

ILLINOIS POLLUTION CONTROL BOARD

January 10, 1974

ADDRESSOGRAPH-MULTIGRAPH CORPORATION,)
MULTIGRAPHICS DIVISION,)
)
Petitioner,)
)
v.) PCB 73-290
) PCB 73-449
ENVIRONMENTAL PROTECTION AGENCY,)
)
Respondent.)

Sidney G. Craig, Attorney for Petitioner
Kenneth J. Gumbiner, Assistant Attorney General for the Agency

OPINION AND ORDER OF THE BOARD (by Mr. Henss)

Petitioner operates a plant in Mt. Prospect, Cook County, Illinois for the manufacture of copying machines, photosensitized papers and toners. On March 28, 1973 Petitioner submitted to the Environmental Protection Agency its application for permits to operate five ovens which are used for the drying of solvent coating at the plant. The Agency issued Permit No. 03032586 allowing the plant to operate, but only until December 31, 1973. The Company filed a Permit Appeal (PCB 73-290) contending that the expiration date of the permit should be May 1, 1975.

Petitioner admits that toluene emissions from each of the drying ovens during the solvent coating operation are about 400 lbs. per hour. Rule 205(f) Air Pollution Control Regulations states:

"No person shall cause or allow the discharge of more than 8 lbs. per hour of organic material into the atmosphere from any emission source, except as provided in paragraphs (f)(1) and (f)(2) of this Rule 205...

(2) Exceptions: The provisions of Rule 205(f) shall not apply to:

(D) any owner, operator, user or manufacturer, of paint, varnish, lacquer, coatings or printing ink whose compliance program and Project Completion Schedule as required

by Part 1 of this Chapter, provides for the reduction of organic material used in such process to 20% or less of total volume by May 30, 1975.

Petitioner had submitted a Compliance Plan and Project Completion Schedule with its permit application. The Compliance Plan and Project Completion Schedule called for the complete elimination of the toluene emissions by May 1, 1975 by moving the operation to another State. The Agency disapproved of this method of meeting the Regulations and therefore found that the Compliance Plan and Project Completion Schedule were inadequate. Petitioner, on the other hand, contended that if compliance is achieved prior to the May 30, 1975 deadline for meeting the Standard, then there is no reason for denying an operating permit.

Early in October 1972 corporate officers decided against closing the Mt. Prospect facility. Property which had been acquired for construction of new facilities in other States was then sold, because there had been a decrease in demand for Petitioner's product and for other economic reasons. Since the Mt. Prospect plant will remain in operation it became necessary to bring Petitioner into compliance with the Illinois Regulations by methods different from those previously proposed. A new permit application was filed with the Agency accompanied by a Compliance Plan and Project Completion Schedule showing that compliance will be achieved through incineration of the organic emissions, and not through removal of the plant to another State. The plan is to reduce solvent hydrocarbon emissions by 95% with a control system which will be fully operational by December 31, 1974 and not later than February 3, 1975.

Petitioner states that it will switch from direct firing to indirect firing on its ovens, utilizing heat generated from the after-burners and reducing the need for supply of natural gas. With this procedure, Addressograph's need for natural gas can apparently be met by Northern Illinois Gas Company.

Petitioner now requests a one year variance from Rule 205(f) of the Air Pollution Regulations to allow installation of the incinerators. Petitioner's attorney states that "a decision will apparently be unnecessary on the permit appeal, if the necessary time variance can be obtained".

Petitioner's decision to install incinerators came late, but we cannot conclude that the hardship was self-imposed. The lateness of decision was apparently caused by a changing economic and market situation.

The EPA is of the opinion that the proposed control program will bring the coating operation into compliance and agrees that a one year time schedule for the ordering, delivery, installation and testing of the equipment is reasonable. The Agency has recommended that the variance be granted, subject to certain conditions. We will allow the variance and will incorporate those conditions suggested by the Agency.

We are pleased that the Petitioner's facility will remain in Illinois as a part of the vigorous economy of this State. The closing of the plant would cause the layoff of 470 employees, the discontinuation of paper products necessary for office copying machines and some loss of profit to the Petitioner.

EPA employees interviewed citizens residing in the general vicinity of the plant. Even though some of the citizens complained of odors, all of them approved of the fact that Petitioner now has a control program, and therefore no objections were raised to the granting of the variance.

With the grant of the variance, the reason for denial of operating permit has now been removed. The Agency will give due regard to this opinion in considering Addressograph's new application for permit. The current permit appeal is therefore moot and is dismissed.

ORDER

It is the order of the Pollution Control Board that:

- A. Petitioner Addressograph-Multigraph Corporation, Multigraphics Division be granted variance from Rule 205(f) of the Air Pollution Control Regulations in the operation of its Mt. Prospect facility until January 10, 1975 for the purpose of bringing that facility into compliance through the installation and operation of incineration equipment.
- B. Petitioner shall make timely applications to the Agency for all necessary construction and operating permits.
- C. Petitioner shall by February 14, 1974 post a bond in the amount of \$25,000 in a form acceptable to the Environmental Protection Agency, such bond to be forfeited in the event Petitioner fails to install and operate the control equipment by February 3, 1975. The bond shall be mailed to: Fiscal Services Division, Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706.
- D. The permit appeal (PCB 73-290) is dismissed.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted this _____ day of _____, 1974 by a vote of _____ to _____.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted this 10th day of January, 1974 by a vote of 5 to 0.

Christan L. Moffett