

ILLINOIS POLLUTION CONTROL BOARD
August 5, 1976

LINDBERG CORPORATION,)
)
 Petitioner,)
)
 v.) PCB 76-91
)
 ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

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

On April 2, 1976, Petitioner Lindberg Corporation (Lindberg) filed a variance petition before the Pollution Control Board (Board) requesting variance from Rules 103(b) and 203(a) of the Air Pollution Regulations (Chapter 2). On May 4, 1976, Lindberg submitted an amended petition in response to an Interim Order of the Board. The Environmental Protection Agency filed its recommendation on July 20, 1976. Lindberg has filed a waiver of the 90-day rule until August 12, 1976. No hearing has been held in this matter.

Lindberg operates a facility in Melrose Park which heat treats a wide variety of metal items per customer specifications. Lindberg's operations include a salt heat treating operation consisting of three lines. Lindberg is requesting variance from the permit requirement of Rule 103(b) and the particulate emission limitation of Rule 203(a) of Chapter 2 for its salt heat treating operation.

Stack tests conducted for Lindberg by National Loss Control Service Corporation in November 1975 indicate the following average emission rates from the three lines:

neutral salt lines	2.04 lb./hr.
cyanide salt line	0.95 lb./hr.
Tufftride line	0.78 lb./hr.
Total	<u>3.77 lb./hr.</u>

Rule 203(a) of Chapter 2 limits emissions from the salt heat treating operation to 0.55 lb./hr. Lindberg's plan for achieving compliance is two-fold. Lindberg is currently evaluating a prototype Universal Oil Products multiclone system which has been in-

stalled. If the multiclone achieves 85% compliance efficiency, an order will immediately be placed for a permanent installation, with final compliance scheduled for September, 1977. If, however, the test results of the multiclone are not favorable, Lindberg will then install a prototype Flex-Kleen dust collector utilizing bag filters. Assuming that the dust collector is found to be acceptable, a permanent dust collector would be installed by February, 1978.

As an interim measure, Lindberg indicates it will keep particulate emissions at the lowest possible levels by maintaining a graphite layer on the cyanide salt pots to blanket particulate emissions. When quenching Tufftride loads, Lindberg will attempt to air quench the work before water quenching, which will reduce particulate drive-off. Lindberg also intends to pre-clean work whenever possible to reduce oil burn-off during preheat cycles.

Lindberg's facility is located in a highly industrialized area. The nearest residences are located approximately one-half mile to the south. The total suspended particulates in the vicinity are below the primary ambient air quality standard of 75 ug/m³, as indicated by the following 1975 air quality data for the nearest testing stations:

<u>Station</u>	<u>Distance</u>	<u>Direction</u>	<u>Annual Geo. Mean</u>
Franklin Park	4 miles	North	70 ug/m ³
River Forest	2 miles	East	67 ug/m ³
Hillside	3 miles	Southwest	68 ug/m ³

Apparently, Lindberg's delay in compliance is due to technical difficulties it has faced. The Agency recommendation indicates that Lindberg's operation was previously controlled by a scrubber, but the scrubber had to be discontinued due to contamination of the scrubber effluent with cyanide.

The Board agrees with the Agency's conclusion that, due to the technical difficulties Lindberg has faced and the solution it has now seemingly reached, denial of the variance from Rule 203(a) would constitute an arbitrary and unreasonable hardship.

Lindberg requests variance through March, 1978. However, the variance will only be granted until September 1, 1977 - the date that the first alternate control program is due to be completed. If Lindberg finds that it must utilize the second alternate control program, it can then petition the Board for an extension of the variance granted herein.

The Board denies Lindberg's request for variance from the operating permit requirement of Rule 103(b). Rule 103(b)(6)(a) specifically provides for the granting of a permit to applicants who have received a variance from the Board. Lindberg is hereby granted variance from Rule 203(a) until September 1, 1977.

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

ORDER

It is the Order of the Pollution Control Board that:

- 1) Petitioner Lindberg Corporation is hereby denied variance from Rule 103(b) of Chapter 2.
- 2) Petitioner is hereby granted variance from Rule 203(a) of Chapter 2 until September 1, 1977, subject to the following conditions:
 - a) Within 14 days of this Order and monthly before the 15th day of each month thereafter, Petitioner shall submit written reports to the Agency detailing all progress made toward final compliance with Rule 203(a) of Chapter 2. Said reports shall be sent to:

ENVIRONMENTAL PROTECTION AGENCY
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706
 - b) Within 120 days of this Order Petitioner shall obtain all necessary construction permits for control equipment and all necessary operating permits for the salt heat treating lines and associated control equipment.
 - c) Within 35 days of the installation of the control equipment, Petitioner shall have a stack test conducted in accordance with U.S. EPA Method 5 (State of Illinois Stack Sampling Memo, filed with the Secretary of State, July 1, 1975), by an Agency approved independent testing company. Petitioner shall notify the Agency in writing at least 7 days prior to the testing and shall allow Agency personnel to witness

all tests and review all results. Written notification shall be made to:

ENVIRONMENTAL PROTECTION AGENCY
Division of Air Pollution Control
Field Operations Section
1701 South First Avenue
Maywood, Illinois 60153

- d) During the period of the variance, Petitioner shall adhere to its project completion schedule as specified in its original Petition for Variance, dated March 30, 1976, which is incorporated by reference as if fully set forth herein, and shall follow all interim measures specified in the variance petition.
- f) Within 35 days of this Order Petitioner shall execute and forward to the Control Program Coordinator, a Certification of Acceptance and agreement to be bound to all terms and conditions of the variance. 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 76-91 hereby accept said Order and agree to be bound by all of the terms and conditions thereof.

Signed by _____

Title _____

Date _____

The Certification shall be sent to the address specified in paragraph 2(a), supra.

Mr. Dumelle Dissented.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 5th day of August, 1976 by a vote of 4-1.



Christan L. Moffett, Clerk
Illinois Pollution Control Board