

ILLINOIS POLLUTION CONTROL BOARD
March 27, 1986

IN THE MATTER OF:)
)
PETITION FOR SITE-SPECIFIC) R84-48
REGULATION APPLICABLE TO)
PARTICULATE EMISSIONS FROM)
LTV STEEL COMPANY'S)
CHICAGO WORKS HOT SCARFING)
MACHINES (35 ILL. ADM. CODE)
212.451))

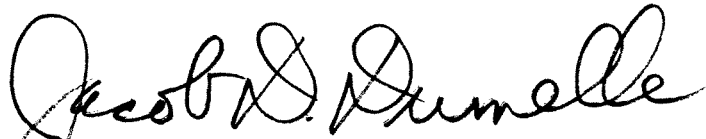
CONCURRING OPINION (by J. D. Dumelle):

My reason for concurring is that the proposed rule does not contain a date by which it automatically ends (a "sunset" provision).

All equipment has a useful life. The hot scarfing machine and its associated wet scrubber may be replaced in the near future. What is that date? A way to generate information on that point during First Notice is to insert a termination date for this rule 6 or 10 years from now. See R85-15, Decatur Site-Specific, and R84-13, Union Oil Company Site-Specific, proposals for First Notice.

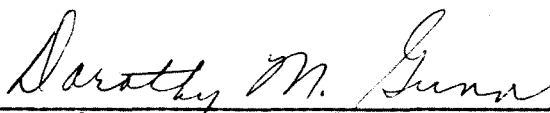
In the instant proceeding a new Federal rule, now out for public comment, may make reconsideration likely in a short period. The respirable particle ambient air quality standard proposed by USEPA would replace the total suspended particulate (TSP) standard here of concern.

Data are not in this record as to the amount of respirable particles (below 10 microns in size) discharged by LTV Steel at this location. It may or may not be a significant discharger that will have to have further controls soon if the proposed standard becomes final.



Jacob D. Dumelle, Chairman

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Concurring Opinion was filed on the 1st day of April, 1986.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board