



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

RE: PERMIT TO INSTALL MODIFICATION  
LORAIN COUNTY  
Application No: 02-07727

CERTIFIED MAIL

DATE: 8/31/2000

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification, a fee of \$0 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,

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

CC: USEPA  
Mike Bookwalter, Ford Motor Co

NEDO



**Permit To Install  
Terms and Conditions**

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

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-07727

Application Number: **02-07727**  
APS Premise Number: **0247080234**  
Permit Fee: **\$ To be entered upon final issuance**  
Name of Facility: **Ford Motor Co Lorain Assembly Plant**  
Person to Contact: **Warren Cohen**  
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 02-7727, issued 9/9/93, to accurately reflect emissions for boilers already installed, increasing CO allowable emissions for all 6 boilers combined to 3.3 TPY to 27.3 TPY.**

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**

Facility ID: **0247080234**

**PTI Application: 02-07727**

**Modification Issued: To be entered upon final issuance**

### **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.

#### **PUBLIC DISCLOSURE**

**Ford Motor Co Lorain Assembly Plant**

Facility ID: **0247080234**

**PTI Application: 02-07727**

**Modification Issued: To be entered upon final issuance**

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**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **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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**Ford Motor Co Lorain Assembly Plant**

**PTI Application: 02-07727**

**Modification Issued: To be entered upon final issuance**

Facility ID: **0247080234**

**Ford Motor Co Lorain Assembly Plant**Facility ID: **0247080234****PTI Application: 02-07727****Modification Issued: To be entered upon final issuance**

<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 sources listed below comprise the Permit to Install for **Ford Motor Co Lorain Assembly Plant** located in **LORAIN** County. The sources 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</u>	<u>Description</u>	<u>BAT Determination</u>
B004	B007	24.5 MMBTU/hr gas-fired boiler for steam generation	Use of only natural gas fuel
	B007 (cont'd)		
B005	B008	24.5 MMBTU/hr gas-fired boiler for steam generation	Use of only natural gas fuel
	B009	24.5 MMBTU/hr gas-fired boiler for steam generation	
B006			Use of only natural gas fuel

**Ford Motor Co Lorain Assembly Plant**  
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Facility ID: **0247080234**

<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>
	gas fuel		3745-23-06 40 CFR Part 60 Subpart DC	
		<u>Applicable Federal &amp; OAC Rules</u>	3745-31-05 3745-17-10 3745-17-11	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Use of only natural gas fuel		3745-31-05 3745-17-10 3745-17-11 3745-18-06 3745-21-08 3745-23-06 40 CFR Part 60 Subpart DC	3745-18-06 3745-21-08 3745-23-06 40 CFR Part 60 Subpart DC	PM/PM <sub>10</sub> 0.12 lb/hr CO 2.06 lbs/hr NO <sub>x</sub> 2.94 lbs/hr SO <sub>2</sub> 0.015 lb/hr OC 0.2 lb/hr
		3745-31-05 3745-17-10 3745-17-11 3745-18-06 3745-21-08 3745-23-06 40 CFR Part 60 Subpart DC	3745-31-05 3745-17-10 3745-17-11 3745-18-06 3745-21-08 3745-23-06 40 CFR Part 60 Subpart DC	PM/PM <sub>10</sub> 0.12 lb/hr CO 2.06 lbs/hr NO <sub>x</sub> 2.94 lbs/hr SO <sub>2</sub> 0.015 lb/hr OC 0.2 lb/hr
Use of only natural gas fuel		3745-31-05 3745-17-10 3745-17-11 3745-18-06 3745-21-08 3745-23-06 40 CFR Part 60 Subpart DC		PM/PM <sub>10</sub> 0.12 lb/hr CO 2.06 lbs/hr NO <sub>x</sub> 2.94 lbs/hr SO <sub>2</sub> 0.015 lb/hr OC 0.2 lb/hr
Use of only natural gas fuel		3745-31-05 3745-17-10 3745-17-11 3745-18-06 3745-21-08		PM/PM <sub>10</sub> 0.12 lb/hr CO 2.06 lbs/hr

**Ford Motor Co Lorain Assembly Plant**Facility ID: **0247080234****PTI Application: 02-07727****Modification Issued: To be entered upon final issuance**

<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>
NO <sub>x</sub> 2.94 lbs/hr	2.94 lbs/hr			
SO <sub>2</sub> 0.015 lb/hr	SO <sub>2</sub> 0.015 lb/hr			
OC 0.2 lb/hr	OC 0.2 lb/hr			
PM/PM <sub>10</sub> 0.12 lb/hr				
CO 2.06 lbs/hr				
NO <sub>x</sub> 2.94 lbs/hr				
SO <sub>2</sub> 0.015 lb/hr				
OC 0.2 lb/hr				
PM/PM <sub>10</sub> 0.12 lb/hr				
CO 2.06 lbs/hr				
NO <sub>x</sub>				

Ford Motor Co Lorain Assembly Plant  
 PTI Application: 02-07727  
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Facility ID: 0247080234

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

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Matter/PM <sub>10</sub>	1.6
Carbon Monoxide	27.3
Nitrogen Oxides	39.0
Sulfur Dioxides	0.2
Organic Compounds	2.6

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>
B008	
B009	
B004	24.5 MMBTU/hr gas-fired boiler
B005	24.5 MMBTU/hr gas-fired boiler
B006	24.5 MMBTU/hr gas-fired boiler
B007	24.5 MMBTU/hr gas-fired boiler

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24.5	
MMBTU/hr	<b><u>NSPS Regulation (Subpart)</u></b>
gas-fired boiler	
	Dc
24.5	
MMBTU/hr	Dc
gas-fired boiler	
	Dc
	Dc
	Dc
	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Air Quality Modeling and Planning  
P.O. Box 1049  
Columbus, OH 43216-1049

and OEPA Northeast District Office - DAPC  
2110 East Aurora Road  
Twinsburg, Ohio 44087

**RECORD(S) RETENTION AND AVAILABILITY**

**Ford Motor Co Lorain Assembly Plant**

Facility ID: **0247080234**

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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 EPA, Northeast District Office.

### **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**

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 OEPA 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 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.

### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

**Ford Motor Co Lorain Assembly Plant**

Facility ID: **0247080234**

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### **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 natural gas use of all six sources (B004 - B009) shall be limited to 650 million cubic feet per rolling 365 day period.

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

<u>Month</u>	<u>Natural Gas (MM Cubic Feet)</u>
1	109
1-2	201
1-3	293
1-4	366
1-5	439
1-6	494
1-7	530
1-8	566
1-9	584
1-10	602
1-11	620
1-12	650

The natural gas usage rate limit of 650 mm cubic feet per year equates to NO<sub>x</sub> emissions of 39.0 tons per year.

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

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

**Ford Motor Co Lorain Assembly Plant**

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2. Fuel Use Recordkeeping Requirement

In accordance with the requirements of Section 60.48C of 40 CFR Part 60, Subpart Dc, Ford Motor Co. shall record and maintain records of the total combined amount of natural gas combusted each day by source numbers B004 - B009. A single gas meter on the gas main serving source numbers B004 - B009 may 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 two 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 recordkeeping information required throughout this permit:

- a. Total monthly consumption of natural gas and rolling 365 day total.
- 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).