

ILLINOIS POLLUTION CONTROL BOARD  
December 5, 1986

PETITION FOR SITE-SPECIFIC )  
VOLATILE ORGANIC MATERIAL )  
EMISSION LIMITATIONS FOR ) R85-28  
NATIONAL CAN CORPORATION )

Proposed Rule. Second Notice.

OPINION AND ORDER OF THE BOARD (by J. Theodore Meyer):

This matter comes before the Board on a November 8, 1985 petition for site-specific relief filed by National Can Corporation (National). National requests site-specific relief from 35 Ill. Adm. Code 215.204(b)(3) which provides that interior can body spray coating materials contain no more than 4.2 lbs of volatile organic material (VOM) per gallon. National seeks to increase this limitation to 5.8 lbs of VOM per gallon for the interior can body spray coating materials used at its Rockford plant. This increase would be accomplished by amending 35 Ill. Adm. Code 215.206 "Exemptions from Emission Limitations" to add a new subsection (c) applicable to the Rockford plant.

Hearing in this matter was held on February 4, 1986. Briefs were filed by National and the Illinois Environmental Protection Agency (Agency) on March 25 and 26, 1986, respectively. National submitted a reply brief on March 31, 1986. The Department of Energy and Natural Resources issued a negative declaration on June 9, 1986 and the Economic Technical Advisory Committee concurred with this finding at its June 20, 1986 meeting.

First notice was proposed on September 25, 1986 and published at 10 Ill. Reg. 17959, October 17, 1986. Two comments were received by the Board during the first notice comment period.

One comment was received from the Secretary of State concerning incorrect labelling of the subsections in proposed Section 215.206. These corrections have been made at second notice. Additionally, a comment was received from the Agency in response to a Board request at first notice that the purpose and effect of subsection (c)(2) be clarified. The Agency has indicated that National must demonstrate compliance under Section 215.207 using the applicable limitation contained in Section 215.204 (4.2 lbs/gal), in addition to complying with the limitation in subsection (c)(1) of 5.8 lbs/gal. The Board has proposed substitute language in subsection (c)(2) to clarify the intent of that provision.

The details of this proposal were extensively treated in the Board's first notice opinion and order in this matter of September 25, 1986 and will not be repeated here. At issue, essentially, is National's manufacture of three-piece steel beer cans which must be coated with an "interior body spray" to insure that no adverse reactions take place between the cans and their contents. VOMs are emitted during the coating process. Because National has the only three-piece steel beer can plant in the nation and because flavor preservation is so critical, National has been unable to secure an acceptable compliant coating. It was estimated that the cost of control technology would be approximately \$6500 per ton of VOM controlled. The facility is located in an area which has been classified by USEPA as "cannot be classified or better than national standards" for ozone. The Board found at first notice that no measurable environmental benefit would accrue by requiring the addition of control technology since National demonstrated that its excess VOM emissions amount to no more than thirteen pounds per day over less than forty-five days per year.

Thus, the Board concluded that while compliance with 35 Ill. Adm. Code 215.204(b)(3) was technically feasible it was not economically reasonable in light of the minimal environmental impact. Accordingly, with the substitution of language in subsection (c)(2) and labelling changes, the Board hereby proposes National's amendment to 35 Ill. Adm. Code 215.206 for second notice.

ORDER

The Board directs that second notice of the following proposed amendment be submitted to the Joint Committee on Administrative Rules:

Title 35: ENVIRONMENTAL PROTECTION  
SUBTITLE B: AIR POLLUTION  
CHAPTER I: POLLUTION CONTROL BOARD  
SUBCHAPTER c: EMISSION STANDARDS AND  
LIMITATIONS FOR STATIONARY SOURCES

PART 215  
ORGANIC MATERIAL EMISSION STANDARDS  
AND LIMITATIONS

SUBPART F: COATING OPERATIONS

Section 215.206 Exemptions from Emissions Limitations

The limitations of this Subpart shall not apply to:

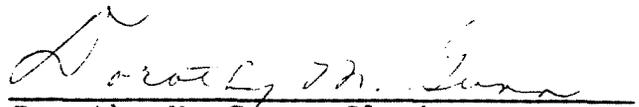
- a) Coating plants whose emissions of volatile organic material as limited by the operating permit will not

exceed 22.7 Mg/year (25 T/year), in the absence of air pollution control equipment; or

- b) Sources used exclusively for chemical or physical analysis or determination of product quality and commercial acceptance provided that:
- 1) The operation of the source is not an integral part of the production process;
  - 2) The emissions from the source do not exceed 363 kg (800 lbs) in any calendar month; and,
  - 3) The exemption is approved in writing by the Agency.
- c) Interior body spray coating material for three-piece steel cans used by National Can Corporation at its Rockford can manufacturing plant in Loves Park, Illinois, provided that:
- 1) The emission of volatile organic material from the interior body spray coating line shall not exceed 0.70 kg/l (5.8 lb/gal) of coating material, excluding water, delivered to the coating applicator; and
  - 2) The emission of volatile organic material shall comply with the provisions of Section 215.204 by use of the internal offset provisions of Section 215.207 computed on a weekly weighted average basis.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 5<sup>th</sup> day of December, 1986, by a vote of 6-0.

  
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Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board