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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AUG 09 2005

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
PETITION OF FORD MOTOR COMPANY)
FOR AN ADJUSTED STANDARD FROM)
35 ILL. ADM. CODE 218.586)

AS
R 05-5
(Adjusted Standard Air)

NOTICE

TO: Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Bradley Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

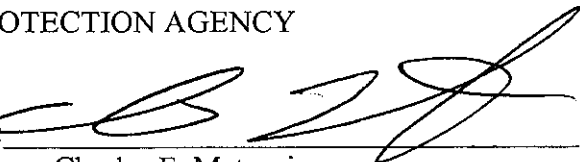
SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have filed with the Office of the Pollution Control Board the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S MOTION TO CORRECT THE TRANSCRIPT OF THE HEARING HELD JUNE 28, 2005 CONCERNING THE PETITION OF FORD MOTOR COMPANY FOR AN ADJUSTED STANDARD FROM 35 ILL. ADM. CODE 218.586 AND POST-HEARING BRIEF OF THE ILLINOIS EPA on behalf of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Date: August 5, 2005

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: _____



Charles E. Matoesian
Assistant Counsel
Division of Legal Counsel

1021 North Grand Avenue East
P.O. Box 19276
Spring field, IL 62794-9276
217/782-5544

THIS FILING IS SUBMITTED ON
RECYCLED PAPER

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

AUG 09 2005

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PETITION OF FORD MOTOR COMPANY) AS 05-5
FOR AN ADJUSTED STANDARD FROM) Adjusted Standard -Air
35 ILL. ADM. CODE § 218.586)

STATE OF ILLINOIS
Pollution Control Board

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S MOTION TO
CORRECT THE TRANSCRIPT OF THE HEARING HELD JUNE 28, 2005
CONCERNING THE PETITION OF FORD MOTOR COMPANY FOR AN
ADJUSTED STANDARD FROM 35 ILL. ADM. CODE § 218.586

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorney Charles Matoesian, and requests the Board order the correction of the transcript for the hearing held June 28, 2005, in the Matter of: Petition of Ford Motor Company for an Adjusted Standard from 35 Ill. Adm. Code § 218.586, as follows:

On page 2 of the transcript, line 23 , the record list "John Baguzis" as present for the Illinois Environmental Protection Agency. Mr. Baguzis actually was present for Ford Motor Company.

On page 14 of the transcript, line 4, the record states "affect" when it should state "effect".

On page 34 of the transcript, lines 3&4, the record states "environmental protection specialist" when it should state "Environmental Protection Specialist".

On page 34 of the transcript, line 11, the record states "section" when it should state "Section".

On page 34 of the transcript, line 12, the record states "administrative code" when it should state "Administrative Code".

On page 35 of the transcript, line 6, the record states: "turn, causes sudden growth in the tanks..." isn't clear. The word "vapor" should be inserted in between sudden and growth. Therefore, the sentence should be modified as "turn, causes sudden vapor growth in the tanks..."

On page 36 of the transcript, line 8, the record states "section" when it should state "Section".

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PETITION OF FORD MOTOR COMPANY) AS 05-5
FOR AN ADJUSTED STANDARD FROM) Adjusted Standard -Air
35 ILL. ADM. CODE 218.586)

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S MOTION TO
CORRECT THE TRANSCRIPT OF THE HEARING HELD JUNE 28, 2005
CONCERNING THE PETITION OF FORD MOTOR COMPANY FOR AN
ADJUSTED STANDARD FROM 35 ILL. ADM. CODE § 218.586**

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On page 36 of the transcript, line 8, the record states "section" when it should state "Section".

WHEREFORE, for the reasons set forth above, the Illinois EPA respectfully requests that the Board order the correction of the hearing transcript as set forth above.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

A handwritten signature in black ink, appearing to read 'Charles E. Matoesian', is written over a horizontal line.

Charles E. Matoesian

DATE: August 5, 2005
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

IN THE MATTER OF:)
)
PETITION OF FORD MOTOR COMPANY) AS 05-5
FOR AN ADJUSTED STANDARD FROM) Adjusted Standard - Air
35 ILL. ADM. CODE 218.586)
)

POST-HEARING BRIEF OF THE ILLINOIS EPA

The Illinois Environmental Protection Agency ("Illinois EPA") hereby submits its Post-Hearing Brief in the above captioned matter. The Illinois EPA recommends that the Illinois Pollution Control Board ("Board") **GRANT** the petition of Ford Motor Company ("FORD") subject to the terms and conditions contained in this recommendation. In support of this recommendation, the Illinois EPA states as follows:

1. A hearing was held before the Board on this matter on June 28, 2005. Testimony was provided by both Illinois EPA staff and representatives for Ford.
2. On July 25, 2005, Ford filed a Post-Hearing Brief with the Board.
3. The Illinois EPA does not take issue with the answers provided by the Petitioner in its Post-Hearing Brief.
4. The Illinois EPA notes one minor point. At the hearing on June 28, 2005, in his answer to a question from Ms. Bassi, Mr. Baguzis replies, "gasoline gets pulled through the carbon canister" (Transcript, page 18, lines 10 and 11). Technically, no gasoline goes through the canister but gasoline vapors do. Therefore, the Illinois EPA understands Mr. Baguzis to mean

that "gasoline vapors" get pulled through the carbon canister.

5. Based on the information and assertions in Ford's Petition and Appendices and independent investigation by the Illinois EPA technical staff, the Illinois EPA continues to believe that compliance by Ford with the present applicable requirements of 35 Ill. Adm. Code §218.586 for Chicago Assembly's operations is not economically reasonable.

6. Ford has requested an adjusted standard from the Board's air pollution control requirements found at 35 Ill. Adm. Code §218.586 insofar as that regulation applies to the initial fuel fill operations at Ford's Plant. Accordingly, the Illinois EPA continues to recommend that the Board **GRANT** Ford's Petition. The Illinois EPA requests that the Board condition its adjusted standard with the following language originally stated in the Illinois EPA's Recommendation:

1. The Ford Motor Company Chicago Assembly Plant shall not be subject to the requirements of 35 Ill. Adm. Code § 218.586, so long as the vehicles fueled at the Chicago Assembly Plant are equipped with onboard vapor recovery systems certified by the USEPA to capture a minimum of 95% of the gasoline vapor displaced during fueling.
2. Ford shall file an application to revise its CAAPP permit to reflect the presence of ORVR in all assembled vehicles in lieu of the existing Stage II vapor recovery system.
3. Ford shall operate in full compliance with all other applicable provisions of 35 Ill. Adm. Code Part 218, including but not limited to, Subpart Y.
4. The relief granted in this proceeding shall be limited to the Stage II vapor recovery system at the Plant as of April 8, 2004.
5. Ford shall operate in full compliance with the Clean Air Act, Illinois Environmental

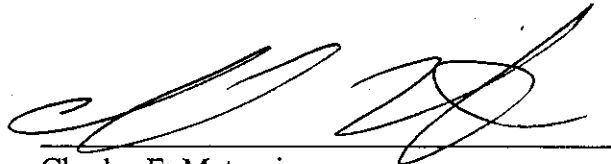
Protection Act and other applicable regulations not otherwise discussed herein.

6. Ford shall continue to report all annual emissions to the Illinois EPA commensurate with the requirements of 35 Ill. Adm. Code Part 254.

WHEREFORE, the Illinois EPA recommends that Ford's Petition for Adjusted Standard be **GRANTED**, and the Board enter an order adopting the adjusted standard with the specific language presented in this Post-Hearing Brief and originally stated in the Illinois EPA's Recommendation.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

A handwritten signature in black ink, appearing to read 'Charles E. Matoesian', is written over a horizontal line.

Charles E. Matoesian

DATE: August 5, 2005
1021 North Grand Avenue East
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STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

PROOF OF SERVICE

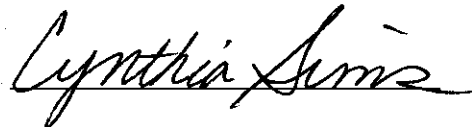
I, the undersigned, on oath state that I have served the attached Illinois Environmental Protection Agency's Motion to Correct the Transcript of the Hearing held June 28, 2005 concerning the Petition of Ford Motor Company for an Adjusted Standard from 35 Ill. Adm. Code 218.586 and Post-Hearing Brief of the Illinois EPA upon the person to whom it is directed, by placing it in an envelope addressed to:

TO: Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Bradley Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

SEE ATTACHED SERVICE LIST

and mailing it by First Class Mail from Springfield, Illinois on August 5, 2005, with sufficient postage affixed.



SUBSCRIBED AND SWORN TO BEFORE ME

this 5th day of August, 2005



Notary Public



THIS FILING IS SUBMITTED ON RECYCLED PAPER

SERVICE LIST AS 05-5

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