

ILLINOIS POLLUTION CONTROL BOARD
February 5, 1981

PRINTPACK, INC.,)
)
) Petitioner,)
)
) v.) PCB 80-148
)
 ILLINOIS ENVIRONMENTAL PROTECTION)
 AGENCY,)
)
) Respondent.)

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

Printpack, Inc. on August 11, 1980 filed a petition for variance from Rule 205(j) of the Board's air pollution control regulations, Chapter 2, for three years. Printpack amended its petition on November 12, 1980. The Illinois Environmental Protection Agency's (Agency) January 26, 1981 motion to file recommendation instanter is granted. Hearing was waived; no public comment has been received.

Printpack, located in Elgin, Kane County, manufactures flexible packaging for use primarily by the food industry. The manufacturing process produces 7,500,000 pounds of papers and films, such as cellophane and polyester, yearly. The process utilizes laminating adhesives of approximately 75% hydrocarbon-containing solvent, or about 6.5 lbs. of solvent per gallon of adhesive. Printpack's yearly use of 45,000 gallons of adhesive per year results in emissions of hydrocarbons of approximately 146 tons per year after some reduction by processing ovens. Under Rule 205(n)(1)(C), Printpack's allowable hydrocarbon emissions are 65 tons per year. Printpack seeks variance in order to use a lower-solvent technology of 2.9 pounds of solvent per gallon of adhesive and projects compliance of 50% of its coatings by the end of 1983 and 100% by the end of 1985. The staged compliance dates are apparently necessitated by variable adaptability of the technology to the lines depending upon the porosity of the substrates. The Agency recommends grant of the variance.

Rule 205(n)(2), an alternate limitation to Rule 205(n)(1)(C), allows emissions at that hydrocarbon level resulting from the use of either an afterburner (under certain circumstances) or another system demonstrated to be at least as efficient either as those controls achieving 2.9 lbs./gallon or as an afterburner pursuant to Rule 205(n)(2)(A).

Printpack alleges that the use of an afterburner is economically unreasonable at a capital cost ranging from \$200,000-700,000 and at yearly operating costs ranging from \$50,000-150,000. Print-

pack alleges that other USEPA-approved technology for hydrocarbon emission reductions is technologically infeasible because of the small concentration of hydrocarbons in the large volume of exhaust air and because separation of the lines cannot be done adequately due to problems with separation of reaction products.

Printpack alleges that USEPA has recognized that the use of low solvent technology is a reasonably available control methodology to reduce hydrocarbon emissions, although cites that it can be technology-forcing in certain applications. Printpack also alleges that the USEPA recognizes that five years' time to develop these applications, and additional time for retrofitting, is a reasonable period in which to require investigation, installation and operation of the technology. The Board finds these to be sufficient allegations of unreasonable hardship and will allow Printpack to develop and use complying low-solvent adhesives.

Printpack alleges that the Board should use a bubble concept (Rule 205(n)(4)) to evaluate its staged compliance plan. However, the concept is unrelated to the date of compliance of all lines, which is the subject of Printpack's variance request.

Printpack's petition makes no mention of the substance of its Compliance Plan required by Rule 205(m)(1)(A) to have been filed with the Agency by January 1, 1980, nor its Project Completion Schedule, required by Rule 104(g)(4) to have been filed with the Agency on or near February 1, 1980, nor its six-month reports from July 1, 1980 to date pursuant to Rule 205(m)(1)(B)(i), nor the status of its operating permit. Petitioner's request for "an extended compliance plan as presented on our permit application" essentially seeks variance from rules relating to the Compliance Plan and Project Completion Schedule.

The Board will grant variance from Rules 104(a), 104(g)(4), 205(n)(1)(C), and 205(m)(1), under certain conditions herein specified, in order for the Agency to grant revisions to the Compliance Plan and Project Completion Schedule pursuant to Rule 104(d). Should Printpack fail to meet any of its compliance dates as contained in the Compliance Plan or Project Completion Schedule, it will be subject to an enforcement action under the Act and the Board's Rules.

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

ORDER

It is the order of the Illinois Pollution Control Board that Printpack, Inc. be and hereby is granted variance from Rules 104(a), 104(g)(4), 205(n)(1)(C), and 205(m)(1) of Chapter 2, Air Pollution Control Rules and Regulations, subject to the following terms and conditions.

1. Printpack, Inc. shall achieve compliance with Rule 205 (n)(1)(C) as follows.

- a. at least 20% of all coating lines by December 31, 1981;
- b. at least 30% of all coating lines by December 31, 1982;
- c. at least 50% of all coating lines by December 31, 1983;
- d. at least 75% of all coating lines by December 31, 1984; and
- e. 100% of all coating lines by December 31, 1985.

2. Printpack, Inc. shall continue research and development of low-solvent adhesives and coatings and all technology enabling the use of such adhesives and coatings.

3. On or before April 1, 1981 Printpack, Inc. shall submit a revised Compliance Plan and Project Completion Schedule to the Illinois Environmental Protection Agency, Division of Air Pollution, Permit Section, 2200 Churchill Road, Springfield, Illinois 62706, which is consistent with the terms of this variance and which comports with the requirements of Rule 104(b) of Chapter 2, Air Pollution Control Rules and Regulations.

4. On or before April 1, 1981 Printpack, Inc. shall apply to the Illinois Environmental Protection Agency at the address in Paragraph 3 of this Order for all necessary operating permits.

5. Beginning on July 1, 1981 and semiannually thereafter, Printpack, Inc. shall submit written reports to the Illinois Environmental Protection Agency, Control Program Coordinator, at the address in Paragraph 3 of this Order which detail the results of its research and development efforts. Such reports shall include the emissions from all adhesives and coatings used and shall state the percentage of adhesives and coatings meeting the limitation in Rule 205(n)(1)(C) of Chapter 2, Air Pollution Control Rules and Regulations.

6. Within 45 days of the date of this Order, Printpack, Inc. shall execute and forward to the Illinois Environmental Protection Agency, Variance Section, at the address in Paragraph 3 of this Order, a Certification of acceptance and agreement to be bound by all conditions of this variance. The forty-five day period shall be stayed if Petitioner seeks judicial review of this variance pursuant to Section 41 of the Environmental Protection Act. The form of said Certification shall be as follows:

CERTIFICATION

I, (We,) _____, having read the Order of the Illinois Pollution Control Board in PCB 80-148 dated _____, understand and accept the Order and agree to be bound by all of its terms and conditions.

_____, Petitioner
_____, Authorized Agent
_____, Title
_____, Date

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order were adopted on the 5th day of April, 1981 by a vote of 5.



Christan L. Moffett, Clerk
Illinois Pollution Control Board