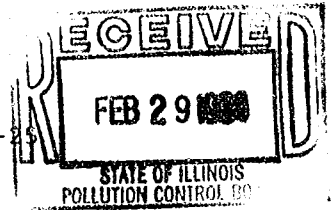


BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

In The Matter Of the Petition Of)
)
)
CLIFFORD-JACOBS FORGING CO.)
)
for a Site Specific Operational Level,)
Pursuant to Chapter 8, Rule 206(d) of)
the Rules and Regulations of the)
Illinois Pollution Control Board)

No. R83-29



RESPONSE TO REQUEST FOR WRITTEN SUMMARY
OF EXPERT TESTIMONY

Petitioner, in response to the order of the hearing officer requiring a written summary of expert testimony, states as follows:

1. The sole expert that will testify on behalf of petitioner will be George W. Kamperman ("Kamperman").
2. Kamperman is an acoustical engineer and was one of the authors of the original noise regulations adopted by the Pollution Control Board in 1973.
3. Kamperman will testify that it is not feasible for petitioner to meet existing noise regulations due to the excessive costs of compliance. The reasons for the excessive costs are that an overall reduction of 11 dB is required and in order to obtain such a noise reduction Petitioner would have to take the following steps:
 - a) Seal all forge shop openings above the grade level doors.
 - b) Install forced air exhaust ventilation systems for each hammer unit to maintain required building ventilation.

- c) Install 3 ft. long standard low pressure drop duct silencers on the exhaust discharge of each fan system.
- d) Replace all corrugated fiberglass exterior wall panels on the west side of the forge shop with glass or other more massive material.
- e) The impulse sound level emission from the ground level door openings cannot be controlled by noise barriers. Therefore, it would be necessary to surround the forge shop with another building having its roof level slightly above the grade level door openings. The roof area of this approximately 18 ft. high noise control structure would be slightly over 40,000 sq. ft.

4. Kamperman will explain why each of the foregoing steps would be necessary to achieve the 11 dB reduction and will also explain that there are no other steps that would be more feasible.

CLIFFORD-JACOBS FORGING CO.

by 
One of Its Attorneys

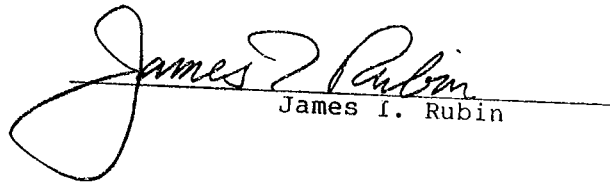
James I. Rubin
Butler, Rubin, Newcomer,
Saltarelli & Boyd
Three First National Plaza
Suite 1505
Chicago, Illinois 60602
(312) 444-9660

CERTIFICATE OF SERVICE

I, JAMES I. RUBIN, certify that I have this day served by first class mail (postage prepaid) copies of petitioner's Response to Request for Written Summary of Expert Testimony upon the following person:

Major Hearn
Environmental Protection Agency
1701 South 1st Avenue
Maywood, Illinois 60153

February 28, 1984


James I. Rubin

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

In The Matter Of the Petition Of)
)
)
CLIFFORD-JACOBS FORGING CO.) No. R83-25
)
)
for a Site Specific Operational Level,)
Pursuant to Chapter 8, Rule 206(d) of)
the Rules and Regulations of the)
Illinois Pollution Control Board)

RESPONSE TO REQUEST FOR WRITTEN
SUMMARY OF EXPERT TESTIMONY

BUTLER, RUBIN, NEWCOMER & SALTARELLI
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS
THREE FIRST NATIONAL PLAZA - SUITE 1505
CHICAGO, ILLINOIS 60602
TELEPHONE (312) 444-9660