

ILLINOIS POLLUTION CONTROL BOARD

March 26, 1975

ADDRESSOGRAPH-MULTIGRAPH CORP.,)
Petitioner,)
)
v.) PCB 75-9
)
ENVIRONMENTAL PROTECTION AGENCY,)
Respondent.)

Mr. Richard J. Kissel, attorney for Petitioner.
Mr. Peter E. Orlinsky, attorney for the Environmental Protection Agency.

OPINION AND ORDER OF THE BOARD (by Dr. Odell)

On January 7, 1975, the Addressograph-Multigraph Corporation filed with the Illinois Pollution Control Board (Board) a Petition for Extension of Variance from Rule 205(f) of the Air Pollution Regulations (Chapter 2) from January 10, 1975, through May 31, 1975. This is a request to extend the date of compliance previously granted by the Board to Petitioner in the consolidated cases PCB 73-290 and PCB 73-449; 10 PCB 617 (January 10, 1974). In the consolidated PCB 73-290 and PCB 73-449 cases the Board's Order specified that:

- A. Petitioner Addressograph-Multigraph Corporation, Multigraphics Division be granted variance from Rule 205(f) of the Air Pollution Control Regulations in the operation of its Mt. Prospect facility until January 10, 1975, for the purpose of bringing that facility into compliance through the installation and operation of incineration equipment.
- B. Petitioner shall make timely applications to the Agency for all necessary construction and operating permits.
- C. Petitioner shall by February 14, 1974, post a bond in the amount of \$25,000 in a form acceptable to the Environmental Protection Agency, such bond to be forfeited in the event Petitioner fails to install and operate the control equipment by February 3, 1975. The bond shall be mailed to: Fiscal Services Division, Illinois EPA, 2200 Churchnill Road, Springfield, Illinois 62706.
- D. The permit appeal (PCB 73-290) is dismissed.

During the term of the Variance granted in PCB 73-449, Petitioner was to install an incineration system to control emissions of photochemically reactive solvents from its five drying ovens.

This Petition involves a solvent coating facility, located at 1800 West Central Road, Mount Prospect, Illinois, which consists of five solvent coating drying ovens and related equipment utilized in the manufacture of photosensitized papers and toners for use in copy machines manufactured by Petitioner at that location.

Petitioner has complied with Orders B and C in PCB 73-449. Petitioner alleges that it has worked diligently to meet the compliance date of January 10, 1975, in Order A of PCB 73-449, but circumstances beyond Petitioner's control have prevented Petitioner from meeting this completion date. An affidavit (Exhibit E) of Mr. George Soderling, project engineer for installation of the pollution control equipment, detailed the progress and the difficulties which Petitioner experienced and the anticipated completion date for each of the incinerators at the Petitioner's plant, as summarized below:

- February 1974 - Detailed specifications prepared and sent to five vendors of control equipment.
- April 1, 1974 - Contract for design, construction, and installation of equipment entered into with Granco Equipment, Grand Rapids, Michigan.
- July 1974 - On-site work started, including footings and foundations.
- August 1974 - Structural steel installed, ready for installation of incinerators.
- Letters of October 22 and November 6, 1974, from Granco Equipment indicate the delay they experienced in delivery of certain components (motors, bearings, and foam silica block) which would delay completion of the five incineration units.
- On January 6, 1975, Granco Equipment had received all of the materials necessary for this project and they estimated that all five incineration units would be operational by April 30, 1975. Mr. Soderling stated that one additional month, to May 31, 1975, would be needed to debug the units for efficient operation.

Petitioner alleges that arbitrary or unreasonable hardship would result if a variance beyond January 10, 1975, is not granted. The control equipment could not be procured and installed by that date. Discontinuance of the solvent coating operations at Mount Prospect would make it impossible to supply electrofax paper products for office copy machines and duplicators, most of which are on rental programs. There is no alternative source of paper available to Petitioner or its customers for approximately 2,500 new M-500 machines in the hands of 900 customers.

A Recommendation from the Environmental Protection Agency (Agency) was received by the Board on February 24, 1975. When an Agency engineer visited Petitioner's facility on January 22, 1975, all five incineration units were in the process of being installed.

The Agency engineer determined that the control equipment should be completely installed and operational by May 31, 1975.

A survey conducted by the Agency on November 21, 1974, of residents near Petitioner's facility indicated that the neighbors were pleased with progress being made by Petitioner in abating its organic emissions. No one voiced any complaints to the Agency.

Since Petitioner is making satisfactory progress toward compliance, and since the delays were not Petitioner's fault, the Agency recommends that this variance be granted, subject to certain conditions.

The Board concurs in this recommendation and will grant Petitioner a variance from Rule 205(f) of Chapter Two from January 10, 1975, through May 31, 1975.

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

ORDER

IT IS THE ORDER of the Pollution Control Board that:

Petitioner, Addressograph-Multigraph Corporation, is hereby granted a Variance from Rule 205(f) of the Air Pollution Regulations from January 10, 1975, through May 31, 1975, to complete the installation of five incineration units at its Mount Prospect plant. This Variance is granted subject to the following conditions:

1. Petitioner shall maintain its performance bond in full force and effect.
2. Within 28 days of the adoption of this Order, and on or before the 10th day of each month thereafter, Petitioner shall submit written reports to the Agency detailing all progress made toward achieving compliance with Rule 205(f) of the Air Pollution Regulations. Said reports shall be submitted to:

Environmental Protection Agency
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706

3. On or before May 31, 1975, Petitioner shall have stack tests performed by an independent testing company. The Agency shall be notified in writing at least 14 days prior to the testing, and shall be given the opportunity to witness all tests and to review the test results. Notification shall be made to:

Environmental Protection Agency
Illinois Naval Armory
East Randolph Street at the Lake
Chicago, Illinois 60602

4. Within 35 days of the adoption of this Order, Petitioner shall execute and forward to the Agency Control Program Coordinator and to the Board a Certification of Acceptance and agreement to be bound to all terms and conditions of the variance. The form of said Certification shall be as follows:

CERTIFICATION

I (We), _____ having read and fully understanding the Order of the Illinois Pollution Control Board in PCB 75-9 hereby accept said Order and agree to be bound by all of the terms and conditions thereof.

Signed by: _____
Title: _____
Date: _____

5. Within 7 days of the completion of the control program, Petitioner shall apply to the Agency for all necessary operating permits.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 26th day of March, 1975, by a vote of 4 to 0.

Christan L. Moffett (gn)
Christan L. Moffett