



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: 13-01967
Fac ID: 1318120180

DATE: 5/5/2005

Ford Motor Company - Cleveland Casting
Batuk Modi
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: 5/5/2005
Effective Date: 5/5/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-01967

Application Number: **13-01967**
APS Premise Number: **1318120180**
Permit Fee: **\$625**
Name of Facility: **Ford Motor Company - Cleveland Casting Modi**
Person to Contact: **Batuk**
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:
Administrative modification primarily to change opacity limits for shared (inlet plenums, control equipment and) exhausts and to reflect present ducting arrangements.

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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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>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P028 Modified The terms of this PTI supercede the terms of PTI 13-2841 issued on April 27, 1994.	Castings Cleaning Line No. 2	0.011 gr/dscf for PM (A-Unit Baghouse) (382)	3745-31-05 3745-15-07	10.12 lbs/hr PM*
		0.014 gr/dscf for PM (B-Unit Baghouse)(#93)	3745-17-07 3745-17-12	4.34 lbs PM ₁₀ /hr*
		0.005 gr/dscf for PM ₁₀ (Both); 5% opacity.		

* See Term and Condition #11.

SUMMARY TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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<u>Pollutant</u>	<u>Tons/Year</u>
PE	26.23**
PM ₁₀	11.25**

* See Term and Condition #12.

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CONSTRUCTION STATUS

The **Cleveland Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **Castings Cleaning Line No. 2.**

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Source

Pollutant(s)

P028

PM

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air

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contaminant emissions.

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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 Air Pollution Control, 1925 St. Clair, Cleveland, Ohio 44114**.

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.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This permit to install is for the following modification to the no. 2 cleaning line:

Presently, the #2 cleaning line consists of one punch out station, two blast cabinets, four shake-out machines, and one roll-over. The modified #2 cleaning line will consist of one punch-out station, one axial flow blast cabinet, one shake-out machine, and one roll over.
2. Particulate emissions from the block transfer (process belt), knock-off station (process belt), V-8 hi-frequency shakeout, #1 V-8 grinder 12-1, #2 V-8 grinder 12-2, V-8 axial flow cabinet, rollover, V-8 hi-frequency shakeout, V-8 axial flow blast, rollover, V-8 hi-frequency shakeout shall be vented to the A-unit baghouse. Particulate emissions from the A-unit baghouse shall not exceed 0.011 grain per dry standard cubic foot of total exhaust gases.
3. Particulate emissions from the #1 V-8 grinder and #2 V-8 grinder shall be vented to the B-unit baghouse. Particulate emissions from the B-unit baghouse shall not exceed 0.014 grain per dry standard cubic foot of total exhaust gases.

4. Visible emissions from the stacks of the A-unit and B-unit baghouses shall not exceed 5 percent opacity as a six-minute average.
5. Exhaust flow rates from the A-unit and B-unit baghouses shall not exceed 499,800 and 99,000 actual cubic feet per minute, respectively.
6. At no time shall the existing zero V-8 axial flow blast cabinet system, the modified #2 V-8 axial flow blast cabinet system and the No. 3 shot blast cabinet system be in operation at the same time. These systems are "dampered" such that only two can be operated at the same time.
7. The total daily operating hours for sources P028 and P029 shall not exceed the value contained in OAC Chapter 3745-17.

The total daily operating hours for sources P027 through P036 shall not exceed the value contained in OAC Chapter 3745-17.

8. This facility shall install and operate a device or devices which will automatically record the specific daily operating hour restrictions in order to verify the term and condition in no. 7.

In addition, daily records shall be maintained for the operating times of each source identified in term and condition no. 7 to document compliance with the specific hourly operating restrictions. These records shall be maintained by the facility and retained in the facility's files for a period of not less than three years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

9. This facility shall submit a report to the Cleveland Bureau of Air Pollution Control any exceedance of the term and condition of no. 7 within forty-five days. This report shall summarize the reason for the exceedance and the corrected action taken.
10. This permit in no way limits the applicability of any other State or Federal regulation.
11. Calculation of pound per hour limits:

This source consists of multiple emission units. Some emission units are exhausted into baghouse A and some are exhausted into baghouse B. Other sources not listed in this permit are also exhausted into the baghouses. The pound per hour emission limitations were calculated based on the percent air flow contribution of the emission units to each baghouse multiplied by the allowed concentration of each baghouse.

Before the modification the lb/hour emissions were 13.41 lbs PM/hr.

After the modification (which includes the shutdown of baghouse #83) the lb/hour emissions are 10.12 lb PM/hr.

This results in a net reduction of 3.29 lbs per hour for this modification.

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12. P028 is limited to 18 hours per day per applicant's requested operating schedule and based on applicant's submitted operating schedule records before the modification. Therefore, the before and after modification operating schedule for source P028 has not changed and the total net tons per year reduction before and after the modification is the net lbs per hour reduction associated with shutting down baghouse no. 83 as documented in term and condition no. 13 times the operating hours per year (5184).