

ILLINOIS POLLUTION CONTROL BOARD
April 26, 1979

STEPAN CHEMICAL COMPANY,)
)
 Petitioner,)
)
 v.) PCB 79-32
)
 ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

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

On February 15, 1979, Stepan Chemical Company (Stepan) filed a Petition for Extension of a previously granted variance from Rules 203(a) and 205(g)(1)(C) of Chapter 2: Air Pollution Control Regulations for its facility known as the Millsdale Plant located on the Des Plaines River in Will County near Ellwood, Illinois. There has been no hearing in this matter, and the Board has received no public comment.

Stepan's phthalic anhydride plant, which is the subject of this variance petition, has been the subject of several variance proceedings in the past, the latest of which was PCB 78-220. In addition, a recent amendment of Rule 205(g) pursuant to R77-3 applies to Stepan. In PCB 78-220, Stepan applied for an extension of its original variance until November 15, 1978, to allow installation of additional equipment on its Du Pont Torvex[®] catalytic reactor on the waste gas stream of the phthalic anhydride plant. Subsequently, a problem involving the combustor exhaust fan arose. The fan was not able to operate at design conditions, and Stepan therefore postponed the stack tests, which were required by the Board Order in PCB 78-220, until the problem is corrected. Stepan now requests that the variance be continued until November 15, 1979, to allow time to solve the fan problem.

Since the operation of the phthalic anhydride process at this plant has been fully documented in prior Board decisions, the Board will dispense with the technical aspect of the plant operation. The only problem remaining now is the inability of the combustion exhaust fan to operate at design conditions. Stepan and Du Pont, the supplier of the control equipment, studied the problem and concluded a larger fan will be needed. It has been determined that a 2,000 horsepower fan is necessary and must be fabricated, since a fan

of that size is not commercially available. It is for this purpose that Stepan requests the variance extension until November, 1979. On April 12, 1979, the Board adopted a new Rule 205(g)(1) of Chapter 2: Air Pollution Control Regulations in R77-3. Stepan's phthalic anhydride plant is in compliance with the new Rule 205(g)(1). According to the Illinois Environmental Protection Agency (Agency) figures, the plant is presently in compliance with Rule 203(a). In addition, the plant is in compliance with Rule 205(f) because its emissions are not photochemically reactive. Stepan therefore requires only a variance from Rule 203(a) for possible violations during shake-down and debugging of the new control equipment.

The Agency investigation in this matter indicates that particulate concentrations in the area are below the primary ambient air quality standard. Considering the satisfactory progress made by Stepan toward compliance with Board Regulations and the fact that the Torvex[®] reactor is a new application of this technology, the Board finds that Stepan should be granted a variance from Rule 203(a) to allow Stepan and Du Pont the time to make the necessary modifications to the system. The Board will, therefore, grant Stepan a variance from Rule 203(a) of Chapter 2 until June 30, 1979, subject to certain conditions. Since Stepan has not submitted information to show whether its emissions will interfere with the attainment or maintenance of ambient air quality standards, the Board, under Section 36 of the Illinois Environmental Protection Act, cannot grant a variance beyond the June 30, 1979 date.

This Opinion constitutes the findings of fact and conclusions of law of the Board in this matter.

ORDER

Finding that Stepan Chemical is currently unable to comply with the Board's Regulations, it is the Order of the Pollution Control Board that Stepan Chemical Company be granted variance from Rule 203(a) of Chapter 2 of the Board's Regulations until June 30, 1979 subject to the following conditions:

- a) Stepan Chemical Company shall comply with all applicable provisions of the Board Order in PCB 78-220;
- b) Stepan Chemical Company shall install a larger fan and modify the dampers for the Torvex[®] catalytic reactor;

- c) Until such time as the Torvex[®] catalytic reactor is in full operation, Stepan shall minimize emissions as much as possible;
- d) Stepan shall conduct stack tests for the particulates and organics within 35 days after the installation of the dampers and completion of the reactor;
- e) Within 60 days of the date of this Order, Stepan shall apply and obtain all necessary Agency construction and operating permits;
- f) Stepan shall submit to the Agency on a monthly basis a written report detailing all progress toward compliance, said report to be submitted to the Environmental Protection Agency, Control Program Coordinator, 2200 Churchill Road, Springfield, Illinois 62706;
- g) Stepan Chemical Company shall continue in effect its performance bond in the amount of \$25,000.00 in a form satisfactory to the Agency;
- h) Within 45 days of the date of this Order, Stepan Chemical Company shall execute and forward to the Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706, a Certification of Acceptance and Agreement to be bound to all terms and conditions of this Order. The 45 day period shall be held in abeyance during any period this matter is being appealed. The form of said certification shall be as follows:

CERTIFICATION

I (We), _____, having read and fully understanding the Order of the Illinois Pollution Control Board in PCB 79-32, hereby accept said Order and agree to be bound by all of the terms and conditions thereof.

SIGNED _____

TITLE _____

DATE _____

- i) If final compliance is not achieved by July 1, 1979, Stepan may be subject to noncompliance penalties under Section 120 of the Clean Air Act as amended in August, 1977.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 26th day of April, 1979 by a vote of 4-0.

Christan L. Moffett
Christan L. Moffett, Clerk
Illinois Pollution Control Board