



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 13-03798

DATE: 5/4/2004

Ford Motor Company - Cleveland Casting
Batuk Modi
5600 Henry Ford Boulevard
Brook Park, OH 44142

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CLAA

PA

**CUYAHOGA
COUNTY**

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-03798 FOR AN AIR CONTAMINANT SOURCE FOR
FORD MOTOR COMPANY - CLEVELAND CASTING**

On 5/4/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ford Motor Company - Cleveland Casting**, located at **5600 Henry Ford Boulevard, Brook Park**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-03798:

Porous plug desulfurization - P419.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-03798

Application Number: 13-03798
APS Premise Number: 1318120180
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ford Motor Company - Cleveland Casting
Person to Contact: Batuk Modi
Address: 5600 Henry Ford Boulevard
Brook Park, OH 44142

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5600 Henry Ford Boulevard
Brook Park, Ohio**

Description of proposed emissions unit(s):
Porous plug desulfurization - P419.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally

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Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (stack)	5.3
PE (fugitive)	5.6
PM ₁₀ (stack & fugitive)	6.7

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Ford I
PTI A

Emissions Unit ID: P419

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P419 - 100 tons of nodular iron per hour capacity external porous plug hot gray iron (from cupola 1) continuous desulfurization process ladle with D-unit baghouse (No. 78) for particulate control	OAC 3745-31-05(A)(3)
	OAC 3745-17-07(B)(1)
	OAC 3745-17-08(B)
	OAC 3745-17-11(B)(1)
	OAC 3745-17-12(I)(9)
	OAC 3745-17-07(A)(1)

Ford I
PTI A

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40 CFR 63 Subpart EEEEE

Applicable Emissions
Limitations/Control Measures

The requirements of this rule include compliance with the requirements of OAC rule 3745-17-12(I)(9), OAC rule 3745-17-07(A)(1), and OAC rule 3745-17-07(B)(1).

Particulate emissions (PE) for this emissions unit from stack D-25 of multi-unit D-unit baghouse (No. 78) shall not exceed the following limits:

- 1.2 lbs PE/hr; and
 - 5.3 TPY.
- See A.I.2.b.

Fugitive particulate emissions from the porous plug desulfurization process shall not exceed 5.6 TPY.

Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit. See A.I.2.a. below.

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Visible fugitive particulate emissions from any part of the porous plug desulfurization process or control equipment or from any building openings (roof, windows, doors, etc.) shall not exceed 20% opacity as a 3-minute average.

The control measures specified by this rule are equivalent to the control measures specified under OAC rule 3745-31-05(A)(3) (BAT).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Particulate emissions (PE) from baghouse no. 78 serving this emissions unit (P419) and emissions units F005, F025, P160, P161, P162, P192, P193, P194, P290, P291, P412, P907 desulfurization unit and P907 charge bucket loading shall not exceed 0.0055 grain per actual cubic foot of total exhaust gases.

Comply with all applicable requirements by due dates established pursuant to that rule.

The visible fugitive particulate emission limitation specified by this rule is less stringent than the visible fugitive particulate emission limitation established pursuant to OAC rule 3745-17-07(B)(1).

See A.I.2.c.

2. Additional Terms and Conditions

- 2.a** Best available control measures shall be the installation of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.b** Ford Cleveland Casting Plant reported a flow of 25,150 acfm through stack D-25 of this multi-unit D-unit baghouse (No. 78) as contribution solely from P419. The lb/hr particulate rate was determined by converting the allowable limit of 0.0055 gr/acf from 17-12(I)(9) based on this air flow.
- 2.c** 40 CFR 63 Subpart EEEEE (MACT) is not applicable to this emissions unit but applies to the facility overall fugitive emissions. This rule was signed by the pertinent US EPA authority on 08/29/2004 but it has not been promulgated (published in the Federal Register) yet.

II. Operational Restrictions

1. The pressure drop across baghouse no. 78 shall be continuously maintained within the range of 0.5 to 10 inches of water column at all times while the emissions unit is in operation.
2. The ducts exhausting uncontrolled emissions generated in the two porous plug desulfurization units associated with Cupolas Nos. 1 and 7 merge into a common duct and vent into the same compartment(s) of D-unit baghouse (No. 78). Only one of the two porous plug desulfurization units shall be operated at any time. An automatically controlled damper system and/or automatic interlock system and/or other device shall be so designed, installed and operated that it:
 - a. shuts off the damper on the non-operating unit while it keeps the damper on the operating unit open and exhausts emissions from the operating unit into the baghouse; and
 - b. the units cannot operate without capturing (the capture hood for this emissions unit is detachable or non-permanent) the emissions and without exhausting them into the baghouse or the emissions unit should be provided with a permanent hood with adequate capture efficiency.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across baghouse no. 78 while the emissions unit is in operation. The monitoring device shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall collect and record the pressure drop, in inches of water column, for baghouse no. 78 once for each day the emissions

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unit is in operation.

The permittee may petition to change the monitoring frequency if desired.

2. The permittee shall collect and record, for the baghouse capture (collection) and control system, the downtimes of the capture (collection) system, control device, and monitoring equipment and the time(s) the emissions unit was operated without the capture and control systems for each day the emissions unit was in operation.

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3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible PE from any stack serving this emissions unit and for any visible fugitive PE escaping from the building containing 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 minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident had ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

4. The permittee shall keep records of the hours of operation when both the porous plug units operated simultaneously.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify all periods of time during which the pressure drop across baghouse no. 78 was not maintained within the range specified in section A.II.1. of these terms and conditions, as well as the corrective actions that were taken to achieve compliance.
2. The permittee shall submit quarterly reports, for each control system, containing the daily downtimes for and the absence of the capture (collection) system, control device, and monitoring equipment when the emissions unit was in operation. These reports shall be submitted to the Cleveland Division of Air Quality by February 15 and August 15 of each year and shall include the previous calendar quarters.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible PE from any stack serving this emission unit or any visible fugitive PE escaping from the

Issued

Emissions Unit ID: P419

building containing this emissions unit were observed and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Cleveland Division of Air Quality by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter.

4. The permittee shall submit written deviation reports for periods in which both Cupola 1 and Cupola 7 were operated using porous plug processes simultaneously. These reports shall be submitted to the Cleveland Division of Air Quality within 30 days of the occurrence of the deviation.

V. Testing Requirements

1. Compliance with the emission limitation(s) specified in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the above visible PE limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the above visible fugitive PE limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(3).

- 1.c Emission Limitation:

PE from baghouse no. 78 serving this emissions unit (P419) and emissions units F005, F025, P160, P161, P162, P192, P193, P194, P290, P291, P412, P907 desulfurization unit and P907 charge bucket loading shall not exceed 0.0055 grain per actual cubic foot of total exhaust gases.

Applicable Compliance Method:

If required, compliance with the above PE limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10).

- 1.d Emission Limitation:

The contribution of PE from baghouse no. 78 for this emissions unit shall not exceed 1.18 lbs PE/hr.

Applicable Compliance Method:

Compliance with the above hourly PE limitation shall be determined by using the following

formula:

$$PE = 0.0055 \frac{\text{gr}}{\text{acf}} \times 25,150 \frac{\text{acf}}{\text{min}} \times 60 \frac{\text{min}}{\text{hr}} \times \frac{1}{7000} \frac{\text{lb}}{\text{gr}} = \text{Actual lbs PE/hr where the}$$

0.0055 gr/acf can be replaced by the gr/acf obtained by stack testing in A.V.2 below. The value of 25,150 acfm is the design flow rate.

- 1.e Emission Limitation:
 PE from baghouse no. 78 for this emissions unit shall not exceed 5.3 TPY

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- 1.f Emission Limitation:
 Fugitive particulate emissions from this emissions unit shall not exceed 5.6 TPY.

Applicable Compliance Method:

Compliance with the above PE limitation shall be determined by using the following formula:

Under the maximum emission conditions:

$$\frac{0.0128 \text{ lb Fugitive PE}}{1 \text{ T. Iron Desulfurized}} \times \frac{876,000 \text{ T. Iron Desulfurized}}{\text{Year}} \times \frac{1}{2000} = 5.6 \text{ TPY FE}$$

For any year in which the tons iron desulfurized is below the maximum, the 876,000 T. iron is replaced by the actual yearly tons of iron desulfurized.

The above emission factor of 0.0128 lb Fugitive PE/ton of iron desulfurized is the uncaptured fugitive emission factor and was derived from emission measurements and process weight rates contained in the report on the stack tests performed on May 24, 1984 on the cupola 7 porous plug desulfurization unit. This factor was determined as follows:

The 11.8 lbs/hour uncontrolled particulate emissions measured by the stack test were estimated (engineering judgment during observations from 3 inspections) to be at a capture efficiency of approximately 95%. The estimated 5% fugitive emissions were calculated to be 0.62 lb/hr. The 0.62 lb fugitive emissions/hour divided by the cupola 48.4 tons/hour iron production rate (calculated from data from the above stack test report and cupola 7 permit application) gave us an emission factor of 0.0128 lb fugitive PE/ton iron desulfurized.

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2. If required or consistent with the Title V Permit Test Schedule, the permittee shall conduct, or have conducted, emission testing for PE from baghouse no. 78 serving this emissions unit (P419) and emissions units F005, F025, P160, P161, P162, P192, P193, P194, P290, P291, P412, P907 desulfurization unit and P907 charge bucket loading in accordance with the following requirements:

The emission testing for baghouse no. 78 shall be conducted in accordance with the test schedule established for the pending Title V permit.

The emission testing shall be conducted to determine compliance with the allowable PE concentration for baghouse no. 78 (0.0055 gr/acf at stack D-25); the allowable visible PE for the stack D-25 of baghouse no. 78; and the allowable visible fugitive PE for this emissions unit.

The following test methods shall be employed to determine compliance with the allowable emission and concentration limits: Method 5 of 40 CFR, Part 60, Appendix A for PE, and Method 9 of 40 CFR, Part 60, Appendix A for visible particulate emissions. Alternative USEPA-approved test methods may be used with prior approval from the Cleveland Division of Air Quality.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Cleveland Division of Air Quality's refusal to accept the results of the emission tests.

Personnel from the Cleveland Division of Air Quality shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Cleveland Division of Air Quality within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland Division of Air Quality.

Ford Motor Company - Cleveland Casting

PTI Application: 13-02708

Issued

Facility ID: 1318120180

Emissions Unit ID: P419

VI. Miscellaneous Requirements

None

Ford F

PTI A

Emissions Unit ID: P419

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None