

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Ford Motor Company, Lima Engine Plant		
Premise Number	0302020143		
Number of Non-insignificant Emissions Units	23		
What makes this facility a Title V facility?	CO, PE, NOx, VOC		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes		

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
N/A			

C Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

C If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

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

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
P011	9.55 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P012	10.03 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P013	3.82 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P023	2.80 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P024	0.40 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P025	0.23 lbs PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P026	3.1 lbs OC/hr and 5.5 TPY OC from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. The annual limitation is based on restricting the number of engines tested. ET - there are sufficient stack test results from similar emission units to demonstrate compliance.

P026	28.4 lbs CO/hr and 50.7 tons CO/rolling, 12-month period from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. The rolling, 12-month limitation is based on restricting the number of engines tested to avoid PSD. ET - there are sufficient stack test results from similar emission units to demonstrate compliance.
P026	2.6 lbs NOx/hr and 4.6 TPY NOx from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. The annual limitation is based on restricting the number of engines tested. ET - there are sufficient stack test results from similar emission units to demonstrate compliance.
P026	1.1 lbs OC/hr, 2.0 TPY OC from fuel rail blow down	31-05		y	y	y	y	n	n	OR - maintain pilot light at all times, no visible emissions from flare except for 5 minutes during any consecutive 120 minute period M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P026	1.1 lbs CO/hr, 2.0 TPY CO from fuel rail blow down	31-05		n	n	n	n	n	n	M,R,Rp - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. The annual limitation is based on restricting the number of engines tested. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P026	0.2 lb NOx/hr, 0.4 TPY NOx	31-05		n	n	n	n	n	n	M,R,Rp - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. The annual limitation is based on restricting the number of engines tested. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P028	1.66 lbs PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P029	0.77 lb PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance

P031	0.55 lb PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P032	2.50 lbs PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P033	3.20 lbs NOx/hr, 14.0 TPY NOx	31- 05(A)		y	y	y	y	y	n	OR - the temperature of the thermal incinerator must not be less than 50 degrees below the temperature of the most recent emission test which demonstrated compliance with the emissions limit. M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction.
P033	0.16 lb OC/hr, 0.7 TPY OC	31- 05(A)		y	y	y	y	y	n	OR - the temperature of the thermal incinerator must not be less than 50 degrees below the temperature of the most recent emission test which demonstrated compliance with the emissions limit. M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction.
P033	10.16 lbs CO/hr, 44.5 TPY CO	31- 05(D)		y	y	y	y	y	n	OR - the temperature of the thermal incinerator must not be less than 50 degrees below the temperature of the most recent emission test which demonstrated compliance with the emissions limit. M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction.
P034	0.11 lb PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P034	0.68 lb OC/hr	31-05		n	n	n	n	n	n	M,R,Rp,ET - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping reporting or testing requirements are needed.
P037	0.27 lbs PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance

P037	1.63 lbs OC/hr	31-05		y	n	n	n	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P038	0.21 lb PE/hr	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P038	1.32 lbs OC/hr	31-05		n	n	n	n	n	n	M,R,Rp,ET - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping reporting or testing requirements are needed.
P041	0.34 lb PE/hr	31-05		y	n	n	n	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P041	1.99 lbs OC/hr	31-05		n	n	n	n	n	n	M,R,Rp,ET - the hourly limit is based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed.
P042	14.36 lbs CO/hr and 62.91 TPY CO from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp, - the hourly and annual limits are based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. ET - compliance is demonstrated by using a company developed formula which is based on stack test results from similar emission units.
P042	1.52 lbs OC/hr and 6.66 TPY OC from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp, - the hourly and annual limits are based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. ET - compliance is demonstrated by using a company developed formula which is based on stack test results from similar emission units.
P042	5.92 lbs NOx/hr and 25.93 TPY NOx from engine exhaust	31-05		n	n	n	n	n	n	M,R,Rp, - the hourly and annual limits are based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. ET - compliance is demonstrated by using a company developed formula which is based on stack test results from similar emission units.

P042	1.00 lb CO/hr and 4.38 TPY CO from fuel rail blow down	31-05		n	n	n	n	n	n	M,R,Rp - the hourly and annual limits are based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P042	0.6 lbs OC/hr and 2.63 TPY OC from fuel rail blow down	31-05		y	n	n	n	n	n	OR - maintain pilot light at all times, no visible emissions from flare except for 5 minutes during any consecutive 120 minute period M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P042	0.16 lb NOx/hr and 0.70 TPY NOx from fuel rail blow down	31-05		n	n	n	n	n	n	M,R,Rp - the hourly and annual limits are based on the emissions unit's PTE. Therefore no monitoring, recordkeeping or reporting requirements are needed. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P048	0.14 lb PE/hr, 0.61 TPY PE	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P048	0.23 lb OC/hr, 1.0 TPY OC	31-05		y	y	y	y	n	n	OR -the use of photochemically reactive material is prohibited M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P049	0.30 lb PE/hr, 1.31 TPY PE	31-05		y	y	y	y	n	n	OR - operate and maintain pressure drop monitor M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance
P049	2.92 lbs OC/hr, 12.79 TPY OC	31-05		y	y	y	y	n	n	OR -the use of photochemically reactive material is prohibited M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - there are sufficient stack test results from similar emission units to demonstrate compliance

P050	10.16 lbs CO/hr, 44.5 TPY CO	31- 05(D)		y	y	y	y	y	n	OR - the average combustion temperature for any 3 hour block of time shall not be less than 50 degrees below the temperature maintained during the latest stack test which demonstrated compliance with the emissions limit. M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction.
P050	0.16 lb OC/hr, 0.7 TPY OC	31- 05(A)		y	y	y	y	y	n	OR - the average combustion temperature for any 3 hour block of time shall not be less than 50 degrees below the temperature maintained during the latest stack test which demonstrated compliance with the emissions limit. M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction
P050	3.20 lbs NOx/hr, 14.0 TPY NOx	31- 05(A)		n	n	n	n	y	n	M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction.
R004	0.551 lb PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - the dry filtration system must be in operation during all coating operations M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - the limit is based on the formula $E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$ where TE = transfer efficiency and CE = control efficiency.
R004	coatings usage not to exceed 10 gals/day	21-09 (U)(2) (e)		n	y	y	y	n	n	ET - the only limit is number of gallons of usage, therefore compliance is demonstrated through record keeping
R005	0.551 lb PE/hr	17-11 (B)(1)		y	y	y	y	n	n	OR - the dry filtration system must be in operation during all coating operations M,R,Rp - adequate monitoring, recordkeeping and reporting requirements are in permit to meet the operational restriction. ET - the limit is based on the formula $E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$ where TE = transfer efficiency and CE = control efficiency.
R005	coatings usage not to exceed 10 gals/day	21-09 (U)(2) (e)		n	y	y	y	n	n	ET - the only limit is number of gallons of usage, therefore compliance is demonstrated through record keeping

P011, P012, P013, P023, P024, P025, P028, P029, P031, P032, P034, P037, P038, P041, P048, P049, R004, R005	20% opacity	17- 07(A)		n	y	y	y	n	n	ET - compliance is demonstrated by visible emissions readings
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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

C **Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.