

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

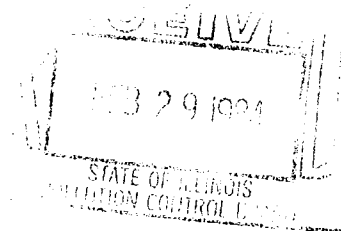
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In The Matter Of the Petition Of)
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VAUGHAN & BUSHNELL MANUFACTURING CO.)
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for a Site Specific Operational Level,)
Pursuant to Chapter 8, Rule 206(d) of)
the Rules and Regulations of the)
Illinois Pollution Control Board)

No. R83-32



RESPONSE TO REQUEST FOR WRITTEN SUMMARY
OF EXPERT TESTIMONY

Petitioner, in response to the order of the hearing officer requiring a written summary of expert testimony, states as follows:

1. The sole expert that will testify on behalf of petitioner will be George W. Kamperman ("Kamperman").

2. Kamperman is an acoustical engineer and was one of the authors of the original noise regulations adopted by the Pollution Control Board in 1973.

3. Kamperman will testify that it is not feasible for petitioner to meet existing noise regulations due to the excessive costs of compliance. The reasons for the excessive costs are that an overall reduction of 12 dB is required and in order to obtain such a noise reduction Petitioner would have to take the following steps:

- a) Close all openings in the forge shop above grade level door openings with 1/8" glass or heavier material.
- b) Install a ventilation system to remove hot air from the forge shop.

- c) Close off all present grade level openings on the south side of the shop. Install an acoustically lined tunnel on the south side of the shop to accommodate all material handling into the shop and scrap removal from the shop. This new entrance will require the removal of one or two forging units from the shop.
- d) Seal off the present main access doors on the east side of the shop - on West Main Street.
- e) Install an air supply system to properly distribute fresh air in the forge shop at grade level.
- f) Install IAC Type 3 PML or equivalent silencers on all fresh air inlets to the forge shop and the exhaust air discharge from the forge shop.

4. Kamperman will explain why each of the foregoing steps would be necessary to achieve the 12 dB reduction and will also explain that there are no other steps that would be more feasible.

CLIFFORD-JACOBS FORGING CO.

by James I. Rubin
One of Its Attorneys

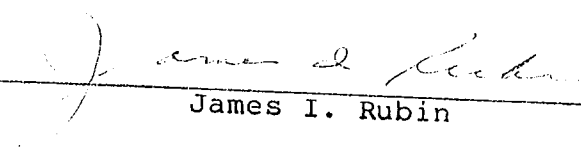
James I. Rubin
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CERTIFICATE OF SERVICE

I, JAMES I. RUBIN, certify that I have this day served by first class mail (postage prepaid) copies of petitioner's Response to Request for Written Summary of Expert Testimony upon the following person:

Major Hearn
Environmental Protection Agency
1701 South 1st Avenue
Maywood, Illinois 60153

February 28, 1984



James I. Rubin

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