

ILLINOIS POLLUTION CONTROL BOARD
June 21, 1973

THE CELOTEX CORPORATION)
)
) #73-123
 v.)
)
 ENVIRONMENTAL PROTECTION AGENCY)

JOHN L. PARKER AND E. GERALD REYNOLDS, APPEARED ON BEHALF OF
THE CELOTEX CORPORATION
FREDERICK ENTIN, ASSISTANT ATTORNEY GENERAL, APPEARED ON BEHALF
OF ENVIRONMENTAL PROTECTION AGENCY

OPINION AND ORDER OF THE BOARD (BY SAMUEL T. LAWTON, JR.):

The Celotex Corporation has filed an amended petition for variance seeking relief from the provisions of Rule 3-3.111 of the Rules and Regulations Governing the Control of Air Pollution and from Chapter 2, Rule 203(a) of the Air Pollution Control Regulations to enable particulate emissions in excess of the above Rules from its asphalt saturator and filler dryer and heater, both located in its Wilmington plant, until March 21, 1974.

Hearing was held on the petition on May 23, 1973. The Agency has filed a recommendation based on the original petition in which it recommends allowance of the variance, but on a shorter time frame than proposed by petitioner. On the basis of the amended variance petition and the views expressed by Agency personnel at the hearing, it does not appear that the Agency has any serious differences with the petitioner relative to the variances proposed.

We grant the variances as requested in the petition until March 21, 1974.

The Celotex Corporation is a Division of the Jim Walter Corporation, a national producer of building materials. The Celotex Corporation manufactures roofing and other building material composed chiefly of asphalt-treated felt products. Wilmington has a population of 4,335 and is located approximately 16 miles south of Joliet, in Will County. The principal component parts of the Celotex plant (Petitioner's Ex. 4-6) consists of a felt mill and a roofing mill. In the felt mill, wood and paper are pulped and formed into sheet felt which becomes the base for the roofing products (R. 31). This, in turn, is fed to the roofing mill where it is saturated with hot liquid asphalt contained in a dip tank known as the asphalt saturator. The liquid asphalt flow rate to the saturator is approximately 16,500 pounds per hour (R. 32). The saturated felt is then either cooled or rolled for use as roofing felt or building paper or is coated with

stabilized asphalt and surfaced with granules and sand to make composition roofing. In the coating and surfacing operation, the sand used as a filler is simultaneously dried and heated in a rotary kiln. Dry sand exits the kiln at 25,000 pounds per hour. The dry sand is then sized in screening equipment and blended with asphalt, following which the mixture is applied to the asphalt saturated felt. The emission sources, which are the subject of this proceeding, are located within and adjacent to the roofing mill (R. 28-29), (Petitioner's Ex. 4). These emission sources are the three exhaust stacks from the asphalt saturator and the filler dryer and heater exhaust stack and related equipment. Air contaminants discharged from the asphalt saturator constitute particulate matter estimated at 45 pounds per hour, both solid and liquid, and small quantities of SO₂ and hydrocarbons, for which latter emissions no variance is sought.

The 45 pounds per hour estimated emission rate for particulates is based on similar asphalt saturating processes (R. 121-123). The air contaminants discharged from the filler dryer and heater constitute solid particulate matter and water vapor. The estimated particulate emission rate is 25 pounds per hour based primarily on screen analyses.

To control emissions from the asphalt saturator, petitioner proposes the installation of 40,000 CFM high energy air filtration system known as a HEAF unit. Exhaust gases from the three saturator stacks will be drawn through a perforated drum covered with a fiberglass mat, and then will pass through a York de-mister pad, which is a packed bed acting as a detainer for liquid droplets. It is estimated that this unit will remove between 90% and 95% of particulate emissions from the saturator (R. 126-134). The unit will cost approximately \$61,800 (R. 129). Particulate emissions from the filler dryer and heater and associated equipment will be controlled by the installation of an aerodyne series "SV" dust collector, through which emissions from the filler dryer and heater stack will be passed, and, in addition, a baghouse of approximately 4,000 CFM to handle emissions from the transfer points, bucket elevator and Rotex screen. Anticipated efficiency of the aerodyne would be 95%. The aerodyne unit, with fans, will cost in excess of \$4,000 and the baghouse approximately \$3,400. Baghouse removal efficiency is estimated at 99%.

Plans have been made with Commonwealth Edison Company for the necessary electrical power which will entail the installation of a new transformer. The proposed schedule for compliance is as follows:

<u>Item</u>	<u>Duration</u>	<u>Completion Date</u>
Equipment order		June 6, 1973
Equipment delivery including engineering design and construction permit applications	26 weeks	December 6, 1973
Equipment installation	6 weeks	January 17, 1974
Startup	1 week	January 24, 1974
Debugging and final stack test	4 weeks	February 21, 1974
Final stack test results	4 weeks	March 21, 1974

We believe an adequate showing of hardship has been made to justify the allowance of the variances proposed. A denial of variance does not necessitate shut-down of the plant. The Company presumably has the option to remain in violation and take its chances on the possible imposition of a penalty. This, however, does not present an alternative which the Board would favor. The record does support petitioner's contentions that suspension of operation or termination of the facilities involved would have a serious economic impact on the Company, its employees and its customers, causing disruption of the line of production relating to operations beyond those immediately involved in the present proceeding. Furthermore, the schedule for compliance is a relatively short one, considering the magnitude of the installation involved and the degree of compliance that will be achieved once the program is completed.

The record likewise supports the economic dependency of the Wilmington community on the continuing operation of the petitioner's facility. We believe the hardship on the Company, its employees and customers and the community, if the variance is denied, is far greater than any continuing burden on the surrounding area in allowing the present particulate emissions to continue until the abatement program is completed in March of 1974. While there was some evidence that petitioner's emissions produced a nuisance impact on portions of the community, the evidence was not extensive nor particularly persuasive, and we do not feel of a sufficient magnitude to justify a denial of the variances sought. The Agency has indicated that it does not oppose the variance allowance.

This opinion constitutes the findings of fact and conclusions of law of the Board.

IT IS THE ORDER of the Pollution Control Board that:

1. Variances from Rule 3-3.111 of the Rules and Regulations Governing the Control of Air Pollution and Rule 203(a) of the Air Pollution Control Regulations, are granted to The Celotex Corporation to enable the emission of particulates in excess of the foregoing Rules until March 21, 1974,

pending installation of abatement equipment as set forth in the amended petition of petitioner and specified in the foregoing Opinion, with respect to its asphalt saturator and filler dryer and heater facilities.

2. Petitioner shall file on or before July 6, 1973, in form satisfactory to the Agency, a performance bond in the amount of \$70,000, guaranteeing installation of all abatement equipment as specified in its petition and the record herein, by March 21, 1974. The bond shall be mailed to: Fiscal Services Division, Illinois Environmental Protection Agency, 2200 Churchill Drive, Springfield, Illinois 62706.

I, Christan Moffett, Clerk of the Pollution Control Board, certify that the above Opinion and Order was adopted on the 21st day of June, 1973, by a vote of 4 to 0.

Christan S. Moffett