

ILLINOIS POLLUTION CONTROL BOARD
October 27, 1982

ENGINEERED COATED PRODUCTS, INC.)
)
 Petitioner,)
)
 v. PCB 82-2
)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
)
 Respondent.)

MR. VILNIS GAGAINIS APPEARED ON BEHALF OF PETITIONER.

MR. PETER E. ORLINSKY APPEARED ON BEHALF OF RESPONDENT.

OPINION AND ORDER OF THE BOARD (by I. G. Goodman):

Engineered Coating Products, Inc. (ECP) petitioned for variance from Rule 205(n)(1)(C) of Chapter 2: Air Pollution of the Board Rules and Regulations on January 14, 1982. The petition was twice amended on March 2, 1982 and May 3, 1982. Hearing was waived by ECP on June 22, 1982. On July 1, 1982 the Board ordered this matter to hearing to expedite the review of the U.S. Environmental Protection Agency should the variance be granted and subsequently presented as an amendment to the State Implementation Plan. Hearing was held on August 16, 1982. No citizens were at the hearing and the Board has received no public comment. In its petition ECP requests an additional year to comply with the (2.9 lb/gal) 3.5 kg/l limitation of volatile organic materials, excluding water, delivered to the coating applicator, as contained in Rule 205(n)(1)(C), Paper Coating. Rule 205(j) of Chapter 2 requires ECP to comply no later than December 31, 1982.

ECP is located at 2800 Shermer Road, Northbrook, Illinois in an industrial park near Glenview Naval Air Station, with residential areas west and southeast of the facility. Employing approximately 22 persons, ECP operates one pressure sensitive coating line, which includes an oven with three uncontrolled exhaust stacks. ECP estimates that approximately 5,300,000 square yards of film, foils, paper, and miscellaneous custom materials are coated with 532,000 pounds of pressure sensitive adhesives. The higher performance sensitive adhesives, including double-faced tapes, aluminum foil tape and transfer films are primarily for use in automotive and major appliance product assembly. Twelve suppliers furnish as many as twenty-one different pressure sensitive adhesives, which average approximately 53% solvent and 47% solids, for an average weight of 7.3 lbs/gal. Based on these

figures, ECP estimates that it discharges 282,000 pounds of solvent or 141 tons of volatile organic compounds per year.

In efforts to comply with Rule 205(n)(1)(C), ECP has begun working with suppliers to reformulate the adhesives it uses. Initial attempts with water-based coatings failed because the existing production equipment rusted. ECP is still actively seeking water based and high solids coatings which are compatible with existing equipment or which will require limited equipment modification. ECP investigated using both solvent recovery systems and afterburners. Normally, the former would only involve activated charcoal and steam recovery. Since some of the adhesives used at ECP contain water soluble solvents, distillation would also be required. The cost of the energy required for steam production and distillation would be prohibitive. Afterburners also proved too expensive, the cost approximated to be the same as that invested on the coating and laminating equipment--approximately \$300,000.

ECP proposes to reduce the total volatile organic compounds it emits by reformulating some of the adhesives used to either high solids or water-based materials. All of the adhesives used will not be reformulated by late 1983, however ECP intends to gain sufficient reductions from those that are to enable the implementation of an alternative control strategy. ECP is presently working with nine suppliers to develop compliance adhesives. Its compliance program projects that half of the coatings used by December, 1983 will be either water-based or high solids adhesives, and additional conversions to reformulated adhesives will occur in 1984 and 1985.

The Illinois Environmental Protection Agency (Agency) surveyed the residential area surrounding ECP and found no complaints of odor or otherwise. ECP is, however, located in a non-attainment area for ozone and three violations of the 0.12 ppm standard have been recorded at the nearby Skokie monitor in 1980. The Board notes that the Arlington Heights monitor, also nearby, recorded one violation of the 0.12 ppm standard in 1981, and that the Skokie monitor in 1981, again, recorded three violations of that standard. The Agency believes that ECP's episode action plan is sufficient to safeguard against periods of high ozone concentrations. The Agency estimates that ECP is required to reduce its volatile organic compound emissions by 56,195 pounds per year in order to comply with Rule 205(n)(1)(C) and considers reformulation, and the twelve to eighteen months it will require, the most efficient means of achieving compliance.

Installation of thermal incineration or a recovery system is too costly to warrant ECP compliance with Rule 205(n)(1)(C) by December 31, 1982, when compared with the cost and energy savings a reformulation program would provide. ECP has diligently pursued developing such a program and indicates that sufficient compliance coatings will be available no later than a year after December 31, 1982 as required by Rule 205(j).

The potential environmental harm during the single ozone season between December, 1982 and 1983 is minimized by the episode action plan.

Furthermore, compliance by means of coating reformulation warrants additional time in this situation. Although ECP anticipates it will provide sufficient emission reductions for compliance with Rule 205(n)(1)(C) in 1983, the progress achieved should provide for development and use of even more water-based and high solids coatings. The Board finds that installation of conventional capture equipment would impose an arbitrary and unreasonable hardship for ECP, and therefore grants variance from Rule 205(n)(1)(C) so that ECP may pursue and convert to the use of water-based and high solids adhesive coatings no later than April 1, 1984.

This Opinion constitutes the findings of facts and conclusions of law of the Board in this matter.

ORDER

Engineered Coated Products, Inc. is hereby granted variance from Rule 205(n)(1)(C) of Board Rules and Regulations Chapter 2: Air Pollution for its facility at Northbrook, Illinois until April 1, 1984 subject to the following conditions:

1. Within 28 days of this Order, and every three months thereafter, Engineered Coated Products, Inc. shall submit written reports to the Illinois Environmental Protection Agency detailing all progress made in achieving compliance with Rule 205(n)(1)(C) of Chapter 2. Said reports shall include information on the quantity and VOC content of all coatings utilized during the reporting period, a description of the status of the reformulation program, and any other information which may be requested by the Illinois Environmental Protection Agency.
2. At least 180 days before the expiration date of this variance, Engineered Coated Products, Inc. shall file a permit application with the Agency which details a plan to, and proof that the plan will achieve compliance with Rule 205(n)(1)(C) of Chapter 2 by December 31, 1983.
3. Within forty-five days of the date of this Order, Engineered Coated Products, Inc. shall execute and forward to the Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706, a Certificate of Acceptance and Agreement to be bound to all terms and conditions of this variance. This forty-five day period shall be held in abeyance for any period this matter is being appealed. The form of the certificate shall be as follows:

CERTIFICATE

I, (We), _____, having read the Order of the Illinois Pollution Control Board in PCB 82-2, dated _____, understand and accept the said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

By: Authorized Agent

Title

Date

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 27th day of October, 1982 by a vote of 5-0.



Christan L. Moffett, Clerk
Illinois Pollution Control Board