SUPPLEMENT TO PERMIT NO. 44-96

Ford Motor Company
J. A. Jones Environmental Services Company
Monroe, Michigan

April 1, 1996

GENERAL CONDITIONS

- 1. Rule 201(1) The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule.
- 2. Rule 201(4) If the installation, reconstruction, relocation, or alteration of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the person to whom this permit was issued, or the designated authorized agent, shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
- 3. Rule 201(6)(a) If this Permit to Install is issued for a process or process equipment located at a stationary source which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
- 4. Rules 201(6)(b)(i) or 216(1)(a)(v)(A) Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.
- 5. Rule 201(6)(b)(ii) Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:
 - A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.

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- B. A schedule of compliance for the process or process equipment as described in Rule 119(a).
- C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.
- 6. Rule 201(7) and Section 5510 of Act 451, P.A. 1994 The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Departments' rules or the Clean Air Act.
- 7. Rule 219 A new owner or operator of the process or process equipment covered by this Permit to Install shall immediately make a written request to the Department for a change of ownership or operational control. The request shall include all of the information required in Rule 219(1)(a), (b) and (c). If the request for a change in ownership or operational control is approved, the terms and conditions of this Permit to Install shall apply to the person or legal entity which hereafter owns or operates the process or process equipment for which this Permit to Install is issued. The written request shall be sent to the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909.
- 8. Rule 901 Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
- 9. Rule 912 The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.
- 10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
- 11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

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SPECIAL CONDITIONS

- 13. Rule 331 The particulate emission from the reagent storage and batch preparation operation shall not exceed 0.10 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis, nor 2.9 pounds per hour.
- 14. Visible emissions from the reagent storage and batch preparation operation shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a).
- 15. Visible emissions from the waste and soil blending operation shall not exceed 0% opacity.
- 16. Rules 1001, 1003 and 1004 Verification of particulate emission rates from the reagent storage and batch preparation operation by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.
- 17. Applicant shall not operate the reagent storage and batch preparation operation unless the fabric filter collector and the associated ventilation system is installed and operating properly.
- 18. The disposal of collected air contaminants shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 19. Applicant shall not operate the waste solidification operation unless the program for continuous fugitive emissions control for all roads, off-road areas and waste areas specified in Addendum No. 1 has been implemented and is maintained.
- 20. Except as allowed by Rule 285 (b) and (c), applicant shall not substitute any raw materials for the Type-I Portland cement, self-setting Type C fly ash, Type F fly ash and hydrated lime without prior notification to and approval by the Air Quality Division.

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ADDENDUM NO. 1 AIR USE PERMIT APPLICATION WASTE SOLIDIFICATION ACTIVITIES CLOSURE OF SURFACE IMPOUNDMENTS FORD MONROE STAMPING PLANT J.A. JONES ENVIRONMENTAL SERVICES COMPANY MONROE, MICHIGAN

The following procedures will be implemented, as needed, to minimize the generation and dispersion of fugitive dust during the site waste solidification activities:

1. Off-Road and Waste Areas:

- Solidification Scheme: In situ waste solidification methods will be employed to
 preclude excavation and transport of the waste material. Waste materials to be
 solidified are generally saturated in their natural state and will be treated with a
 cementious materials (fly ash and cement) applied in slurry form. Additives will
 be received and stored in pneumatic tankers to preclude dust. Additives will be
 mixed with water in a central batch plant and then pumped in slurry form to the
 treatment areas to eliminate traffic over waste areas.
- Water Sprinkling: Dry areas will be irrigated and/or sprinkled with collected storm water or river water.
- <u>Paving</u>: Frequently used travelways will be covered with gravel and redressed as necessary.
- Temporary Seeding and Mulching: Temporary seeding and mulching will be performed to stabilize inactive graded areas.

Roads:

- Water: water will be the primary dust suppressant for roads. Standing water and collected storm water will be used within the containment units and contained within the limits of the proposed containment units. Clean water will be used on access roads and parking areas outside of the exclusion zone.
- <u>Paving</u>: Site access roads are to be paved with compacted gravel and redressed as necessary.
- <u>Maintenance</u>: Gravel roads will be periodically redressed with gravel and graded to drain. Paved roads and the adjacent portions of public roads will be cleaned, as necessary, to control dust.
- Speed: 10 mph speed limits are posted on all site access and haul roads.
- <u>Truck Wash</u>: Two automated truck washes will be operated to clean the tires
 and undercarriage of delivery trucks exiting the site and to minimize the
 migration of mud and dust off the site.

3. Implementation Schedule:

All active on site areas, including haul roads, active work areas, and staging areas, will be visually inspected on a daily basis to assess surface conditions and determine what, if any, dust control procedures are necessary. Additional inspections will be conducted during excessively dry and/or hot periods.

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