

ILLINOIS POLLUTION CONTROL BOARD
October 18, 1979

IN THE MATTER OF:)
)
EMISSIONS OF VOLATILE) R78-3,4
ORGANIC MATERIAL)

SUPPLEMENTARY OPINION AND ORDER OF THE BOARD

(by Mr. Dumelle):

On July 12, 1979 the Board retained jurisdiction in this proceeding in case changes were needed to secure approval of the Illinois Implementation Plan or to clarify the Board's intent in the Opinion adopted on August 23, 1979.

On August 1, 1979 Dow Chemical Company (Dow) asked the Board to reconsider its decision not to exempt 1,1,1-trichloroethane (methyl chloroform) or methylene chloride from the definition of volatile organic material. Dow asked for an additional hearing to discuss this issue. The Board's decision is discussed at length on pages 11-13 of the Opinion. The Board sees no reason to reopen the record on this issue.

On August 7, 1979 the Agency asked the Board to include the definition of open top vapor degreasing contained on page 28 of the Board's Proposed Order adopted on March 29, 1979. The omission of this definition was inadvertent, and it shall be inserted in Rule 201.

On October 2, 1979 the Agency asked the Board to reconsider and clarify the explanation of Rule 205(n)(2)(A) on pages 21 and 22 of the Opinion.

Rule 205(n)(2)(A) provides for compliance with the applicable emission limitations through the use of afterburners. This rule requires that at least 75% of the VOC emissions from a coating line be captured and oxidized by an afterburner that is at least 90% efficient in oxidizing VOC, measured as total combustible carbon, to carbon dioxide and water. It is necessary to require an overall level of control, as well as an afterburner efficiency requirement to ensure that emissions are captured and controlled. "[I]f there is no capture requirement, then setting a requirement for oxidation in the afterburner may be meaningless because there would be no assurance that emissions would ever reach the afterburner to be oxidized." (Public Comment 74) By requiring an overall efficiency of 75% in the control system, a source is allowed flexibility to capture a greater or lesser amount of VOC emissions depending on the efficiency of the afterburner. For example, if source A's afterburner is 90% efficient, 84%

of that source's emissions will need to be captured to achieve an overall 75% reduction; but if source B's afterburner is 99% efficient, source B will only need to capture 76% of the VOC emissions. The Board believes that these capture efficiencies will be achievable by the compliance date because at least one plant is already capturing 73% (Ex.17).

The Board hereby adopts its Opinion dated August 23, 1979 and this Supplementary Opinion as its Opinion in this proceeding.

ORDER


1. Dow Chemical Company's motion for reconsideration or additional hearings is hereby denied.
2. The Agency's motion to reconsider and clarify the Board's Opinion is hereby granted.
3. The following definition is hereby added to Rule 201 of Chapter 2: Air Pollution:

Open Top Vapor Degreasing: The batch process of cleaning and removing soils from surfaces by condensing hot solvent vapor on the colder metal parts.

4. The Board's decision to retain jurisdiction in this proceeding is hereby vacated.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Supplementary Opinion and Order were adopted on the 18th day of October, 1979 by a vote of 4-0.



Christan L. Moffett, Clerk
Illinois Pollution Control Board