

ILLINOIS POLLUTION CONTROL BOARD  
January 19, 2006

IN THE MATTER OF: )  
)  
ORGANIC MATERIAL EMISSION ) R06-21  
STANDARDS AND LIMITATIONS FOR ) (Rulemaking – Air)  
THE CHICAGO AND METRO-EAST )  
AREAS: PROPOSED AMENDMENTS TO )  
35 ILL. CODE 218 AND 219 )

ORDER OF THE BOARD (by T.E. Johnson):

On December 22, 2005, the Board received a rulemaking proposal submitted by the Illinois Environmental Protection Agency (Agency) pursuant to Sections 27 and 28 of the Illinois Environmental Protection Act (Act). 415 ILCS 5/27, 28 (2004). The Agency proposes amendments to Parts 218 and 219 of the volatile organic material (VOM) rules to allow for the use of add-on controls as a compliance option for printing operations using cold cleaning solvent degreasing. Pet. at 3.

**BACKGROUND**

Solvent cleaning, or degreasing as it is commonly called, is a process using aqueous liquids or non-aqueous organic solvents to clean and remove soils from surfaces. Pet. at 2. Solvent cleaning is divided into three major types: cold cleaning, open-top vapor degreasing, and conveyORIZED degreasing. *Id.* Evaporation of the solvent used during degreasing results in VOM emissions that react with other pollutants such as nitrogen oxide and carbon monoxide to form ozone. *Id.*

Diversapack, a printing company that recycles its solvents in a totally enclosed parts washer and uses add-on controls for the abatement of process emissions, contacted the Agency in May 2003 regarding a possible variance from the vapor pressure limits at 35 Ill. Adm. Code 218.182(c). Pet. at 2. Diversapack uses solvents compatible with their printing operations that do not meet the current vapor pressure requirements. *Id.* The Agency identified three additional point sources in the Chicago area that use add-on controls plus solvents that do not meet the lower vapor pressure limits. *Id.*

In lieu of the site-specific rulemakings for each of the identified facilities, the Agency is proposing revisions to 35 Ill. Adm. Code 218 and 219. Pet. at 2. Specifically, the Agency proposes revising Sections 218.182 and 219.182 to allow for add-on controls or equivalent alternative control plans as compliance options, as well as additional revisions concerning solvent sale, solvent use, add-on control testing, and record keeping requirements. Pet. at 3.

In 1997, the Agency submitted control measures that reduced VOM emissions for cold cleaning degreaser operations in the Chicago and Metro-East nonattainment areas. Pet. at 3. These revisions lowered the allowed solvent vapor pressure for operations in Chicago and the

Metro-East areas. *Id.* Under the Clean Air Act and the USEPA State Implementation Plan (SIP), failure to obtain equivalent emissions reductions from the cold cleaning sources would require the Agency to make up the deficiency through the implementation of contingency control measures. Pet. at 3-4. The Agency asserts that the USEPA indicates that the 95% control level proposed here is sufficient for this emissions source category. Pet. at 4.

Currently an 8-hour national ambient air quality standard (NAAQS) standard is in effect for the Chicago and the Metro-East areas designating both as a moderate ozone nonattainment area. Pet. at 3. This 8-hour NAAQS replaced the previous 1-hour standard on June 15, 2005. Given that the USEPA has a policy against regression, the control measures adopted to meet the 1-hour standard must still be maintained. *Id.*

### **SUMMARY OF PROPOSAL**

The Agency is proposing to revise its cold cleaning degreaser rules in the Chicago and Metro-East nonattainment areas by making parallel changes to 35 Ill. Adm. Code 218.182(c) and (d) and 219.182(c) and (d). Pet. at 5. The Agency is proposing revisions to allow for the sale or purchase of solvents with vapor pressure greater than 1.0mmHg in units greater than five gallons to or by sources that have valid permits, are in compliance with the add-on control requirements, or are exempt. *Id.* The Agency is also proposing control requirements to allow for the option of add-on controls. *Id.* Subsections are being created that will require sources using solvents with vapor pressures greater than 1.0mmHg to control their emissions to an overall capture and control efficiency of no less than 95%. Pet. at 6.

The Agency proposes provisions that allow for equivalent alternative emissions plans stipulating that emissions from a solvent with a vapor pressure of 1.0 mmHg shall be the basis for assessment of equivalent emissions for any proposed control plan and that the equivalent alternative control plans must have at least 95% reduction in VOM emissions. Pet. at 7. Provisions have also been added mandating the testing of add-on controls. *Id.* Currently operating add-on controls must be tested by March 1, 2006, and newly constructed add-on controls shall be tested within 90 days after startup. *Id.* The testing procedures, monitoring, and recordkeeping provisions for add-on controls and equivalent alternative control plans will be consistent with the provisions in Section 218.105 and Section 219.105, which require that the control devices be operated and maintained at the manufacturer's specifications and continuously monitored to assure that they are operating at the required compliance levels. All records must be kept for a minimum of three years. *Id.*

The Agency's proposal, including its statement of reasons and the full text of the proposed rule language, is available through the Clerk's Office in Chicago (312-814-3620) and on the Board's Web site ([www.ipcb.state.il.us](http://www.ipcb.state.il.us)) using the Clerk's Office On-Line or "COOL."

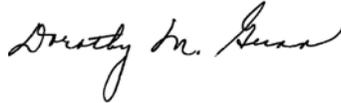
### **DISCUSSION**

The Board accepts the Agency's proposal for hearing. However, a review of the proposal reveals that the Agency did not address the applicability of or provide the information requested in the "published study or report" requirement of Section 102.210(c). 35 Ill. Adm. Code

102.210(c). *See also* 35 Ill. Adm. Code 102.202(k). The Board requests that the Agency address Section 102.210(c), or its inapplicability, in writing prior to any hearing scheduled in this proceeding at such time as directed by the hearing officer. The assigned hearing officer is directed to proceed expeditiously under the rulemaking provisions of the Act (415 ILCS 5/27, 28 (2004)) and the Board's procedural rules. 35 Ill. Adm. Code 102.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above order on January 19, 2006, by a vote of 4-0.



Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board