

ILLINOIS POLLUTION CONTROL BOARD
February 21, 1974

KENCOTE LAMINATIONS, INC.,)
)
 Petitioner,)
)
 vs.) PCB 73-500
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

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

On November 29, 1973, Kencote Laminations, Inc. filed its Petition For Variance seeking therein variance from the provisions of Rule 205(f) of the Air Pollution Control Regulations until June 30, 1974.

Petitioner operates a facility in Lake Bluff, County of Lake, Illinois. The subject facility is a custom coating and laminating operation utilizing both active and inactive solvent systems to deposit varying amounts of adhesives, vinyls, acetates and other resins on papers, fabric, urethane foams and assorted other substrates, using three gas fired hot air ovens to remove the solvents.

Petitioner is seeking a variance from Rule 205(f) of the Air Pollution Control Regulations in order to allow it to continue operating its tower drying oven and its H/C drying oven while control equipment is being installed.

Petitioner's facility contains three major emission sources:

- a. Source 1 - tower drying oven: emissions of aromatic solvent blends and MEK.
- b. Source 2 - H/C drying ovens: emissions of MEK.
- c. Source 3 - H/C drying ovens: emissions of aromatic solvent blends.

Petitioner estimates the following average emissions from each source:

- a. Source 1: 60 lbs/hr aromatic solvent blends
 30 lbs/hr MEK
- b. Source 2: 34 lbs/hr MEK
- c. Source 3: 34 lbs/hr aromatic solvent blends
 158 lbs/hr TOTAL

The Agency disagrees with Petitioner as to the total amount of emissions from the three sources. Agency personnel have made the following calculation of Petitioner's total emissions:

amount of material applied = 800,000 lbs/yr
hours of operation = 2000 hr/yr
estimated emission factor = 1200 lbs/ton

$$\frac{800,000 \text{ lbs/hr} \times 1200 \text{ lbs/ton}}{2000 \text{ lbs/ton}} = 240 \text{ lbs/hr}$$

Rule 205(f), which came into effect December 31, 1973, limits emissions of hydrocarbons from each of Petitioner's sources to 8 lbs/hr (total from all sources = 24 lbs/hr).

In an attempt to achieve compliance with Rule 205(f), Petitioner has contracted with Drying Systems Inc., Morton Grove, Illinois, to design, supply and install three 1400° gas-fired incinerators on the existing exhaust stacks to reduce the emission of any solvents to below acceptable standards. The estimated cost of the incinerators is \$60,000.

Incinerator capacities will be:

Tower Drying Oven	18 gal./hour of solvent
H/C Drying Oven	33 gal./hour of solvent (total for 2 units)

Since the incinerators are of regenerative design, exhaust temperatures will range from 275°F to an estimated 375°F at the point of exhaust. Dwell time in the incinerators will be approximately .4 seconds at 1400°F assuring complete reduction of exhausts to non-visible, non-contaminating, no odor emissions.

Installation of ducting, incinerators, fans, and all electrical controls will take 6 to 8 weeks resulting in a completion date of approximately March 15, 1974 with testing and final approval by Petitioner by April 15, 1974.

The Agency believes that the control equipment that Petitioner is having installed will bring the emission sources in question into compliance. The Agency also believes that Petitioner's time schedule for installation is reasonable.

Petitioner alleges that when it first contracted with Drying Systems, Inc. on June 25, 1973, both parties anticipated that final installation of the control system would occur prior to December 31, 1973 - the effective date of Rule 205(f), thus obviating the need for a variance. Petitioner further

alleges that delays on the part of the equipment supplier, which were beyond Petitioner's control, have caused the final date of installation to be extended to April 15, 1974.

Petitioner's facility is located in a heavily industrialized area and the nearest residence is approximately one-half mile away. The Agency has not received complaints regarding Petitioner's facility.

We are disposed to grant variance from Rule 205(f). However, we see no reason to allow variance until June 30, as requested by Petitioner, when Petitioner itself states that it expects the subject incinerators to be operational by April 15, 1974.

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 Kencote Laminations, Inc. be granted a variance from Rule 205(f) of the Air Pollution Control Regulations until May 1, 1974, subject to the following conditions:

1. Petitioner shall apply for and obtain all necessary construction and operating permits from the Agency;

2. Within 30 days of the date of this Order, Petitioner shall submit proof to the Agency, in writing, that it is able to obtain the necessary fuel to operate the three gas-fired incinerators. Said submittal be sent to:

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

3. Commencing 30 days after the date of this Order, and continuing monthly thereafter, Petitioner shall submit reports to the Agency detailing the progress made toward compliance with Rule 205(f).

4. Prior to the expiration of the variance, Petitioner shall install a hood over its roller coaters to direct the fumes to the ovens on Sources 2 and 3.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 21st day of February, 1974 by a vote of 5-0.

Christan L. Moffett