

ILLINOIS POLLUTION CONTROL BOARD  
August 22, 1984

IN THE MATTER OF: )  
 )  
VOLATILE ORGANIC MATERIAL ) R82-14  
EMISSIONS FROM STATIONARY ) Dockets A & B  
SOURCES; RACT III )

DISSENTING OPINION (by J. D. Dumelle and W. J. Nega):

Our reasons for dissenting on the August 10, 1984 order have to do with the lack of foundation of a need to regulate the heat-set web offset industry and the synthetic organic and polymer manufacturing industry (Opinion, pp. 11-24).

The heatset web offset industry regulation appears to be a de minimus one. The majority opinion indicates that only 12 presses in Illinois will be affected by this rule (p. 17). No estimates are given by the majority as to the reductions in volatile organic materials to the atmosphere that will be achieved. Without these data a rule should not be enacted.

Secondly, it is possible that this rule will have little effect upon ozone generation if the VOM reductions, even if significant in quantity, are far removed in location from non-attainment areas. The EcIS on this category (Doc. No. 83/32) contains a map on p. 42 (Fig. 21) showing all of the 17 plants affected by the original proposal. Of the 17, a total of 8 are in attainment counties. Seven of these eight are not adjacent to non-attainment counties. Thus, if the VOM reductions achieved are largely in plants in these non-adjacent counties then little improvement in ozone levels will occur. Put another way, the rule will then have little effect and be largely useless and a waste of money for all.

A third point of concern is the competition between roto-gravure plants and heatset web offset plants. The former have a 1,000 ton/yr. exemption; the proposed rule gives the heatset web offset plants only a 25 ton/yr. exemption. What does this do to business costs and competition (see R. 735)?

The synthetic organic and polymer manufacturing industry proposed rule is far tighter than the IEPA original proposal. The 1,500 component cutoff level in the rule includes plants with about 45 valves not of the ball and plug type. This 45 valve limit is far below the 100 valve exemption level proposed by IEPA. A better component cutoff level would be about 3,300 instead of 1,500. At this number of components, about 100 valves which are not ball and plug type would exist in the plant.

Again, as in the heatset web offset press rule, the majority does not give estimates of VOM reductions to be achieved by this rule. Is this a de minimus rule or is the VOM reduction in

emissions significant? We do not know. How then can we make a considered decision?


In conclusion, the proposed rules for these two industries have a poor data base, may be de minimus, and may not be of significant help to reduce ozone levels.

Every new rule carries its own cost - of permits to apply for - of inspections to be made - of records to be kept. If the very basis for the rule is absent, as detailed above, why be in a rush to regulate?

  
 \_\_\_\_\_  
 Jacob D. Dumelle, Chairman

  
 \_\_\_\_\_  
 Walter J. Nega, Board Member

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Dissenting Opinion was submitted on the 11<sup>th</sup> day of September 1984.

  
 \_\_\_\_\_  
 Dorothy M. Gunn, Clerk  
 Illinois Pollution Control Board