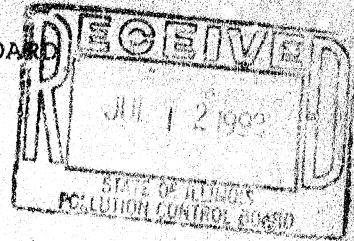


BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS



CONTINENTAL WHITE CAP, INC.,)
)
Petitioner,)
)
v.)
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

PCB 92-155
(Variance)

JOINT MOTION TO MODIFY BOARD ORDER

White Cap, Inc. ("White Cap"), previously known as Continental White Cap, Inc., and the Illinois Environmental Protection Agency ("Agency") hereby file a Motion to Modify Board Order dated April 22, 1993, based upon new information which has arisen subsequent to the hearing in PCB 92-155. Except as modified by this Motion, the information contained in White Cap's Petition for Variance, the Amended Agency Recommendation and the hearing record remains true and accurate and is incorporated herein by reference.

1. On April 22, 1993, the Illinois Pollution Control Board ("Board") issued an Order granting White Cap a variance from requirements of the Board's air pollution control regulations found at 35 Ill. Admin. Code §§ 218.105, 218.205, 218.207 and 218.211 (Part 218 requirements). The grant of the variance was recommended by the Agency subject to certain conditions which were included and outlined in the Board's Order dated April 22, 1993.

2. White Cap is seeking an extension of the deadlines set forth in Condition 4 of the Order which require that White Cap develop a program that provides for the upgrade of afterburners #5 and #6 that control emissions from the multiple coating lines C-6 and C-7 and the tandem coating line C8A, C9A and PC10A, respectively; submit this program to the Agency for approval by May 15, 1993; complete this program, including destruction efficiency testing of afterburners #5 and #6, within 90 days of receipt of the Agency's approval; and submit a written report of the destruction efficiency test results within 60 days of testing. (See Order, pp. 4-5)

3. White Cap developed a program that provides for the upgrade of afterburners #5 and #6 as required and submitted this program to the Agency on May 11, 1993. On June 4, 1993, White Cap received approval of this program from the Agency. The letter of approval is attached as Exhibit A.

4. However, since White Cap submitted its program to the Agency, White Cap has continued to identify possible improvements to afterburners #5 and #6. As part of this evaluation, White Cap has decided to further upgrade afterburners #5 and #6 which are the subject of Condition 4.

5. As part of the new plan, White Cap will replace the catalyst blocks in afterburner #5 with a modular block design, rather than simply clean the catalyst blocks of this afterburner and repair or replace any broken catalyst blocks as set forth in the program submitted to the Agency. The

replacement of this bed will require White Cap to reconstruct portions of the shell of the afterburner which will require White Cap to obtain a construction permit. Further, as part of the new plan, White Cap will to replace the catalyst blocks in afterburner #6 with the new blocks instead of, again, simply cleaning the old ones and replacing any broken blocks as set forth in the program submitted to the Agency. This new plan will exceed that required by Condition 4 of the Variance, but, as a result, White Cap will not be able to meet the deadlines set forth in Condition 4 of the Order.

6. Had these changes been anticipated, White Cap's Petition for a Variance and the Agency's Amended Recommendation would have reflected the time necessary to implement this new plan. However, it was not until White Cap reevaluated the possible improvements to its facility, particularly afterburners #5 and #6, that White Cap decided to seek approval from its corporate headquarters to upgrade these afterburners beyond that required by Condition 4 of the Variance. White Cap recently received corporate approval to go forward with this upgrade of these systems, and on June 17, 1993, White Cap sent a letter to the Agency explaining the improvements to its program for the upgrade of afterburners #5 and #6.

7. White Cap already has ordered the materials and equipment necessary to construct the new modular block system and replace the catalyst blocks but has been informed by the manufacturers that all materials may not be designed and

delivered until as late as October, 1993. In the interim, White Cap will apply for a construction permit to install the new modular block design in incinerator #5. The installation of this system will require White Cap to shut down these lines for several days. White Cap will install the system when production slows in the fall that will allow these lines to be down for several days or, at the latest, during the Christmas holidays when White Cap shuts down this facility in order to perform routine maintenance and repairs on the lines. Hence, the new system will be installed no later than January 3, 1994. White Cap will then test the new emission systems to ensure that they are operating properly during the month of January, 1994; conduct destruction efficiency tests on these two afterburners by February 15, 1994, weather permitting; and submit a written report on the destruction efficiency test results to the Agency within 60 days of the tests.

8. White Cap's new plan to upgrade afterburners #5 and #6 will not present any increased environmental impact.

9. White Cap is in compliance with the remaining conditions of the Board's Order.

10. The Agency joins in this Motion and recommends that the Board extend the deadline for White Cap to complete the replacement of the catalyst blocks in afterburner #5 with a new modular block design and the catalyst blocks in incinerator #6 with new blocks until January 3, 1994. The time extension is necessary for White Cap to complete the design of the new

modular block system for incinerator #5, apply for a construction permit, receive delivery of equipment and construct the new systems and replace the blocks in incinerator #6. The Agency has further authorized the undersigned to file this Joint Motion.

WHEREFORE, White Cap and the Agency request that the Board modify its Order of April 22, 1993 and extend the deadline for compliance with Condition 4 of White Cap Inc.'s Variance as set forth herein.

Respectfully submitted,
CONTINENTAL WHITE CAP, INC.

BY: Tracey L. Mihelic
One of Its Attorneys

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State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3333

June 2, 1993

Ralph L. Fasano
White Cap, Inc.
1819 North Major Avenue
Chicago, Illinois 60639

Re: PCB 92-155 Variance Conditions

Dear Mr. Fasano:

The Agency has reviewed the incinerator optimization program and the quarterly recordkeeping report that you recently submitted pursuant to the variance order.

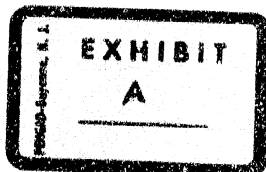
The incinerator optimization program and the format for the quarterly recordkeeping report are acceptable.

If you have any questions concerning this matter, please contact David Hulskotter at 217/782-2113.

Sincerely,

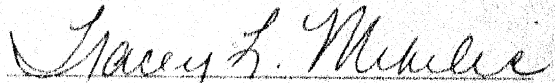
Ann M. Zwick
Assistant Counsel
Division of Legal Counsel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she caused a true and correct copy of the foregoing Notice of Filing and Joint Motion to Modify Board's Order to be served upon the parties listed on the attached service list by first class mail on July 12, 1993.


Tracey L. Mihelic