



State of Ohio Environmental Protection Agency

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Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
ALLEN COUNTY
Application No: 03-09697

CERTIFIED MAIL

DATE: 8/31/2000

Ford Motor Company Lima Engine Plant
Kevin Bruin
1155 Bible Rd
Lima, OH 45801

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

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/31/2000
Effective Date: 8/31/2000**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-09697

Application Number: **03-09697**
APS Premise Number: **0302020143**
Permit Fee: **\$700**
Name of Facility: **Ford Motor Company Lima Engine Plant**
Person to Contact: **Kevin Bruin**
Address: **1155 Bible Rd
Lima, OH 45801**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1155 Bible Rd
Lima, OHIO**

Description of modification:

Modification to PTI #03-09697 issued 08/14/1996 to reduce monitoring frequency and update pressure drop operational changes and to eliminate duplication of emission unit designation.

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 Company Lima Engine Plant

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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.

PUBLIC DISCLOSURE

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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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<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 sources listed below comprise the Permit to Install for **Ford Motor Company Lima Engine Plant** located in **ALLEN** 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>
P041	P036	3.9 L-V8 cylinder head machining line	3.9L-V8 camshaft machining line Use of mist collector and compliance with the terms and conditions of this permit
P034	P037	3.9L-V8 connecting rod machining line	3.9L-V8 cylinder block machining line Use of mist collector and compliance with the terms and conditions of this permit
P035		3.9L-V8 crankshaft machining line	Use of mist collector and compliance with the terms and conditions of this permit

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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>
Use of mist collector and compliance with the terms and conditions of this permit		Applicable Federal & <u>OAC Rules</u>	3745-31-05	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
			3745-17-11	
			3745-17-07	
Use of mist collector and compliance with the terms and conditions of this permit		Applicable Federal & <u>OAC Rules</u>	3745-31-05	Particulate matter: 0.34 lb/hr; Opacity Restrictions OC: 1.99 lbs/hr; (see Additional Special Terms and Conditions)
			3745-17-11	
			3745-17-07	
Use of mist collector and compliance with the terms and conditions of this permit		Applicable Federal & <u>OAC Rules</u>	3745-31-05	Particulate matter: 0.11 lb/hr; Opacity Restrictions OC: 0.68 lb/hr; (see Additional Special Terms and Conditions)
			3745-17-11	
			3745-17-07	
Use of mist collector and compliance with the terms and conditions of this permit		Applicable Federal & <u>OAC Rules</u>	3745-31-05	Particulate matter: 0.11 lb/hr; Opacity Restrictions OC: 0.68 lb/hr; (see Additional Special Terms and Conditions)
			3745-17-11	
			3745-17-07	
Use of mist collector and compliance with the terms and conditions of this permit		Applicable Federal & <u>OAC Rules</u>	3745-31-05	Particulate matter: 0.11 lb/hr; Opacity Restrictions OC: 0.68 lb/hr; (see Additional Special Terms and Conditions)
			3745-17-11	
			3745-17-07	

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(see
Additional
Special
Terms
and
Conditions)

Particulate
matter:
0.27
lb/hr;
Opacity
Restrictions OC:
1.63
lbs/hr;
(see
Additional
Special
Terms
and
Conditions)

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Organic Compounds (OC)

Pollutant

Particulate matter (PM)*

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Tons/Year

4.1
24.8

* All particulate matter emissions are considered to be PM₁₀.

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 OEPA Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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 Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

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

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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.

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

A. Applicable Emission Limitations and/or Control Requirements

Emissions from the metal machining lines (emissions units P034 to P037 and P041) shall be controlled with mist collectors capable of achieving $\geq 95\%$ control efficiency for PM. Emissions from the metal machining lines shall not exceed the following:

<u>Emissions Unit</u>	Applicable Emission Limitations	
	<u>PM (lbs/hr)</u>	<u>OC (lbs/hr)</u>
(P041) 3.9 L-V8 cylinder head machining line	0.34	1.99
(P034) 3.9 L-V8 connecting rod machining line	0.11	0.68
(P035) 3.9L-V8 crankshaft machining line	0.11	0.68

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(P036) 3.9L-V8 camshaft machining line	0.11	0.68
(P037) 3.9L-V8 cylinder block machining line	0.27	1.63

The applicable PM emission limitations for emissions units P034 to P037 and P041 were based on an emission factor of 0.0007 gr/scf from stack tests performed on similar emissions units.

The applicable OC emission limitations for emissions units P034 to P037 and P041 were based on an emission factor of 0.0044 gr/scf from stack tests performed on similar emissions units.

The applicable emission limitations are based on maximum process capacities and operation of the units 8760 hrs/yr.

B. Operational Restrictions

1. The pressure drop across the mist collectors for emissions units P034 to P037 and P041 shall be maintained within the range of 1 to 10 inches of water while the emissions units are in operation.
2. This permit allows for the use of the coolants/cutting fluid materials specified by the permittee in its PTI application number 03-09697. In conjunction with the requirements of OAC 3745-31-05, the emissions limits specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coolant/cutting fluid material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Division of Air Pollution Control, Northwest District Office (NWDO) are required:
 - A. any change in the composition of the coolant/cutting fluid materials or use of new coolant/cutting fluid materials that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the American Conference of Governmental Industrial Hygienists (ACGIH), than is currently reflected in the permittee's PTI application;
 - B. any change to the emissions unit or its exhaust parameters that would result in an exceedance of the Maximum Acceptable Ground-Level Concentration (MAGLC) or air toxics beyond plant property lines;
 - C. any change in the composition of the coolant/cutting fluid materials or use of new coolant/cutting fluid materials that would result in the emissions of any organic compound excluded from the definition of "VOC" in OAC 3745-21-01(B)(6); and,
 - D. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC 3745-31-01(KK).

C. Monitoring and/or Recordkeeping Requirements

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The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the mist collectors while the emissions units are in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each mist collector for emissions units P034 to P037 and P041 on a weekly basis.

D. Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drops across the mist collectors for emissions units P034 to P037 and P041 did not comply with the allowable range specified above in condition (C)(1).