
Superseded Permit Number:	P0109545
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P142</b>
Company Equipment ID:	MC 101
Superseded Permit Number:	P0109545
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P143</b>
Company Equipment ID:	MC 103
Superseded Permit Number:	P0109545
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P144</b>
Company Equipment ID:	MC 104
Superseded Permit Number:	P0109545
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P145</b>
Company Equipment ID:	MC 106
Superseded Permit Number:	P0109545
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
Ford Motor Co.-Lima  
**Permit Number:** P0115683  
**Facility ID:** 0302020143  
**Effective Date:** 1/17/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Ford Motor Co.-Lima  
**Permit Number:** P0115683  
**Facility ID:** 0302020143  
**Effective Date:** 1/17/2014

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2.
2. Under the authority of OAC rule 3745-31-05(D), this permit establishes the following facility-wide terms and conditions for purposes of establishing federally enforceable requirements to limit the potential to emit (PTE) of greenhouse gases (GHGs) from the facility. The federally enforceable requirements are being established for purposes of limiting the PTE of carbon dioxide equivalent (CO<sub>2</sub>e) emissions from the facility only associated with “general stationary fuel combustion sources” involving the use of combustible fuels. A federally enforceable requirement limiting the use of natural gas at the facility will limit emissions of CO<sub>2</sub>e from the natural gas combustion sources to 75,175 tons per rolling, 12-month period. The PTE of 75,175 tons CO<sub>2</sub>e annually from the natural gas combustion sources along with the potential CO<sub>2</sub>e from other fuel fired combustion sources [current PTE 997 tpy] and non-combustion sources at the facility will result in a PTE below 100,000 tons per year of CO<sub>2</sub>e. The PTE of less than 100,000 tons CO<sub>2</sub>e annually will result in GHGs from the facility not becoming “subject to regulation” as defined in 40 CFR 51.166(b)(48)(i) and as a result no determination regarding major source status of the facility for GHGs on a mass basis will be required.
  - a) This permit establishes an operational restriction which limits the quantity of natural gas combusted at the entire facility as a means to limit total PTE for CO<sub>2</sub>e. The maximum rolling, 12-month quantity of natural gas used shall not exceed 1250 million standard cubic feet (MMCF) per rolling, 12-month period. This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas usage, upon issuance of this permit.
  - b) The permittee shall collect and record the following information each month for natural gas usage at the entire facility:
    - (1) The amount of natural gas usage, in MMCF, for the entire facility. This one value will include all operations, processes, emission units, etc. which combust natural gas;
    - (2) The rolling, 12-month facility-wide usage of natural gas, in MMCF;
    - (3) The facility-wide CO<sub>2</sub>e emissions from natural gas combustion, in tons (short tons), quantified in accordance with the calculation methodologies outlined in 40 CFR Part 98.33. (It should be noted that 40 CFR Part 98.33 quantifies GHG emissions in metric tons and emissions must be converted to short tons for purposes of this monitoring and recordkeeping requirement due to PSD applicability involving short ton thresholds); and



- (4) The rolling, 12-month facility-wide CO<sub>2</sub>e emissions from natural gas combustion, in tons.
- c) The permittee shall submit quarterly deviation reports that identify:
  - (1) all deviations of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
    - a. all exceedances of the rolling, 12-month natural gas usage restriction of 1250 MMCF; and
    - b. all exceedances of the rolling, 12-month facility-wide CO<sub>2</sub>e emission limitation of 75,175 tons from natural gas combustion sources.
  - (2) the probable cause of each deviation (excursion);
  - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- d) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- e) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



**Final Permit-to-Install and Operate**

Ford Motor Co.-Lima

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- f) Compliance with the emission limitation of 75,175 tons of CO<sub>2</sub>e from natural gas combustion sources, per rolling, 12-month period from the entire facility shall be demonstrated by the monitoring and recordkeeping in section B.2.b).



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Ford Motor Co.-Lima  
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## **C. Emissions Unit Terms and Conditions**



**1. P051, Dynamometer Test Cell (EAST SIDE)**

**Operations, Property and/or Equipment Description:**

4 Cell Engine Testing Dynamometer - East

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)c., c)(1), d)(1), e)(2) and f)(2)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	40.8 lbs nitrogen oxides (NOx)/hr  21.1 lbs carbon monoxide (CO)/hr  6.88 lbs volatile organic compounds (VOC)/hr  See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	19.13 tons NOx per rolling, 12-month period  9.88 tons CO per rolling, 12-month period  3.23 tons VOC per rolling, 12-month period  See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-18-06(G)	See b)(2)f.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a thermal incinerator. The thermal incinerator shall be capable of achieving a minimum overall control efficiency of 90%, by weight, for VOC (100% capture and 90% destruction efficiency) and a minimum overall control efficiency of 95% for CO (100% capture and 95% destruction efficiency). BAT requirements also include compliance with the terms and conditions of this permit.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- c. OAC rule 3745-31-05(D) establishes federally enforceable restrictions to limit the potential to emit from this emissions unit by limiting the fuel usage [see c)(2)] for purposes of avoiding Title V applicability.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight rate, as defined in OAC rule 3745-17-07(B)(14), is equal to zero\*.

\*The only materials introduced into this process are gaseous fuels and liquid fuels that are used solely as fuels for the purpose of combustion.

- e. This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- f. This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

c) Operational Restrictions

- (1) The maximum annual gallons of fuel used in this emissions unit shall not exceed 75,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

The permittee shall demonstrate compliance upon start-up under the provisions of this permit by using existing records for determining the rolling, 12-month summation of the monthly fuel usage. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.



- (2) To ensure proper operation of the emissions unit, the permittee shall operate and maintain the existing interlock system on the thermal incinerator which shuts down the emissions unit when the combustion temperature is below the required level.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
    - a. the fuel usage each month, in gallons;
    - b. the rolling, 12-month summation of the fuel usage, in gallons;
    - c. the calculated, controlled monthly emission rate for NO<sub>x</sub>, CO and VOC using the established emission factors of 0.51 lbs NO<sub>x</sub>/gallon of fuel burned, 5.27 lbs CO/gallon of fuel burned, 0.86 lbs VOC/gallon of fuel burned, and applying the overall control efficiency of the incinerators (95% for CO and 90% for VOC); and
    - d. the rolling, 12-month summation of the emission rates for NO<sub>x</sub>, CO and VOC in tons.
  - (2) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
  - (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
    - a. all 3-hour blocks of time, when the emissions unit controlled by the thermal incinerator was in operation, during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
    - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal incinerator, and/or downtime of the monitoring equipment, when the associated emissions unit was in operation.



These records shall be maintained at the facility for a period of five years.

- (4) The permittee shall maintain a log of the activation of the interlock system when the emissions unit is not shut down. This log shall include the date, time, and duration of each such period.
- (5) The permittee shall, on a quarterly basis, test the interlock system to ensure that the emissions unit does shut down whenever the average combustion temperature within the thermal incinerator is more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (6) Whenever the monitored average combustion temperature within the thermal incinerator deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling, 12-month fuel usage limitation; and
    - ii. the rolling, 12-month NO<sub>x</sub>, CO and VOC emissions.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the thermal incinerator during the 12-month reporting period for this emissions unit:
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal incinerator was outside of the acceptable range;



- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal incinerator;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal incinerator into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) **Testing Requirements**

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 18 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for NOx.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

NOx: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.



- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:  
40.8 lb NOx/hr  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly emission limitation by conducted emission testing in accordance with the requirements in section f)(1).



b. Emission Limitation:

6.88 lbs VOC/hr

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation shall be demonstrated by multiplying the emission factors established by the permittee of 0.86 lbs VOC/gallon of fuel burned, by the maximum gallon usage rate of 80 gallons of fuel/hr and applying the overall control efficiency of 90%. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:

21.1 lbs CO/hr

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be demonstrated by multiplying the emission factors established by the permittee of 5.27 lbs CO/gallon of fuel burned, by the maximum gallon usage rate of 80 gallons of fuel/hr and applying the overall control efficiency of 95%. If required, the permittee shall demonstrate compliance by testing in accordance Methods 1-4 and 10 of 40 CFR, Part 60, Subpart A.

d. Emission Limitations:

19.13 tons NOx per rolling, 12-month period

9.88 tons CO per rolling, 12-month period

3.23 tons VOC per rolling, 12-month period

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the annual emission limitations in accordance with the record keeping requirements in section d)(5).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



**2. P108, P108 - MC AA-35 (D35 BLOCK 90-100)**

**Operations, Property and/or Equipment Description:**

engine machining operation with oil mist collection system (MC-AA-35)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.10 lb particulate emissions (PE)/hr; 0.44 ton PE/yr  0.61 lb volatile organic compounds (VOC)/hr; 2.67 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf and 0.0044 gr VOC/acf.



- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the abnormal visible emissions.
  - (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
    - a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
    - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.
- The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.
- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model).



The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (3) The permittee shall also identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible particulate emissions.
  - (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.10 lb PE/hr and 0.44 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/acf by the maximum volumetric air flow rate of 16000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations:

0.61 lb VOC/hr and 2.67 tons VOC/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.0044 gr/acf by the maximum volumetric air flow rate of 16000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.



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Applicable Compliance Method:

- d. If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.
  
- g) Miscellaneous Requirements
  - (1) None.



**3. P110, P110 - MC BB-28 (D35BLOCK 40-50)**

**Operations, Property and/or Equipment Description:**

engine machining operation with oil mist collection system (MC-BB-28)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.08 lb particulate emissions (PE)/hr; 0.35 ton PE/yr  0.45 lb volatile organic compounds (VOC)/hr; 1.97 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf and 0.0044 gr VOC/acf.



- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the abnormal visible emissions.
  - (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
    - a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
    - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.
- The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.
- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model).



The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The permittee shall also identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible particulate emissions.
  - (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.08 lb PE/hr and 0.35 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/acf by the maximum volumetric air flow rate of 12000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations:

0.45 lb VOC/hr and 1.97 tons VOC/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.0044 gr/acf by the maximum volumetric air flow rate of 12000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.



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Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

g) Miscellaneous Requirements

- (1) None.



**4. P111, P111 - MC Y-26 (D35 BLOCK 120-130)**

**Operations, Property and/or Equipment Description:**

engine machining operation with oil mist collection system (MC-Y-26)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.20 lb particulate emissions (PE)/hr; 0.88 ton PE/yr  1.21 lbs volatile organic compounds (VOC)/hr; 5.30 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf and 0.0044 gr VOC/acf.



- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the abnormal visible emissions.
  - (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
    - a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
    - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.
- The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.
- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model).



The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible particulate emissions.
  - (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.20 lb PE/hr and 0.88 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/acf by the maximum volumetric air flow rate of 32000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations:

1.21 lb VOC/hr and 5.30 tons VOC/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.0044 gr/acf by the maximum volumetric air flow rate of 32000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.



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Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

g) Miscellaneous Requirements

- (1) None.



**5. P114, P114 - MC BB-1 (D35 CRANK 70-100)**

**Operations, Property and/or Equipment Description:**

engine machining operation with oil mist collection system (MC-BB-1)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.03 lb particulate emissions (PE)/hr; 0.13 ton PE/yr  0.44 lb volatile organic compounds (VOC)/hr; 1.93 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.



- (2) Additional Terms and Conditions
  - a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf and 0.01 gr VOC/acf for straight oil.
  - b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operation log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the abnormal visible emissions.
  - (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
    - a. for one full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
    - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.



- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).



If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid



electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations

0.03 lb PE/hr; 0.13 ton PE/yr

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr PE/acf by the maximum volumetric air flow rate of 5100 acfm and converting to pounds/hour by multiplying by 60 minutes/hour and dividing by 7000 grains/pound.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations

0.44 lb VOC/hr; 1.93 tons VOC/yr

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet grain loading emission factor of 0.01 gr VOC/acf by the maximum volumetric air flow rate of 5100 acfm and converting to pounds/hour by multiplying by 60 minutes/hour and dividing by 7000 grains/pound.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation



**Final Permit-to-Install and Operate**

Ford Motor Co.-Lima

**Permit Number:** P0115683

**Facility ID:** 0302020143

**Effective Date:** 1/17/2014

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



**6. P116, P116 - MC W-03 (D35 CRANK 10, 120 - 160, 200 & 220)**

**Operations, Property and/or Equipment Description:**

engine machining operation with oil mist collection system (MC-W-03)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	0.11lb particulate emissions (PE)/hr; 0.48 ton PE/yr  0.81lb volatile organic compounds (VOC)/hr; 3.55 tons VOC/yr  Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf, 0.01 gr VOC/acf for straight oil, and 0.0044 gr VOC/acf for water soluble oil.
- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operation, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
- (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
  - a. for one full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.



- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC



rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall also identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations

0.11 lb PE/hr; 0.48 ton PE/yr

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr PE/acf by the maximum volumetric air flow rate of 18500 acfm and converting to pounds/hour by multiplying by 60 minutes/hour and dividing by 7000 grains/pound.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations

0.81 lb VOC/hr; 3.55 tons VOC/yr

Applicable Compliance Method

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the maximum outlet grain loading emission factors of 0.01 gr VOC/acf for straight oil and 0.0044 gr VOC/acf for water soluble oil by the maximum volumetric air flow rates of 2300 acfm for straight oil and 16200 acfm for water soluble oil and converting to pounds/hour by multiplying by 60 minutes/hour and dividing by 7000 grains/pound.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8,760 hours/year, and dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly limitation, compliance with the annual limitation shall be demonstrated.



c. Emission Limitation

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A

g) Miscellaneous Requirements

(1) None.



**7. P146, DC 107**

**Operations, Property and/or Equipment Description:**

Machining operations associated with dust/mist collection

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)f., d)(3), d)(4), d)(5), d)(6) and e)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	See b)(2)a. and c)(1)  0.38 lb particulate emissions less than or equal to 10 micron diameter (PM <sub>10</sub> )/hr and 1.65 tons PM <sub>10</sub> /yr  0.84 lb volatile organic compounds (VOC)/hr and 3.68 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-07(B)(1)	See b)(2)f.
f.	ORC 3704.03(F)(4)(d)	See d)(3) through d)(6) and e)(2)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-114-01	

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1):

- i. 0.38 lb PM<sub>10</sub>/hr; 1.65 tons PM<sub>10</sub>/yr; 0.84 lb VOC/hr and 3.68 tons VOC/yr; and
- ii. Visible PE shall not exceed 10% opacity, as a six-minute average.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM<sub>10</sub> and VOC emissions from this air contaminant source since the controlled potential to emit (PTE) for this emissions unit is less than 10 tons per year taking into consideration legally and practically enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.



- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.
- e. The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)a.]:

- a. The engine machining operation shall employ a dust collector with the following maximum manufacturer's guaranteed outlet grain loadings:

Emissions Unit	VOC maximum grain/WSCF*	PM <sub>10</sub> maximum grain/DSCF**
P146	0.01	0.002

\* WSCF = wet standard cubic foot

\*\*DSCF = dry standard cubic foot

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, Monday through Friday, for each emissions unit in operation and when the weather conditions allow, for any visible particulate emissions from these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and



- e. any corrective actions taken to eliminate the abnormal visible emissions.
- (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
- a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.

- (3) The emission units P141 through P146 were evaluated in PTI P0109545 based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.



- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: petroleum distillates (Stoddard solvent)

TLV (mg/m<sup>3</sup>): 572.6

Maximum Hourly Emission Rate (lbs/hr): 3.95\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 89.6

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all five oil mist collectors and one dust collector (emissions units P141 through P146).

The permittee, has demonstrated that emissions of petroleum distillates (Stoddard solvent), from emissions units P141 through P146, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and



- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented.

If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
0.38 lb PM<sub>10</sub>/hr and 1.65 tons PM<sub>10</sub>/yr



Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet PM<sub>10</sub> grain loading emission factor of 0.002 gr/dscf by the maximum volumetric air flow rate of 22,000 acfm, and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7,000 grains/lb.

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual PM<sub>10</sub> limitation was developed by multiplying the hourly PM<sub>10</sub> limitation by the maximum operating schedule of 8,760 hrs/yr, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitations:

0.84 lb VOC/hr and 3.68 tons VOC/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emission limitation by multiplying the outlet VOC grain loading emission factor of 0.01 grain per wet standard cubic foot (wscf) by the maximum volumetric air flow rate of 10,000 acfm, and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7,000 grains/lb.

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8,760 hrs/yr, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



**8. R005, Maintenance Paint Booth**

**Operations, Property and/or Equipment Description:**

Maintenance Paint Spray Booth

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.
b.	OAC rule 3745-21-09(U)(2)(e)	Coatings usage shall not exceed 10 gallons per day
c.	OAC rule 3745-17-11(C)	See c)(1) ,c)(2) and d)(2) through d)(6)

(2) Additional Terms and Conditions

a. The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-11(C) and 3745-21-09(U)(2)(e).

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any



modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each day the coating line is in operation:
  - a. the name and identification number of each coating employed.
  - b. the volume, in gallons, of each coating employed.
  - c. the total volume, in gallons, of all the coatings employed.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as,



a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coatings usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
Coatings usage shall not exceed 10 gallons per day
  - Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.



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g) Miscellaneous Requirements

(1) None.



**9. Emissions Unit Group -Engine Machines w/Collection 1: P104,P105**

EU ID	Operations, Property and/or Equipment Description
P103	Oil mist collection system (MC-35).
P104	Oil mist collection system (MC-36).
P105	Oil mist collection system (MC-37).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>Emissions unit P103:</u> 0.05 lb particulate emissions (PE)/hr; 0.22 ton PE/yr  0.69 lb volatile organic compounds (VOC)/hr; 3.02 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average.  <u>Emissions unit P104 and P105</u> 0.06 lb PE/hr; 0.26 ton PE/yr  0.86 lb VOC/hr; 3.77 tons VOC/yr



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average</p> <p>Emissions Unit P105 0.06 lb PE/hr; 0.26 ton PE/yr</p> <p>0.86 lb VOC/hr; 3.77 tons VOC/yr</p> <p>Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for these emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/dscf and 0.01 gr VOC/wscf.
- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
- (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
- a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.

- (3) Permit to install (PTI) 03-13820 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 8.11\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 897.4

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors installed at the facility in 1994 (emissions units P079 and P085 through P093). This limit reflects the largest annual increase of VOC from the oil mist collectors contained in the PTI identified above.

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that



the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:



- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. **Emission Limitations:**  
  
0.05 lb PE/hr and 0.22 ton PE/yr from P103  
  
**Applicable Compliance Method:**  
  
The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/dscf by the maximum volumetric air flow rate of 8000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.  
  
If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.  
  
The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.
  - b. **Emission Limitations:**  
  
0.69 lb VOC/hr and 3.02 tons VOC/yr from P103



The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.01 gr/wscf by the maximum volumetric air flow rate of 8000 wscf and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitations:

0.06 lb PE/hr and 0.26 ton PE/yr from P104 and P105 individually

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/dscf by the maximum volumetric air flow rate of 10000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

d. Emission Limitations:

0.86 lb VOC/hr and 3.77 tons VOC/yr from P104 and P105 individually

Applicable Compliance Method:

The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.01 gr/wscf by the maximum volumetric air flow rate of 10000 wscf and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by



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2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

e. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

g) Miscellaneous Requirements

(1) None.



**10. Emissions Unit Group -Engine Machines w/Collection 2: P106,P107**

EU ID	Operations, Property and/or Equipment Description
P106	engine machining operation with oil mist collection system (MC-AA-38)
P107	engine machining operation with oil mist collection system (MC-AA-29)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4) and d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>From each emissions unit individually</u> 0.11 lb particulate emissions (PE)/hr; 0.48 ton PE/yr  0.68 lb volatile organic compounds (VOC)/hr; 2.98 tons VOC/yr  Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be maximum outlet grain loadings of 0.0007 gr PE/acf and 0.0044 gr VOC/acf.



- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
  - c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, Monday through Friday, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the abnormal visible emissions.
  - (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
    - a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
    - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.
- The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.
- (3) Permit to install (PTI) 03-16010 for this emissions unit was evaluated based on the actual materials (metal working fluids) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model).



The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: petroleum distillates (stoddard solvent)

TLV (mg/m<sup>3</sup>): 342,300 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.5\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4,107

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all of the oil mist collectors associated with the above referenced PTI (emissions units P106-P108, P110-P114 and P116).

(4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.



- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
  
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
    - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
    - b. any corrective actions taken to eliminate the visible particulate emissions.
  - (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.11 lb PE/hr and 0.48 ton PE/yr from each emissions unit individually

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the outlet grain loading emission factor of 0.0007 gr/acf by the maximum volumetric air flow rate of 18000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 5 of 40 CFR, Part 60, Appendix A.

The annual PE limitation was developed by multiplying the hourly PE limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

b. Emission Limitations:

0.68 lb VOC/hr and 2.98 tons VOC/yr from each emissions unit individually

Applicable Compliance Method:

The permittee may demonstrate compliance with this emissions limitation by multiplying the outlet grain loading emission factor of 0.0044 gr/acf by the maximum volumetric air flow rate of 18000 acfm and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitation was developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.



**Final Permit-to-Install and Operate**

Ford Motor Co.-Lima

**Permit Number:** P0115683

**Facility ID:** 0302020143

**Effective Date:** 1/17/2014

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

g) Miscellaneous Requirements

(1) None.



11. Emissions Unit Group -Mist Collectors: P141,P142,P143,P144,P145

EU ID	Operations, Property and/or Equipment Description
P141	Machining operations associated with mist collection
P142	Machining operations associated with mist collection
P143	Machining operations associated with mist collection
P144	Machining operations associated with mist collection
P145	Machining operations associated with mist collection

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f., d)(3), d)(4), d)(5), d)(6) and e)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F)	See b)(2)a. and c)(1)  <u>Emissions unit P141:</u> 0.08 lb particulate emissions less than or equal to 10 micron diameter (PM <sub>10</sub> )/hr and 0.37 ton PM <sub>10</sub> /yr  0.53 lb volatile organic compounds (VOC)/hr and 2.31 tons VOC/yr  <u>Emissions unit P142:</u> 0.11 lb PM <sub>10</sub> /hr and 0.49 ton PM <sub>10</sub> /yr  0.70 lb VOC/hr and 3.06 tons VOC/yr



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<u>Emissions unit P143:</u> 0.08 lb PM <sub>10</sub> /hr and 0.37 ton PM <sub>10</sub> /yr  0.53 lb VOC/hr and 2.31 tons VOC/yr  <u>Emissions unit P144:</u> 0.11 lb PM <sub>10</sub> /hr and 0.49 ton PM <sub>10</sub> /yr  0.70 lb VOC/hr and 3.06 tons VOC/yr  <u>Emissions unit P145:</u> 0.11 lb PM <sub>10</sub> /hr and 0.49 ton PM <sub>10</sub> /yr  0.65 lb VOC/hr and 2.88 tons VOC/yr  <u>For each emissions unit P141 through P145:</u> Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-17-07(B)(1)	See b)(2)f.
f.	ORC 3704.03(F)(4)(d) OAC rule 3745-114-01	See d)(3) through d)(6) and e)(2)

(2) Additional Terms and Conditions

- a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1):
  - i. Emissions unit P141: 0.08 lb PM<sub>10</sub>/hr; 0.37 ton PM<sub>10</sub>/yr; 0.53 lb VOC/hr and 2.31 tons VOC/yr;
  - ii. Emissions unit P142: 0.11 lb PM<sub>10</sub>/hr; 0.49 ton PM<sub>10</sub>/yr; 0.70 lb VOC/hr and 3.06 tons VOC/yr;
  - iii. Emissions unit P143: 0.08 lb PM<sub>10</sub>/hr; 0.37 ton PM<sub>10</sub>/yr; 0.53 lb VOC/hr and 2.31 tons VOC/yr;



- iv. Emissions unit P144: 0.11 lb PM<sub>10</sub>/hr; 0.49 ton PM<sub>10</sub>/yr; 0.70 lb VOC/hr and 3.06 tons VOC/yr;
  - v. Emissions unit P145: 0.11 lb PM<sub>10</sub>/hr; 0.49 ton PM<sub>10</sub>/yr; 0.65 lb VOC/hr and 2.88 tons VOC/yr; and
  - vi. For each emissions unit P141 through P145: Visible PE shall not exceed 10% opacity, as a six-minute average.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM<sub>10</sub> and VOC emissions from these five air contaminant sources (P141 through P145) since the controlled potential to emit (PTE) for each emissions unit is less than 10 tons per year taking into consideration legally and practically enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from emissions units P141 through P145. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) are an air contaminant that do not involve an established NAAQS.



- e. The visible emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [See b)(2)a.):

- a. Each engine machining operation shall employ a mist collector with the following maximum manufacturer’s guaranteed outlet grain loadings:

Emissions Unit	VOC maximum grain/WSCF*	PM <sub>10</sub> maximum grain/DSCF**
P141	0.0044	0.0007
P142	0.0044	0.0007
P143	0.0044	0.0007
P144	0.0044	0.0007
P145	0.01 (straight oil) 0.0044 (water soluble oil)	0.002 (for either oil type)

\* WSCF = wet standard cubic foot

\*\*DSCF = dry standard cubic foot

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, Monday through Friday, for each emissions unit in operation and when the weather conditions allow, for any visible particulate emissions from these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the abnormal visible emissions.
- (2) Notwithstanding the frequency of the monitoring and record keeping requirements specified in section d)(1), the permittee may reduce the visual observations from daily readings to weekly readings if the following conditions are met:
- a. for 1 full quarter the facility's daily visual observations indicate no abnormal visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section d)(1), on a weekly basis.

The permittee shall revert to daily readings if any abnormal visible emissions are observed. The daily readings shall continue for one full quarter. If abnormal visible emissions are observed during this time, the permittee shall continue daily readings until such time that no abnormal visible emissions have been observed for a period of three consecutive months.

- (3) The emission units P141 through P146 were evaluated in PTI P0109545 based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold



Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: petroleum distillates (Stoddard solvent)

TLV (mg/m<sup>3</sup>): 572.6

Maximum Hourly Emission Rate (lbs/hr): 3.95\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 89.6

MAGLC (ug/m<sup>3</sup>): 13,633.3

\*The hourly emission rate represents a combined rate from all five oil mist collectors and one dust collector (emissions units P141 through P146).

The permittee, has demonstrated that emissions of petroleum distillates (Stoddard solvent), from emissions units P141 through P146, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;



- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented.

If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to eliminate the visible particulate emissions.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
P141: 0.08 lb PM<sub>10</sub>/hr and 0.37 ton PM<sub>10</sub>/yr;  
P142: 0.11 lb PM<sub>10</sub>/hr and 0.49 ton PM<sub>10</sub>/yr;  
P143: 0.08 lb PM<sub>10</sub>/hr and 0.37 ton PM<sub>10</sub>/yr;



P144: 0.11 lb PM<sub>10</sub>/hr and 0.49 ton PM<sub>10</sub>/yr; and  
 P145: 0.11 lb PM<sub>10</sub>/hr and 0.49 ton PM<sub>10</sub>/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with these emission limitations by multiplying the outlet PM<sub>10</sub> grain loading emission factor in grain per dry standard cubic foot (DSCF) by the maximum volumetric air flow rate in actual cubic feet per minute (ACFM), as shown in the following table, and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7,000 grains/lb.

Emissions Unit	Outlet PM <sub>10</sub> Grain Loading Emission Factor (grain/DSCF)	Volumetric Flow Rate (ACFM)
P141	0.0007	14,000
P142	0.0007	18,500
P143	0.0007	14,000
P144	0.0007	18,500
P145	0.002	14,000

If required, the permittee shall demonstrate compliance with the hourly limitations by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A, and Methods 201, 201A and 202 of 40 CFR, Part 51, Appendix M.

The annual PM<sub>10</sub> limitations were developed by multiplying the hourly PM<sub>10</sub> limitations by the maximum operating schedule of 8,760 hrs/yr, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance with the annual limitations shall also be demonstrated.

b. Emission Limitations:

P141: 0.53 lb VOC/hr and 2.31 tons VOC/yr;  
 P142: 0.70 lb VOC/hr and 3.06 tons VOC/yr;  
 P143: 0.53 lb VOC/hr and 2.31 tons VOC/yr;  
 P144: 0.70 lb VOC/hr and 3.06 tons VOC/yr; and  
 P145: 0.65 lb VOC/hr and 2.88 tons VOC/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with these emission limitations by multiplying the outlet VOC grain loading emission factor in grain per wet standard cubic foot (wscf) by the maximum volumetric air flow rate in actual cubic feet per



minute (acfm), as shown in the following table, and converting to pounds/hour by multiplying by 60 min/hr and dividing by 7,000 grains/lb.

Emissions Unit	Outlet VOC Grain Loading Emission Factor (grain/WSCF)	Volumetric Flow Rate (ACFM)
P141	0.0044	14,000
P142	0.0044	18,500
P143	0.0044	14,000
P144	0.0044	18,500
P145	0.02 (straight oil) 0.0044 (water soluble oil)	14,000

If required, the permittee shall demonstrate compliance with the hourly limitations by testing in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual VOC limitations were developed by multiplying the hourly VOC limitation by the maximum operating schedule of 8,760 hrs/yr, and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation specified above shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.