ILLINOIS POLLUTION CONTROL BOARD May 29, 1984

DEPARTMENT OF THE AIR FORCE, (CHANUTE AIR FORCE BASE))	
Petitioner,	,	
v.) PCB 84-2	4
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,))	
Respondent.)	

DISSENTING OPINION (by J. D. Dumelle):

My reason for dissenting is that the carbon adsorption system is not reliable and is expensive to operate. It is functioning not to remove soluble organics but as a filter unit to remove suspended solids.

The petition is replete with details of maintenance problems which have occurred in the carbon adsorption system. It is obviously unreliable and its use should be discontinued.

The IEPA raises concerns about ammonia removal now possibly occurring in the carbon adsorption system. Ammonia was not a subject of the variance petition, and the Board regulations on ammonia continue to be in effect. Similarly the concern over possible toxics from fire retardant chemicals is misplaced. Relief is not being asked for those discharges (if in fact they exist and are toxic).

The major issue before the Board in this proceeding is that of environmental effects. The Air Force gave little but conclusory statements. The IEPA gave no information. The Board has had enough experience with low flow meandering streams to make a judgment on environmental effects. No fish kills have been reported. The effluent in November and December of 1983, when the tertiary system was inoperative, was 9 and 11 mg/l BOD respectively and 7 and 10 mg/l suspended solids. This is practically at the 10 mg/l BOD standard and lower than the 12 mg/l suspended solids standard.

I would have granted a six or nine month variance and stopped the present waste of money on the carbon adsorption system. In a further proceeding, the Air Force could be required to provide more environmental effects information.

Respectfully submitted,

Jacob D. Dumelle, Chairman

Dorothy M. Gonn, Clerk

Illinois Pollution Control Board