

ILLINOIS POLLUTION CONTROL BOARD
May 2, 1990

PRECISION COATINGS, INC.,)
)
 Petitioner,)
)
 v.) PCB 90-90
) (Provisional Variance)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

ORDER OF THE BOARD (J. Dumelle):

This matter comes before the Board on receipt of an Agency Recommendation dated May 1, 1990. The recommendation refers to a request from Petitioner, Precision Coatings, Inc. for a 5-day provisional variance from the volatile organic materials emissions standards, as set forth in 35 Ill. Adm. Code 215.204(c) and 215.205, for the period from May 7, 1990 through May 11, 1990.

Upon receipt of the request the Agency issued its recommendation, concluding that the failure to grant the requested 5-day provisional variance would impose an arbitrary or unreasonable hardship on Petitioner.

Precision Coatings operates a reprographic coating plant at Spring Valley, in Bureau County, which produces manufacturing drafting paper, Xerographic paper, and blueprint paper. In the process, Precision Coatings coats polyester film and paper with coatings containing non-halogenated solvents (acetone, methyl ethyl ketone, isopropyl alcohol, toluene, methyl alcohol, ethyl alcohol, and heptane). The emissions from Precision Coatings' three coating lines (numbers 1, 2, and 3) and transparentizing line (number 4) are ducted to a Reeco Model VF "Re-Therm" thermal oxidizer which meets the requirements of 35 Ill. Adm. Code 215.205(b). Line number 1 is also equipped with a packed tower scrubber designed to remove trichloroacetic acid.

Precision Coatings' permits allow it to operate lines numbered 1 and 4 either by using coatings that comply with the 2.9 lb/gallon limit of 35 Ill. Adm. Code 215.204(c) or by ducting the volatile organic emissions to the afterburner. Lines numbered 2 and 3 lack the capacity to use compliant coatings, so the permits require that Precision Coatings duct their emissions to the afterburner.

Precision Coatings discovered the need to effect repairs to its afterburner during the course of recent maintenance. Precision Coatings seeks a 5-day provisional variance from 35 Ill. Adm. Code 215.204(c) and 215.205 and the permit requirements

(permits numbered 8311062, 8311063, 87020049, and 87060015) so it may shut down its afterburner for necessary repairs. Such a shutdown is necessary to effect the repairs. Compliance with 35 Ill. Adm. Code 215.204(c) and 215.205 and the permit conditions would require a production shutdown during the period of the repairs.

The Agency asserts that a production shutdown would cause Precision Coatings to suffer an arbitrary and unreasonable hardship. The Agency points out that the Board has not granted Precision Coatings provisional variance relief yet this year. The Agency states that Precision Coatings compliance plan consists of using compliant coatings on line 1 and so scheduling production on lines 2, 3 and 4 as to minimize volatile organic material emissions. The Agency concurs in Precision Coatings estimate that the maximum volatile organic emissions would increase from 3.5 tons (controlled) to 18 tons (uncontrolled) as a result of a grant of this provisional variance. The Agency points out that these emissions would occur at the beginning of the ozone season when significant ozone formation does not occur because of meteorological conditions. The Agency concludes that no significant adverse environmental impact would occur because Bureau County is an attainment area with regard to the ozone National Ambient Air Quality Standard and it does not adjoin any non-attainment area for ozone.

The Agency recommends that the Board grant the requested provisional variance with certain conditions.

In light of the Agency Recommendation, the Board hereby grants a provisional variance from 35 Ill. Adm. Code 215.204(c) and 215.205 from May 7, 1990 through May 11, 1990, subject to the following conditions:

1. Precision Coatings, Inc. shall operate production line number 1 only using coatings that comply with the requirements of 35 Ill. Adm. Code 215.204(c);
2. Precision Coatings, Inc. shall so operate production lines numbered 2, 3, and 4 as to minimize volatile organic material emissions;
3. Precision Coatings, Inc. shall notify the following person by telephone on the day it shuts down its afterburner and on the day it returns its afterburner to service:

Mr. Richard Jennings, PE
Regional Manager
Illinois Environmental Protection Agency
5415 North University Street
Peoria, Illinois 61614
309-693-5460

4. Precision Coatings, Inc. shall, within ten days of the

date of this order, execute a Certificate of Acceptance and Agreement in the following form:

CERTIFICATION

I (We), _____,
hereby accept and agree to be bound by all terms and conditions of the Order of the Pollution Control Board in 90-90, dated May 2, 1990.

Petitioner

Authorized Agent

Title

Date

5. Precision Coatings, Inc. shall, within ten days of the date of this order, forward an executed copy of the Certificate of Acceptance and Agreement required under condition 4 to the following person and addressed as follows:

Ms. Lisa Moreno
Enforcement Programs
Illinois Environmental Protection Agency
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

6. The failure of Precision Coatings, Inc. to promptly execute and forward the Certificate of Acceptance and Agreement as required under conditions 4 and 5 shall render this provisional variance void and of no effect as a shield against an action to enforce the rules from which this provisional variance grants relief.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, do hereby certify that the above Order was adopted on the 2nd day of May, 1990, by a vote of 4-0.

Dorothy M. Gunn
Dorothy M. Gunn, Clerk
Illinois Pollution Control Board