

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

MAY 30 2006

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
PROPOSAL OF VAUGHAN & BUSHNELL) R2006 - 11
MANUFACTURING COMPANY OF)
AMENDMENT TO A SITE-SPECIFIC RULE)
35 ILL. ADM. CODE 901.121)

**VAUGHAN & BUSHNELL MANUFACTURING COMPANY'S
POST-HEARING COMMENTS**

pc#1

NOW COMES Vaughan & Bushnell Manufacturing Company ("Vaughan"), by and through its attorneys, Davis & Campbell L.L.C., and hereby provides the Illinois Pollution Control Board ("Board") with its post-hearing comments, including responses to questions by the Board and issues raised through the course of this proceeding.

SUMMARY OF PROCEEDING

As more fully explained in the Proposal of Amendment to a Site-Specific Rule, the Amendment to Proposal of Amendment to a Site-Specific Rule (collectively the "Proposal"), and the public hearing on the Proposal dated March 7, 2006 at City Hall in Bushnell, Illinois ("Hearing"), Vaughan is seeking an amendment to the site-specific rule found at 35 Ill. Adm. Code Section 901.121 with respect to the operation of the Vaughan forging facility in Bushnell, Illinois ("Shop"). *Hearing Transcript 1*. Currently, Vaughan is permitted to operate in a manner inconsistent with the Sound Emission Standards and Limitations promulgated by the Board pursuant to 35 Ill. Adm. Code Section 901 *et seq.* Vaughan seeks an amendment to the previously promulgated rule because the land-use surrounding the Shop has dramatically changed since the original rule was created, the community impact of the proposed amendment is slight, the changing economy has made operation under the original rule economically unreasonable, and complete compliance is technically infeasible. (*The original rule was*

promulgated pursuant to the petition of Vaughan found at R83-32 in the Illinois Pollution Control Board database of files). Therefore, Vaughan is requesting that the Board adopt the rule proposed as the final rule applicable to its operations at the Shop.

DISCUSSION OF PROPOSAL AND TESTIMONY

RELIEF REQUESTED

Pursuant to the Proposal, Vaughan seeks an amendment to the previously promulgated rule of the Board found at 35 Ill. Adm. Code Section 901.121(b). Specifically, Vaughan requests an amendment to the previous rule in order to operate its production facility an additional four and one-half hours. Vaughan proposes the following amendment to the previously promulgated rule (language proposed to be added by amendment is indicated by underscoring and language proposed to be deleted by amendment is indicated by strike-outs):

Vaughan & Bushnell Manufacturing Company and the future owners of the forging facility located at the intersection of Davis and Main Streets, Bushnell, Illinois, shall comply with the following site-specific operational level:

- a) Operate no more than ten hammers at any one time during the hours of 6:00 a.m. and 1:30 a.m. Monday through Sunday; and
- ~~b) Operate its forging hammers only between the hours of 6:00 a.m. and 1:30 p.m. Monday through Saturday.~~
- b) Operate no more than ten hammers at any one time during the hours of 1:30 a.m. and 6:00 a.m. Monday through Sunday.

SHOP and SURROUNDING COMMUNITY

Vaughan was incorporated in 1892. *Tr. 15.* The history of Vaughan and its operations was illustrated at the Hearing by Vaughan employee Dan Chambers (“Mr. Chambers”). Mr. Chambers testified that at the City of Bushnell facility, the primary products manufactured are hammers and heavy striking tools. *Id.* At the Shop, Vaughan currently employs more than 263 persons, which makes it the largest employer in the area. *Tr. 16.* Mr. Chambers testified that

Vaughan's gross annual payroll for 2005 was \$8.4 million and its total expenditures to the City of Bushnell for natural gas, water, and electricity (which greatly support the local economy) for 2005 exceeded \$1,037,000.00. *Id.* Mr. Chambers also testified that Vaughan's operation in the Shop is one of only two operations in the United States which manufactures hammers and heavy striking tools. *Id.*

The Shop houses an impact forging operation which is subject to the Board's noise emission regulations. It is located in the City of Bushnell at the intersection of Davis and Main Streets in an area that is almost exclusively composed of heavy industrial operations. The Shop, a drop-forge facility, is classified as an industrial land use. To the immediate north of the Shop is real estate consisting of several buildings owned by Vaughan but not used in the drop-forge operation, the Silver Fox Tavern, two residential houses, and the City of Bushnell water tower and water treatment plant. Immediately east of the Shop is a parking lot, the Archer Daniels Midland manufacturing facility (which manufactures protein), a Burlington Northern Railroad Office, and Burlington Northern Railroad tracks. To the immediate south of the Shop is a second set of railroad tracks (the Keokuk Junction Railway Company), a vacant residence, a liquor store, and the City of Bushnell's power plant and electrical maintenance facility. Finally, to the immediate west of the Shop is a parking lot and to the southwest are mobile homes, an FS Grain Elevator, and the Norforge Manufacturing facility (a drop forge facility similar to Vaughan's Shop). Elsewhere in the area are different commercial concerns including a lumberyard and a second grain elevator.

The predominant industrial character of the area was described by Vaughan employee William Mourning ("Mr. Mourning") at the Hearing. Mr. Mourning testified that the closest residence to the Shop is more than 300 feet away and that, while several single family residences are located beyond 300 feet from the Shop, these residences are subject to noise emissions from

several geographically closer sources such as the Burlington Northern Railroad, the Keokuk Junction Railway Company and other industrial facilities. *Tr. 33.* Also at the Hearing, Mr. Mourning identified and described *Exhibit C* to the Proposal, a map by which Vaughan illustrated the industrial nature of the area surrounding the Shop. *See Tr. 29-34.*

Taken as a whole, the evidence clearly describes and demonstrates the industrial character of the area surrounding the Shop. The operations of the Shop are but one small component of the noise produced in this area. The activities of many other nearby industries substantially create the area's ambient noise. Furthermore, the industrial nature of the surrounding businesses results in heavy truck traffic and other vehicular traffic. All of these sources contribute to the area's ambient and extraneous noise. *See Tr. 99.*

NOISE ABATEMENT MEASURES

Vaughan's production of striking implements requires the use of impact forging procedures. The forging process consists of heating pieces of carbon or alloy steel ("work-pieces") in furnaces to a temperature of approximately 2350 degrees Fahrenheit and then shaping those work-pieces by forcing them between two dies. The upper die is attached to a guided ram and the lower die is attached to the forge. The upper die and ram are mechanically lifted and then dropped onto the lower die with great force. It is the pressure exerted by the ram or forge hammer being dropped that forces the heated work-piece into the impression on the dies. Each forge hammer is capable of producing approximately 1,500 blows every hour. The sound produced by this process is impulsive and originates primarily from the impact between the upper and lower die and the work-piece. *Tr. 54.* Efficient production requires a constant flow of materials between the furnaces and drop hammers as well as into and out of the Shop.

The forging process creates a substantial amount of heat due to the extreme temperatures to which the furnaces must heat the work-pieces to make them sufficiently malleable. Fueling

the combustion in these furnaces requires a tremendous amount of oxygen. Consequently, the Shop requires extensive ventilation which can often only be accomplished by opening several doors to allow the free flow of outside air. *Tr. 42.* This natural ventilation system is widely utilized in the forging industry. However, one side effect is that noise escapes through these side openings. *Id.*

The Shop itself was created in 1940 and now houses ten drop hammers capable of producing up to 2,500 lbs. of force in the production of striking tools. *Tr. 46.* The Shop is a one-story building that runs east and west. The building itself was constructed in 1923 and is composed principally of a structural frame with brick walls. These walls are as much as twenty-four inches thick in some spots. There are openings on the east and south walls of the Shop to permit air to flow through and to permit access to the Shop. *Tr. 43.* The north and west walls are interior walls with openings to the remainder of the Vaughan facility. The roof is made entirely of wood rafters, sheet metal, and tar (for sound dampening purposes).

The Shop is equipped with two kinds of noise abatement control measures; structural dampening and source reduction. The structural dampening is a result of the actual construction of the Shop itself. As indicated above, the materials of the Shop construction act as a sound dampening tool to prevent the escape of noise into the surrounding community. Noise source reduction techniques are employed by way of the method in which the drop-hammers are installed. The drop-hammers are installed according to the manufacturer's recommendation to achieve the greatest possible minimization of vibration and noise. *Tr. 46.* The base of each drop-hammer is anywhere from 15-18 feet below the ground and is comprised of reinforced concrete, criss-crossed oak timbers, and two full inches of fabrica (a dense rubber material which absorbs noise and vibration). *Tr. 47.* The noise abatement control measures utilized by Vaughan is consistent with that which is commonly used in the drop-forge industry.

Regardless of the noise abatement technology employed, drop-forge facilities will and do emit noise which cannot be eliminated completely. *Tr. 50.* Raw material must be continuously delivered to the Shop and the finished product along with waste material must be continuously removed from the Shop. *Tr. 39.* Two doors are located in the Shop through which raw materials and finished product are transferred in and out. *Tr. 41.* All drop forge facilities must incorporate such doors to deliver and remove raw material and finished products from their facilities. Because such doors must be open for a length of time to permit the delivery and removal process, sound will necessarily escape from any drop forge facility during these periods, a fact which noise abatement technology cannot eliminate.

SOUND LEVEL MEASUREMENT SURVEY

Three sound level measurement surveys were conducted by Vaughan employee and engineer Mike Havens ("Mr. Havens") in 2005. The survey measurements quantified the sound decibel level from all sound sources at various locations near the Shop. Measurements were made under representative community conditions at various times in a twenty-four hour period. Mr. Havens testified at the Hearing that he utilized a Radio Shack sound level meter (model 332055) which is capable of measuring ambient noise from 50 to 126 decibels. *Tr. 79.* While Mr. Havens testified that he is not a qualified expert on sound emissions data gathering and that he was not familiar with the Board's regulations regarding sound level measurement, he maintained that he followed the manufacturer's manual when operating the sound level meter. *Tr. 89.*

Mr. Havens tested the ambient noise at several locations surrounding the Shop and within the general area that could reasonably be perceived as being impacted by the proposed amendment to the site-specific rule. The noise levels attributable to the drop-hammers measured approximately 55 decibels during the four and one-half hours of operation as proposed by

Vaughan. The Board has noise rules in place which currently limit the sound emissions from an impact forging operation during those four and one-half hours to 53 decibels. To put things into perspective, at the Hearing Mr. Havens indicated that the ambient noise level within the room in which the Hearing was conducted measured between 58 and 65 decibels. *Tr. 79.*

Mr. Havens testified at the Hearing that he conducted the sound level measurement surveys and that the information he collected is reflected in the Proposal. *Id.* Because each of the sound sources in the area were audibly distinct, Mr. Havens ascertained during the sound level measurement surveys which of the surrounding sources he believed had the greatest contribution to the sound level readings. *Tr. 82.* As indicated in his testimony at the Hearing, Mr. Havens was able to identify only one point of testing in which the sound emitted from Vaughan, and attributable to the impact of the drop hammers, was in excess of the current regulations promulgated by the Board. *See Tr. 79-88.* That point of testing was immediately outside the large door of the Shop at a time when it was open to transfer raw material into the Shop. However, there are no residences in this area. The sound level measurement survey conducted during the proposed four and one-half hours of operation which tested the sound level near the closest residence was 59 decibels but such reading was attributable to other noise sources in the area and not the operation of Vaughan's impact forging. Thus, operations during the four and one-half hours as proposed by Vaughan will have only minimal impact on the community.

As indicated above, Vaughan is located in the City of Bushnell which serves as a cross-road for at least two railroad tracks. Those tracks are actively used, resulting in trains frequently rolling through the city. In fact, as City of Bushnell Mayor Steve Russell testified at the Hearing, as many as 45 to 50 trains travel through the City of Bushnell every day. *Tr. 96.* At each street crossing the trains sound their horn, creating an abundance of noise twenty-four hours a day. *Tr.*

98. The noise emitted from each blow of the horn and from the train engine itself was measured at 98 decibels. *Tr. 81.* Such noise within and throughout the City of Bushnell, twenty-four hours a day, is far in excess of the sound emitted by Vaughan's forging operations.

COMMUNITY IMPACT

The result of the proposed change in Vaughan's hours of operation will have only a minimal impact on the community immediately surrounding the Shop. The sound emitted from the Shop and attributable to the drop-hammers is minimal when considered in the context of the industrial nature of the surrounding community. Additionally, the sound actually produced by the drop-hammers during the proposed hours of operation has previously been shown to be around 55 decibels, close to the 53 decibel standard promulgated by the Board for sound levels during the hours of operation the proposed amendment would encompass. Such levels of sound will have only a slight impact on the community in general and residents thereof in particular.

At the Hearing, many residents of the City of Bushnell were present and provided testimony in support of the Proposal. *See Tr. 119.* As previously discussed, the City of Bushnell's Mayor testified at the Hearing. His testimony included that he and the city council are unanimously in favor of the request of Vaughan to increase their hours of operation to meet the demand for their products. *Tr. 100.* He further testified that as an alderman for the City of Bushnell for two years and the Mayor for one year, he has not received a single complaint concerning the sounds emitted by Vaughan's manufacturing operations. *Tr. 101.*

The city attorney for the City of Bushnell also testified at the Hearing that he has acted in such capacity for about 30 years and that during his tenure he also has not received a single complaint concerning the sound emitted by Vaughan. *Tr. 104.* The city attorney further testified that most of the houses and residences that existed around the Shop at the time of the original Petition of Vaughan in 1984 are no longer standing and that as such, the community impact of

the increased hours of operation, and the sounds created thereby, would be minimal compared to the economic benefit the City of Bushnell will receive from the increased production of Vaughan. *Tr. 103.*

Illinois State Representative Richard P. Myers, representative of the 94th Legislative District (the Legislative District in which the City of Bushnell is located), also testified at the Hearing that he has represented the residents of Bushnell in the Illinois legislature for 12 years and during that time he has received no noise complaints regarding Vaughan. *Tr. 107.* Representative Myers further testified that Vaughan has a significant impact on the industrial base in the City of Bushnell and that its continued existence in the community is essential to the economy of the area. *Tr. 105.*

Michael Steelman, chairman and chief executive officer of Farmers & Merchants State Bank of Bushnell, testified at the Hearing that his bank is located only three blocks from the Shop and that the “sounds of forging, which, if ever heard and certainly rarely heard, are the economic heartbeat of [the City of Bushnell]”. *Tr. 110.* Also, in his role as a director of the Bushnell Economic Development Corporation, Mr. Steelman testified that the Bushnell Economic Development Corporation fully supports the Proposal. *Id.*

Don Swartzbaugh, president of the Chamber of Commerce for the City of Bushnell also testified at the Hearing that the Chamber fully supports the Proposal. *Tr. 111.* Mr. Swartzbaugh’s testimony was supported by Mike Howell, alderman for the City of Bushnell, who testified that without the additional hours of operation at the Shop the economy of the community would suffer. *Tr. 113.*

City of Bushnell resident Daniel Roberts testified at the Hearing that his residence is located at what is designated as location “eight” on Exhibit C to the Proposal (within 300 feet of the Shop) and that he has resided there for the past 18 years. *Tr. 111.* Mr. Roberts further

testified that it came to his attention at the Hearing that Vaughan was currently operating during the four and one-half hours as requested in the Proposal and that he hadn't noticed any additional hammer activity. *Tr. 112.* Furthermore, Mr. Roberts stated that he does not believe that Vaughan's operation impacts his health and well being. *Id.*

Local resident Justin Hood testified at the Hearing that his residence is located at what is designated as location "three" on Exhibit C to the Proposal (across the street from the Shop) and that he has lived there for five and one-half years. *Tr. 114.* Mr. Hood testified that he and his family go to bed between 8 p.m. and 10 p.m. every night and that they have not been disturbed by any excessive noise from the Shop even though it is currently operating throughout the night. *Id.*

Finally, local resident Merlin Evans testified at the Hearing that his residence is located at what is designated as location "two" on Exhibit C to the Proposal (adjacent to the Shop) and that he has lived there for 16 years. *Tr. 122.* Mr. Evans testified that during the time he has resided at that location, his health and well being has not suffered as a result of the forging operation at the Shop. *Tr. 122-124.*

Based on the testimony elicited at the Hearing from the local government officials and residents of the City of Bushnell the community health impact of the proposed change in Vaughan's hours of operation will be only negligible, if any. The sound emitted from the Shop and attributable to the drop-hammers is minimal when considered in the context of the industrial nature of the surrounding community. However, as the above testimony suggests, the economic benefit to the City of Bushnell that will result from granting Vaughan its Proposal is far greater than the slight health impact to the community.

TECHNICAL FEASIBILITY and ECONOMIC REASONABLENESS

As previously indicated, sound emission is an unavoidable consequence of the forging

industry. Mr. Mourning testified at the Hearing that although there have been advances in technology in the area of sound dampening as it relates to the forging industry, such changes in technology have not adequately replaced the "natural cooling" system most forging shops must currently utilize. *Tr. 50.*

Mr. Mourning explained that it is possible in some situations to install sound barriers which would be placed in front the Shop's openings to the outside with the purpose of dampening or reducing the amount of sound which escapes through those openings. *Tr. 51.* However, while these sound barriers may block some of the sound emissions, they also have the side effect of blocking the air flow which creates the "natural cooling" of the Shop. *Tr. 57.* As Mr. Mourning testified at the Hearing, the amount of sound actually dampened or reduced by these sound barriers is minimal when compared with the side effects of decreased cooling, which results in unsafe conditions for the workers and greatly lowered production. *Tr. 50.* Additionally, due to the location of the Shop, such sound barriers would cross the city sidewalks and streets and block pedestrian and vehicle traffic. Thus, the sound barriers are not technically feasible.

Mr. Mourning also testified at the Hearing that recent advances in technology have resulted in an advanced ventilation system which could be placed above or around the furnaces. This sort of ventilation system would extract much of the escaping heat from the furnaces before it permeates the entire building, keeping the Shop cooler and thereby permitting the side openings of the building to be closed for longer periods of time, which would reduce the duration of sound emissions. *Tr. 57.* However, these ventilation systems cost upwards of \$1,000,000.00 and would not permit the complete closure of the side openings of the building as fresh air must still be allowed to enter the Shop. *Tr. 61-62.* Thus, although some degree of reduction in sound emissions may be achieved through this technology, the costs of such ventilation systems far

outweigh their benefit, making them economically unreasonable.

Although there have been advances in technology in the area of sound dampening as it relates to the forging industry, such changes in technology have not adequately replaced the “natural cooling” system and/or are currently technically unfeasible and economically unreasonable in practical application.

In addition to the lack of technically feasible and economically reasonable technological advances in the forging industry, Vice President Mr. Ronald Miller (“Mr. Miller”) testified at the Hearing that Vaughan is facing increased competition from U.S. striking tool manufacturers who have either moved their operations to China (*i.e.*, Stanley Tools and Cooper Tools) or are outsourcing hammers from Chinese operations. *Tr. 116-117*. The increased competition is the result of lower manufacturing costs and greater manufacturing output in China. *Id.*

Unlike its competitors, Vaughan has long focused its marketing efforts on “Made in U.S.A.” which is important to the professional tradesmen who make a living with the tools as well as to consumers who believe in an American made product. *Tr. 118*. Mr. Miller believes that Vaughan can compete with its Chinese counterparts but in order to do so Vaughan must expand its manufacturing output to meet its increased demand or lose sales and ultimately customers. *Id.* The Proposal is the most technically feasible and economically reasonable means of expanding Vaughan’s manufacturing output.

PREVIOUS RECORD OF PETITION OF VAUGHAN

At the Hearing, the Board requested that the record of Vaughan’s original petition for a site-specific operational level, found in the Illinois Pollution Control Board database of files and designated as R83-32 (“R83-32 Record”), be incorporated into the record of the Proposal. *Tr. 73*. Vaughan has considered the incorporation of such record and agrees to the action of the Board. The R83-32 Record provides additional proof that the land-use surrounding the Shop has

dramatically changed since the original rule was promulgated, the community impact of the proposed amendment is slight, and the original rule creates limitations that are no longer economically reasonable or technically feasible for Vaughan.

For example, in the R83-32 Record it was asserted that approximately 50 residences would potentially be exposed to sound levels in excess of those allowed by the rules promulgated by the Board. As discussed above, most of those residences no longer exist due to the ever increasing industrial nature of the Shop's location. In fact, only a handful of residences, all located more than 300 feet from the Shop, may now be exposed to sound levels in excess of those allowed by the rules promulgated by the Board.

Additionally, the R83-32 Record contains a discussion of the enormous costs associated with installing and fitting ventilation systems in the Shop. However, George Kamperman, the professional employed by Vaughan in 1983 to conduct an analysis of the feasibility of implementing noise reduction systems concluded that such systems would have only minimal dampening effects on the sound emitted by Vaughan but would have a substantial detrimental effect on the amount of production at the Shop. The same remains true with today's ventilation technology.

Furthermore, Mr. Kamperman also testified as part of the R83-32 Record that there would be no adverse effect to the land-use surrounding the Shop, or the residences therein, from a sound emission of 63 decibels during the hours of operation proposed by Vaughan in the R83-32 Record (which, at the time exceeded the sound levels promulgated by the Board for the requested hours of operation). Similar to the petition found in the R83-32 Record, the Proposal seeks a site-specific regulation which is in excess of the sound level standards promulgated by the Board but for a different period of operation. The impact on the residences surrounding the Shop of Vaughan's operations during the proposed four and one-half hours of operation will be

minimal.

Thus, the R83-32 Record provides additional support for granting the requested relief.

WHY THE RELIEF REQUESTED SHOULD BE GRANTED

Testimony elicited at the Hearing evidences the changes in the community surrounding the Shop such that approval of the Proposal is appropriate. While the R83-32 Record indicates that many residences surrounded the Shop in 1983, testimony at the Hearing indicated that only a few of those residences are standing today. Of the few residences still remaining in the area surrounding the Shop, many of the owners of those residences attended the Hearing and testified that the proposed hours of operation of the Shop would not have any negative impact on them.

Vaughan has not only the support of the local residents, but the City of Bushnell as a whole, and even a state representative. The City of Bushnell and the Bushnell Economic Development Corporation have both submitted letters to the Board in support of the Proposal. Numerous other individuals and corporations have also testified in support of the relief requested.

Although Vaughan did not hire a noise professional to conduct field sound measurements, it did provide a sound level measurement survey conducted by one of its engineers. The sound level measurement survey produced results similar to the professional survey conducted in 1983 when Vaughan petitioned the Board for its initial site-specific rule as it relates to the sound emitted from the Shop and attributable to drop-hammers. The sound level measurement survey indicates that the area immediately surrounding the Shop will be exposed to noise levels of approximately 55 decibels during the proposed four and one-half hours of operation and, for reasons consistent with those found in the R83-32 Record, such minimal deviation from the 53 decibel sound level rule promulgated by the Board would have almost no perceivable impact on the public.

Vaughan reviewed whether there are technical means available for further reducing sound emissions to levels sufficient to achieve compliance with the Board's noise regulations. Vaughan investigated installing additional noise abatement equipment, as well as installing a barrier partition to seal the Shop. Because of its location and the exorbitant cost of such technology, it was determined that these measures would be staggeringly financially burdensome on Vaughan and minimally effective in reducing the level of noise emissions from the Shop. In all, there is no assurance that the technical means would effectively reduce sound emissions to levels that would achieve compliance.

Vaughan also reviewed the economic impact on itself and the City of Bushnell should the Proposal not be granted. Due to increased competition from foreign production and the increased demand for its product, Vaughan concludes that absent permission to operate during the four and one-half hour period as requested in the Proposal, it may be forced to join the ever growing list of American companies that have no choice but to outsource much of their operations. The result is an extreme detriment to the City of Bushnell.

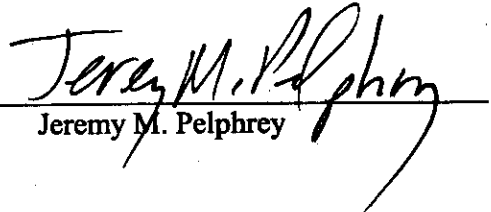
Finding no technically feasible or economically reasonable solution, Vaughan filed this Proposal which garnered the support of the community and the City of Bushnell. Using the sound level measurement surveys conducted in 2005 and informative economic factors, Vaughan identified the extent of the relief necessary to continue their operations. The site-specific relief requested was developed by taking into account these factors as well as the expected impact on the community. Finally, Vaughan has demonstrated that allowing the Proposal will cause almost no change in the sound emissions in this area and thus no negative impact on the community due to the types and amount of extraneous and ambient noise already present in the area given its primarily industrial character.

Vaughan has demonstrated that the requested relief is necessary and warranted, and its

community consequences slight, primarily due to noise already present in the industrial area in which the Shop is located. Vaughan therefore requests that the Board adopt the rule proposed as the rule applicable to its operations at the Shop.

Respectfully submitted,

VAUGHAN & BUSHNELL MANUFACTURING
COMPANY

By: 
Jeremy M. Pelphey

Jeremy M. Pelphey
DAVIS & CAMPBELL L.L.C.
Attorneys for *Vaughan & Bushnell
Manufacturing Company*
401 Main Street, Suite 1600
Peoria, Illinois 61602
Tel: (309) 673-1681
Fax: (309) 673-1690
jmpelphrey@dcamlaw.com

MD06-151

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSAL OF VAUGHAN & BUSHNELL) R2006 - 11
MANUFACTURING COMPANY OF)
AMENDMENT TO A SITE-SPECIFIC RULE)
35 ILL. ADM. CODE 901.121)

CERTIFICATE OF SERVICE

The undersigned certifies that he served a copy of the Vaughan & Bushnell Manufacturing Company's Post-Hearing Comments in the above captioned matter, upon the following attorneys by depositing a copy of the same in an envelope addressed as follows:

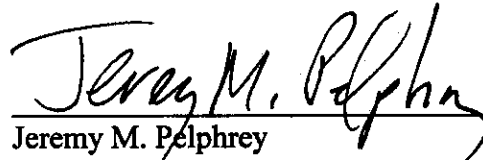
Clerk of the Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Division Chief of Environmental Enforcements
Office of Attorney General
188 W. Randolph Street, 20th Floor
Chicago, Illinois 60601

Office of Legal Services
Chief, Legal Division
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794

and by depositing the envelope in the United States mail with first-class postage fully prepaid in Peoria, Illinois on this 23rd day of May, 2006.



Jeremy M. Pelphey

Jeremy M. Pelphey
DAVIS & CAMPBELL L.L.C.
Attorneys for VAUGHAN & BUSHNELL
MANUFACTURING COMPANY
401 Main Street, Suite 1600
Peoria, Illinois 61602
Tel: (309) 673-1681
Fax: (309) 673-1690
jmpelphrey@dcamplaw.com