

ILLINOIS POLLUTION CONTROL BOARD  
September 5, 1974

SCHWINN BICYCLE COMPANY, )  
 )  
 Petitioner, )  
 )  
 vs. ) PCB 74-218  
 )  
 ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
 Respondent. )

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

On June 11, 1974, Schwinn Bicycle Company filed its Petition For Variance, seeking therein variance from the provisions of Rule 205(f) of the Board's Air Pollution Regulations for a period of one year.

Petitioner operates four plants in Chicago for the manufacture of bicycles and wheeled toys. Petitioner employs approximately 2,200 persons. In Petitioner's Plant #4, located at 4444 West Ohio, bicycle frames are welded and polished, and a primer coating is applied. In Plant #1, at 1718 North Kildare, the bicycles are assembled. This operation includes polishing, plating and painting the frames and associated parts.

Petitioner employed various consulting firms to determine Petitioner's compliance with Illinois air pollution regulations. This data was subsequently utilized in filing for Petitioner's operating permit applications. The study revealed that certain emission sources, specifically three assembly line painting processes using solvent base paints, were each discharging more than 8 pounds per hour of organic material into the atmosphere. Such emissions would be in violation of Rule 205(f).

In December 1972, Petitioner filed operating permit applications for these emission sources specifying compliance through change to solvents which are exempt under Rule 205(f). Petitioner made the change to exempt solvents and the operating permits were granted in 1973.

Petitioner has received Operating Permits for its paint line (November 29, 1973) and primer line (July 20, 1973) at Plant #1 and for its primer line (February 21, 1974) at Plant #4.

In Petitioner's Plant #4, the bicycle frames are assembled. Then the unpainted frame is sent through the primer line. In the primer line, the frames are cleaned with water, phosphates, and chromic acid to prepare the steel for painting and to add a light corrosion-resistant finish. These clean frames are then dipped into a primer tank before passing through a 365°F baking oven. The last two devices are the sources of emissions from Plant #4 with which this Petitioner is concerned.

Petitioner asserts that the emission of photochemically reactive hydrocarbons from this source is 18.13 lb/hr.

In Petitioner's Plant #1, there are two sources of emissions: the primer paint line for bicycle front forks and the color paint line for the frames. The primer paint line operates in a manner similar to the line in Plant #4. On Petitioner's color paint line, the frames are passed through a Ransberg aluminum spray booth, a drying tunnel, and a drying oven before going through three color spray booths and a baking oven. Petitioner asserts that the emissions of photochemically reactive hydrocarbons from the primer line are 4.46 lb/hr and from the paint line are 95.60 lb/hr.

Petitioner states that a variance is necessary due to major shortages of exempt solvents in the market. Petitioner alleges that it has been unable to procure from its suppliers at any price sufficient exempt solvents to achieve continued compliance. Petitioner has supplied exhibits and an affidavit in support of its alleged inability to obtain sufficient quantities of exempt solvents.

Petitioner asserts that the marketability of wheeled toys and bicycles is substantially influenced by the cosmetic appeal of glossy finishes provided by solvent based paints and that changes in basic painting methods to either water base paints or powder coatings are not feasible as the existing system is incompatible with these processes and any changeover would necessitate a prolonged shutdown of these facilities.

Petitioner's Plant #4 is located in an industrial area. A school is one-half mile north, the nearest residences are one-third mile east, and a hospital is one mile southeast. There have been no citizen complaints, and there have been no objections to the granting of a variance to Petitioner's Plant #4.

Petitioner's Plant #1 is located in an industrial area. The nearest residence is 500 feet to the south of the source. There have been citizen complaints and there have been no objections to the granting of a variance to Petitioner's Plant #1.

The Agency believes that the hardship to Petitioner, its employees, and its dealers outweighs any additional damage which might be caused to the environment by the granting of this variance.

Variance will be granted; however, the period of variance shall be for a shorter period than the year requested, and subject to certain conditions.

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

IT IS THE ORDER of the Pollution Control Board that Schwinn Bicycle Company be granted a variance for the subject facilities from the provisions of Rule 205(f) of the Illinois Air Pollution Regulations until March 31, 1975, subject to the following conditions:

a. Petitioner shall utilize as much exempt solvent formulations as can be furnished by suppliers.

b. Petitioner shall submit monthly reports to:

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

The monthly reports shall include the total amount of solvents used, the nature and amount of non-exempt solvents used, the nature and amount of exempt solvents used, and amount and nature of exempt solvents purchased (indicating the supplier), the amount and nature of non-exempt solvents purchased (indicating the supplier), and the amount and nature of solvents in inventory at the beginning of each month.

c. Within five months of the date of this Order, Petitioner shall submit to the Agency a modified compliance plan to replace that which has been nullified by shortages. This plan may:

- i. Achieve compliance at the expiration of the Variance by replacement of photochemically reactive solvents with non-reactive solvents demonstrated to be readily available; or
- ii. Achieve compliance at the expiration of the Variance by qualification under the Alternative Standard Rule 205(f)(1); or
- iii. Achieve compliance by May 30, 1975, under the provisions of Rule 205(f)(2)(D).

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 5<sup>th</sup> day of September 1974 by a vote of 4-0.

*Christan L. Moffett*