

ILLINOIS POLLUTION CONTROL BOARD
February 14, 1975

JOSLYN MFG. and SUPPLY COMPANY,)
)
 Petitioner,)
)
 vs.)
)
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

PCB 74-427

OPINION AND ORDER OF THE BOARD (by Dr. Odell)

Joslyn Mfg. and Supply Company filed its Petition for Variance seeking relief from Rule 203(b) (particulates) of the Air Pollution Control Regulations for a period of one year pending installation of control equipment. The record shows that Petitioner's operation has never been in compliance; therefore, pursuant to Rule 203(c), the applicable Rule in this case is Rule 203(a).

Petitioner operates a zinc galvanizing facility in Franklin Park, Illinois. After the steel or iron which is to be galvanized has been degreased, pickled and rinsed it is fluxed in zinc ammonium chloride and then immersed in a bath of molten zinc. This plant operates on a three-shift, 6 days per week basis to produce 8400 lbs./hr. of galvanized metal. About 670 lbs./hr. of zinc are used in this operation.

Presently the plant is operating with one 4' x 8" x 52' galvanizing kettle. Emissions from this kettle are now vented directly to the atmosphere at the rate of 22.26 lbs./hr. The allowable rate under Rule 203(a) is 1.34 lbs./hr. Particulates emitted from the plant are composed of:

NH ₄ CL	68%	NH ₃	1%
ZnO	15.8%	Oil	1.4%
ZnCL ₂	3.6%	H ₂ O	2.5%
Zn	4.9%	C	2.8%

A second galvanizing kettle will be added during 1975. Emissions from the two kettles will be controlled by installing enclosures around the kettles and venting the fumes to a bag house. The project is currently in the engineering design phase. Current data indicate that the control equipment will cost about \$200,000 and, together with the second kettle, will take one year to complete.

Petitioner explains that part of this time is required to formulate procedures to insure satisfactory operation of the bag house. Since ammonium chloride fumes tend to absorb moisture, dry powdered lime will have to be injected into the gas stream at the bag house inlet. The bags will also have to be precoated with dry lime to facilitate periodic cleaning. Petitioner states that the process has been used successfully at other locations.

Petitioner claims that it could not come into immediate compliance without shutdown of the facility. Such closure would impose an arbitrary and unreasonable hardship on Petitioner, its employees and customers. Most employees would have difficulty in finding other employment. Petitioner states that the proposed control equipment could not be installed immediately regardless of cost. It is claimed that no harm would be imposed upon the public from the continued operation of the plant because ammonium chloride is a non-toxic dust and is not known to be harmful or injurious in any way. This facility is located in an industrial area with no residences nearby. The Agency has not received any complaints from area citizens about this facility.

The Agency believes the one year project completion schedule is reasonable and recommends granting this variance subject to certain conditions. The Board agrees that Petitioner appears to finally be on the road to achieving compliance.

Compliance with Rule 203(a) was required by December 31, 1973. Petitioner did not submit any evidence to justify this delay of almost one year before requesting the variance or seeking to achieve compliance. Because of this unexplained delay, the Board will not grant a variance for the full term sought by Petitioner. The Board grants Petitioner a variance until June 30, 1975.

ORDER

IT IS THE ORDER of the Pollution Control Board that Joslyn Manufacturing and Supply Company is granted variance from Rule 203(a) of the Air Pollution Control Regulations from November 14, 1974, to and including June 30, 1975, for the purpose of installing air pollution control equipment at its Franklin Park, Illinois facility. This variance is subject to the following conditions:

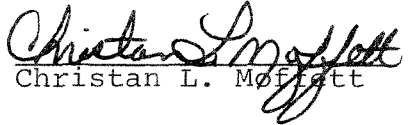
1. Petitioner shall obtain all necessary construction and operating permits from the Agency.

2. Petitioner shall submit monthly progress reports to the Agency. Said progress reports shall commence on March 15, 1975, and shall provide details of Petitioner's progress towards completion of the bag house installation program. The first progress report shall contain a schedule for installation of the bag house.

3. Petitioner shall, by March 31, 1975, post a bond in the amount of \$20,000 in a form acceptable to the Environmental Protection Agency, such bond to be forfeited in the event Petitioner fails to install and operate the bag house. Bond shall be mailed to: Fiscal Services Division, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706.

4. Petitioner shall not begin using the second galvanizing kettle until all control equipment is operational.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 14th day of February, 1975, by a vote of 4 to 0.


Christan L. Moffett