

ILLINOIS POLLUTION CONTROL BOARD  
May 10, 1979

GRANITE CITY STEEL, a Division )  
of National Steel Corporation, )  
 )  
Petitioner, )  
 )  
v. ) PCB 78-241  
 )  
ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
Respondent. )

OPINION AND ORDER OF THE BOARD (by Mr. Dumelle):

Petitioner has requested a variance from Section 9(a) of the Act and Rule 206(d) of the Board's Air Pollution Control Regulations. The Agency has recommended that a variance be granted. Petitioner and the Agency filed a Stipulation of Facts. No hearing was held.

Rule 206(d) limits the emission of carbon monoxide from sintering plants, blast furnaces, and basic oxygen furnaces to a standard of 200 ppm, corrected to 50% excess air. Petitioner operates an integrated steel mill in Madison County which includes a sintering plant, two basic oxygen furnaces and two blast furnaces. Carbon monoxide emissions from these facilities exceed the standard by 19,689 ppm; 18,907 ppm; and 2,913 ppm after correction respectively.

Petitioner has not installed any controls on these emissions. Petitioner has proposed that the standard in Rule 206(d) be changed in a pending regulatory proceeding (R78-1). Petitioner and the Agency have asked the Board to consider the relevant portions of R78-1 in this matter.

Petitioner has investigated two different control systems to meet the present standard. These are catalytic oxidation and thermal incineration. Catalytic oxidation has been discounted because it has never been demonstrated on steel making operations. Thermal incineration, while feasible, would require large amounts of natural gas which would cost \$36,748/day if available and would require \$14.42 million in capital costs. If fuel oil were used, fuel costs would be higher and increased particulate and sulfur dioxide emissions would result.

Exhibits L and O in R78-1 comprise Petitioner's efforts to ascertain the effect these emissions are having on ambient carbon monoxide levels. Exhibit L calculates a maximum one hour concentration of 2.334 ppm and a maximum eight hour concentration of 1.142 ppm. These values compare favorably with the national and state ambient standards of 35 ppm and 9 ppm. These results were then combined with carbon monoxide emissions from local mobile sources in Exhibit O. Under atmospheric conditions which maximized Petitioner's contribution, the highest projected level was 4.50 ppm. This level was characterized as an ultraconservatively high hybrid of the one hour and eight hour standards.

Denial of a variance in this instance would constitute an arbitrary or unreasonable hardship on Petitioner. Immediate compliance would require a sharp cutback in operations, at significant cost to Petitioner. This cost is rendered unreasonable when it is compared with the minor improvements in ambient carbon monoxide levels which would result. The Board concludes that the long range solution to Petitioner's noncompliance lies in the resolution of R78-1.

In order to satisfy the requirements of Section 113(d) of the Clean Air Act, the Board will make the following conclusions. Petitioner is presently unable to comply with Rule 206(d) of the Air Pollution Control Regulations and Section 9(a) of the Act. Notice and opportunity for public hearing have been provided through the procedure in Section 37 of the Act.

The only interim control possible in this case is curtailment of operations in the event that air quality in the area should be in jeopardy. During normal operation of the facilities, emission levels will remain at the levels stated in the Petition. If carbon monoxide concentrations at the nearest monitoring site reach State and Federal maxima, Petitioner will monitor its operations for upset conditions and report its findings to the Agency. Since Petitioner operates a major source, it must go on notice that it may be liable for non-compliance penalties under Section 120 of the Clean Air Act. This variance shall terminate on June 30, 1979 or upon completion of the proceedings in R78-1, whichever occurs first.

This Opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

- 1) Petitioner is presently unable to comply with Rule 206(d) of the Air Pollution Control Regulations and Section 9(a) of the Act.
- 2) Petitioner is hereby granted a variance from Section 9(a) of the Act as it pertains to Petitioner's carbon monoxide emissions and Rule 206(d) of the Air Pollution Control Regulations until June 30, 1979 or until the Board takes final action in R78-1, whichever occurs first.
- 3) Within 45 days of the date of this Order, Petitioner shall execute a Certificate of Acceptance and Agreement to be bound by the terms of this variance. This Certificate shall be forwarded to the Illinois Environmental Protection Agency, Enforcement Programs, 2200 Churchill Road, Springfield, Illinois 62706. This 45 day period shall be held in abeyance if this matter is appealed. The form of said Certification shall be as follows:

CERTIFICATION

I (We), \_\_\_\_\_, having read and fully understanding the Order in PCB 78-241, hereby accept that Order and agree to be bound by all of its terms and conditions.

SIGNED \_\_\_\_\_


TITLE \_\_\_\_\_

DATE \_\_\_\_\_

- 4) Petitioner must go on notice that it may be liable for non-compliance penalties under Section 120 of the Clean Air Act.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 10<sup>th</sup> day of May, 1979 by a vote of 5-0.

  
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 Christan L. Moffett, Clerk  
 Illinois Pollution Control Board