

ILLINOIS POLLUTION CONTROL BOARD
July 18, 1974

GREAT LAKES CARBON CORPORATION,)
)
Petitioner,)
)
vs.)
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
Respondent.)
)
PCB 74-75

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

The Petition for Variance in the above-captioned case was filed with the Agency on February 28, 1974. On the same day, the Pollution Control Board ordered Petitioner to submit additional information. On April 26, 1974, Petitioner filed its additional information with the Agency.

Petitioner owns and operates a facility in Chicago which is engaged in calcining anthracite coal and petroleum coke. Petitioner's facility includes four rotary calcining kilns, four rotary cooling drums, covered conveyors for handling raw and calcined coke and coal, enclosed calcined coke storage silos, seven enclosed raw coke silos, and open storage piles of raw coal and coke.

On February 9, 1972, the Agency filed an enforcement action against Petitioner, alleging violations of Sections 9(a) and 9(b) of the Environmental Protection Act, and Rule 3-3.111 of the Rules and Regulations Governing the Control of Air Pollution. (PCB 72-48).

On November 1, 1972, Petitioner filed a Petition for Variance seeking a variance from the regulations applicable to operation of its kilns, material handling system, storage piles, and permit requirements. (PCB 72-431).

The actions were consolidated by the Board; and a final Order was issued on May 24, 1973. In its Order, the Board approved of a stipulation entered into by the Agency and Petitioner in which Petitioner agreed to a backfitting program for its calcining kilns, material handling systems, and storage piles.

The stipulation contemplated that each calcining kiln to be backfitted would be equipped with a redesigned settling chamber and stack. On November 1, 1973, Petitioner filed a proposal to employ alternate technology with the Board, alleging that the original proposal was not practical for various reasons.

Petitioner is now seeking an extension of the original variance granted on May 24, 1973 until not later than May 24, 1975, as it applies to kilns 2,3 and 4. The particular relief sought is from the following:

- a. Section 9(a) of the Environmental Protection Act: with respect to the kiln and cooler stacks and the material handling systems for said kilns.

- b. Rule 203(b) of the Air Pollution Control Regulations: with respect to the kiln and cooler stacks.
- c. Rule 203(f) of the Air Pollution Control Regulations: with respect to the material handling systems of said kilns.

Consistent with the Board's prior order, Petitioner shut down kiln 1 on January 24, 1973 in order to begin backfitting. Petitioner has determined that its original proposal to redesign the settling chamber is not feasible. Petitioner is now in the process of installing a baghouse on kiln 1 as an alternate means of achieving compliance. The total cost of the installation will be approximately \$1,500,000. The Agency estimates that the efficiency of the baghouse being installed will be 99.7% - adequate to bring kiln 1 into compliance.

Petitioner has purchased a spray truck and has completed latex spraying of all inactive stockpiles. Petitioner also is continuing to periodically spray all open or working piles with water.

The emission rate for particulates from kiln 1 was 235 lbs/hr compared to an allowable rate of 15 lbs/hr. The Agency estimates the emissions from kilns 2,3, and 4 to be of the same order. Petitioner's facility is located in a heavy industrial area. Citizens living or working in the vicinity of the facility who were contacted by the Agency personnel voiced no objections to the extension of Petitioner's variance.

Considering the lack of citizen complaints, the Agency believes that denial of the variance extension would be unreasonable for the following reasons:

- a. Petitioner has complied with all conditions of the original variance.
- b. Petitioner is spending \$1,500,000 on control equipment for kiln 1.
- c. While kiln 1 is shutdown for backfitting, Petitioner is being limited to approximately 50% of its calcining capacity.
- d. Delays to date have been the result of unforeseen problems in modifying the settling chamber and the decision to install a baghouse.

Although we are concerned by the magnitude of Petitioner's emissions, we are convinced by the factors set out above that the requested extension is appropriate. The extension will be granted, subject to conditions.

Petitioner is admonished to adhere strictly to those 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 Petitioner's original variance be extended to May 24, 1975 as it applies to kilns 2,3, and 4, subject to the following conditions:

- a. Kilns 2,3, and 4 must be shut down for backfitting or phase out no later than May 24, 1975.
- b. During the period of the variance, Petitioner may not increase emissions over current levels.
- c. Petitioner shall apply for all necessary permits from the Agency.
- d. Petitioner shall continue to submit monthly reports to the Agency detailing all progress made toward eventual compliance as well as all maintenance procedures employed. Said reports shall be sent to:

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

- e. Petitioner shall keep its performance bond in effect.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 18th day of July, 1974 by a vote of 5-0.

Christan L. Moffett