

ILLINOIS POLLUTION CONTROL BOARD

January 17, 1974

LUDLOW CORPORATION, )  
 )  
 Petitioner, )  
 )  
 v. ) PCB 73-444  
 )  
 ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
 Respondent. )

John D. Donlevy, Attorney for Petitioner  
Lee A. Campbell, Assistant Attorney General for the EPA

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

Ludlow Corporation requests variance from Rule 205(f) of the Illinois Air Pollution Control Regulations until June 1, 1974, pending installation of replacement incinerators. Petitioner operates a plant in Chicago which manufactures pressure sensitized paper. During the manufacturing process hydrocarbons are released and subsequently are discharged to the atmosphere through two stacks. Hydrocarbon emissions are 36 lbs. per hour from one stack and 27 lbs. per hour from the other stack. Rule 205(f) limits petitioner to a total of 8 lbs./hour of hydrocarbon emissions after December 31, 1973.

In 1971 petitioner installed two fume incinerators at the facility after receiving assurance from the manufacturer that the units would achieve the 95 per cent hydrocarbon reduction required by the Chicago Environmental Control Board. However, the two incinerators functioned improperly and caused the emission of smoke from the stacks and the presence of oil fumes in the plant. Repeated attempts to solve the problems failed. Petitioner then retained Arthur D. Little and Company to recommend a solution.

After extensive investigation, petitioner elected to replace the existing incinerators with two new Air Preheater incinerators

at a cost of \$209,400. The Air Preheater Company has guaranteed 95 per cent removal of hydrocarbon emissions, which will reduce petitioner's emission to 1.8 lbs. per hour from the first stack and 1.35 lbs. per hour from the second stack. The total plant emission of 3.15 lbs./hr. will then be well within our standard.

Air Preheater estimated that it would take six months for fabrication, delivery and installation of the equipment and training of the Ludlow employees. The actual operating date will be near the end of May, 1974.

Petitioner stated that if it did not obtain a variance it might be forced to shut down its operation for three months. Cessation of operation for a three month period would constitute an unreasonable hardship. We question whether it would be necessary to completely close petitioner's operation if variance is denied, but we do agree with Ludlow that injury to the public will be minimal during this brief period of noncompliance.

EPA employees questioned petitioner's neighbors and found some indication that odors from the plant were bothersome at times. None of petitioner's neighbors opposed the variance. The Agency recommended granting the variance subject to certain conditions.

It is our opinion that Petitioner has made a good faith effort to control its emissions and has shown a need for the variance. Petitioner has already ordered two new incinerators which should reduce the hydrocarbon emissions to an acceptable level. We will grant this variance subject to those conditions recommended by the Agency.

#### ORDER

It is the order of the Board that Ludlow Corporation be granted a variance from Rule 205(f) of the Illinois Air Pollution Control Regulations until June 1, 1974 for the purpose of installing two Air Preheater incinerators at its Chicago manufacturing plant. This variance is subject to the following conditions:

A. Petitioner shall notify the Environmental Protection Agency upon completion of its control program.

B. Petitioner shall obtain all required permits from the Environmental Protection Agency.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above order was adopted on the 17<sup>th</sup> day of January, 1974 by a vote of 5-0.

  
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Christan L. Moffett, Clerk  
Illinois Pollution Control Board