



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** **CERTIFIED MAIL**
CUYAHOGA COUNTY
Application No: 13-01639
Fac ID: 1318120180

DATE: 8/24/2004

Ford Motor Company - Cleveland Casting
Dave Parker
5600 Henry Ford Boulevard
Brook Park, OH 44142

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 8/24/2004
Effective Date: 8/24/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-01639

Application Number: **13-01639**
APS Premise Number: **1318120180**
Permit Fee: **\$6875**
Name of Facility: **Ford Motor Company - Cleveland Casting**
Person to Contact: **Dave Parker**
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 modification:

Revise particulate limits P110 - P120 of Mold Line 1 Established by PTI " 13-1639 on October 29, 1986 by limits established by OAC 3745-17-12 (I) in 1991.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Ford Motor Company - Cleveland Casting** located in **CUYAHOGA** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Modified</u>	<u>Source Identification Description</u>	<u>New Sand Transfer (J3)</u>	<u>Return Sand Storage (J4)</u>	<u>BAT Determination</u>
P110 Modified	P117 Modified	2 Holding Furnaces		Sand Cooling (K1)	10% Opacity
P111 Modified	P118 Modified	Iron Pouring			10% Opacity
P112 Modified	P119 Modified	Mold Conveyor w/ cope			10% Opacity
P113 Modified	P120 Modified	3 Casting Shake-outs			3.08 *** lbs PE/hr
P114 Modified		Cope & Drag Punch-up			10.5 * lbs PE/hr
P115 Modified		Castings Hook-ups (H2)			9.6 ** lbs PE/hr
P116		Sand Reclaim (J1)			9.6 ** lbs PE/hr
		Mag Belt (J2)			9.6 ** lbs PE/hr

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
9.6 ** lbs PE/hr		Same as above	Permit Allowable Mass Emissions and/or Control/Usage Requirements	9.6 ** lbs PE/hr, 18.8 TPY PE
9.6 ** lbs PE/hr	Applicable Federal & OAC Rules	Same as above	1.3 lbs PE/hr, 2.5 TPY PE	9.6 ** lbs PE/hr, 18.8 TPY PE
9.6 ** lbs PE/hr	OAC 3745-31-05, 17-07, 17-12 (I) (11) OEPA	Same as above	0.80 lb PE/hr. 1.6 TPY PE	
9.6 ** lbs PE/hr	Director's December 2003 Findings & Orders		10.5* lb PE/hr, 20.6* TPY PE	
9.6 ** lbs PE/hr	17-12 (I) (12), Rest		3.08 *** lbs PE/hr, 6.0 TPY PE	
	17-12(I)(13), Rest		10.5 * lbs PE/hr, 20.6* TPY PE	
	17-12 (I)(3)(a), Rest		9.6 ** lbs PE/hr, 18.8 TPY PE	
	17-12(I)(13), Rest		9.6 ** lbs PE/hr, 18.8 TPY PE	
	17-12(I)(14), Rest		9.6 ** lbs PE/hr, 18.8 TPY PE	
	Same as above		9.6 ** lbs PE/hr, 18.8 TPY PE	
	Same as above		9.6 ** lbs PE/hr, 18.8 TPY PE	

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* The limits of 10.5 lbs PE/hr and 20.6 TPY PE are the total combined limits for P112 and P114 and the opacity limitation applies to their common stock.

** The limits of 9.6 lbs PE/hr and 18.8 TPY PE are the total combined limits for P115 through P120.

*** Limitation based upon 0.0063 grains PE/acf from the F Unit baghouse.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PE (for P110-P120)	49.5 * (for 11 sources)

* Based upon a 3920 hours/yr operating schedule in the original permit.

This condition in no way limits the applicability of any other state or federal regulation.

The applicability of OAC Rule 3745-17-11 to all source operations of this new Mold Line No. 1 shall be consistent with the Ohio Environmental Protection Agency Director's Final Finding and Orders (hereinafter "Final Findings and Orders") issued and effective August 16, 1985 to Ford Motor Company Cleveland Casting Plant and covering the molding area. The allowable particulate emission rate (s) for these source operations shall be determined as follows:

1. Source operations with uncontrolled particulate mass emission rate (s) (UMRE's) equal to or greater than ten (10) pounds per hour are limited to emission rate (s) equal to or less than those for similar source operation (s) specified in order 1A of the Final Finding and Orders as determined by Figure II of the Subject rule.
2. The remaining source operations (less than ten (10) pounds per hour UMRE's) shall be limited to 10% opacity unless upon installation, operation, and emission testing, a higher opacity level is demonstrated by Ford to be appropriate in accordance with OAC rule 3745-17-07(F).

As specified in OAC Rule 3745-31-05 (Criteria for Decision by the Director", each of the eleven (11) source operations of Mold line no. 1 Must, at a minimum, employ Best Available Technology (BAT). For the purposes of this Permit to Install, BAT has been determined to include the following:

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1. Particulate emissions from each of the source operations shall be adequately and properly hooded, ducted and controlled.
2. The controlled sources shall be equipped with rod-bed scrubbers, operated at a minimum pressure drop of seven (7) inches of water and volumetric air flow rate such that particulate emissions are reduced to a level equal to or better than achieved for similar scrubber-controlled source operations (specified in the Final Finding and Orders). Equivalent performance shall be determined on the basis of scrubber control efficiency, outlet grain loading, or measured particulate mass emission rate.
3. The uncontrolled source operations shall be limited to 10% opacity unless upon installation, operation, and emission testing, a higher level is demonstrated by Ford to be appropriate.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

PERMIT TO OPERATE APPLICATION

A Permit to Operate Application must be submitted to the appropriate field office for each source in this Permit to Install.

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.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Division of Air Pollution Control**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Mold Line 1 together with the other operating mold lines shall not exceed a total of 64.4 operating hours during any calendar day, based on OAC 3745-17-12(I)(47)(d).
2. The Terms and Conditions of this Permit to Install (No. 13-01639) supercede the Terms and Conditions of PTI No. 13-1639 issued on October 29, 1986.
3. Ohio EPA Director's Findings and Orders, Issued in December 2003, addressed changing particulate emission limits for emissions units P112, P113, and P114 in accordance with the limits established in OAC rule 3745-17-12(I). The Findings and Orders also listed all the emission units P110 Through P120 and the emission limits comparison of PTI# 13-1639 versus OAC Rule 32745-17-12(I) in a footnote and directed Ford Cleveland Casting Plant (Ford CCP) to work with Ohio EPA to modify the requirements of PTI #13-1639. Follow-up discussions with Ford resulted in an agreement to modify the particulate emission limits for all the of the emissions units in this PTI in accordance with OAC rule 3745-17-12(I).
4. Emissions units P110, P099 and P413 shall be vested to the AAF baghouse or another baghouse of equal or better control.