

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **03-16144**

A. Source Description

Ford Motor Company is planning to modify the existing engine test cells at their facility in Lima, Ohio, Allen County. The modifications will allow for the testing of a new larger engine in both the East and West testing cells. The operation of this engine would result in higher short term emission rates than previously permitted. The permittee has requested to limit the annual fuel usage for the cells to avoid PSD requirements.

B. Facility Emissions

The facility will emit nitrogen oxides and carbon monoxide above major source thresholds for PSD permitting requirements. At 8760 hrs, this equipment has the potential emissions of 357 tpy of nitrogen oxides, and 185 tpy of carbon monoxide.

C. Operating Limitations

Ford Motor Company has requested a federally enforceable limit on their annual fuel usage of 150,000 gallons of fuel for both emissions units per rolling 12-month period. This would restrict the emissions units potential emissions to 20 tons of carbon monoxide and 38 tons of nitrogen oxides.

D. Conclusions

By restricting annual fuel usage, the terms and conditions of this permit to install will limit the facility's nitrogen oxide and carbon monoxide emissions to less than PSD thresholds. Excursion reports will be required for each emissions unit to ensure compliance.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
ALLEN COUNTY

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 03-16144

DATE: 3/30/2004

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. 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 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 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 a fee of \$400 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,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO

Lima-Allen Regional Planning Commission

IN

ALLEN
COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-16144** FOR AN AIR CONTAMINANT SOURCE FOR
FORD MOTOR COMPANY LIMA ENGINE PLANT

On 3/30/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ford Motor Company Lima Engine Plant**, located at **1155 Bible Rd, Lima, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16144:

(2) engine internal combustion testing machines.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402
[(419)352-8461]



**Permit To Install
Terms and
Conditions**

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

DRAFT PERMIT TO INSTALL 03-16144

Application Number: 03-16144
APS Premise Number: 0302020143
Permit Fee: **To be entered upon final issuance**
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 proposed emissions unit(s):
(2) engine internal combustion testing machines.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. 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

Ford Motor Company Lima Engine Plant

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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).

- b. 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.

11. 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.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

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5. Construction of New Sources(s)

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.

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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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.

Issued

Emissions Unit ID: P050

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	38.3
OC	3.2
CO	19.8

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Ford I

PTI A

Emissions Unit ID: P050

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Ford F
PTI A**

Emissions Unit ID: P050

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - 4-Cell Engine Testing Dynamometer Facility-West Block. Modification to PTI 03-07762, issued 4/4/02. Modification to allow an increase in emission limitations.	OAC rule 3745-31-05(A)(3)	40.8 lbs nitrogen oxides (NO _x)/hr
		3.4 lbs organic compounds (OC)/hr
		21.1 lbs carbon monoxide (CO)/hr
		See A.I.2.a. and A.I.2.b.
	OAC rule 3745-31-05(C)	Group Emission Limits for P050 and P051 combined (see A.I.2.c)
	OAC rule 3745-17-11 (B)(1)	None, see A.I.2.d.
	OAC rule 3745-17-07 (A)	None, see A.I.2.e.
	OAC rule 3745-18-06(G)	See A.I.2.f.
	See A.I.2.g.	
	None, See A.I.2.h.	

Emissions Unit ID: P050

2. Additional Terms and Conditions

- 2.a** The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a thermal incinerator. The thermal incinerator shall be capable of achieving a minimum overall control efficiency of 95%, by weight, for OC (100% capture and 95% destruction efficiency) and a minimum overall control efficiency of 95% for CO (100% capture and 95% destruction efficiencies for CO). All emissions from the 4 west block engine testing cells shall be routed to the thermal incinerator. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.b** The requirements of the rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.c** The emissions from emissions units P050 and P051 combined shall not exceed the following:
- i. 38.3 tons of NO_x per year, based upon a rolling, 12-month summation of the monthly emissions;
 - ii. 19.8 tons of CO per year, based upon a rolling, 12-month summation of the monthly emissions; and,
 - iii. 3.2 tons of OC per year, based upon a rolling, 12-month summation of the monthly emissions.

For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.

OAC rule 3745-31-05(C) establishes federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting fuel usage (see A.II.2) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(I), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight rate, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.*

* The only materials introduced into this process are gaseous fuels and liquid fuels that are used solely as fuels for the purpose of combustion.

- 2.e** This emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- 2.f** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

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- 2.g** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.h** This is an existing emissions unit as defined by 40 CFR Part 63 Subpart P and as such is exempt from the requirements of this rule pursuant to 40 CFR Part 63.9290(b).

II. Operational Restrictions

1. None of the 4 west block engine testing cells shall operate whenever the average combustion temperature within the thermal incinerator is more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. This condition shall be met by operating and maintaining the existing interlock system on the thermal incinerator which shuts down the emissions unit when the combustion temperature is below the required level.
2. The maximum annual gallons of fuel used in emissions units P050 and P051 combined shall not exceed 150,000 gallons per year, based upon a rolling 12-month summation of the monthly fuel usage.

The permittee shall demonstrate compliance upon start-up under the provisions of this permit by using existing records for determining the rolling 12-month summation of the monthly fuel usage. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and

Issued

Emissions Unit ID: P050

recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain a log of the activation of the interlock system when the emissions unit is not shut down. This log shall include the date, time, and duration of each such period.
4. The permittee shall, on a quarterly basis, test the interlock system to ensure that the emissions unit does shut down whenever the average combustion temperature within the thermal incinerator is more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
5. The permittee shall maintain monthly records of the following information for this emission units P050 and P051 combined:
 - a. the fuel usage each month, in gallons;
 - b. the rolling, 12- month summation of the fuel usage, in gallons;
 - c. the calculated, controlled monthly emission rate for NO_x, CO, and OC using the established emission factors of 0.51 lbs NO_x/gallon of fuel burned, 5.27 lbs CO/gallon of fuel burned, 0.86 lbs OC/gallon of fuel burned, and applying the overall control efficiency of the incinerators (95% for CO and OC); and,
 - d. the rolling, 12- month summation of the emission rates for NO_x, CO, and OC in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - b. a record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation (date, time,

Ford F**PTI A**

Emissions Unit ID: P050

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and duration).

2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the interlock system was activated and the emissions unit was not shut down.
3. The permittee shall submit deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month fuel usage limitation; and,
 - b. the rolling, 12-month NO_x, CO, and OC emissions.
4. These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 180 days following the first day this emissions unit commences modified operation/s as allowed for by this PTI.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates of NO_x.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

NO_x: Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted on either the East Block or West Block of cells while the emissions unit is operating at the "worst case" emission rate, unless otherwise specified or approved by the Ohio EPA Northwest District Office. As part of the "Intent to Test" notification described below, the permittee shall provide documentation as to which block of cells is proposed to be tested, and the operational scenario under which the testing will take place.

Emissions Unit ID: P050

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office.

2. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation
40.8 lbs NO_x/hr

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly emission limitation by conducting emission testing in accordance with the requirements in section A.V.1.

- b. Emission Limitation
3.4 lbs OC/hr
21.1 lbs CO/hr

Applicable Compliance Method

Compliance with the hourly emission limitations shall be determined by multiplying the emission factors established by the permittee of 5.27 lbs CO/gallon of fuel burned and 0.86 lbs OC/gallon of fuel burned, by the maximum gallon usage rate of 80 gallons of fuel/hr and applying the overall control efficiency of 95%. If required, the permittee shall demonstrate compliance by testing in accordance with appropriate USEPA test methods.

- c. Emission Limitation
Group Emission Limits for P050 and P051 combined of
38.3 tons NO_x, 19.8 tons CO, and 3.2 tons OC per rolling 12-month period.

Applicable Compliance Method

Ford I

PTI A

Emissions Unit ID: P050

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The permittee shall demonstrate compliance with the annual emission limitations in accordance with the record keeping requirements in section A.III.5.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - 4-Cell Engine Testing Dynamometer Facility-West Block. Modification to PTI 03-07762, issued 4/4/02. Modification to allow an increase in emission limitations.	OAC rule 3745-31-05(A)(3)	See A.VI.1.

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the permit's maximum annual emissions for each toxic compound will be less than 1.0

Ford I**PTI A**

Emissions Unit ID: P050

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ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Ford F
PTI A

Emissions Unit ID: P051

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - 4-Cell Engine Testing Dynamometer Facility-East Block. Modification to PTI 03-07762, issued 4/4/02. Modification to allow an increase in emission limitations.	OAC rule 3745-31-05(A)(3)	40.8 lbs nitrogen oxides (NO _x)/hr
		3.4 lbs organic compounds (OC)/hr
		21.1 lbs carbon monoxide (CO)/hr
		See A.I.2.a. and A.I.2.b.
	OAC rule 3745-31-05(C)	Group Emission Limits for P050 and P051 combined (see A.I.2.c)
	OAC rule 3745-17-11 (B)(1)	None, see A.I.2.d.
	OAC rule 3745-17-07 (A)	None, see A.I.2.e.
	OAC rule 3745-18-06(G)	See A.I.2.f.
	OAC rule 3745-21-08(B)	See A.I.2.g.
	OAC rule 3745-23-06(B)	See A.I.2.g.
	OAC rule 3745-21-07(B)	See A.I.2.g.
	40 CFR Part 63 Subpart P P P P P	None, See A.I.2.h.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a thermal incinerator. The thermal incinerator shall be capable of achieving a minimum overall control efficiency of 95%, by weight, for OC (100% capture and 95% destruction efficiency) and a minimum overall control efficiency of 95% for CO (100% capture and 95% destruction efficiencies for CO). All emissions from the 4 east block engine testing cells shall be routed to the thermal incinerator. BAT requirements also include compliance with the terms and conditions of this permit.
- 2.b** The requirements of the rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.c** The emissions from emissions units P050 and P051 combined shall not exceed the following:
- i. 38.3 tons of NO_x per year, based upon a rolling, 12-month summation of the monthly emissions;
 - ii. 19.8 tons of CO per year, based upon a rolling, 12-month summation of the monthly emissions; and,
 - iii. 3.2 tons of OC per year, based upon a rolling, 12-month summation of the monthly emissions.

For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.

OAC rule 3745-31-05(C) establishes federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting fuel usage (see A.II.2) for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(I), Figure II of OAC rule 3745-17-11 does not apply. Table I of OAC rule 3745-17-11 does not apply because the process weight rate, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.*

* The only materials introduced into this process are gaseous fuels and liquid fuels that are used solely as fuels for the purpose of combustion.

- 2.e** This emissions unit is exempt from the visible particulate emissions limitations specified in

Emissions Unit ID: P051

OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

- 2.f** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
- 2.g** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) and OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.h** This is an existing emissions unit as defined by 40 CFR Part 63 Subpart P and as such is exempt from the requirements of this rule pursuant to 40 CFR Part 63.9290(b).

II. Operational Restrictions

- None of the 4 east block engine testing cells shall operate whenever the average combustion temperature within the thermal incinerator is more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. This condition shall be met by operating and maintaining the existing interlock system on the thermal incinerator which shuts down the emissions unit when the combustion temperature is below the required level.
- The maximum annual gallons of fuel used in emissions units P050 and P051 combined shall not exceed 150,000 gallons per year, based upon a rolling 12-month summation of the monthly fuel usage.

The permittee shall demonstrate compliance upon start-up under the provisions of this permit by using existing records for determining the rolling 12-month summation of the monthly fuel usage. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

III. Monitoring and/or Recordkeeping Requirements

- The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and

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recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall maintain a log of the activation of the interlock system when the emissions unit is not shut down. This log shall include the date, time, and duration of each such period.
4. The permittee shall, on a quarterly basis, test the interlock system to ensure that the emissions unit does shut down whenever the average combustion temperature within the thermal incinerator is more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
5. The permittee shall maintain monthly records of the following information for this emission units P050 and P051 combined:
 - a. the fuel usage each month, in gallons;
 - b. the rolling, 12- month summation of the fuel usage, in gallons;
 - c. the calculated, controlled monthly emission rate for NO_x, CO, and OC using the established emission factors of 0.51 lbs NO_x/gallon of fuel burned, 5.27 lbs CO/gallon of fuel burned, 0.86 lbs OC/gallon of fuel burned, and applying the overall control efficiency of the incinerators (95% for CO and OC); and,
 - d. the rolling, 12- month summation of the emission rates for NO_x, CO, and OC in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees

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Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and,

- b. a record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation (date, time, and duration).
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the interlock system was activated and the emissions unit was not shut down.
 3. The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month fuel usage limitation; and,
 - b. the rolling, 12-month NO_x, CO, and OC emissions.
 4. These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 180 days following the first day this emissions unit commences modified operation/s as allowed for by this PTI.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates of NO_x.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

NO_x: Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted on either the East Block or West Block of cells while the emissions unit is operating at the "worst case" emission rate, unless otherwise specified or approved by the Ohio EPA Northwest District Office. As part of the "Intent to Test" notification described below, the permittee shall provide documentation as to which block of cells is proposed to be tested, and the operational scenario under which the testing will take place.

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- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office.

2. Compliance with the emission limitation(s) in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation
40.8 lbs NO_x/hr

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly emission limitation by conducting emission testing in accordance with the requirements in section A.V.1.

- b. Emission Limitation
3.4 lbs OC/hr
21.1 lbs CO/hr

Applicable Compliance Method

Compliance with the hourly emission limitations shall be determined by multiplying the emission factors established by the permittee of 5.27 lbs CO/gallon of fuel burned and 0.86 lbs OC/gallon of fuel burned, by the maximum gallon usage rate of 80 gallons of fuel/hr and applying the overall control efficiency of 95%. If required, the permittee shall demonstrate compliance by testing in accordance with appropriate USEPA test methods.

- c. Emission Limitation
Group Emission Limits for P050 and P051 combined of
38.3 tons NO_x, 19.8 tons CO, and 3.2 tons OC per rolling 12-month period.

Applicable Compliance Method

Ford I

PTI A

Emissions Unit ID: P051

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The permittee shall demonstrate compliance with the annual emission limitations in accordance with the record keeping requirements in section A.III.5.

VI. Miscellaneous Requirements

None

Ford F

PTI A

Emissions Unit ID: P051

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - 4-Cell Engine Testing Dynamometer Facility-East Block. Modification to PTI 03-07762, issued 4/4/02. Modification to allow an increase in emission limitations.	OAC rule 3745-31-05(A)(3)	See A.VI.1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

Issued: To be entered upon final issuance

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the permit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.