

Statement of Basis For Title V Permit

Company Name	Ford Motor Co. - Lorain Assembly Plant	
Premise Number	02 47 08 0234	
Number of Non-insignificant Emissions Units		
What makes this facility a Title V facility?	Potential emissions of particulates, sulfur dioxide, nitrogen oxides carbon monoxide and 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	
A.1	25-03		emission control action program.
A.2	20	Yes	40 CFR Part 61 asbestos renovation and removal activities
A.3		No	requires notice & compliance testing of emissions units B001-B003, considered to be on 'cold standby' status by the applicant, prior to authorization to operate. Also requires compliance with all applicable NSR requirements prior to activation.
A.4		No.	requires notice & compliance testing of emissions units K012, K015-K018, K026, K027, K029 and Z043, considered to be on 'cold standby' status by the applicant, prior to authorization to operate. Also requires compliance with all applicable NSR requirements prior to activation.
A.5		No	standard language regarding witnessing of compliance tests and reporting of test results.
A.6	31-05		Per PTI 02-4198, lists the common production, control and emission limits for K015-K019.

- **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.

- 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							
B004 - B009	20% opacity as a 6-minute ave.	17-07(A)		Y	N	N	N	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	0.12 lb of PE/hr	31-05 & PTI 02-7727		Y	N	N	N	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	2.06 lbs of CO/hr	31-05 & PTI 02-7727		Y	N	N	N	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	2.94 lbs of NOx/hr	31-05 & PTI 02-7727		Y	Y	Y	Y	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit. PTI 02-7727 was a synthetic minor for NOx at 39.9 tons per year.
	0.015 lb of SO2/hr	31-05 & PTI 02-7727		Y	N	N	N	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	0.2 lb of O.C./hr	31-05 & PTI 02-7727		Y	N	N	N	Y	N	OR - 1. This emissions unit shall only fire natural gas fuel. 2. The annual, combined total natural gas usage of emissions units B004-B009 is limited to 650 million cu. ft. It is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
B010-B015	20% opacity as a 6-minute ave.	17-07(A)		Y	N	N	N	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmBtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.

	0.062 lb of PE/mm btu & 0.98 lb of PE/hr	31-05 & PTI 02-8386		Y	N	N	N	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmbtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	13.45 lbs CO/hr	31-05 & PTI 02-8386		Y	N	N	N	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmbtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	59.18 lbs NOx/hr	31-05 & PTI 02-8386		Y	Y	Y	Y	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmbtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit. PTI 02-8386 was a synthetic minor for Nox at 39.1 tons per year.
	0.5 lb of SO2/mmbtu	18-06 31-05 PTI 02-8386		Y	Y	Y	Y	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmbtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
	1.43 lbs of O.C./hr	31-05 & PTI 02-8386		Y	N	N	N	Y	N	OR 1. The annual, combined total diesel fuel usage of emissions units B010-B015 is limited to 162,096 gallons. 2. The sulfur content of the diesel fuel fired in this emissions unit shall not exceed 0.5% sulfur content (0.5 lb/mmbtu). This is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
K019	4.8 lbs of VOC /hr	21-09© (1)(d)		N	Y	Y	Y	Y	N	
	20% opacity as a 6-minute ave.	17-07(A)		N	N	N	N	Y	N	In regard to particulate emissions, this is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.

	0.551 lb of PE/hr	17-11(B)		Y	N	Y	Y	Y	N	OR - Permittee must use spray booth water wash filtration system whenever emissions unit is in operation. In regard to particulate emissions, this is an inherently clean emissions unit based upon our knowledge & experience in regulating this type of emissions unit.
K028	4.9 lbs of VOC per gallon coating	21-09(U) (1)(g)		N	Y	Y	Y	Y	N	
Z042	3.5 lbs of VOC per gallon coating	21-09(U) (1)(d)		N	Y	Y	Y	Y	N	

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

• **Instructions for Part III:**

- 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.
- 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 comments. 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.

- 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.