ILLINOIS POLLUTION CONTROL BOARD August 9, 1990

NATIONAL STEEL CORP., GRANITE CITY DIVISION,)		
	Petitioner,))	PCB 90-150	
	v.)	(Provisional	Variance)
ILLINOIS ENVIR PROTECTION AGE)		
	Respondent.	})		

DISSENTING STATEMENT (by J.D. Dumelle):

My reason for dissenting lies in the incorrect technical basis for the IEPA recommendation to grant this provisional variance.

The IEPA asserts that the two sprayings of adjacent roadways will reduce PM-10 (particulate matter 10 microns or less in size) by 29.74 lbs/hr. The shutdown of the West Quench Tower and use of the non-complying East Quench Tower will increase PM-10 emissions by 27.70 lbs/hr. according to IEPA.

As a technical matter all PM-10 is not identical. Emissions from coke ovens are notoriously cancer-causing. Coke oven topside workers have a high documented incidence of lung cancer. On the other hand, roadway dust emissions may be relatively innocuous sand and dirt particles and may contain a low amount of the dangerous polyaromatic hydrocarbons (PAH).

If, in fact, as the IEPA seems to assert the roadway dust is equivalent in toxicity to the coke oven emissions then why has IEPA not required the roadways to be paved? That would then permanently eliminate the PM-10 emissions from this source which impinge daily upon Granite City residents, some of whom live as close as 1,000 feet away.

Finally, it seems to me that the provisional variance would have required that the non-complying East Quench Tower be equipped with grit arrestors so that in the future this situation would never again occur.

For these reasons, I dissent.

Jacob D. Dumelle, P.E.

Dorothy M. Gunn, Clerk

Illinois Pollution Control Board