

ILLINOIS POLLUTION CONTROL BOARD
February 14, 1974

KOPPERS COMPANY, INC.,)
)
 Petitioner,)
)
 vs.)
) PCB 73-494
ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

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

On November 19, 1973, Koppers Company, Inc. filed its Petition seeking therein a variance from Rule 205(f) of the Air Pollution Control Regulations.

Petitioner has a manufacturing facility located at Stickney, County of Cook, Illinois, for the production of phthalic anhydride and tar products. Petitioner's plant employs 150 persons with an annual payroll of \$1,700,000 and has been manufacturing at this location since 1920. The environmental control systems installed at Petitioner's facility represent a capital investment in excess of \$1,500,000 and have an annual operating cost of approximately \$500,000.

The tar saturation plant has an annual production of approximately 15,000,000 lbs. of tarred felt. Tarred felt is a basic component in residential and commercial roofing. Petitioner is a major supplier of roofing materials to the building industry.

Petitioner is seeking a 14-month Variance from Rule 205(f) of the Air Pollution Control Regulations during which time it plans to install control equipment necessary to achieve compliance.

Emissions from Petitioner's facility consist of heavy hydrocarbons which are in part photochemically reactive, but probably contain less than 5% non-condensables. Stack tests conducted at the facility indicate that total emissions are approximately 21 lbs/hr as compared to an allowable limit of 8 lbs/hr (Rule 205(f)).

Petitioner proposes to install a Johns-Manville High Energy Air Filter System (HEAF) to control the emissions. In terms of costs and operating reliability, this control

method appears to be superior. This choice is further reinforced by the fact that this system is operating satisfactorily on similar processes at several locations in Illinois.

Briefly, the equipment consists of a high static pressure fan, a heavy fiberglass mat, and a mist separator. The mat is movable so that a fresh surface is constantly being exposed. As the hydrocarbon particles collect on the mat, they impinge upon each other to form larger droplets, which are disengaged from the mat by the high velocity of the air stream. These droplets are then removed from the air stream in the low velocity mist separator, and collected and drained off as a liquid.

Petitioner estimates that the cost to install the HEAF will be approximately \$85,000 and that annual operating costs will be approximately \$12,000. Petitioner alleges that it will require 14 months to install the equipment.

The Agency agrees with Petitioner that the proposed control program will be adequate to bring the facility into compliance with Rule 205(f). The Agency does question, however, the 14-month time period proposed by Petitioner. U. S. Environmental Protection Agency technical guidelines for review of compliance programs indicate that 42 weeks is a reasonable period for the installation of a HEAF. Barring unforeseen delays, the Agency believes that Petitioner should be able to have its HEAF functional within one year.

Petitioner indicates that its reason for non-compliance with Rule 205(f) is based upon unawareness of the quantity of its emissions. Initial tests conducted by Petitioner in 1972 indicated that emissions were on the borderline between compliance and non-compliance. Since the test results were not conclusive, Petitioner conducted additional tests in early 1973, at which time it determined that its emissions were in excess of Rule 205(f). Following the determination of non-compliance, Petitioner hired a consultant, conducted studies of various possible control programs, and submitted its Petition for Variance.

We are disposed to grant the variance sought for one year and subject to certain conditions. We feel that Petitioner may well have been misled by the initial stack test mentioned above and that Petitioner is now committed to an abatement plan which will achieve compliance.

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

IT IS THE ORDER of the Pollution Control Board that Koppers Company, Inc. be granted a variance from the provisions of Rule 205(f) for a period of one year from the date of this Order, subject to the following conditions:

1. Commencing thirty (30) days from the date of this Order and continuing quarterly thereafter, Petitioner shall submit progress reports to:

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

Said reports shall detail Petitioner's progress toward achieving compliance.

2. Petitioner shall apply for all necessary construction and operating permits from the Agency.

3. Within fifty (50) days of the date of this Order, Petitioner shall post a Performance Bond in a form acceptable to the Agency and in the amount of \$50,000.00. Said bond shall be posted with:

Illinois Environmental Protection Agency
Fiscal Services
2200 Churchill Road
Springfield, Illinois 62706

Said bond shall be designed to insure installation of the subject control equipment.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 14th day of February, 1974 by a vote of 5-0.

