

# Statement of Basis For Title V Permit

Company Name	Ford Motor Company - Sandusky Plastics Plant	
Premise Number	0322020042	
Number of Non-insignificant Emissions Units	10	
What makes this facility a Title V facility?	Potential organic compound (OC) emissions in excess of 100 tons/year	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.	y		OAC rule 3745-15-06 Malfunction of Equipment; scheduled maintenance; reporting
A.2.	y		OAC rule 3745-15-08 Circumvention
B.1.	y		OAC rule 3745-15-07 Air pollution nuisances prohibited
B.2.	y		Lists each insignificant emissions unit located at the facility and states that each unit must still comply with all applicable state and federal regulations as well as any issued PTI.
B.3.	N	y	Company had in application as applicable... states that storage, treatment, transport & disposal of waste materials be done in accordance with all applicable state and federal regulations.
B.4.		y	OAC rule 3745-49-03 public disclosure statement.

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**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B004	0.020 pound PE/million BTU	17-10 (B)(1)		N	N	Y	Y	Y	N	OR- CAM rule is currently not applicable; compliance methods requirements sufficient M- compliance methods requirements sufficient R- maintain monthly records of the quantity of natural gas employed Rp - General Terms and Conditions of permit require quarterly excess emissions reporting ET- compliance methods requirements (use AP-42 Table 1.4-1) and RK to calculate emissions and verify compliance Misc - No additional requirements were needed
B004, R022, R027, R038, R050, R051, R052, R053,	20% opacity as 6-min ave	17-07 (A)		N	N	N	N	Y	N	OR- CAM rule is currently not applicable; compliance methods requirements sufficient M - compliance methods requirements sufficient R - compliance methods requirements sufficient Rp - compliance methods requirements sufficient ET- compliance methods requirements (use OAC rule 3745-17-03(B)(1)) to verify compliance Misc- No additional requirements were needed
B004	1.6 pound PE/million BTU when No. 2 fuel oil is employed	18-06 (D)		Y	N	Y	Y	Y	N	OR- CAM rule is currently not applicable; sulfur content limit to maintain compliance with emission limit M- record keeping will be sufficient R- records of quantity of no. 2 oil employed and analytical results Rp- General Terms and Conditions of permit require quarterly excess emissions reporting ET- compliance methods requirements (use OAC rule 3745-18-04(E)(3), (F)(2) and (F)(4) to verify compliance Misc - No additional requirements were needed
P056	3.0 pounds OC/hour, not to exceed 15.0 pounds/day	21-07 (G)(1)		N	N	Y	Y	Y	Y	OR- CAM rule is currently not applicable; record keeping and compliance methods requirements were sufficient M - record keeping and compliance methods requirements were sufficient R- maintain records of the "split" in OC emissions between oven and associated spray booth Rp - notify director of any violation of emission limitation ET- compliance methods requirements (use record keeping as tool to demonstrate compliance) Misc - this Title V permit will supersede the PTI for P056 (03-9956)

P056, R022, R027, R038, R050, R051, R052, R053, R054	235.6 tons OC/year *	N	31-05	N	N	Y	Y	Y	N	OR- CAM rule is currently not applicable; record keeping and compliance methods requirements were sufficient M- record keeping and compliance methods requirements were sufficient R- maintain records of the emissions from all OC-emitting units at the facility Rp- notify director of any violation of emission limitation ET- compliance methods requirements (use record keeping as tool to demonstrate compliance) Misc - No additional requirements were needed
R022, R038	8.0 pounds OC/hour not to exceed 40.0 pounds/day	21-07 (G)(2)		N	N	Y	Y	Y	Y	OR- CAM rule is currently not applicable; record keeping and compliance methods requirements were sufficient M - record keeping and compliance methods requirements were sufficient R- maintain records of the coating usage and resultant OC emissions Rp - notify director of any violation of emission limitation ET- compliance methods requirements (use record keeping as tool to demonstrate compliance) Misc - this Title V permit will supersede the PTIs for R022 (03-8126 & 03-9956) & R038 (03-6604, 03-8125 & 03-9956)

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements