



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov.  
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
LORAIN COUNTY  
Application No: 02-08386

DATE: 3/8/2001

Ford Motor Co Lorain Assembly Plant  
Warren Cohen  
5401 Baumhart Rd  
Lorain, OH 44053

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  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/8/2001  
Effective Date: 3/8/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-08386

Application Number: **02-08386**  
APS Premise Number: **0247080234**  
Permit Fee: **\$0**  
Name of Facility: **Ford Motor Co Lorain Assembly Plant Cohen**  
Person to Contact: **Warren**  
Address: **5401 Baumhart Rd  
Lorain, OH 44053**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5401 Baumhart Rd  
Lorain, OHIO**

Description of modification:  
**Modification of PTI 02-8386, issued 8/3/94, to reflect emissions for diesel engine-generator sets already installed, slight increases CO and OC emissions, decreases in PE.**

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

**Ford Motor Co Lorain Assembly Plant**  
**PTI Application: 02-08386**  
**Modification Issued: 3/8/2001**

Facility ID: **0247080234**

### **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 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.

#### **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.

### **SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; 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 Co Lorain Assembly Plant** located in **LORAIN** 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.

B015

<u>Ohio EPA Source Number</u>	<u>Source Identification</u>	<u>Description</u>
B010	B012	Generator No. 1 15.81 MMBTU/hr heat input, stationary internal combustion engine generator set. Engine is a 16 cylinder, four cycle, with a 4210 cubic inch displacement and 2,598 HP rating, burning diesel fuel. Generator power rating is 1825 KW
	B014	
B011	B014 (cont'd)	Generator No. 2 15.81 MMBTU/hr heat input, stationary internal combustion engine generator set. Engine is a 16 cylinder, four cycle, with a 4210 cubic inch displacement and
	B013	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
2,598 HP rating, burning diesel fuel. Generator power rating is 1825 KW	inch displacement and 2,598 HP rating, burning diesel fuel. Generator power rating is 1825 KW	Generator power rating is 1825 KW		
Generator No. 3 15.81 MMBTU/hr heat input, stationary internal combustion engine	Generator No. 4 15.81 MMBTU/hr heat input, stationary internal combustion engine set. Engine is a 16 cylinder, four cycle, with a 4210 cubic inch displacement and 2,598 HP rating, burning diesel fuel. Generator power rating is 1825 KW	Generator No. 6 15.81 MMBTU/hr heat input, stationary combustion engine generator set. Engine is a 16 cylinder, four cycle, with a 4210 cubic inch displacement and 2,598 HP rating, burning diesel fuel. Generator power rating is 1825 KW	<p style="text-align: center;"><u>BAT Determination</u></p> <p>Technology applied shall be used as peaking unit, only</p>	<p>Technology applied shall be used as peaking unit, only</p>
Generator set. Engine is a 16 cylinder, four cycle, with a 4210 cubic	Generator No. 5 15.81 MMBTU/hr heat input, stationary internal combustion engine set. Engine is a 16 cylinder, four cycle, with a 4210 cubic inch displacement and 2,598 HP rating, burning diesel fuel.		<p>Technology applied shall be used as peaking unit, only</p>	<p>Technology applied shall be used as peaking unit, only</p>



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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
PM/PM <sub>10</sub> - 0.062 lb/hr	0.062 lb/MMBTU, and 0.98 lb/hr			
MMBTU, and 0.98 lb/hr	NO <sub>x</sub> - 10.3 grams/HP-HR, and 59.18 lbs/hr	PM/PM <sub>10</sub> - 0.062 lb/MMBTU, and 0.98 lb/hr		
NO <sub>x</sub> - 10.3 grams/HP-HR, and 59.18 lbs/hr	SO <sub>2</sub> - 0.5 lb/MMBTU, and 7.9 lbs/hr	NO <sub>x</sub> - 10.3 grams/HP-HR, and 59.18 lbs/hr		
SO <sub>2</sub> - 0.5 lb/MMBTU, and 7.9 lbs/hr	CO - 13.45 lbs/hr	SO <sub>2</sub> - 0.5 lb/MMBTU, and 7.9 lbs/hr		
CO - 13.45 lbs/hr	OC - 1.43 lbs/hr	CO - 13.45 lbs/hr		
OC - 1.43 lbs/hr		OC - 1.43 lbs/hr		
PM/PM <sub>10</sub> - 0.062 lb/MMBTU, and 0.98 lb/hr	PM/PM <sub>10</sub> - 0.062 lb/MMBTU, and 0.98 lb/hr			
NO <sub>x</sub> - 10.3 grams/HP-HR, and 59.18 lbs/hr	NO <sub>x</sub> - 10.3 grams/HP-HR, and 59.18 lbs/hr			
SO <sub>2</sub> - 0.5 lb/MMBTU, and 7.9 lbs/hr	SO <sub>2</sub> - 0.5 lb/MMBTU, and 7.9 lbs/hr			
CO - 13.45 lbs/hr	CO - 13.45 lbs/hr			
OC - 1.43 lbs/hr	OC - 1.43 lbs/hr			

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**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Matter/PM <sub>10</sub>	0.7
Nitrogen Oxides	39.06
Sulfur Dioxide	5.21
Carbon Monoxide	8.9
Organic Compounds	0.94

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Ohio Environmental Protection Agency Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

**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 contaminant emissions.

**MALFUNCTION/ABATEMENT**

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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 Ohio Environmental Protection Agency Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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 NUISANCE 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. Fuel Usage Limitation

Combined diesel fuel use of all six sources (B010-B015) shall be limited to 162,096 gallons per rolling 365 day period.

In order to ensure federal enforceability, during the first 12 months of operation, Ford Motor Company shall not exceed the following fuel usage limits for the specified time periods:

<u>Month</u>	<u>Diesel Fuel (Gallons)</u>
1	40,000
1-2	50,000
1-3	60,000
1-4	75,000
1-5	85,000
1-6	95,000
1-7	105,000

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1-8	115,000
1-9	125,000
1-10	135,000
1-11	145,000
1-12	162,000

The diesel fuel usage rate limit of 162,096 gallons per year equates to NO<sub>x</sub> emissions of 39.1 tons per year.

Ford Motor Company shall maintain records listing the amount of diesel fuel consumed by these six (6) sources each month, and the calculated total amount of the fuel consumed per rolling 365 day period.

Ford Motor Company shall specifically report all instances where the above fuel usage limits were exceeded.

2. Fuel Use Record Keeping Requirement

Ford Motor Company shall record and maintain record of the total combined amount of diesel fuel combusted each day by source numbers B010-B015. A fuel meter or meters shall be used for obtaining this data.

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of three (3) years following the date of such record.

3. Quarterly Reports

This facility shall submit quarterly reports to the Ohio EPA field office which summarize the following record keeping information required throughout this permit:

- a. total monthly consumption of diesel fuel and rolling 365 day total; and
- b. clearly report any emission limitation exceedances and the exceedance of any fuel use limitation specified in this permit.

These quarterly reports shall be submitted by February 1, May 1, August 1 and November 1 of each year and shall cover the previous three (3) calendar months (October through December, January through March, April through June, and July through September, respectively).

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4. Peaking Unit NO<sub>x</sub> Emission Exemption

The use limitations listed in this permit qualify source numbers B010-B015 as peaking units per OAC Rule 3745-14-01 definition, and therefore exempts said sources from the NO<sub>x</sub> emission limits of OAC Rule 3745-14-03.

Said rule defines a peaking unit as any electric generating unit that operates at a capacity factor of less than ten (10) percent between April 1 and October 31 of any calendar year.