Appendix B

WORK PRACTICE PLAN FOR THE CONTROL OF FUGITIVE DUST EMISSIONS FROM UNPAVED ROADWAYS AT THE FORD MOTOR COMPANY CLEVELAND CASTING PLANT

A. Dust control program for unpaved roadways:

1. The facility shall employ the following dust control measures on all of the unpaved roadways identified in Figure I of this Appendix such that the program achieves and maintains a minimum of 75 percent control efficiency, as determined by the methodology set forth in the U.S. Environmental Protection Agency's reference document entitled Control of Open Fugitive Dust Sources (EPA-450/3-88-008), Section 3.0, "Unpaved Roads":

a. All unpaved roadways shall be treated with a dust suppressant solution, consisting of either a petroleum resin emulsion, asphalt emulsion or acrylic cement in water, and applied at a coverage dilution with water at a ratio of not more than 10 parts of water to one part of concentrate. Such treatments shall be performed in accordance with the following schedule and on a year-round basis, except as otherwise provided in Section A.1.b of this Appendix:

segments	minimum application frequency
UR1	every four and one-half weeks
UR2, UR3	every six and one-half weeks

b. The requirements of Section A.1.a of this Appendix may be suspended during any one of the following events:

i. when the unpaved roadways are visibly wetted as a result of a precipitation of equal to or greater than one quarter inch of rainfall as measured by an on-site rain gauge or rainfall data provided by the National Weather Service at Cleveland Hopkins Airport; or

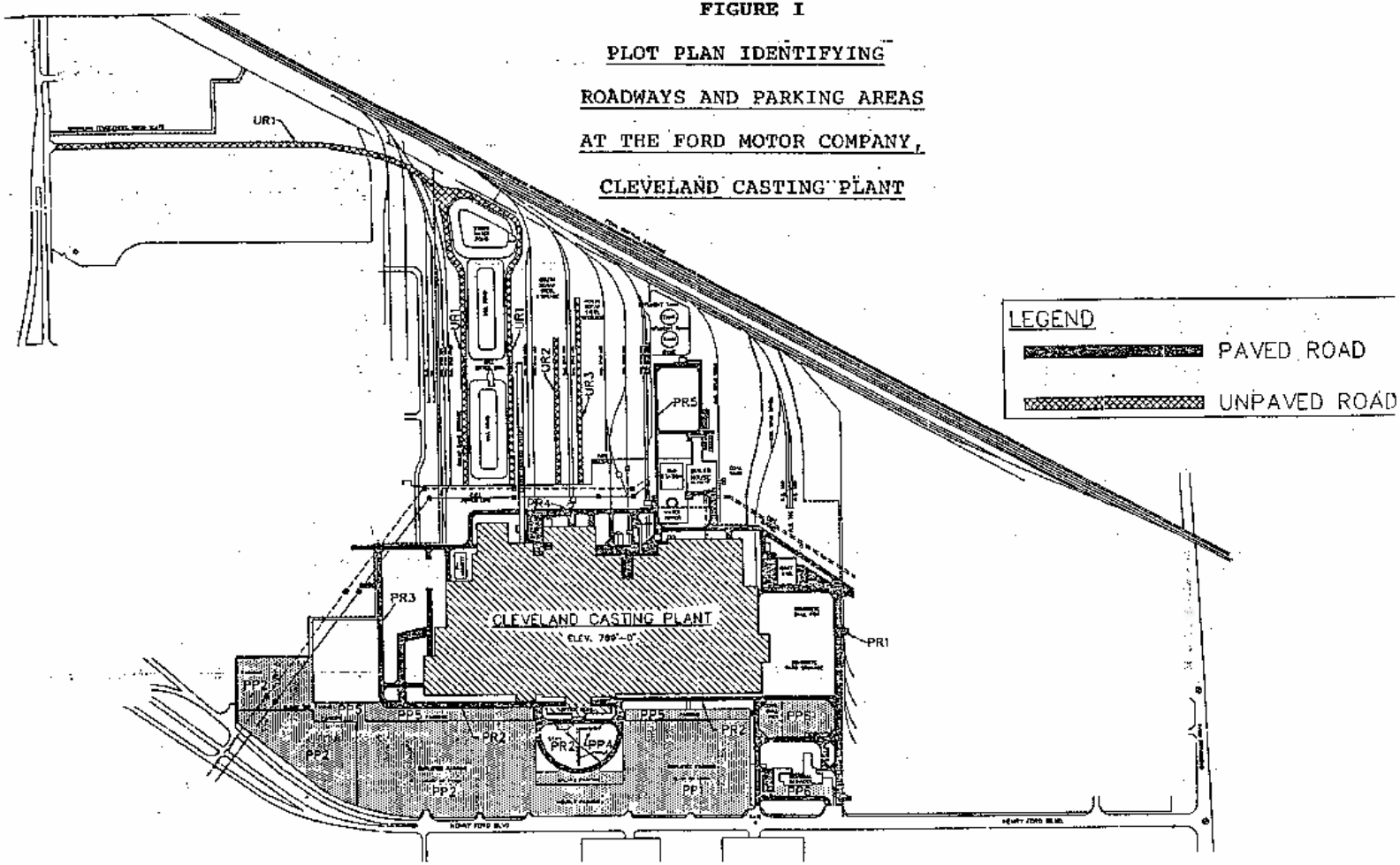
ii. when the unpaved roadways are covered with snow and/or ice.

Resumption of the treatment requirements of Section A.1.a of this Appendix shall occur within five (5) days after cessation of the above event(s).

2. Any dust suppressant spray truck used for treating unpaved roadways pursuant to Section A.1.a shall be operated and maintained in order to apply dust suppressant solution at a coverage rate of at least 0.25 gallon per square yard at the specified frequency.
3. The facility shall maintain records and submit reports concerning the dust control program in accordance with the following:
    a. The following information shall be recorded on a daily basis:
        i. for periods during which the treatment requirements of Section A.1.a of this Appendix have been suspended pursuant to the provisions of Section A.1.b of this Appendix:
            a. the date(s) of suspension;
            b. the specific treatment operations suspended;
            c. the daily precipitation in inches of water and/or the presence of snow and/or ice cover, whichever is/are applicable;
        ii. the date each unpaved roadway was treated;
        iii. an identification of each unpaved roadway or portion thereof which was treated;
        iv. an identification of the dust suppressant spray vehicle employed for the treatment;
        v. the name of the operator who performed the treatment;
        vi. the type of chemical dust suppressant applied to each unpaved roadway;
        vii. the dilution ratio (gallons of chemical dust suppressant to gallons of water); and
        viii. the amount of dust suppressant solution applied to each unpaved roadway (gallons per square yard).
    b. The records collected pursuant to Section A.3.a of this Appendix shall be retained by the facility for a period of not less than three years and shall be made available to the Director or his representative upon request.
    c. The facility shall submit to the Director or his representative, within five (5) days of any non-compliance with the requirements of Section (A) of this Appendix, a report which includes a detailed explanation of the cause of such noncompliance, all remedial actions required, and the date by which compliance was or will be reestablished.

B. Change to dust control programs in Section A of this Appendix:

1. The facility may petition the Ohio EPA for written approval of treatment methods, treatment schedules and procedures or reporting requirements different from those required herein. Such alternative practices must be demonstrated to the Ohio EPA and the U.S. Environmental Protection Agency to result in equivalent dust control effectiveness in accordance with the document entitled Control of Open Fugitive Dust Sources (EPA-450/3-88-008). The facility reserves the right to contest any disapproval of such petition in the appropriate judicial forum.
2. In the event that the facility certifies that the use of all or a portion of an unpaved roadway identified in Figure I of this Appendix has been discontinued, the dust suppressant solution application program for that roadway may be terminated or reduced. If the facility begins to utilize any new unpaved roadway, parking area, or other vehicular activity area not shown in Figure I of this Appendix, it shall notify the Director in the reports required pursuant to this Appendix and treat the roadway or area in accordance with the procedures contained herein.
3. The Director shall not be precluded from requiring adjustments, including increased chemical suppressant application, if on-site inspections reveal that the program contained herein does not prevent excessive visible dust entrainment and emissions from a particular roadway or surface.
4. In the event that an unpaved roadway that has been chemically treated becomes completely hardened and cemented by such treatment so as to become like a paved road as demonstrated by observation, by compaction tests and silt analyses or in the event that the facility paves any unpaved roadway or area, that roadway or area shall be treated as a paved surface and shall be subject to the requirements of paragraph (I)(1) of rule 3745-17-12 of the Administrative Code.

FIGURE I

PLOT PLAN IDENTIFYING ROADWAYS AND PARKING AREAS AT THE FORD MOTOR COMPANY, CLEVELAND CASTING PLANT