

ILLINOIS POLLUTION CONTROL BOARD
April 25, 1974

REFLECTOR HARDWARE CORPORATION,)
)
 Petitioner,)
)
 vs.) PCB 74-55
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

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

This is a Petition for a Variance filed on February 1, 1974 with the Environmental Protection Agency (hereinafter "Agency") by the Reflector Hardware Corporation (hereinafter "Petitioner").

Petitioner manufactures store fixture equipment for discount and department stores and library equipment for public and private educational institutions. Petitioner utilizes over 9,000 tons of coil and sheet steel annually in its Melrose Park plant. Steel stock is received and fabricated into the desired shape by bending, cutting, drilling, and other fabrication operations. Depending on the type of finish desired, the product then is shipped or painted or plated and dipped in lacquer.

Petitioner is seeking a Variance from Rule 205(f) of the State of Illinois Air Pollution Control Regulations until "the proper solvents become available to us from our suppliers." (Pet. pg.2).

Petitioner applied for operating permits in December, 1973, but the permits were denied because of excessive emissions from the painting operations.

Petitioner's present sources of emissions of organic material are two lacquer dip tanks, four electrostatic disc paint spray booths, and the bake ovens following the electrostatic booths.

Petitioner has requested a Variance from Rule 205(f) to allow emissions from the lacquer dip tanks. However, an Agency representative was informed that a new dip tank which will utilize water soluble lacquer is under construction. The new dip tank will replace the most frequently used solvent based lacquer dip tank. Construction and conversion should be completed by the end of February, 1974. It is the Agency's position that Petitioner will not need a variance for the new dip tank. Agency calculations indicate that emissions from the present dip tank (tank #2 large parts dip tank) will be in excess of the allowable standards, so a Variance is required for the remaining dip tank.

Petitioner has requested a Variance from Rule 205(f) to allow emissions from its paint lines #12 and #2. Petitioner began converting a major portion of the paint used on the paint lines to water based paint about the middle of December, 1973, but the organic material emissions are still over the allowable standards because of the amount of photochemically reactive solvents used.

Petitioner claims that it is unable to obtain the necessary non-photochemically reactive solvents due to the petroleum shortage and substantiates its claim with three letters from its suppliers. Although these letters are dated November, 1973, an Agency representative verified their current validity by contacting the solvent supplier.

Petitioner's compliance plan is to wait until non-photochemically reactive solvents become available at some indefinite time in the future:

Petitioner is emitting photochemically reactive organic material from the paint lines in excess of the limits of Rule 205(f).

Petitioner has attempted to comply with Rule 205(f) by changing its paint and lacquer formulae, but it has been unable to obtain non-photochemically reactive thinning solvents.

Petitioner has demonstrated that immediate compliance would impose an arbitrary and unreasonable hardship because of the unavailability of exempt solvents. However, Petitioner has not made adequate attempts to seek alternate solutions.

IT IS THE ORDER of the Pollution Control Board that the Petitioner be granted a Variance from Rule 205(f) of the Illinois Air Pollution Control Regulations for a period of six months after the date of this Order on paint lines #1 and #2 and on lacquer dip tank #2 (large parts dip tank) subject to the following conditions:

- a. Petitioner shall be required to utilize as much exempt solvent formulations as can be furnished by its suppliers.
- b. Petitioner shall be required to reapply for a renewal of its operating permit within 30 days of the date of this Order.
- c. Petitioner shall submit a progress report three months after the date of the Board Order to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706

d. Within five months of the date of the Board Order, Petitioner shall be required to submit to the Agency a Compliance Plan which may:

i. Achieve compliance at the expiration of the Variance by replacement of photochemically reactive solvent with non-reactive solvents demonstrated to be readily available; or

ii. Achieve compliance at the expiration of the Variance by qualification under the Alternative Standard of Rule 205(f)(1); or

iii. Achieve compliance by May 30, 1975, under the provisions of Rule 205(f)(2)(D).

e. That the Petitioner does not need a variance from Rule 205(f) for lacquer dip tank #1. Therefore, that part of the Petition requesting a Variance for lacquer dip tank #1 is denied without prejudice.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 25th day of June, 1974 by a vote of 5-0.

Christan L. Moffett
Clerk