

IN THE COURT OF COMMON PLEAS
DEFIANCE COUNTY, OHIO

STATE OF OHIO, ex rel.
BETTY D. MONTGOMERY,
ATTORNEY GENERAL OF OHIO

Plaintiff,

v.

GENERAL MOTORS
CORPORATION,

Defendant.

CASE NO. 98 CV 33718

JUDGE

FILED
IN COURT OF COMMON PLEAS
DEFIANCE COUNTY, OHIO

JUL 10 1998

CONSENT ORDER

Jean Ziegler
CLERK

Plaintiff, the State of Ohio, by its Attorney General Betty D. Montgomery, at the written request of Donald R. Schregardus, the Director of Environmental Protection, has filed a Complaint seeking injunctive relief and civil penalties from Defendant General Motors Corporation ("Defendant" or "GM"), for violations of various provisions of R.C. Chapter 3704 and related rules promulgated thereunder, and both parties have consented to the entry of this Order.

Therefore, without trial, admission, or determination of any issue of fact or law, and upon the consent of the parties hereto, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

I. DEFINITIONS

1. As used in this Order, the following terms are defined as follows:
 - a. "Facility" means Defendant GM's iron casting facility located at 26427 State Route 281, Defiance, Defiance County, Ohio.
 - b. "Ohio EPA" means the Ohio Environmental Protection Agency.
 - c. "Director" means the Director of Environmental Protection.

- d. "Air contaminant source" or "source" has the same meaning as set forth in R.C. 3704.01(C) and Ohio Administrative Code ("O.A.C.") 3745-31-01(D) and 3745-35-01(B)(1).
- e. "Permit to Operate" or "PTO" has the same meaning as set forth in O.A.C. Chapter 3745-35.
- f. "Permit to Install" or "PTI" has the same meaning as set forth in O.A.C. Chapter 3745-31.
- g. "Bubble sources" shall refer to all of the following sources: P028-P033 and P041-P046.
- h. "Plant 2 East" shall refer to all of the sources listed in Table 3, attached.

II. JURISDICTION AND VENUE

2. The Court has jurisdiction over the parties and the subject matter of this case. The Complaint states a claim for which relief can be granted, and venue is proper in this Court.

III. PERSONS BOUND

3. The provisions of this Consent Order shall apply to and be binding upon the parties to this action, and, in accordance with Rule 65(D) of the Ohio Rules of Civil Procedure, their officers, agents, servants, employees, attorneys, successors, and assigns, and those persons in active concert or participation with them who receive actual notice of this Consent Order whether by personal service or otherwise.

IV. SATISFACTION OF LAWSUIT AND RESERVATION OF RIGHTS

4. The Plaintiff alleges in its Complaint that the Defendant has owned and operated the Facility in such a manner as to result in various violations of the air pollution control laws, the regulations, and the State Implementation Plan of the State of Ohio. Specifically, the Complaint alleges violations concerning the following sources: the plasma arc cupola, the Ajax

induction furnaces, and various hot and cold box sources. Compliance with the terms of this Consent Order shall constitute full satisfaction of any civil liability of the Defendant to the Plaintiff for the claims alleged in the Plaintiff's Complaint. In addition, compliance with the terms of this Consent order shall constitute satisfaction of any civil liability of the Defendant to the Plaintiff for any emission violations of each of the sources listed in the attached Table 1 from the entry of this order until the date the Director of Ohio EPA issues a final action on the modification applications which Defendant must submit pursuant to paragraph 8, supra, provided, however, that such satisfaction is contingent upon Defendant meeting the requirements of paragraph 7 of this Order.

5. Except as provided herein, this Consent Order shall not be construed to limit the authority of the Plaintiff to seek relief for violations not alleged in the Complaint, nor shall this Consent Order bar the State of Ohio from bringing any action against the Defendant for any violations which occur after the entry of this Order. Except as provided herein, nothing in this Consent Order shall be construed to relieve the Defendant of its obligations to comply with applicable federal, State or local statutes, regulations, or ordinances.

V. INJUNCTIVE RELIEF

6. Except as provided herein, as to the sources identified herein and in the Complaint, the Defendant is hereby enjoined and ordered to comply with R.C. Chapter 3704 and the regulations adopted thereunder, including all terms and conditions of the Defendant's currently effective Permits to Install and Permits to Operate, and any subsequent renewals or modifications thereafter. Specifically, the Defendant agrees to refrain and is hereby permanently

enjoined from "installing" or "modifying" any air contaminant source, as those terms are defined by O.A.C. 3745-31-01(I) and (J), at the Facility without first applying for and obtaining a Permit To Install from the Director in accordance with O.A.C. 3745-31-02. In addition, the Defendant agrees to refrain and is hereby permanently enjoined from operating any air contaminant source without first meeting applicable requirements for operating permits under R.C. 3704 and the regulations adopted thereunder.

7. Beginning on the date when this Consent Order is entered until the Director takes a final action on the permit applications submitted pursuant to paragraph 8, Defendant is enjoined and ordered to operate and maintain the sources in Table 1 to minimize emissions, and to keep all control equipment in good working condition.

8. By August 31, 1998, Defendant is enjoined and ordered to submit complete PTI modification applications for each source listed in Table 1. If Ohio EPA notifies Defendant in writing that the modification applications are deficient or require additional information, Defendant is enjoined and ordered to respond fully and correct such deficiencies or lack of information within twenty-one (21) days or such longer period as Ohio EPA might establish.

9. If Ohio EPA determines that any or all of the PTI modifications are not approvable, the parties agree that the Director may issue the denial of the PTI as a final action. Defendant hereby waives any right it may have pursuant to R.C. Chapters 3745 or 119 to have an adjudicatory hearing prior to having its permits denied. The parties further agree that Defendant may challenge any such final action at the Environmental Review Appeals Commission. Nothing in this order shall be construed as a waiver of Defendant's right to seek a stay of permit

conditions in a proceeding before the Environmental Review Appeals Commission.

10.(a). On February 19, 1998, Defendant performed stack testing on the bubble sources. Defendant has submitted the results of that test, and Ohio EPA has accepted those results and determined that the results demonstrate compliance. Defendant is enjoined to conduct an annual stack test on the bubble sources, to be completed on or before January 30 of each year, beginning in 1999. Defendant may request that its obligation to perform annual testing be eliminated if, in a subsequent annual test, Defendant demonstrates that it is operating the bubble sources at or near maximum capacity. Not later than 30 days prior to each annual test, Defendant shall submit an intent to test notification ("ITT") to Northwest District Office. The ITT shall describe, in detail, the proposed test methods and procedures, the emissions unit operating parameters, the time(s), date(s) of the test(s), and the person(s) who will be conducting the tests. Personnel from Ohio EPA's Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary. A written report of the results of the test(s) shall be signed by the person responsible for the test and submitted within 30 days following the completion of the test.

(b). Defendant is enjoined to properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The pressure drop across the baghouse shall be maintained within the range of 1.5 to 7.0 inches of water while the emissions unit is in operation. The Defendant shall record the pressure drop across the baghouse

on a daily basis. The Defendant shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

11. Defendant is further enjoined to address the alleged past opacity violations from the Plant 2 East by either: (1) shutting the Plant 2 East sources down by December 31, 1998; or (2) by submitting to Ohio EPA a compliance schedule for installing new or modified dust collectors and/or taking other steps which reduce emissions and maintain compliance for these sources. If GM chooses to achieve compliance by shutting down the Plant 2 East, GM specifically reserves its right to use those emission reductions in any future offset calculations for new source review, including any netting calculations.

VI. SUPPLEMENTAL ENVIRONMENTAL PROJECT

12. Defendant shall complete the emission and opacity reduction program described in this paragraph and attached Table 2. Specifically, Defendant is ordered and enjoined to install each new dust collector identified in the first column of Table 2 ("Dust Collector Stack No.") by the date indicated in the last column ("Date Installed"). These new dust collectors shall replace the dust collectors identified in Table 2, column 4 ("Dust Collectors Replaced"). Upon installation of each new dust collector, Defendant is ordered and enjoined to vent all previously uncontrolled stack and fugitive emission identified in Table 2, columns 5 and 6 ("Uncontrolled Stacks Replaced" and "Fugitive") to the new dust collector. Upon installation, Defendant is enjoined and ordered to maintain compliance with an emission limit of 0.020 grain/dscf for each new dust collector and any future replacements of the dust collector.

VII. CIVIL PENALTY

13. (a.) Within thirty (30) days of entry of this Consent Order, the Defendant shall pay a cash civil penalty of Two Hundred Twenty Thousand Dollars (\$220,000) to the State of Ohio by delivering a certified check made payable to the order of "Treasurer, State of Ohio" to: Jena Suhadolnik, Administrative Assistant, Office of the Attorney General, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3428.

(b.) In lieu of paying an additional civil penalty of Four Hundred Sixty-Five Thousand Dollars (\$465,000), Defendant shall completely comply with the terms of paragraph 12, which paragraph constitutes a supplemental environmental project. If Defendant fails to comply with paragraph 12, it shall be subject to stipulated penalties as set forth in paragraph 14, up to a maximum of Four Hundred Sixty-Five Thousand Dollars (\$465,000).

(c.) In lieu of paying an additional civil penalty of Twenty Thousand Dollars (\$20,000), the defendant shall pay Twenty Thousand Dollars (\$20,000) to the Ohio-Kentucky-Indiana Regional Council of Governments to be used only for the distribution of new gas caps for 1971, 1972 and 1973 vehicles in southwestern Ohio (i.e. vehicles registered in Hamilton, Warren, Butler and Clermont Counties.). Payment shall be made by the defendant delivering a certified check, made payable to the Ohio-Kentucky-Indiana Regional Council of Governments, attention Judi Craig, at the following address within seven days after entry of this Order: 801-B West 8th Street, Suite 400, Cincinnati, Ohio 45203-1607. Said check shall be used exclusively by OKI in the Gas Cap Replacement Program.

VIII. STIPULATED PENALTIES

14. Except as otherwise provided in paragraph 16, in the event that the Defendant fails to comply with the requirements imposed by paragraphs 7, 8, 10(a), 11 or 12 this Consent Order, the Defendant shall, immediately and automatically, be liable for and shall pay a stipulated penalty according to the following payment schedule. For each day of failure to meet a requirement, up to thirty (30) days -- One Thousand Dollars (\$1,000) per day for each requirement not met. For each day of failure to meet a requirement in excess of thirty (30) days -- Two Thousand Dollars (\$2,000) per day for each requirement not met. In addition, in the event that the Defendant violates the permanent injunction set forth in paragraph 6 of this Consent Order relating to the installation or modification of air contaminant sources without first obtaining a permit to install, Defendant shall pay a stipulated penalty of Five Thousand Dollars (\$5,000) per source per installation/modification.

15. Payment of all stipulated penalties shall be paid by the Defendant by their delivering to the Plaintiff, c/o Jena Suhadolnik, Administrative Assistant, or her successor, at the Office of the Attorney General of Ohio, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3428, a certified check in that amount, payable to the order of "Treasurer, State of Ohio," immediately upon the occurrence of the violation giving rise to the penalty.

16. The State may reduce or eliminate the stipulated penalties due under paragraph 14 if, in its sole discretion, the State deems it appropriate. The imposition, payment and collection of stipulated penalties pursuant to violations of this Consent Order shall not prevent the State

from pursuing additional remedies, civil, criminal or administrative, for violations of applicable laws.

IX. RETENTION OF JURISDICTION

17. The Court will retain jurisdiction of this action for purposes of enforcing this Consent Order. The Defendant may, pursuant to Civil Rule 60(B), apply for this order to terminate after the defendant has achieved compliance for all of the Table 1 sources pursuant to paragraph 8 above, and after it has completed the supplemental environmental project described in paragraph 12 above, and after payment of all civil and/or stipulated penalties that may be due. Said termination may not occur until the emission limit established in paragraph 12 and the annual stack testing requirement established in paragraph 10 are reflected in a final Title V permit issued to the defendant and defendant has permanently waived its right to contest the lawfulness and reasonableness of these requirements. The Plaintiff reserves the right to oppose such a motion if it is filed.

X. COURT COSTS

18. The Defendant is hereby ordered to pay all court costs of this action.

XI. POTENTIAL FORCE MAJEURE

19. If any event occurs which causes or may cause a delay of any requirement of this Consent Order, Defendant shall notify the Ohio EPA, Northwest District Office, in writing within ten (10) days of the event, describing in detail and anticipated length of the delay, the precise cause or causes of the delay, the measures taken and to be taken by Defendant to prevent or minimize the delay and the timetable by which measures will be implemented. Defendant will

adopt all reasonable measures to avoid or minimize any such delay.

20. In any action by the Plaintiff to enforce any of the provisions of this Consent Order, Defendant may raise that it is entitled to a defense that its conduct was caused by reasons entirely beyond its control such as, by way of example and not limitation, acts of God, strikes, acts of war or civil disturbances. While the Plaintiff does not agree that such a defense exists, it is, however, hereby agreed upon by Defendant and the Plaintiff that it is premature at this time to raise and adjudicate the existence of such a defense and that the appropriate point at which to adjudicate the existence of such a defense is at the time that an action to enforce the terms and conditions of this Consent Order, if any, is commenced by the Plaintiff. At that time, the burden of proving that any delay was or will be caused by circumstances entirely beyond the control of Defendant shall rest with Defendant. Unanticipated or increased costs associated with the implementation of any action required by this Consent Order, or changed financial circumstances, shall not constitute circumstances entirely beyond the control of Defendant or serve as a basis for an extension of time under this Consent Order. Failure by Defendant to comply with the notice requirements of Paragraph 19 shall render this Paragraph 20 void and of no force and effect as to the particular incident involved and shall constitute a waiver of Defendant's right to request an extension of its obligations under this Consent Order based on such incident. An extension of one compliance date based on a particular incident does not mean that Defendant qualifies for an extension of a subsequent compliance date or dates. Defendant must make an individual showing of proof regarding each incremental step or other requirement for which an extension is sought.

XII. ENTRY OF CONSENT ORDER AND JUDGMENT BY CLERK

21. Pursuant to Rule 58 of the Ohio Rules of Civil Procedure, upon signing of this Consent Order by the Court, the clerk is directed to enter it upon the journal. Within three days of entering the judgment upon the journal, the clerk is directed to serve upon all parties notice of the judgment and its date of entry upon the journal in the manner prescribed by Rule 5(B) of the Ohio Rules of Civil Procedure and note the service in the appearance docket.

XIII. AUTHORITY TO ENTER INTO THE CONSENT ORDER

22. Each signatory for the Defendant represents and warrants that he/she has been duly authorized to sign this document and so bind the corporation to all terms and conditions thereof.

23. GM enters this Consent Order to resolve potential claims alleged in the Complaint. GM does not admit or agree to any finding or statement of liability. Nothing in this Consent Order, nor any action taken pursuant to this Order, shall be construed as an admission by Defendant.

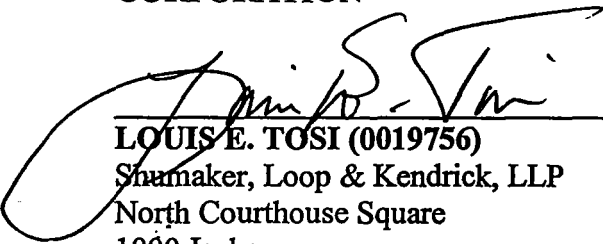
IT IS SO ORDERED

DATE

/s/ Joseph N. Schmenk
**JUDGE, COURT OF COMMON PLEAS
DEFIANCE COUNTY**

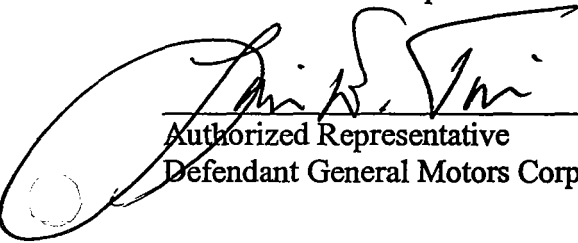
APPROVED:

**GENERAL MOTORS
CORPORATION**




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(614) 466-2766

Attorneys for Plaintiff State of Ohio

Last Update: July 2, 1998

Consent Order – Table 1

Emissions Unit #	Stack ID
P302	841
P320	846
P321	845
P323	913, 312-1
P324	913, 913-1
P325	914, 914-1
P329	908
P330	908
P331	911
P332	911
P352	847
P353	915
P354	916
P355	917
P356	918
P358	631
P361	960
P362	961
P369	631
P370	924
P371	924
P372	925
P373	925
P374	925
P375	925
P379	937 Act. 957
P383	938
P384	939
P385	940
P386	941
P387	933
P388	945
P389	946
P318	358 359 580 581 887

Consent Order - Table 2
Dust Collector Replacement Program

(a)						
Stack No.	Description	Type	Dust Collectors Replaced	Uncontrolled Stacks Replaced	Fugitive	Date Installed
DC-079	S/O - Drag Enclosure - L#3	B		361		Jun-93
	Mold Conveyor - L#3			370		
DC-013A	Blast Cabinet #7	C	DC-004A			Nov-94
	Blast Cabinet #8					
	Shakers @ #7 & #8 Blast Cabinets					
DC-027	L#6 Rod Furnace & RMIP	C		M-016		Jul-94
	Asea Furnace Area					
DC-011B	#5 Blast Cabinet	C	DC-006			Sep-95
	Cad. Head Grinder		DC-007			
	Cad. Head Shaker		DC-007			
	Blk or Head Grinder		DC-007			
DC-064A	L#4 Shake-Out	B	DC-064			Apr-95
DC-065A	L#4 Shake-Out	B	DC-065			Apr-95
DC-067A	L#3 Shake-Out	B	DC-067			May-95
DC-069A	L#5 Push-Off	B	DC-069	562		Dec-95
	L#5 Pick-Off & Dump					
DC-071A	L#5 Shake-Out	B	DC-071			Nov-95
DC-072A	L#5 Shake-Out	B	DC-072			Oct-95
DC-080	L#5 Rod Furnace Fugitive	C			Fugitive	Feb-95
	L#5 Mold Conveyor				565	
	L#5 Mold Conveyor				660	
DC-081	Gen III Sys.	C	DC-011A			
	Gen III Sys.					
	Blast Cabinet #1 - Removed					
DC-057A	L#5 Shake Out & Drag Enclosure	B	DC-057			Feb-96
DC-001A	Core Shell Sand System	W	DC-001			Nov-96
	L#7 Finishing					
DC-002A	L#7 Sprue Dump	W	DC-002			Nov-96
	Core Shell Sand System					
	L#7 Shake Out					
DC-003A	L#7 Sand System	W	DC-003			Sep-96
DC-004A	L#7 Sand System	W	DC-004			Nov-96
DC-007A	L#7 Blast Cabinet	W	DC-007			Jul-96
DC-010A	L#6 Blast Cabinet	W	DC-010			Jul-96
DC-013A	L#6 Sand System	W	DC-013			Nov-96
	L#6 Sand System					
DC-014A	L#6 Shake Out	W	DC-014			Oct-96
	Seacoal Silo					
DC-005B	Blast Cabinet #11	C	DC-005A			Sep-97
	Shaker - North of #11 B/C					
	Shaker - South of #11 B/C					
DC-016	Ajax Swivel Hoods	C		EF-029 to EF-034		Jul-97
DC-034B	L#4 Cope Roll Over & Pick Off	B	DC-034A			Jul-97
	L#5 Sand System					
DC-044A	Seacoal Pulverizer	C	DC-044			Jul-97
DC-083	#5 Ajax Furnace	C		697		Jul-97
	#4 Cupola Desulfurization			698		
	#3 & #4 Cupola Iron Bath			662A		
DC-086	L#5 Mold Cooling	B		457		Jul-97
	L#5 Mold Cooling			475		
	L#5 Cooling Court			575		
	L#5 Sand System					
DC-087	L#3 Cstg. Cool. Conveyor	B		297		Jul-97
	L#3 Mold Conveyor			302		
	L#3 Cstg. Cool. Conveyor			303		
	L#3 Mold Conveyor			304		
	L#3 Mold Conveyor			352		
	L#3 Mold Conveyor			354		
	L#3 Mold Conveyor			381		
	L#3 Mold Conveyor			391		

(a) - "B" = Baghouse - "C" = Cartridge - "W" = Wet Collector

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Consent Order - Table 2
Dust Collector Replacement Program

(a)

Dust Collectors	Description	Type	Dust Collectors Replaced	Uncontrolled Stacks Replaced	Fugitive	Date			
DC-019	#6W Cupola Desulfurization	W		M-045		Mar-99			
	#6E Cupola Desulfurization			M-2					
DC-029	L#7 Rod Furnace	C			Fugitive	Mar-99			
DC-088	Rod Furnace Fugitive	C			Fugitive	Mar-99			
DC-089	L#4 Mold Conveyor	B		527					
	L#4 Mold Conveyor		528						
	L#4 Basement		474						
	L#4 Mold Conveyor		529						
	L#4 Mold Conveyor		530						
	Fugitive Emissions			Fugitive					
	L#4 Mold Conveyor		517						
	L#4 Mold Conveyor		526						
	Mold Sweep & Basement		1/2 of DC-068						
	Fugitive Emissions			Fugitive					
DC-008A	L#7 Cope & Drag		B	DC-008					Dec-99
DC-009A	L#3 Cope & Drag		B	DC-009					Dec-99
DC-011A	L#6 Sand System	W	DC-011			Dec-99			
DC-022A	L#6 Charge Make Up Coke & Stone	B	DC-022			Dec-99			
DC-026A	L#6 Drag Enclosure	B	DC-026			Dec-99			
	L#7 Drag Enclosure								
DC-035B	L#5 Sand System	W	DC-035A	616		Dec-00			
	L#5 Sand System								
DC-006A	L#7 Sand Sytem	W	DC-006			Dec-00			
DC-017A	Core Sand System	W	DC-017			Dec-00			
DC-050A	Shaker - N of #10A B/C	W	DC-050			Dec-00			
	#10A Blast Cabinet								
	Process Belt - S of #10A B/C								
	Grinder - S of #10A B/C								

(a) - "B" = Baghouse - "C" = Cartridge - "W" = Wet Collector - "EF" = Uncontrolled Exhaust Fan

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Consent Order - Table 3
Plant 2 East Sources
Equipment to be Shut Down

(a)

Stack No.	Description	Type	Dust Collectors Replaced	Uncontrolled Stacks Replaced	Fugitive	Date
DC-002	L#14 Didion	W				Dec-98
DC-004	L#15 & L#16 Shak-Out	W				Dec-98
DC-005	L#13 Shake-Out	W				Dec-98
DC-006	L#12 Shake-Out	W				Dec-98
DC-007	L#17 & L#18 Shake-Out	W				Dec-98
DC-008	L#19 & L#20 Shake-Out	W				Dec-98
DC-010	Sprue Handling	W				Dec-98
DC-012	Sand System	W				Dec-98
DC-013	Sand Coolers	W				Dec-98
DC-015	Blast Cleaning Cabinets	W				Dec-98
EF-013 to EF-022	Iron Pouring & Mold Cooling	EF				Dec-98
EF-056 to EF-060	Iron Pouring & Mold Cooling	EF				Dec-98
EF-062	Slag Station	EF				Dec-98

(a) - "B" = Baghouse - "C" = Cartridge - "W" = Wet Collector - "EF" = Uncontrolled Exhaust Fan

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Consent Order - Attachment #4**Permit / Description
D/C Replacement Program**

Past Permit No.	Future Permit No.	Stack Number	DC Type	Stack Status	Description	Plant	Additional Permits Involved
	P003				Molding Facilities - L#6	2W	
		DC-009A	B	Replaced DC-009	Cope & Drag Station		
		DC-026A	B	Replaced DC-026	Drag Enclosure		P007
		F-013			Cope & Drag Enclosure		
		F-036			Cope Enclosure		
		F-038			Cope Enclosure		
P004					Mold Shake-Out - L#6	2W	
		DC-014A	W	Replaced DC-014	Mold Shake-Out		P019
P006					Sort Area - L#7	2W	
		DC-002A	W	Replaced DC-002	Sort Area - Basement		P009, P164
		DC-028A	C		Sort Area - Basement		
		DC-028B	C		Sort Area - Basement		
		DC-028C	C		Sort Area - Basement		
		DC-028D	C		Sort Area - Basement		
	P007				Molding Facilities - L#7	2W	
		DC-008A	B	Replaced DC-008	Cope & Drag Station		
		DC-026A	B	Replaced DC-026	Drag Enclosure		P003
		F-014			Cope & Drag Enclosure		
		F-037			Cope Enclosure		
P009	P009				Sand System - Core	2W	
		C-012			Sand Addition		
		C-014			Heater - Shell Sand		
		C-025			Incline Belt		
		DC-001A	W	Replaced DC-001	Sand System		P086
		DC-002A	W	Replaced DC-002	Delivery Belt		P006, P164
		DC-016	W		Sand System		
		DC-017A	B	Replaced DC-017	Sand System		
P011		DC-029	C				
		New		Replaced Fugitive	L#7 Rod Furnace & RMIP		
		F-006			L#7 Rod Furnace & RMIP		
		F-007			L#7 Rod Furnace & RMIP		
		F-008			L#7 Rod Furnace & RMIP		
		F-009			L#7 Rod Furnace & RMIP		
P012					Iron Pour - L#6	2W	
		DC-027	C	New	RMIP, Rod Fce, West Asea		P024
		F-003			Rod Furnace		
		F-004			Pour Loop		
		F-005			Pour Loop		
P015					Sand System - L#7	2W	
		DC-003A	W	Replaced DC-003	Sand System		
		DC-004A	W	Replaced DC-004	Sand System		
		DC-006A	W	Replaced DC-006	Sand System		
		F-035			Sand Addition		
P019	P019				Sand System - L#6	2W	
		DC-012	W		Sand System		
		DC-011A	B	Replaced DC-011	Sand System		
		DC-013A	C	Replaced DC-013A	Sand System		
		DC-014A	W	Replaced DC-014	Seacoal Silo		P004
		DC-023	B		Clay Silo - South		
		DC-024	B		Seacoal Silo - West		
		DC-025	B		Clay Silo - West		
		F-034			Sand Addition		
P020					Blast Cabinet - Line #6	2W	
		DC-010A	W	Replaced DC-010	Blast Cabinet		
		DC-015	W		Spruc & Cstg Handling		

Past Permit No.	Future Permit No.	Stack Number	DC Type	Stack Status	Description	Plant	Additional Permits Involved
P024					Cupola - L#6E	2W	
		DC-027	C	Replaced M-016	Furnace Area		P012
		M-023			Hot Blast		
		M-035			Wet Cap		
		M-036			Emission Stack		
		M-044			Spill		
P041					Ajax Furnace #1	2E	
		EF-001			Charge Bucket Hood		
		EF-002			Furnace Lid		
		DC-016	C	Replaced EF-029	Swivel Hood		P042, P043, P044, P045, P046
P042					Ajax Furnace #2	2E	
		EF-003			Charge Bucket Hood		
		EF-004			Furnace Lid		
		DC-016	C	Replaced EF-030	Swivel Hood		P041, P043, P044, P045, P046
P043					Ajax Furnace #3	2E	
		EF-005			Charge Bucket Hood		
		EF-006			Furnace Lid		
		DC-016	C	Replaced EF-031	Swivel Hood		P041, P042, P044, P045, P046
P044					Ajax Furnace #4	2E	
		EF-007			Charge Bucket Hood		
		EF-008			Furnace Lid		
		DC-016	C	Replaced EF-032	Swivel Hood		P041, P042, P043, P045, P046
P045					Ajax Furnace #5	2E	
		EF-009			Charge Bucket Hood		
		EF-010			Furnace Lid		
		DC-016	C	Replaced EF-033	Swivel Hood		P041, P042, P043, P044, P046
P046					Ajax Furnace #6	2E	
		EF-011			Charge Bucket Hood		
		EF-012			Furnace Lid		
		DC-016	C	Replaced EF-034	Swivel Hood		P041, P042, P043, P044, P045
P086					L#7 Dump - Dept 816	2W	
		DC-001A	W	Replaced DC-001	L#7 Dump - Dept 816		P009
P089	P089				Shake-Out - L#4	1	
		DC-034B	B	Replaced DC-034A	R/O, P/O, Cope Enclosure		P180
		DC-064A	B	Replaced DC-064	Flask Handling & Sand Return		
		DC-065A	B	Replaced DC-065	Shake-Out		
		DC-089	B	Repl 1/2 of DC-068	Shake-Out		P088, P090
	P090				Mold Cooling - L#4	1	
		454			Mold Cooling		
		490			Mold Cooling		
		501			Mold Cooling		
		DC-088	B	Replaced 517, 526, 527, 528	Mold Cooling		P088, P089, P191
		DC-089	B	Replaced 529, 530 & Fugitive	Mold Cooling		P089
P098					Blast Cabinet - #5	1	
		DC-011B	C	Replaced DC-006	Blast Cabinet		P127, P235, P255
P127					Grinder - @ #5 Blast Cabinet	1	
		DC-011B	C	Replaced DC-007	Grinder		P098, P235, P255
P139					Casting Cooling - L#3	1	
		159			Casting Cooling		
		316			Casting Cooling		
		318			Casting Cooling		
		321			Casting Cooling		
		825			Casting Cooling		
		DC-087	B	Replaced 297, 303	Casting Cooling		P142
P142					Mold Cooling - L#3	1	
		308			Mold Cooling		
		309			Mold Cooling		
		353			Mold Cooling		

Past Permit No.	Future Permit No.	Stack Number	DC Type	Stack Status	Description	Plant	Additional Permits Involved
		371			Mold Cooling		
		372			Mold Cooling		
		390			Mold Cooling		
		391		Removed	Mold Cooling		
		DC-079	B	Replaced 370	Mold Cooling		P248
		DC-087	B	Replaced 302, 304, 352, 354, 381, 391			P139
P158					Blast Cabinet - #1 - (Removed)	1	
		DC-011A		Removed	Blast Cabinet		
P164					Shake-Out - L#7	2W	
		DC-002A	W	Replaced DC-002	Shake-Out		P006, P009
		DC-017	W		Shake-Out		
	P167				Charge Make-Up - L#6	2W	
		DC-018	W		Feeder - Charge Material		
		DC-022A	B	Replaced DC-022	Charge Make-Up		
P173					Mold Cooling - L#5	1	
		476			Mold Cooling		
		478			Mold Cooling		
		554			Mold Cooling		
		DC-080	C	Replaced 565, 660	Mold Cooling		P192
		DC-086	B	Replaced 575, 457, 475			P180
P174					Shake-Out - L#5	1	
		DC-037A	W		Shake-Out		
		DC-057A	B	Replaced DC-057	Shake-Out		P273
		DC-058	W		Shake-Out		
		DC-069A	B	Replaced DC-069, 562	Shake-Out		
		DC-071A	B	Replaced DC-071	Shake-Out		
		DC-072A	B	Replaced DC-072	Shake-Out		
P180	P180				Sand System - L#5	1	
		DC-034B	B	Replaced DC-034A	Sand System		P089
		DC-035B	B	Replaced DC-035A, 616	Sand System		
		DC-038	W		Sand System		
		DC-086	B	New	Sand System		P173
P188					Cupola - #4	1	
		456A			Iron Trough		
		663			Service Vent		
		704			Oil / Water Separator		
		706			Slag Tank		
		708			Dwell Chamber		
		709			Recup Stack		
		710			Hot Blast Spill		
		711			Purge Stack		
		718			Oil / Water Separator		
		793			Gas Recirc Sys Vent		
		DC-083	C	Replaced 697A, 698A	Iron Trough		P173, P190, P272
P190					Furnace - #5 Ajax	1	
		662			Furnace - #5 Ajax		
		665			Furnace - #5 Ajax		
		880			Furnace - #5 Ajax		
		DC-083	C	Replaced 662A			P173, P188, P272
	P191				Rod Furnace - L#4	1	
		707			Rod Furnace - L#4		
		DC-088	C	Replaced 474 & Fugitive	Rod Furnace - L#4		P090
P192					Rod Furnace - L#5	1	
		701			Rod Furnace - L#6		
		DC-080	C	Replaced Fugitive	Rod Furnace - L#6		P173
P197					Desulfurization	2W	

Pasi Permit No.	Future Permit No.	Stack Number	DC Type	Stack Status	Description	Plant	Additional Permits Involved
		DC-019	W	Upgraded & Replaced M-045	Desulfurization		P210
P207		233			Slurry System	1	
		DC-043	W		Slurry System		
		DC-044A	C	Replaced DC-044	Slurry System		
	P210				Desulfurization - 6E	2W	
		DC-019	W	Upgraded & Replaced M-002	Desulfurization		P197
P235					Shaker - N of #5 Blast Cabinet	1	
		DC-011B	C	Replaced DC-007	Shaker		P098, P127, P255
P248					Shake-Out - L#3	1	
		DC-067A	B	Replaced DC-067	Shake-Out		
		DC-079	B	Replaced 361	Shake-Out		P142
P253					Blast Cabinet - #7	1	
		DC-013A	C	Replaced DC-004A	Blast Cabinet - #7		P254, P256, P257
P254					Shaker - Block - #7 Blast Cabinet	1	
		DC-013A	C	Replaced DC-004A	Shaker - Block - #7 Blast Cabinet		P253, P256, P257
P255					Grinder - Block - #7/8 Blast Cabinet	1	
		DC-011B	C	Replaced DC-007	Grinder - Block - #7/8 Blast Cabinet		P098, P127, P235
P256					Blast Cabinet - #8	1	
		DC-013A	C	Replaced DC-004A	Blast Cabinet - #8		P253, P254, P257
P257					Shaker - Block - #8 Blast Cabinet	1	
		DC-013A	C	Replaced DC-004A	Shaker - Block - #8 Blast Cabinet		P253, P254, P256
P272					Desulfurization - #4 Cupola	1	
		DC-083	C	Replaced 698	Desulfurization - #4 Cupola		P188, P190
P273					Molding Facilities - L#5	1	
		DC-056	W		Molding Facilities - L#6		
		DC-057A	B	Replaced DC-57	Molding Facilities - L#7		P174
P284					Blast Cabinet - Inline - L#7	2W	
		DC-007A	W	Replaced DC-007	Blast Cabinet - Inline - L#7		
P289					Blast Cabinet - #11	1	
		DC-005B	C	Replaced DC-005A			P300, P301
P300					Shaker - N of #11 Blast Cabinet	1	
		DC-005B	C	Replaced DC-005A	Shaker - N of #11 Blast Cabinet		P289, P301
P301					Shaker - S of #11 Blast Cabinet	1	
		DC-005B	C	Replaced DC-005A	Shaker - S of #11 Blast Cabinet		P289, P300
P306					Shaker - Block - @ #5 & 6 Blast Cabinet	1	
		DC-050A	C	Replaced DC-050	Shaker		P326, P327, P328
P326					Blast Cabinet - #10A	1	
		DC-050A	C	Replaced DC-050	Blast Cabinet - #10A		P306, P327, P328
P327					Shaker & Misc Equip - 5.7L Head	1	
		DC-050A	C	Replaced DC-050	Shaker & Misc Equip.		P306, P326, P328
P328					Grinder - 5.7L Head	1	
		DC-050A	C	Replaced DC-050	Grinder		P306, P326, P327
P380					Blast Cabinet - #12	1	
		DC-081	C	New	Blast Cabinet - #12		P381
P381					Grinder - Head - @ #12 Blast Cabinet	1	
		DC-081	C	New	Grinder - Head - @ #12 Blast Cabinet		P380