

ILLINOIS POLLUTION CONTROL BOARD
September 6, 1972

CRANE PACKING COMPANY)
(MORTON GROVE PLANT))
v.) PCB 72-131
ENVIRONMENTAL PROTECTION AGENCY)

CRANE PACKING COMPANY)
(CRYSTAL LAKE PLANT))
v.) PCB 72-132
ENVIRONMENTAL PROTECTION AGENCY)

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

This Order supplements earlier Orders dated April 4, 1972 and May 17, 1972. These are related variance proceedings brought upon petitions filed March 31, 1972. Petitioner sought variances for its Morton Grove and Crystal Lake plants from certain of the asbestos emission regulations until October 31, 1972.

Public hearings were scheduled (by Board Order dated April 4, 1972) but cancelled after receipt of the Agency Recommendations and a letter from petitioner's attorneys dated May 15, 1972 indicating that the Agency recommendations were acceptable to petitioner. The Agency recommended that the variances be granted subject to certain conditions.

By Order dated May 17, 1972 we granted both variances subject to conditions specified in several numbered paragraphs of the Order. One condition (par. 3) was that petitioner report within 45 days on the economic feasibility of performing a stack test on emissions from the fabric dust collector after installation. We reserved the right, based upon this report, to order such tests to be performed as might be necessary.

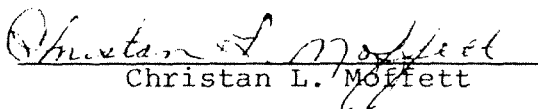
Petitioner has now notified the Board (by letter dated July 5, 1972) that a stack test will cost \$700 to \$1,200 and that petitioner "does not feel that the expense of running stack sampling as a 'proof of performance' may be necessary for compliance with the regulations." The Agency in its reply (letter dated August 11, 1972) concedes that

emissions sampling is not absolutely necessary for proof of compliance with the standards but argues that the \$700 - \$1,200 cost of the stack test is "neither excessive nor abnormal".

We have no record beyond these two letters to look to for evidence as to the need for and economic feasibility of stack testing in this situation. We find, however, that petitioner has failed to advance persuasive reasons why the \$700 - \$1,200 expenditure for stack testing would not be reasonable under the circumstances here. This Board has often emphasized that stack tests give the best indication of the actual performance of control equipment (e.g. see In re: Emission Standards, PCB #R71-23, dated April 13, 1972, page 9).

We accordingly order that petitioner conduct one or more stack tests on emissions from the fabric dust collector after installation, and report the test results to the Agency and to this Board. The Agency is then ordered to advise the Board whether, and the extent to which, the test results affect the continuing grant of these variances.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted on the 6th day of September, 1972 by a vote of 4 to 0.


Christan L. Moffett