

ILLINOIS POLLUTION CONTROL BOARD  
June 9, 1977

MOBIL OIL CORPORATION, )  
 )  
 ) Petitioner, )  
 )  
 )  
 ) v. ) PCB 77-22  
 )  
 )  
 ) ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
 ) Respondent. )

CONCURRING OPINION (by Mr. Dumelle):

The record in this case is incomplete and unsatisfactory in many respects. No reasons are given by Mobil Oil for the 29-month delay in achieving the 3.0 mg/l ammonia effluent standard which became effective on December 31, 1974. All we know is that ammonia discharges have been cut about in half from 77 mg/l in 1973 to 42 mg/l for 1975.

Besides this unexplained delay is the question of the effect of Mobil Oil's ammonia discharges upon the Illinois River. The Board's Opinion in the Effluent Criteria proceeding, R70-8, (January 6, 1972) is quite clear that low dissolved oxygen levels in the Illinois River were the reason for regulating ammonia effluents to the Des Plaines River (3 PCB 406).

The Agency, which should be fully familiar with this major Board Opinion, was silent on this point. We do not know in this record whether dissolved oxygen levels in the Illinois River below Peoria are still substandard and deleterious to fish or whether the River has now recovered and meets Illinois standards.

One milligram per liter of ammonia requires 4.5 times as much oxygen. Thus the daily average of 889 lbs. of ammonia and the daily maximum of 1,957 lbs. granted to Mobil Oil translate to 4,000 lbs. and 8,806 lbs. of oxygen required. This in turn, translates to the raw sewage approximate equivalent of a City of 24,000 people or 52,836 respectively. We would not tolerate the raw sewage dumping to the Illinois River of a Pekin (31,375) or a Berwyn (52,502). Why were the ammonia levels not reduced in a timely fashion?

If the waters of Illinois are to be made "fishable and swimmable" then we had best follow the Board's dates for compliance.

I concur in this decision because it does place Mobil Oil on a research program. I hope that in future variance proceedings, if still necessary, that they will examine the effects of their ammonia discharges upon the dissolved oxygen of the Illinois River.

Respectfully submitted,



Jacob D. Dumelle

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Concurring Opinion was submitted on the 13<sup>th</sup> day of June, 1977.



Christan L. Moffett, Clerk  
Illinois Pollution Control Board