

ILLINOIS POLLUTION CONTROL BOARD
November 7, 1974

THE MEYERCORD COMPANY,)	
)	
Petitioner,)	
)	
vs.)	PCB 74-220
)	
ENVIRONMENTAL PROTECTION AGENCY,)	
)	
Respondent.)	

Mr. George R. Hooper, on behalf of Petitioner;
Mr. Gregory Arenson and Kathryn S. Nesburg, Assistants Attorney General
on behalf of Respondent.

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

This is a petition for a variance filed by the Meyercord Company (hereinafter Petitioner) with the Environmental Protection Agency (hereinafter Agency) on June 13, 1974. The Petitioner, Hastings Division Plant, is located in Chicago.

Petitioner manufactures decalcomania and tax stamps. It has two plants, one in Carol Stream and the Hastings Division plant in Chicago. The plant in Chicago, for which Petitioner is requesting this Variance, manufactures backing paper. This paper is then shipped to the Carol Stream plant where the design is imprinted. A variance from Rule 205(f) was requested May 21, 1974 for the Carol Stream plant, PCB 74-184.

Petitioner requests a Variance for one year from Illinois Pollution Control Board Regulations Chapter 2, Part II, Rule 205(f) for the purpose of reformulating the solvents it uses and acquiring such exempt solvents.

Petitioner submitted information for an operating permit on May 31, 1974.

The emission source at Petitioner's Chicago plant is a coater-dryer-laminator. First a resinous material, used for its adhesive properties, is applied to natural kraft clay coated paper in a reverse roll coater. Next, the coated paper goes through a duct where air is circulated to remove solvents. Flue gases from this operation exit through stack #2. Then the material is dried by passing through a hot air oven operated at 100°F. Gases containing hydrocarbons exit from the oven through stack #4. After leaving the oven, a Mylar coating is applied to the paper.

Petitioner's operation is completely uncontrolled. Emissions of photochemically reactive organic compounds from both stacks together are 115.5 lbs/hour based on the process weight of the non-exempt solvents. Petitioner estimates that about 10% of the total emissions come from Stack #2.

Petitioner proposes to comply with Rule 205(f) in one year by reformulating its solvents to substitute exempt solvents as soon as it can get exempt solvents from its suppliers. It has no plans to install pollution control equipment.

Petitioner claims a denial of a Variance would result in 83% reduction in out put with a corresponding reduction in revenues. It also claims that 5 or 6 people would have their wages and hours reduced by about 80%.

At a public hearing held on August 26, 1974, testimony was offered by several of the Petitioner's witnesses in an attempt to show that Petitioner was taking steps to come into compliance.

Petitioner did not have a compliance program when it filed its original variance petition. The program referred to at the hearing (Petitioner's Exhibit #1) was drawn up in August 1974. The program consists, in part, of farming out some of the work to other companies (R 25-26). It includes raising the height of Stack #4 (R 27-28). But the most important part of the plan is to obtain exempt solvents, and this is something Petitioner cannot be certain of doing. Thus, the plan has a weakness which renders Petitioner's control program inadequate.

The public suffers harm in two ways as a result of emissions from Petitioner's plant. Those persons who live near the plant suffer from the odors which are sometimes emitted from the plant. Other persons who live and work in Chicago suffer from ozone, which is caused in part by chemical reactions involving hydrocarbons in the atmosphere.

Mrs. Rosie McCutcheon testified at the hearing. She lives at 1849 West 13th Street. Petitioner's plant is located at 1838 West Hastings Street, across the alley to the south from Mrs. McCutcheon's building. Mrs. McCutcheon testified that she sometimes smelled an unpleasant odor coming from outside of her apartment (R 81). She testified that the odor had a strong, solution-like smell and that it took her breath away (R 81). She suffers from emphysema and has to bury her face in a pillow so she can breathe when the odor comes (R 82). She testified that the odors came from the west and south (R 82), and she testified that there is a large building behind her house to the south and west (R 83). She said that the building has one story on the back, but that there are more stories on the Hastings Street side (R 84). Mr. Knopf testified that he has detected an odor "principally at the fountain of the double reverse roll cord (sic)." (R 19) He further testified that the odor is "vented out in the roof and during a great deal of the summer we have windows open on the second, third, and fourth floors (R 22). Steven Rosenthal testified that the stacks

were about the same level as the residential houses which were located across the alley to the north of Petitioner's plant (R 92). Mr. Rosenthal detected solvent odors coming from the two stacks on the roof (R 93).

Mr. Rosenthal, the Agency engineer, also testified that "hydrocarbons play a key role in the formation of ozone, photochemical oxidants) or whatever, and it's for this reason they are restricted." (R 94) He then pointed out that Petitioner's facility ranks eleventh out of those facilities in Chicago which emit photochemically reactive hydrocarbons in excess of 90 lbs/hr (R 99).

The Agency contends that Petitioner has failed to prove that denial of the Petition for Variance would result in an arbitrary or unreasonable hardship. We agree.

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

IT IS THE ORDER of the Pollution Control Board that the Petition for a Variance from Illinois Pollution Control Board Regulations, Chapter 2, Part II, Rule 205(f) be and is hereby denied.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted on this 7th day of November, 1974 by a vote of 4-0.

Christan L. Moffett