



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 08 2013

REPLY TO THE ATTENTION OF:

Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Plantwide Applicability Limit (PAL) permit, permit number P0104237, for Ford Motor Company - Ohio Assembly Plant in Avon Lake, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. The permit does not include emission limits for particulate matter (PM). PM is still a regulated pollutant under 40 C.F.R. 52.21(b)(23)(i) and Ohio Administrative Code (OAC) 3745-31-01(SSS). Therefore, the permit should include emission limits for PM.
2. Ohio Administrative Code (OAC) 3745-31-32 (A)(3)(a)(iv) requires PALs to include fugitive emissions to the extent that they are quantifiable. Fugitive emissions are not mentioned in the Staff Determination. If fugitive emissions are present at this source, requirements to monitor them must be included in the permit to ensure compliance with the PALs.
3. OAC 3745-31-32 (A)(2)(b) states that "baseline actual emissions are to include emissions associated not only with operation of the unit, but also emissions associated with startup, shutdown and malfunction [SSM]." Emissions from SSM are not mentioned in the Staff Determination. Please clarify whether SSM emissions were included in the calculations for the PAL baseline actual emissions.
4. OAC 3745-31-32 (A)(11)(a)(i) requires the PAL permit to contain enforceable monitoring requirements that determine PAL pollutant emissions in terms of mass per unit time. Furthermore, OAC 3745-31-32 (A)(11)(a)(ii) requires that the monitoring utilize mass balance calculations, continuous emissions monitoring systems, continuous parametric monitoring systems, predictive emissions monitoring systems, and/or emission factors. Although these regulations are cited

in the permit at Part B.2.c., the permit only provides enforceable monitoring requirements for emissions units K007, K013, and K014. For the other emissions units, the monitoring requirements do not employ any of the methods required by OAC 3745-31-32 (A)(11)(a)(ii) and do not yield the mass-per-unit-time data required by OAC 3745-31-32 (A)(11)(a)(i). The monitoring requirements for these emissions units must be modified to comply with the PAL monitoring regulations.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name.

Genevieve Damico
Chief
Air Permits Section