

ILLINOIS POLLUTION CONTROL BOARD
May 11, 1989

MINNESOTA MINING AND)
MANUFACTURING COMPANY,)
)
Petitioner,)
)
v.) PCB 88-14
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

ORDER OF THE BOARD (by B. Forcade):

On March 8, 1989, Minnesota Mining and Manufacturing Company ("3M") filed a Motion for Reconsideration or Clarification in this matter. That motion identified certain potential problems with the Board's February 2, 1989, Opinion and Order. On March 27, 1989, the Illinois Environmental Protection Agency ("Agency") timely responded. The Board granted reconsideration, but ordered additional memoranda on the matter.

On May 3, 1989, in response to the request for additional memoranda, 3M and the Agency filed a joint response to the Board's Order of April 6, 1989. In order to clarify their intent, and to ensure that VOM emissions are minimized during the period of April 1, 1989 through April 1, 1990, 3M and the Agency agreed that the Board's February 2, 1989 Order in this matter should be modified by adding a new subparagraph (c) to Condition No. 2.

The Board will adopt the requested modification. The Board now repeats its entire Order, including the new subparagraph (c) to Condition No. 2. The Board will require 3M to sign and return a copy of the new certification.

ORDER

The Board hereby grants the Minnesota Mining and Manufacturing Company ("3M") a variance from 35 Ill. Adm. Code 215.204(c) and 215.207, as amended at 12 Ill. Reg. 815, 840-42 (Jan. 8, 1988), for the period from December 24, 1987 until April 1, 1989, provided it fulfills the following conditions:

1. Compliance for Line 6H will be determined according to Section 215.204(c).

2. Ninety days after installation of new control equipment on any of Lines 2G, 3G, 4G, 2H and 3H or upon normal operation of the new control equipment on any of Lines 2G, 3G, 4G, 2H and 3H, whichever occurs first for each line:
 - a. Volatile organic material from the "adhesive coating" will not by-pass the thermal oxidizers and the thermal oxidizers will achieve 95% destruction efficiency on the captured volatile organic material, except during malfunction and breakdown as authorized by the IEPA operating permit.
 - b. Lines 2G, 3G, 4G, 2H and 3H shall be operated to achieve at least equivalence with 2.9 lb. VOM/gallon using the formulas contained in Section 215.207 for each product manufactured, except during malfunction and breakdown as authorized by the IEPA operating permit.
 - c. However, nothing in this Order shall be construed to require that lines 2H and 3H achieve line-by-line compliance with the 2.9 lbs. VOM/gallon limitation using the formulas contained in Section 215.207 until April 1, 1990 by which time 3M shall install a single thermal oxidizer to control solvent not trapped by the carbon absorbers on lines 2H and 3H and to act as a backup when the solvent recovery units are down for maintenance.
3. Control efficiency of the carbon absorption units on Lines 2H and 3H will be documented on a daily basis. The thermal oxidizer to be installed on Lines 2H and 3H shall have a destruction efficiency of 90%, except during malfunction or breakdown as authorized by the IEPA operating permit.
4. 3M shall submit to IEPA every quarter a report describing in detail the progress made in the previous three months in the design and construction of the thermal oxidizers and the improvements made to the carbon absorption units.
5. a. Quarterly reports shall be submitted to the IEPA's regional office in Maywood and the Permit Section in Springfield within 20 days of the end of the quarter.

Illinois Environmental Protection Agency
Division of Air Pollution Control
The Intercontinental Center
1701 First Avenue
Maywood, IL 60153

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
2200 Churchill Road
Springfield, IL 62702

- b. The quarterly report shall include a summary of the daily operations of the coating lines operating pursuant to Section 215.207 and include the following information:
 - i. Weighted average VOM content of coating (lb/gallon, less water);
 - ii. Weighted average control efficiency for VOM (percent);
 - iii. Actual VOM emissions (lb/day),
 - iv. Allowable VOM emissions (lb/day) pursuant to Section 215.207; and
 - v. Actual VOM emissions expressed as percent of allowable, i.e., (actual divided by allowable) times 100%.
 - c. The quarterly report shall include a summary of afterburner and carbon absorption malfunctions, with the nature and duration of the malfunction, and a description of measures taken to prevent future occurrences.
6. Within 45 days after the date of this Order, 3M shall execute and send to:

Illinois Environmental Protection Agency
Attention: Susan Schroeder
Enforcement Programs
2200 Churchill Road
Springfield, IL 62794-9276

a Certificate of Acceptance and Agreement of this variance by which it agrees to be bound by the terms and conditions contained herein. This variance will be void if 3M fails to execute and forward the certificate within the 45-day period. The 45-day period shall be in

abeyance for any period during which the matter is appealed. The form of the certification shall be as follows:

CERTIFICATION

I, (We) _____, having read the Order of the Illinois Pollution Control Board in PCB 88-14, dated May 11, 1989, understand and accept the said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

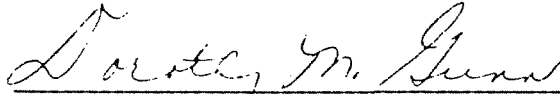
Authorized Agent

Title

Date

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the 11th day of May, 1989, by a vote of 7-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board