

ILLINOIS POLLUTION CONTROL BOARD

June 6, 1974

ENVIRONMENTAL PROTECTION AGENCY,)	
)	
Complainant,)	
)	
vs.)	PCB 72-285
)	
ILLINI BEEF PACKERS INCORPORATED,)	
)	
Respondent.)	

Larry R. Eaton, Assistant Attorney General for the EPA
 William R. Carney, Attorney for Respondent

OPINION AND ORDER OF THE BOARD (by Mr. Henss):

On December 13, 1973 this Board ordered Illini Beef Packers Incorporated to investigate its Joslin operation to determine whether methods of operation, or maintenance practices might be causing periodic odorous emissions, and to report to the EPA and this Board. If such emissions were found Illini Beef was to propose a program to correct the problem. Illini Beef was further ordered to implement a program to handle odor complaints from nearby residents.

Illini Beef has complied with all parts of the December 1973 Order and the Agency has submitted its comments on the company's proposed control program.

With respect to the inedible rendering system, Illini Beef reports that its air scrubber and afterburner are installed and operating under Agency permit. Both devices are operating successfully.

In addition, Illini Beef proposes to close most of the doors which lead to the rendering process area. The 30,000 CFM air movement of the scrubber creates a negative pressure in the inedible rendering process portion of the building and therefore, it is necessary for the west door to be partially open. This will allow the scrubber to operate at designed efficiency and keep the inside temperature at a reasonable level for operator comfort. All other doors are to remain closed during operating hours and all doors including the west door will be closed during nonoperating hours.

All exhaust openings which were originally designed into the inedible rendering process area have been sealed. This will insure that all air from the rendering area will pass through the scrubber prior to being released to the atmosphere. Daily checks are to be made on the scrubber and the afterburner. Routine maintenance will be performed during the daily checks. Necessary repair parts will be stocked in case of mechanical failure.

Employees working in the inedible rendering area have been taught the proper operation of all equipment including the control devices. They have been instructed to be aware of seemingly minor items which could cause an odor problem. Illini Beef's "early detection crew" consists of 24 hour security personnel, 24 hour shift operators, the waste treatment operator, all management and supervisory personnel and all persons working in the inedible rendering process area. This would appear to provide adequate coverage and we shall not require further action in this respect.

All areas including the inedible processing areas are to be thoroughly cleaned on a regular basis under the scrutiny of the USDA. This includes a complete wash down of cattle holding pens each day.

The Agency requests that the local, district or regional office of the Agency be notified immediately upon discovery of any malfunction in the pollution control devices or unusual operating conditions related to the processing plant or the wastewater treatment system. Illini Beef states that it has no objection to such a requirement and it shall be ordered.

With respect to the waste treatment system, Illini Beef reports that it has a full-time waste treatment system operator with proper industrial license issued by the EPA. As part of his duties the operator makes daily maintenance checks of all system equipment, checks for any noticeable odors and checks the natural cover on two anaerobic cells. No odors have been noticed around the waste treatment system since the cover formed over these cells.

Several precast concrete covers have been delivered and are scheduled to be placed over the concrete structures between the anaerobic cells and the aerated cell. These concrete covers should reduce the chance that odors might come from the lagoon area. The Agency requests that the covers be caulked into position and all sample ports covered. Illini Beef did not object to this request and it shall be ordered.

The only major area of disagreement between Illini Beef and the Agency concerns the method by which the Company proposes to

handle citizen complaints. On December 23, 1973 Illini Beef issued a notice to personnel as to the procedure to be followed when an odor complaint is received. The procedure, if followed, should constitute compliance with Part B of our prior Order.

However, the Agency requests that the initial phase of the complaint program include a notification by direct mail to all residents within a five mile radius of the facility of the plant telephone number and its "intended use". The Agency wants this direct mailing to be supplemented by advertisements in a local newspaper or announcements on the radio of the existence of the complaint program. Illini Beef protests that such notification would place them in a position of "advertising for complaints" which they consider a "totally extreme position by the EPA". Illini Beef points out that the designated telephone number will be the plant's primary number which is listed in the area telephone book, easily accessible to any of the area residents. It is the Board's opinion that Illini Beef has provided a reasonable telephone program in compliance with our Order and that the measure proposed by the Agency is above and beyond that required to resolve the problem. This Order shall be the final order of the current proceeding.

This Opinion constitutes the Board's findings of fact and conclusions of law.

ORDER

It is the Order of the Pollution Control Board that the proposed odor control program submitted by Illini Beef Packers Incorporated is hereby accepted as proposed with the following modifications:

1. All doors in the inedible rendering process area except the "west door" shall be kept closed. The "west door" may be opened but only to the extent necessary to maintain the designed efficiency of the scrubber and to provide operator comfort.
2. In the event Illini Beef experiences any malfunctions in the pollution control devices or unusual operating conditions which could lead to the emission of odors, Illini Beef shall immediately notify the Environmental Protection Agency's Regional Office in Rockford, Illinois (telephone 815/987-7576). If such malfunction or unusual operating condition occurs during other than normal business hours, the regional office shall be notified as soon as possible on the next regular business day.

3. All concrete covers placed over the structures between the anaerobic cells and the aerated cells shall be caulked into place and all sample ports shall be covered.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order was adopted this 6th day of June, 1974 by a vote of 4 to 0.

Christan L. Moffett