

Because of this setback, Petitioner could not carry through with the Compliance Plan and Project Completion Schedule it had submitted to the Agency. Petitioner notified the Agency and the Board of this development on August 14, 1973 and requested a variance from Rules 103(b)(2), 103(b)(6)(E), 104 and 205(f) of the Air Pollution Control Regulations.

In its Amended Petition filed September 1973, Petitioner stated that it had investigated several techniques for removing organic vapors. Three of the most promising techniques are carbon adsorption, condensation and incineration. Each of these methods would require increased energy from natural gas or #2 fuel oil, increased supplies of which are allegedly not available. Petitioner estimated that only 10 or 15% of the plant could operate without using the dryer which is involved. Closing down the dryer would, according to Petitioner, place an arbitrary and unreasonable hardship on Petitioner, its 40 employees, the local economy and dependent industries.

Petitioner stated that a variance would not affect the general public since the closest residence was more than 1/2 block from the plant, and wind conditions and the general nature of the atmosphere would not be conducive to the formation of photochemical smog. No formal complaints from citizens or governmental agencies concerning odors had been received by Petitioner.

EPA surveillance personnel have reported that no odor problem existed outside the plant. The Agency recommends granting the variance subject to certain conditions. Petitioner has agreed to comply with each condition called for in the Agency Recommendation.

Under the variance, Stauffer will be required to investigate the possibility of diverting some of the present natural gas allotment for the purpose of incinerating the organic vapors, and then recirculating the combustion gasses back through the tunnel dryer. It seems that Petitioner has possible alternative methods for achieving compliance. Petitioner has not told the Board exactly how it proposes to achieve compliance but makes this statement: "Based on statements from its fuel suppliers and from its knowledge of the proprietary processes involved, its dryer will be brought into compliance with Rule 205(f) by December 31, 1974".

We will allow a one year variance. A denial, we think could restrict plant operations and cause economic and personal loss far outweighing environmental damage which might result from the discharge of the vapors.

The variance means that Stauffer will be discharging about 17 lbs. per hour of organic vapors over that allowed by Regulation, a situation which will be corrected in 1974.

ORDER

It is the order of the Pollution Control Board that:

- 1) Stauffer Chemical Company is granted a variance until December 6, 1974 from Rules 103(b)(2), 103(b)(6)(E), 104 and 205(f) of the Air Pollution Control Regulations in order to operate its gas-fired, forced air dryer pending installation of control equipment or alteration of process sufficient to achieve compliance with the above cited Rules.
- 2) Stauffer Chemical Company shall explore the possibility of using existing natural gas allotments to incinerate the tunnel dryer organic vapor emissions and recirculating part of the combustion gasses back to the tunnel dryer.
- 3) Within 4 months of the date of this Order, Petitioner shall notify the Variance Section of the Agency of its new control program and Project Completion Schedule.
- 4) Petitioner shall submit quarterly progress reports to the Agency's Variance Section, 2200 Churchill Road, Springfield, Illinois 62706. Such reports shall commence one month after the date of this Order.
- 5) Petitioner shall apply for all necessary construction and operating permits.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted this 6th day of December 1973 by a vote of 4 to 0.

Christan L. Moffett