

ILLINOIS POLLUTION CONTROL BOARD

January 3, 1975

UNIROYAL, INC., )  
Petitioner, )  
 )  
v. ) PCB 74-371  
 )  
ENVIRONMENTAL PROTECTION AGENCY, )  
Respondent. )

Opinion and Order of the Board (by Dr. Odell)

On October 15, 1974, Uniroyal, Inc. sought a variance from Rule 205(f) of the Air Pollution Regulations (Chapter Two) until May 31, 1975.

Petitioner had previously filed a Petition for Variance from Rule 205(f) on June 14, 1974. The Pollution Control Board (Board) granted a variance in that case until March 31, 1975, subject to a number of conditions. See Uniroyal, Inc. v. Environmental Protection Agency, PCB 74-222 (September 12, 1974). Petitioner now requests that the earlier variance be withdrawn and that the instant petition be substituted in its place.

Petitioner's Chicago plant at 2638 North Pulaski Road is one of a number of plants in Uniroyal's Plastic Products Division. The principal business activity at the Chicago plant is the fabrication of plastic items, principally for use as interior components of automobiles. This petition pertains to a final processing step wherein the fabricated item is spray-coated with a selected pigment that is applied in a solution consisting of various organic solvents. Spray coating is carried out in two separate spray-coating lines, Spray-Coating Lines Nos. 1 and 2. The step of spray coating is carried out in a spray booth, following which the sprayed item is oven-dried and then cooled in an air-cooled tunnel. All of these steps result in the vaporization of organic solvents to some degree.

Petitioner states that it uses 205 lbs/hr of spray-coating materials on Line No. 1 and 500 lbs/hr on Line No. 2. Hydrocarbon emissions are presently uncontrolled. In February, 1973, stack samplings were taken on Spray-Coating Lines Nos. 1 and 2. Total hydrocarbon emission rates (methane basis) were

measured using the flame ionization technique. The following emission rates were obtained:

Spray-Coating Line No. 1

	<u>Total hydrocarbon</u> lbs/hr
Spray booth	130.23
Oven	13.99
	<u>144.22</u>

Spray-Coating Line No. 2

	<u>Total hydrocarbon</u> lbs/hr
Spray booth A	90.10
Spray booth B	76.86
Oven	1.89
Cooling tunnel	6.46
	<u>175.31</u>

The allowable emissions per source are 8 lbs/hr of hydrocarbons under Rule 205(f) of Chapter Two.

Petitioner's present time schedule to achieve compliance with Rule 205(f) is as follows:

May 14, 1974 - Petitioner's management committed funds sufficient to insure compliance with Rule 205(f).

September 9, 1974 - Request made to Peoples Gas, Light and Coke Company for an initial fuel allocation of natural gas (3600 CFH) for catalytic incinerator to be used on Spray Booth A on Line No. 1 and Spray Booth B on Line No. 2.

September 11, 1974 - Final decision that full implementation of a water-based spray top coating system is not commercially feasible at this time and that an alternate form of control will therefore be required.

September 23, 1974 - Begin preliminary engineering and design for alternate control technique.

October 7, 1974 - Begin final design engineering for alternate control technique.

December 2, 1974 - Complete final design engineering and order direct flame thermal incinerator. Begin removing catalytic incinerator from Providence, R.I. plant for shipment to Chicago plant.

January 6, 1975 - Begin installing catalytic incinerator at Chicago plant.

January 15, 1975 - Begin building and structural modification to building for direct thermal incineration.

February 3, 1975 - Make catalytic incinerator at Chicago plant operational, thereby reducing organic emissions by at least 50 percent.

May 5, 1975 - Receive delivery of direct thermal incinerator and begin installation.

May 31, 1975 - Make direct thermal incinerator operational. Compliance with Rule 205(f) achieved.

Petitioner discovered in September, 1974, that implementation of a commercially acceptable water-based spray system, as the compliance method scheduled in PCB 74-222, could not be accomplished by September 30, 1974, for two reasons. First, the production equipment would require more extensive modification than previously envisioned. Second, additional time to obtain customer approval and acceptance of the new product would be required.

A variance from Rule 205(f) until May 31, 1975, will permit Petitioner to install an incineration system to oxidize organic emissions from Spray-Coating Lines No. 1 and No. 2 as completely as possible. This incineration system will be utilized until a satisfactory water-spray coating system is developed at which time the water-spray system may be substituted.

Petitioner estimates that it will spend \$43,200 for the transfer, repair, and reinstallation of the catalytic incinerator from its Providence plant, and \$163,000 for the acquisition and installation of a new thermal incinerator. Total cost of installed equipment is estimated to be \$206,200. Besides the expenditures for incineration equipment, Petitioner expects to invest \$116,000 to improve and modify the spray-coating lines to enable them to utilize the water-based top coat solutions and thus eliminate the use of organic-based materials for the top coat portion of its production by early 1976. Petitioner does not expect to be able to change to water-based coatings for both top and bottom coats until a much later date.

Petitioner's plant is located in an industrial/commercial area. There have been no citizen complaints.

The Environmental Protection Agency (Agency) filed its Recommendation on December 17, 1974. The Agency recommended that the Petition for Variance from Rule 205(f) of Chapter Two be granted until May 31, 1975, subject to certain conditions. The Agency agreed that it would constitute an arbitrary and unreasonable hardship to deny the Petition for Variance when the Petitioner is planning to achieve compliance through interim control measures. The amount of time requested is reasonable considering the magnitude of the work that needs to be done to install both the catalytic and direct thermal incinerators.

We deny the Petitioner's request to withdraw its Petition for Variance in PCB 74-222. Final Board action has already taken place on that request. We construe this case before us as a Petition for Variance from April 1, 1975, through May 31, 1975, and as to such Orders in the Order in PCB 74-222 that cannot be implemented because of changes in the compliance plan.

We grant Petitioner's request for a Variance subject to certain conditions spelled out in our Order. Uniroyal is making good-faith efforts to abate its pollution source with a definite program for compliance. Large sums are being spent. The two-month delay is not self-imposed. On these facts, it would be an unreasonable hardship to deny the Petitioner the additional time to meet the requirements of Rule 205(f) of Chapter Two.

#### ORDER

IT IS THE ORDER of the Pollution Control Board that Uniroyal, Inc. be granted a Variance from Rule 205(f) of the Air Pollution Regulations for its Chicago plant until May 31, 1975, subject to the following conditions:

1. Petitioner shall continue to carry out, where applicable, the Order in PCB 74-222 (September 12, 1974).
2. Petitioner shall apply for and obtain all necessary permits for the installation and operation of new equipment.
3. For the provisions of this Variance, Petitioner shall, by February 1, 1975, post a performance bond in the amount of \$10,000 in a form acceptable to the Agency. Such bond shall be forfeited in the event Petitioner fails to adhere in the most practicable manner to the timetable set out above in the Opinion. The bond shall be mailed to:

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

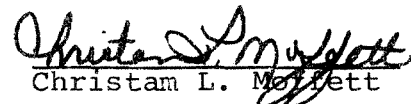
4. Petitioner shall continue in its efforts to develop a water-based spray-coating system so that it may complete the conversion of Lines Nos. 1 and 2 as soon as possible.

5. Petitioner shall reduce its solvent emissions no less than 50% by February 3, 1975. By May 31, 1975, Petitioner shall control all solvent emissions by at least 85% to comply with Rule 205(f)(1)(A).

6. Petitioner shall submit monthly reports to the Agency through June, 1975. The reports shall follow the form and include the information set out in Order #5 of PCB 74-222.

7. Petitioner shall submit its final compliance plan, with dates included, to the Agency by March 31, 1975.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 3<sup>rd</sup> day of January, 1974, by a vote of 5 to 0.

  
Christan L. Moffett