## ILLINOIS POLLUTION CONTROL BOARD April 25, 1974

MONSANTO COMPANY	) ) )	PCB 74-57
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ENVIRONMENTAL PROTECTION AGENCY	)	

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

Monsanto filed a Petition for Variance from the Air Pollution Regulations on February 4, 1974. The Agency filed a Recommendation to grant the variance subject to certain conditions on March 13, 1974. No hearing was held. Monsanto operates an industrial chemical plant located in Sauget, St. Clair County, Illinois, where it produces 4-nitrodiphenylamine (4-NDPA) which is a raw material used in the manufacture of rubber chemicals. Monsanto requests a variance until April 30, 1974 from Rule 206(c) of the Air Pollution Regulations which pertains to carbon monoxide emissions. The compliance date of Rule 206(c) was December 31, 1973. Monsanto states that it will have installed equipment and achieve compliance with Rule 206(c) by April 30, 1974.

Monsanto previously requested a variance from Rule 206(g)(2) of the Air Regulations for this same discharge of carbon monoxide. The Board denied without prejudice this previous request on December 20, 1973 in Monsanto Company v. EPA, PCB 73-413, because Monsanto failed to provide the Board with the quantity and environmental impact of its carbon monoxide emission.

Monsanto states that it has "agreed to follow the interpretation applied by the Agency and to treat emissions from (their) process as if they were being emitted by petroleum or petrochemical processes covered by Rule 206(c)" (Monsanto's Variance Petition, page 3). Monsanto has provided the Board with the information necessary to properly grant a variance. Monsanto's emission of carbon monoxide averages 176 pounds per hour and is discharged from an 88-foot stack. Monsanto's plant is located in an industrial area, with the nearest resident approximately 500 feet from the 4-NPDA facility. Monsanto calculated that the ambient air quality concentration at a point on the ground, five hundred feet down wind from the

stack, would be approximately 1 ppm (hourly average). The Agency agrees with this calculation. The national and Illinois one-hour standard is 35 ppm and the maximum eight hour concentration is 9 ppm, not to be exceeded more than once per year.

Both Monsanto and the Agency state there have been no complaints regarding the facility and Monsanto's plant is located in a highly industrial area with no other known major stationary sources of CO nearby. However, CO is odorless and not detectable without instruments.

Monsanto is disposing of the waste carbon monoxide by incinerating it in a gas-fired boiler. Orders were placed in June, 1973 for a flame arrestor to prevent flashbacks from the boilers into the 4-NPDA process. The Agency approved operating and construction permits in July, 1973. Monsanto began construction of the project in September, 1974. Due to equipment delays Monsanto was unable to install the equipment necessary to complete the project in order to come into compliance with Rule 206 by December 31, 1973.

Because Monsanto has proceeded in good faith to achieve compliance with Rule 206(c) of the Air Pollution Regulations and the minimal degree of environmental degradation, the Board has decided to grant the requested variance subject to the conditions recommended by the Agency.

This Opinion constitutes the Board's findings of facts and conclusions of law.

## ORDER

The Board hereby grants Monsanto Company a variance from Rule 206(c) until April 30, 1974 subject to the following conditions:

- 1. Monsanto shall report to the Agency upon completion of the incinerator;
- 2. Monsanto shall stack test the incinerator to insure compliance with Rule 206(c). Such tests shall be performed with Agency representatives notified in advance and within 30 days after April 30, 1974. A copy of the stack test report shall be forwarded to the Agency within 30 days of the completion of the test.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the day of April, 1974 by a vote of 5-0

Illinois Pollution Control Board