

ILLINOIS POLLUTION CONTROL BOARD

January 23, 1975

SHERWIN WILLIAMS COMPANY,)
)
) Petitioner,)
)
 vs.) PCB 74-408
)
 ENVIRONMENTAL PROTECTION AGENCY,)
)
) Respondent.)

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

In PCB 74-212 Petitioner Sherwin Williams was granted variance from Rule 205(f) of the Air Pollution Control Regulations until November 1, 1974 due to a shortage of nonphotochemically reactive organic solvents. Sherwin Williams now requests extension of this variance until May 30, 1975.

Petitioner owns and operates a facility in Elgin, Illinois for the manufacture and coating of metal containers. Operations at this facility include metal forming, coating and lithography. During the initial proceeding Petitioner discussed alternatives to non-photochemically reactive solvents. Possibilities included the use of water based and/or ultraviolet varnishes, both of which were still in the experimental stage. Petitioner's efforts to develop these alternatives were also described in that proceeding. Petitioner states that the request for extension of variance involves the same equipment, the same emissions and the same Regulation as the initial Petition for Variance. In view of the available information and the absence of any objection, the prior record was incorporated as part of this record and no hearing was held on the issues.

During the term of the prior variance Petitioner increased its use of exempt coatings from 77.5% to 98%. This was achieved by switching to water based coatings or reformulation of the coatings with exempt solvents. Despite this achievement Petitioner has a problem because of the 2% organic solvent use in the lithography operation.

During lithography operations a container receives an interior coating on Line 1, a background exterior coating on Line 2 and

printing and varnishing on Lines 3 and 4. Organic emissions from the lithography operation are vented to the atmosphere through four stacks located near the four production lines.

During trial runs on the ultraviolet finishing lines a heat sink required for the curing process unexpectedly warped. Repairs have now been made and new trials are scheduled. Petitioner states that, after the production problems are solved, additional time will be required to perform tests to determine product acceptability.

The water base coatings have also caused some minor problems at this facility. Certain inks used in the lithography operation have been found to be incompatible with the water base coatings furnished by the coating suppliers.

Initial production tests using reformulated coatings indicate that Sherwin Williams has solved most of the production problems. The only reformulated coating that has failed to perform in a satisfactory manner is a finishing varnish that will not adhere to the container surface after the printing operation.

Efforts will be made to develop a satisfactory reformulated finishing varnish but Sherwin Williams will be unable to comply with Rule 205(f) pending such development. Nonexempt coatings are used as infrequently as three or four times a year, but each time they are used 53.8 lbs./hr. of organic solvents are emitted as opposed to the allowable rate of 8 lbs./hr.

This plant is located in an agricultural area. Two farm houses are located near the plant but no complaints or objections have been received from the residents. The Agency approves of Petitioner's achievements and good faith efforts and believe that denial of the variance extension would be arbitrary and unreasonable. The EPA recommends extension of the variance subject to certain conditions.

Sherwin Williams has made considerable advancement toward achieving compliance. Were it not for the problem with the finishing varnish and the warping of a heat sink it is quite possible Petitioner could have achieved compliance within the time allowed by the original variance. The record clearly supports the granting of this request in light of Petitioner's good faith efforts and the minimal adverse effects such variance will cause upon the environment. The variance will be granted.

ORDER

It is the Order of the Pollution Control Board that Sherwin Williams Company is granted a variance from Rule 205(f) of the Air Pollution Control Regulations for its Elgin plant until May 30, 1975 or until such earlier date that a satisfactory alternative finishing varnish can be developed, tested and approved. This variance is subject to the following conditions:

1. Sherwin Williams shall utilize as much exempt reformulated water based coating as can be furnished by its suppliers.
2. Sherwin Williams shall diligently pursue the production application of the ultraviolet curing technology.
3. Petitioner shall apply for all necessary construction and operating permits.
4. Commencing February 15, 1975 Sherwin Williams shall submit monthly progress reports to the Environmental Protection Agency. Said progress reports shall detail progress with the new ultraviolet curing technology and shall include the total amount of solvents used, the nature and amount of nonexempt solvents, the nature and amount of exempt solvents used, the nature and amount of wate based coatings used, the nature and amount of exempt solvents purchased (indicating the supplier), the amount and nature of solvents and coatings in inventory at the beginning of each month.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted this 23RD day of January, 1975 by a vote of 3 to 0.

Christan L. Moffett