

ILLINOIS POLLUTION CONTROL BOARD
January 18, 1996

PEOPLE OF THE STATE)	
OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB 94-274
)	(Enforcement-Air)
CHICAGO STEEL RULE DIE &)	
FABRICATORS COMPANY, an)	
Illinois corporation,)	
)	
Respondent.)	

OPINION AND ORDER OF THE BOARD (by M. McFawn):

This matter comes before the Board upon a two-count complaint filed September 27, 1994, by the Attorney General of the State of Illinois, on behalf of the Illinois Environmental Protection Agency and the People of the State of Illinois, against Chicago Steel Rule Die & Fabricators Company (Chicago Steel), an Illinois corporation, located at 6630 W. Wrightwood, Chicago, Cook County, Illinois. The complaint alleges that Chicago Steel has violated Sections 9(a) and 9(b) of the Illinois Environmental Protection Act (Act), 415 ILCS 5/9(a), 5/9(b) and 35 Ill. Adm. Code 201.143 and 212.201 by causing emissions in excess of permitted limits and by operating an emission source without the proper permits.

Pursuant to 415 ILCS 5/31(a)(2), the parties filed a joint motion requesting relief from the Act's hearing requirement on December 5, 1995. The Board published a notice of the waiver on December 14, 1995; no objection to the granting of the waiver was received. Waiver of hearing is hereby granted.

The parties filed a Stipulation and Settlement Agreement on December 5, 1995. The Stipulation sets forth facts relating to the nature, operations and circumstances surrounding the claimed violations. Chicago Steel neither admits nor denies the alleged violations and agrees to pay a civil penalty of twenty-five thousand dollars (\$25,000.00).

The Board finds the Settlement Agreement acceptable under 35 Ill. Adm. Code 103.180. This settlement agreement in no way affects respondent's responsibility to comply with any federal, state or local regulations, including but not limited to the Act and the Board's pollution control regulations.

This opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

- 1) The Board hereby accepts the Stipulation and Settlement Agreement executed by the People of the State of Illinois and Chicago Steel Rule Die & Fabricators Company, an Illinois corporation, located at 6630 W. Wrightwood, Chicago, Cook County, Illinois. The Stipulation and Settlement Agreement are incorporated by reference as though fully set forth herein.
- 2) Chicago Steel shall pay the sum of twenty-five thousand dollars (\$25,000.00) within one (1) year of the date of this order. Payment shall be made monthly, the first payment in the amount of two thousand eighty-three dollars and thirty-seven cents (\$2,083.37) and subsequent payments in the amount of two thousand eighty-three dollars and thirty-three cents (\$2,083.33). The first payment shall be made within thirty (30) days of this order. Such payment shall be made by certified check or money order payable to the Treasurer of the State of Illinois, designated to the Environmental Protection Trust Fund and shall be sent by First Class mail to:

Illinois Environmental Protection Agency
Fiscal Services Division
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

The certified check or money order shall clearly indicate on its face, Chicago Steel's Federal Employer Identification Number or Social Security Number and that payment is directed to the Environmental Protection Trust Fund.

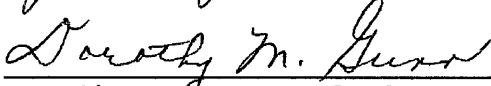
Any such penalty not paid within the time prescribed shall incur interest at the rate set forth in subsection (a) of Section 1003 of the Illinois Income Tax Act, (35 ILCS 5/1003), as now or hereafter amended, from the date payment is due until the date payment is received. Interest shall not accrue during the pendency of an appeal during which payment of the penalty has been stayed.

- 3) Chicago Steel shall cease and desist from the alleged violations.

IT IS SO ORDERED.

Section 41 of the Environmental Protection Act (415 ILCS 5/41) provides for the appeal of final Board orders within 35 days of the date of service of this order. (See also 35 Ill. Adm. Code 101.246, Motion for Reconsideration.)

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above opinion and order was adopted on the 18th day of January, 1996, by a vote of 7-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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DEC - 5 1995

STATE OF ILLINOIS
POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)
)
 Complainant,)
)
 v.)
)
 CHICAGO STEEL RULE DIE &)
 FABRICATORS COMPANY, an Illinois)
 corporation,)
)
 Respondent.)

PCB 94-274
(Enforcement)

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by their attorney, JAMES E. RYAN, Attorney General of the State of Illinois, at the request of the Illinois Environmental Protection Agency ("IEPA" or "Agency"), and Respondent, CHICAGO STEEL RULE DIE & FABRICATORS COMPANY, by its attorney, JOHN WARD of O'Keefe, Ashendon, Lyons & Ward, do hereby submit this Stipulation and Proposal for Settlement. The parties agree that the statement of facts contained herein represents a fair summary of the evidence and testimony which would be introduced by the parties if a full hearing were held. The parties have decided to forego a determination of whether Respondent is liable for the alleged violations in the interest of avoiding the expense and uncertainty of litigation. The parties further stipulate that this statement of facts is made and agreed upon for purposes of settlement only and that neither the fact that a party has entered into this Stipulation, nor any of the facts stipulated herein, shall be introduced into evidence in this or any other proceeding except to enforce

the terms hereof by the parties to this agreement. Notwithstanding the previous sentence, this Stipulation and Proposal for Settlement and any Pollution Control Board ("Board") Order accepting same may be used in any future enforcement action as evidence of a past adjudication of violation of the Act for purposes of Section 42(h) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/42(h) (1992). The agreement shall be null and void unless the Board approves and disposes of this matter on each and every one of the terms and conditions of the settlement set forth herein.

I.
JURISDICTION

The Board has jurisdiction of the subject matter herein and of the parties consenting hereto pursuant to the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 (1992) et seq.

II.
AUTHORIZATION

The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and Proposal For Settlement and to legally bind them to it.

III.
APPLICABILITY

This Stipulation and Proposal For Settlement shall apply to and be binding upon the Complainant and Respondent, as well as the successors and assignees of each and any officer,

director, agent, employee or servant of Respondent. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Settlement the failure of its agents, servants or employees to take such action as shall be required to comply with the provisions of this Settlement.

IV.
STATEMENT OF FACTS

1. The IEPA is an administrative agency established in the executive branch of the State government by Section 4 of the Act, 415 ILCS 5/4 (1992), and charged, inter alia, with the duty of enforcing the Act.

2. Respondent, CHICAGO STEEL RULE DIE & FABRICATORS COMPANY ("Chicago Steel"), is an Illinois corporation. At all time relevant to the Complaint, Chicago Steel has owned and operated a facility located at 6630 W. Wrightwood, Chicago, Cook County, Illinois. At this facility, Chicago Steel manufactures steel rule dies, wood speaker cabinets, television backing plates and furniture.

3. Within its facility, Chicago Steel operates punch presses, saws, routers, two (2) paint spray booths, one (1) silk screen machine, one (1) vinyl-to-wood laminating line with bag-house and two (2) boilers to process scrap wood and sawdust. Chicago Steel also installed a Wheelabrator cyclone in 1991 to control particulate emissions from the two boilers.

4. Sections 3.02 and 3.06 of the Act, 415 ILCS 5/3.02 and 3.06 (1992), provide the following definitions:

"CONTAMINANT" is any solid, liquid or gaseous matter, any order, or any form of energy, from whatever source.

"AIR POLLUTION" is the presence in the atmosphere of one or more contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life, to health, or to property, or to unreasonably interfere with the enjoyment of life or property.

5. Section 9(a) of the Act, 415 ILCS 5/9(a) (1992), provides as follows:

No person shall:

- a. Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act.

6. Section 212.201 of the Illinois Pollution Control Board ("Board") Air Pollution Regulations, 35 Ill. Adm. Code 212.201, provides in pertinent part as follows:

Section 212.201 Existing Sources Using
Solid Fuel Exclusively
Located in the Chicago
Area

No person shall cause or allow the emission of particulate matter into the atmosphere from any existing fuel combustion source using solid fuel exclusively, located in the Chicago Major Metropolitan Area, to exceed 0.15 kg of particulate matter per MW-hr of actual heat input in any one hour period (0.1 lbs/MBtu/hr). . . .

7. From at least March 28, 1990 and continuing to the present, Complainant alleges Chicago Steel has caused and/or allowed the emission of particulate matter into the atmosphere in excess of the limit set forth in 35 Ill. Adm. Code, Section 212.201.

8. The Wheelabrator cyclone, which Chicago Steel installed in 1991, has not succeeded in controlling the particulate emissions from the gas-fired woodburning boilers. Stack tests conducted in May, 1994, pursuant to the construction permit, indicated that additional compliance measures are needed. Chicago Steel was issued a construction permit by the Agency on March 29, 1995, for a baghouse to be installed in line with the cyclone. Chicago Steel has received a guarantee from the manufacturer that this additional control will bring particulate emissions within the allowable limitations.

9. Section 201.102 of the Pollution Control Board's Air Pollution Rules, 35 Ill. Adm. Code 201.102, provides, in pertinent part, the following definitions:

"Emission Source": any equipment or facility of a type capable of emitting specified air contaminants to the atmosphere.

"New Emission Source": any emission source, the construction or modification of which is commenced on or after April 14, 1972.

"Air Pollution Control Equipment": any equipment or facility of a type intended to eliminate, prevent, reduce or control the emission of specified air contaminants to the atmosphere.

"New Air Pollution Control Equipment": any air pollution control equipment, the construction or modification of which is commenced on or after April 14, 1972.

"Air Contaminant": any solid, liquid or gaseous matter, any odor or any form of energy, that is capable of being released into the atmosphere from an emission source.

"Specified Air Contaminant": any air contaminant as to which this Subtitle contains emission standards or other specific limitations.

10. The two paint spray booths, one silk screen machine and the vinyl-to-wood laminating line emit, or are capable of emitting, volatile organic compounds, a specified air contaminant, to the atmosphere. This equipment was constructed after April 14, 1972 and are new emission sources as that term is defined in 35 Ill. Adm. Code 201.102.

11. The punch presses, saws, routers, vinyl-to-wood laminating line and two gas-fired boilers emit, or are capable of emitting particulates, a specified air contaminant to the atmosphere. The baghouse controlling the vinyl-to-wood laminating line, punch presses, saws and routers, is equipment intended to eliminate, prevent, reduce or control the emission of a specified air contaminant, particulates, to the atmosphere. This equipment was constructed after April 14, 1972 and are new emission sources and air pollution control equipment as that term is defined in 35 Ill. Adm. Code 201.102.

12. Section 9(b) of the Act, 415 ILCS(b) (1992), provides as follows:

No person shall:

- b. Construct, install, or operate any equipment, facility, vehicle, vessel, or aircraft capable of causing or contributing to air pollution or designed to prevent air pollution of any type

designated by Board regulations, without a permit granted by the Agency, or in violation of any conditions imposed by such permit.

13. Section 201.143 of the Pollution Control Board's Air Pollution regulations, 35 Ill. Adm. Code, 201.143, provides as follows:

No person shall cause or allow the operation of any new emission source or new air pollution control equipment of a type for which a construction permit is required by Section 201.142 without first obtaining an operating permit from the Agency, except by such testing operations as may be authorized by the construction permit. Applications for operating permits shall be made at such times and contain such information (in addition to the information required by Section 201.157) as shall be specified by the construction permit.

14. The equipment listed in paragraphs 10 and 11 herein must have an operating permit issued by the Agency because it constitutes air pollution control equipment and/or emission sources or units.

15. From at least May 22, 1974 and continuing to October 21, 1991, Chicago Steel operated the woodworking equipment and baghouse listed in paragraph 10 without the required Agency operating permit. This equipment is currently permitted (see attached Exhibit A), with an expiration date of September 16, 1996.

16. From at least May 22, 1974 and continuing to November 6, 1992, Chicago Steel operated the vinyl-to-wood

laminating line listed in paragraph 11 without the required Agency operating permit. This equipment is currently permitted (see attached Exhibit B), with an expiration date of September 16, 1996.

V.

NATURE OF RESPONDENT'S OPERATIONS AND CONTROL EQUIPMENT

Chicago Steel operates a woodworking shop at its Wrightwood Avenue facility. It manufactures wood speaker cabinets, television backing plates and furniture. The facility also manufactures steel rule dies to punch out various shaped openings in wood and particle board sheets on punch presses. The woodworking equipment is vented to a baghouse. The facility also operates two lacquer hand air spray booths with fiberglass filters, four silk screen machines with two gas-fired dryers and one vinyl adhesive laminating line. The two gas-fired, woodburning boilers use scrap wood and sawdust as fuel. In 1991, a Wheelabrator cyclone was installed to control particulate emissions from these two boilers (See attached Exhibit C). A stack test performed pursuant to construction permit conditions demonstrated that additional compliance measures are necessary. Chicago Steel was issued a construction permit, Permit No. 95020095, on March 29, 1995, for an additional baghouse to control particulate emissions from the Wheelabrator cyclone (See attached Exhibit D). Chicago Steel has ordered this equipment and expects it to be operational by December 31, 1995.

VI.
EXPLANATION OF PAST FAILURES TO COMPLY WITH THE ACT

1. Agency files indicate Chicago Steel' facility was originally inspected in 1973-74. The Agency issued a letter citing failure to obtain an operating permit for the facility, including the two boilers, on July 11, 1974. Chicago Steel forwarded material to the Agency, and the Agency requested additional information which was never received. As a result, the permit application was denied on September 13, 1974, citing the two woodburning boilers.

2. The Agency next inspected Chicago Steel on April 27, 1990. A Compliance Inquiry Letter ("CIL") was sent following the discovery of apparent permitting violations by the Agency inspector. Chicago Steel subsequently obtained both an operating permit and a construction permit for the Wheelabrator cyclone. Chicago Steel cites the change of management personnel as a reason for the lapse in permitting status and delay in compliance for its particulate emissions.

3. From the period of 1974 until 1990, Chicago Steel experienced a number of management and personnel changes such that its emissions violations were not resolved.

4. Chicago Steel has received a construction permit for an additional baghouse from the Agency on March 29, 1995. This equipment will be placed and operated in line with the cyclone to additionally control particulate emissions from the gas-fired woodburning boilers.

VII.
FUTURE PLANS OF COMPLIANCE

Respondent, Chicago Steel, shall diligently conform to the Board's permit regulations and shall cease and desist from further violations of the Act and the regulations promulgated thereunder. Additionally, Chicago Steel has committed to add more controls to its Wrightwood Avenue facility and conduct appropriate testing to ensure compliance with the applicable air pollution regulations for particulate matter, as delineated in Special Conditions 1 through 8 of the Construction Permit issued March 29, 1995, which is attached hereto at Exhibit D and incorporated by reference herein the same as though specifically set forth.

VIII.
IMPACT ON THE PUBLIC RESULTING FROM NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (1992), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. The character and degree of injury to, or interference with, the protection of the health, general welfare and physical property of the people;
2. The social and economic value of the pollution source;
3. The suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;

4. The technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source;
5. Any subsequent compliance.

In response to these factors the parties state as follows:

1. Impact to the public resulting from Chicago Steel's noncompliance was that particulate emissions exceeded the allowable limit for a lengthy period of time for the facility. Additionally, the Agency and the public were not privy to information that is important to the control of air pollution in the State of Illinois. The permit process is the only method available for the State to identify possible air pollution sources and their control.

2. The parties agree that Chicago Steel's facility is of social and economic benefit.

3. The parties agree that Chicago Steel is located in a suitable area.

4. The People state that it was practicable and economically reasonable for Chicago Steel to obtain the appropriate Agency permits and to control the excess particulate emissions from the woodburning boilers. The People also state that it is technologically possible to switch the boilers to gas fuel, although Chicago Steel maintains this option is not economically reasonable.

5. Chicago Steel has obtained the necessary operating permits, installed some of the necessary air pollution control equipment, and conducted testing. Chicago Steel has since obtained a subsequent construction permit for additional equipment to control its particulate emissions and has committed to making said equipment operational by December 31, 1995.

IX.
CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (1992), provides as follows:

In determining the appropriate civil penalty to be imposed under subdivisions (a), (b)(1), (b)(2), or (b)(3) of this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

- (1) the duration and gravity of the violation;
- (2) the presence or absence of due diligence on the part of the violator in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
- (3) any economic benefits accrued by the violator because of delay in compliance with requirements;
- (4) the amount of monetary penalty which will serve to deter further violations by the violator and to otherwise aid in enhancing voluntary compliance with this Act by the violator and other persons similarly subject to the Act; and
- (5) the number, proximity in time, and gravity of previously adjudicated violations of this Act by the violator.

In response to these factors, the parties state as follows:

(1) Chicago Steel operated the two (2) gas-fired, woodburning boilers, in excess of particulate limitations for a lengthy period of time. Chicago Steel also operated sixteen (16) mixers, two (2) condensers, two (2) gas-fired boilers, one (1) dualite production process with condenser and baghouse, twenty-two (22) storage tanks, and three (3) hot melt kettles from August 24, 1989, to December 12, 1990, without an operating permit. Chicago Steel has discharged excess emissions of particulates for an extended period of time and will need additional air pollution control equipment to comply with applicable emission limits.

(2) Chicago Steel did subsequently comply with air pollution control requirements by obtaining the necessary operating permits, which were issued by the Agency on October 21, 1991, and November 6, 1992. Chicago Steel also obtained a construction permit for air pollution control equipment on October 24, 1991, and subsequently installed and tested this equipment. As a result of the testing, Chicago Steel needed to add additional pollution control equipment and received a construction permit for same from the Agency on March 29, 1995.

(3) Chicago Steel received an economic benefit by reason of non-compliance in that it deferred the cost and expenses of obtaining an operating permit and installing additional pollution control equipment for a substantial period of time.

(4) Twenty-five thousand dollars (\$25,000.00) is a reasonable penalty based on the above stated violations and will aid in enhancing voluntary compliance with the Act.

(5) Chicago Steel has no history of prior adjudicated violations with the Agency.

X.
TERMS OF SETTLEMENT

A. Respondent, Chicago Steel, neither admits nor denies the violations of Sections 9(a) and (b) of the Act, 415 ILCS 5/9(a) and (b) (1992), and 35 Ill. Adm. Code 212.201 and 201.143.

B. Respondent, Chicago Steel, shall pay a penalty of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) into the Illinois Environmental Protection Trust Fund within one (1) year from the date on which the Pollution Control Board adopts a final order approving this Stipulation and Proposal For Settlement. Payment shall be made monthly, the first payment in the amount of TWO THOUSAND EIGHTY-THREE DOLLARS AND THIRTY-SEVEN CENTS (\$2,083.37) and subsequent payments in the amount of TWO THOUSAND EIGHTY-THREE DOLLARS AND THIRTY-THREE CENTS (\$2,083.33). Payments shall be made by certified check or money order, payable to the Treasurer of the State of Illinois, designated to the Environmental Protection Trust Fund, and shall be sent by first class mail to:

Illinois Environmental Protection Agency
Fiscal Services Division
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Chicago Steel Federal Employers Identification Number of its authorized representative, shall be written upon the certified check or money order.

C. Pursuant to Section 42(g) of the Act, 415 ILCS 5/42(g)(1992), interest shall accrue on any penalty amount not paid within the time prescribed herein, at the maximum rate allowable under Section 1003(a) of the Illinois Income Tax Act, 35 ILCS 5/1003(a)(1992):

- 1) Interest on unpaid penalties shall begin to accrue from the date the penalty payment is due and continue to accrue to the date payment is received;
- 2) Where partial payment is made on any payment amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing;
- 3) All interest on penalties owed Complainant, shall be paid by certified check payable to the Treasurer of the State of Illinois for deposit in the Environmental Protection Trust Fund and delivered to:

Illinois Environmental Protection
Agency
Fiscal Services Division
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

The name and number of the case and Chicago Steel's Federal Identification Number ("FEIN") shall appear on the face of the check. Chicago Steel's FEIN is

D. Respondent, Chicago Steel, shall cease and desist from further violations of the Act and regulations promulgated thereunder. Chicago Steel shall also install and make operational additional air pollution control equipment at its Wrightwood

Avenue facility by December 31, 1995, to ensure its compliance with applicable particulate emissions standards. Chicago Steel shall also comply with any and all conditions of its construction permit, Permit No. 95020095, issued by the Agency on March 29, 1995, for this new equipment. This construction permit, attached hereto as Exhibit D, is incorporated by reference herein as though each and every item were specifically set forth.

E. Respondent, Chicago Steel, shall cease and desist from further violations of Sections 9(a) and (b) of the Act, 415 ILCS 5/9(a) and (b) (1992), and 35 Ill. Adm. Code 212.201 and 201.143.

XI.
COMPLIANCE WITH OTHER LAWS AND REGULATIONS

This settlement agreement in no way affects Respondent's responsibility to comply with any federal, state or local regulations, including but not limited to, the Act, 415 ILCS 5/1 (1992), et seq., and the Illinois Pollution Control Board's Air Pollution Control regulations.

XII.
RIGHT OF ENTRY

In addition to any other authority, the Agency, its employees and representatives, and the Illinois Attorney General, his agents and representatives, shall have right of entry to Chicago Steel's facility at all reasonable times, for the purposes of conducting inspections. In conducting any inspection of

Chicago Steel's facility, the Agency, its employees and representatives, and the Attorney General, his agents and representatives, may take any photographs or samples as they deem necessary in order to conduct their inspection.

XIII.
RELEASE FROM LIABILITY

In consideration of Respondent's payment of a TWENTY-FIVE THOUSAND DOLLAR (\$25,000.00) penalty and commitment to refrain from further violations of the Act, the Agency shall release, waive and discharge Respondent from any further liability or penalties from violations of the Act which were specifically alleged in the Complaint, upon compliance by Complainant of all requirements set forth in Section X. of this Stipulation and Proposal for Settlement. However, nothing in this Settlement Agreement shall be construed as a waiver by Complainant of the right to redress future violations or obtain penalties with respect thereto.

WHEREFORE, Complainant and Respondent request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

AGREED:

FOR THE COMPLAINANT:

FOR THE RESPONDENT

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

CHICAGO STEEL RULE DIE &
FABRICATORS COMPANY

By: *Joseph E. Svoboda*
JOSEPH E. SVOBODA
General Counsel
Division of Legal Counsel

By: *Gerald Guanci*
GERALD GUANCI

Dated: 11/16/95

Dated: 9-20-95

JAMES E. RYAN
Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement Division

By: *William D. Seith*
WILLIAM D. SEITH, Chief
Environmental Bureau
Assistant Attorney General

Dated: 11/28/95

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