

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 ) AS 05-05  
PETITION OF FORD MOTOR COMPANY FOR ) (Adjusted Standard – Air)  
ADJUSTED STANDARD FROM )  
35 Ill.Adm.Code § 218.586 )

**NOTICE OF FILING**

TO:

Charles Matoesian  
Assistant Counsel  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
Charles.Matoesian@epa.state.il.us

Bradley Halloran  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601  
[hallorab@ipcb.state.il.us](mailto:hallorab@ipcb.state.il.us)

PLEASE TAKE NOTICE that I filed on August 15, 2005, with the Office of the Clerk of the Pollution Control Board the **PETITIONER'S REPLY TO POST-HEARING BRIEF OF ILLINOIS EPA**, by electronic filing pursuant to the Board's rules and regulations, a copy of which is served upon you.

Respectfully submitted,

/s/ *Kathleen C. Bassi*

Kathleen C. Bassi  
Attorney for Ford Motor Company

Dated: August 15, 2005

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**PETITIONER’S REPLY TO POST-HEARING BRIEF OF THE ILLINOIS EPA**

NOW COMES Petitioner, FORD MOTOR COMPANY, by and through its attorneys, SCHIFF HARDIN, LLP, and submits this Reply to Post-Hearing Brief of the Illinois Environmental Protection Agency (“Illinois EPA”).

In its Post-Hearing Brief, Illinois EPA recommends that the Illinois Pollution Control Board (“Board”) grant the petition of Ford Motor Company (“Ford”) subject to certain terms and conditions outlined in its recommendation. Ford acknowledges and agrees to comply with the conditions stated in Illinois EPA’s Post-Hearing Brief, as follows:

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.*

Ford agrees that the only vehicles that will be fueled at the Chicago Assembly Plant are those that are equipped with onboard refueling vapor recovery systems certified to capture a minimum of 95% of the gasoline vapors 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.*

Ford will file an application to revise its CAAPP permit upon issuance of the Board's order granting the Adjusted Standard.

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.*

Ford agrees that all other applicable provisions of 35 Ill. Adm. Code Part 218, including Subpart Y, will remain applicable requirements after granting of the Adjusted Standard and that it will continue to comply with them.

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.*

Ford agrees that the Board's order granting the Adjusted Standard requested in PCB R05-05 shall apply to the Stage II vapor recovery system at only the Chicago Assembly 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.*

Ford agrees that it will continue to comply with the Clean Air Act, Illinois Environmental Protection Act and all other applicable regulations.

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

Ford agrees that it will continue to follow the requirements of 35 Ill. Adm. Code Part 254 and report all annual emissions to the Illinois EPA.



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**CERTIFICATE OF SERVICE**

I, Kathleen C. Bassi, an attorney, hereby certify that on August 15, 2005, I served a true and accurate copy of **PETITIONER’S REPLY TO POST-HEARING BRIEF OF ILLINOIS EPA** via email and first class mail on the following individuals:

Charles Matoesian  
Assistant Counsel  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
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[hallorab@ipcb.state.il.us](mailto:hallorab@ipcb.state.il.us)

and via electronic filing with the Illinois Pollution Control Board.

          /s/ *Kathleen C. Bassi*            
Kathleen C. Bassi