

ILLINOIS POLLUTION CONTROL BOARD
August 7, 1975

VELSICOL CHEMICAL CORPORATION,)
 Petitioner,)
)
 v.) PCB 74-312
)
ENVIRONMENTAL PROTECTION AGENCY,)
 Respondent.)

OPINION AND ORDER OF THE BOARD (by Mr. Goodman):

This matter comes before the Pollution Control Board (Board) upon Velsicol Chemical Corporation's (Velsicol) May 8, 1975, second amended petition for variance from Rule 205(f) of the Air Pollution Regulations. Velsicol seeks this variance in order to continue operation of its polymerization until June 30, 1975, while installing pollution control equipment which will completely recycle Petitioner's hydrocarbon emissions.

Velsicol's petrochemical plant is located in Clark County near Marshall, Illinois. The plant manufactures agricultural chemicals and hydrocarbon resins from petroleum fractions. Velsicol's products are used in hot melt adhesives, mastiks, contact cements, metallic paints, latex paints, varnishes, rubber compounding, core oils, hardboard saturants and rotogravure inks. The plant utilizes 9400 pounds of petroleum fractions per hour, 180 pounds of boron trifluoride catalyst per hour, and 85 pounds of lime per hour.

Velsicol's catalytic polymerization unit has two vents which emit hydrocarbon vapor to the atmosphere. The polymerization receiver vent's emissions of 0.58 pounds per hour are within the standards of 205(f). However, the Eimco vent's emissions of a benzene-toluene-xylene mixture from 119 to 130 pounds per hour exceed the permissible emission rates.

In Velsicol Chemical Company v. EPA, PCB 73-543, the Board granted Velsicol a variance from 205(f) until August 31, 1974. Velsicol's plan of compliance at that time consisted of installing an afterburner to incinerate hydrocarbon vapors. With the encouragement of the Environmental Protection Agency (Agency), Velsicol has developed a new compliance plan which would conserve energy and completely recycle the hydrocarbon vapors. The Agency issued a construction permit to Velsicol on July 17, 1974. The emission

control facility consists of explosion control instrumentation at a cost of \$6480.00; an explosion proof compressor at a cost of \$22,820.00; and furnace burners at a cost of \$1,510.00. Velsicol had intended to be in compliance by April 30, 1975. However, due to the arrival of the 125 horse power electric motor which powers the compressor in damaged condition, compliance is not expected until June 30, 1975.

After installation of the pollution control devices, the plant will recover the air-hydrocarbon vapor mixture from the Eimco vent, remix that gas with natural gas, compress that product and then burn it in the process furnace of the Raw Material Converter.

Although the Board does not construe the denial of a variance as a "shut down order", Petitioner alleges that denial of this variance would result in the dismissal of 121 employees, and the withdrawal of 5,000,000 pounds per month of hydrocarbon resins from the open market. Velsicol, also, alleges that it would lose sales in the amount of \$500,000.00 per month and its raw material suppliers would lose some \$250,000.00 per month in revenues.

The Board finds that Velsicol's compliance plan is reasonable and that the denial of the variance would result in unreasonable hardship to Petitioner and its employees, in view of the fact that Petitioner had no control over the delay in compliance. The grant of a variance herein will have a minimal effect on the ambient air quality in the area and will ultimately benefit the ambient air quality and conserve needed energy resources. In consideration of the foregoing, the Board will grant Velsicol a variance from Rule 205(f) for its Marshall plant from August 31, 1974, to and including June 30, 1975.

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

ORDER

It is the Order of the Pollution Control Board that Velsicol Chemical Company be and is hereby granted a variance from Rule 205(f) of the Air Pollution Regulations for its Marshall, Illinois, catalytic polymerization unit from August 31, 1974, to and including June 30, 1975.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 7th day of August, 1975 by a vote of 5-0.


Christan L. Moffett, Clerk
Illinois Pollution Control Board