ILLINOIS POLLUTION CONTROL BOARD December 2, 1982

GRANITE CITY STEEL DIVISION) OF NATIONAL STEEL CORPORATION,)) Petitioner,)) PCB 82-109) v. ILLINOIS ENVIRONMENTAL PROTECTION) AGENCY,)) Respondent.)

CONCURRING OPINION (by J.D. Dumelle):

My reasons for concurring in this matter are my concerns about public health and the lack of complete information on costs of alternatives.

The Petition gives the distance from the coke ovens to the nearest residence as "1000 feet" (p.2). No data are given as to other residences that may be nearby or the distances to them. Are we dealing here with a single house or an entire neighborhood?

The Illinois Environmental Protection Agency Recommendation recognizes a carcinogenic hazard from the coke oven emissions (Para. 23). It goes on to state that the pushing emissions "are thought to be less carcinogenic" than coking process emissions.

At this point we have an unknown population size exposed to an indefinite hazard. The alternative, continuing to purchase coke, is not costed out anywhere. Does it cost a dollar more per ton to buy coke or ten cents or what? No one has told us.

Coke oven emissions are dangerous. The USEPA in its "Regulations Under Consideration" list (Bureau of National Affairs <u>Environment Reporter</u>, November 5, 1982, p.963) has a pending proceeding, SAR NO. 1594, "NESHAPS: Listing of Coke Oven Emissions as Hazardous Air Pollutant". This may result in a listing under Section 112 of the Clean Air Act which in turn will require Federal emission standards.

The major problem to me in this Variance is not the relatively short term increase in particulate emissions. It lies in the extremely close proximity of these coke ovens to residences occupied perhaps continually by elderly or infants. If it is at all possible, Granite City Steel ought to seriously consider acquiring these nearby residences (if more than one exists) for uses other than habitation.

acob D. Dumelle, Chairman

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Concurring Opinion was submitted on the 3^{k} day of <u>Heaternell</u>, 1982.

erk Christan L. Mof

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