

ILLINOIS POLLUTION CONTROL BOARD  
August 1, 1974

J & S TIN MILL PRODUCTS CO., INC.,	)	
	)	
Petitioner,	)	
	)	
vs.	)	PCB 74-137
	)	
ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

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

On April 16, 1974, J & S Tin Mill Products Company, Inc. filed its Petition For Variance, seeking therein variance from the provisions of Rule 205(f) of Chapter 2, Part II of the Air Pollution Control Regulations until March 1, 1975. An Amended Petition was filed on May 10, 1974.

Petitioner operates a facility located in Franklin Park, County of Cook, Illinois. That facility is engaged in the coating and printing of tin plate and black plate. Typical raw materials for this process are 2' x 2' squares of light gauge tin-plated steel, printing inks, enamel and lacquer finishes.

The tin plate is received in palletized form, unloaded by fork lift trucks and transported to the five (5) printing and coating lines. The plates are fed by a conveyor through rubber printing rolls where the ink, enamel or lacquer is applied by direct contact. Following the coating, the plates are fed directly into gas fired drying ovens for baking. The finished plates are palletized and shipped to various manufacturers for stamping and forming.

Petitioner's original control plan was to convert all of its coating lines to exempt solvents. This it has been unable to accomplish because of shortages of exempt solvents.

This variance is requested for Coating Lines 4 and 5 only. Coating Lines 1 and 2 use photochemically reactive solvents; however, each line emits less than eight pounds per hour of hydrocarbons as methane thus satisfying Rule 205(f). Line 3 uses non-photochemically reactive solvents and hence, is exempt from the above rule as no odor problem exists. Lines 4 and 5 each emit more than eight pounds per hour of photochemically reactive solvents. (24.00 lbs/hr and 21.20 lbs/hr, respectively). Petitioner plans to convert Line 4 solvents to exempt solvents and thereby achieve compliance with Rule 205(f). An afterburner will be installed on Line 5 to control emissions so their level will comply with Rule 205(f)(1)(A).

Petitioner expects to have an afterburner delivered by October 1, 1974, installed by February 1, 1975, tested by February 15, 1975, and fully operating by March 1, 1975 to eliminate emissions from coating line 5. Petitioner has a commitment from Northern Illinois Gas to supply the natural gas for the afterburner since the gas demand for such a facility was included in Petitioner's original gas contract. The installed cost of the afterburner will be approximately \$25,000.00.

Line 4 is in the process of changing over to exempt solvent paints. Due to the short supply of such solvents, Petitioner's paint suppliers cannot assure a complete changeover to exempt solvent paints until August 1, 1974.

Petitioner's facility is located in a light industrial area. The nearest residences are a quarter to a half mile south of the plant and separated from the facility by the Tri-State Tollway. The Agency has received no citizen complaints nor any objections to the grant of this Variance.

The Agency states that Petitioner's control program and time schedule appear to be adequate for controlling the problem, and bringing the facility into compliance with Rule 205(f).

This Board is aware of the current shortage of non-photochemical solvents and Petitioner is not unique in its inability to obtain said solvents. The variance will be granted; however, since Petitioner has been assured of sufficient exempt solvents to meet the requirements of Line 4 by August 1, 1974, the variance for Line 4 shall terminate on that date.

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

IT IS THE ORDER of the Pollution Control Board that Petitioner be granted a variance from the provisions of Rule 205(f) of the Air Pollution Control Regulations as follows:

1. Variance for Line 4 shall terminate on August 1, 1974.
2. Variance for Line 5 shall terminate on March 1, 1975.

Petitioner shall observe the following conditions:

- a) Petitioner shall utilize as much exempt solvent formulations as can be furnished by its suppliers.
- b) Petitioner shall notify the Agency immediately if any deviation from the compliance timetable occurs.

c) Petitioner shall submit monthly reports to:

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

The monthly reports shall include the total amount of solvents used, the nature and amount of non-exempt solvents used, the nature and amount of exempt solvents used, the amount and nature of exempt solvents purchased (indicating the supplier), the amount and nature of non-exempt solvents purchased (indicating the supplier), and the amount and nature of solvents in inventory at the beginning of each month.

d) Petitioner shall obtain all necessary Agency permits, particularly for Lines 1, 3 and 5.

e) Petitioner shall conduct a stack test on the afterburner to be installed on Line 5 to insure compliance with the Rules and Regulations. Petitioner shall notify the Agency three (3) days in advance of the test so that Agency personnel may be present at the test to observe test procedures and operating conditions.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 1<sup>st</sup> day of August, 1974 by a vote of 3-0.

Christan L. Moffett