ILLINOIS POLLUTION CONTROL BOARD

February 28, 1974

| IN THE MATTER OF: |) |
|--------------------------|------------|
| |) |
| PETITION OF VARIANCE FOR | PCB 73-558 |
| |) |
| A.B. DICK COMPANY |) |

OPINION AND ORDER OF THE BOARD (by Dr. Odell)

On December 26, 1973, the Petitioner, A.B. Dick Company, filed with the Illinois Pollution Control Board (hereinafter Board) a petition for a variance for two months, from December 31, 1973, to February 28, 1974, from Rule 205(f) and Rule 203(b) of Chapter 2, Illinois Air Pollution Regulations.

Petitioner operates a plant in Niles which is primarily engaged in the assembly of photocopy equipment and the manufacture of photocopy supplies. Petitioner's facility includes a toner concentrate process. The two-month variance was requested to provide enough time to install a baghouse for particulate emissions and recovery of organic emissions in the toner concentrate process. When the baghouse was purchased from the Mikropul Division of United States Filter Corporation on June 6, 1973, the supplier promised delivery by September 17, 1973, and it was to be in operation by November 15, 1973. However, shipment of the equipment was rescheduled four times, and it was finally expected to arrive at Petitioner's plant on December 28, 1973, which was too late to have it installed by December 31, 1973.

On February 8, 1974, the Board received a Recommendation from the Environmental Protection Agency (hereinafter Agency) concerning this petition for a variance. The Agency believes that the "Petitioner is in violation of Rule 203(a), not Rule 203(b), since it was not in compliance with Rule 203(b) on April 14, 1972."

The toner concentrate process presently consists of a blender used to mix ethyl alcohol, carbon black, and dye. The ethyl alcohol is evaporated in a Bowen Spray Dryer which vents to a high efficiency cyclone for product collection. Effluent from the cyclone vents directly to the atmosphere.

Agency calculations confirm Petitioner's calculations which indicate particulate emissions (based on a mass balance across the system) of 1.2 lbs/hour of Dry Powder Pigment. The process weight rate is 25.0 lbs/hour, thereby allowing an emission rate of .24 lbs/hour under Regulation 203(a). The design

efficiency of the baghouse is 99%, and when it is installed it will reduce particulate emissions to .012 lbs/hour.

The 25 lbs/hour process weight rate contains, as the major component, 18.8 lbs per hour of ethyl alcohol. The entire amount of this photochemically reactive solvent is emitted to the atmosphere, in violation of Rule 205(f), effective on December 31, 1973, which limits emissions of photochemically reactive solvents to 8 lbs/hour. Upon installation of the baghouse, Petitioner proposes to duct the baghouse effluent into an existing ethyl alcohol adsorption unit in order to reclaim the effluent, as well as to reduce the emissions of photochemically reactive solvents to less than 8 lbs/hour.

The Agency believes that Petitioner's control program is sufficient to bring it into compliance with Rules 203(a) and 205(f). The Agency has received no complaints from citizens regarding the operations of Petitioner's facility or the granting of a variance in this case.

The Board finds that since Petitioner has been diligent in its attempts to achieve compliance, and that since the delays in delivery of the baghouse were not the fault of Petitioner, that it would be arbitrary and unreasonable to deny a variance for the short period of time requested by Petitioner. Therefore, the Board will grant this variance as specified below.

This Opinion constitutes the findings of fact and conclusions of law of the Board.

ORDER

IT IS THE ORDER of the Pollution Control Board that Petitioner be granted a variance from Rules 203(a) and 205(f) until February 28, 1974, subject to the following conditions:

a. Petitioner shall notify the Environmental Protection Agency on the date that all control equipment is installed and fully operational. Said notification shall be made to:

Environmental Protection Agency Division of Air Pollution Control Control Program Coordinator 2200 Churchill Road Springfield, Illinois 62706

b. Petitioner shall apply for all necessary operating permits for the new control equipment from the Environmental Protection Agency.

Mr. Dumelle abstained.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the day of _______, 1974, by a vote of ________ to _____.

Christan L. Moffett, Clerk