

ILLINOIS POLLUTION CONTROL BOARD
December 11, 1975

CENTRAL ILLINOIS LIGHT COMPANY,)
Petitioner,)
)
v.) PCB 75-177
)
ENVIRONMENTAL PROTECTION AGENCY,)
Respondent.)

Mr. William B. Wombacher and Mr. Randall W. Moon, O'Hern, O'Hern and Wombacher, appeared on behalf of Petitioner, William A. Erdman appeared on behalf of Respondent.

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

This matter comes before the Pollution Control Board (Board) upon the June 23, 1975, Amended Petition of Central Illinois Light Company (CILCO). The Amended Petition seeks variance from Rule 3-3.112 of the Rules and Regulations Governing the Control of Air Pollution until May 30, 1975, and from Rules 203 (g)(1)(B) and 204 (c)(1)(A) of the Air Regulations until October 1, 1975, for Boilers #5 and #6 at its R.S. Wallace Generating Station. The station is located in East Peoria, Tazewell County, Illinois, and has ten steam boilers, six fueled with natural gas and four fueled with pulverized coal.

Boiler #5 was installed in 1939 and has a rated heat input of 323 MMBTU per hour. Boiler #6 was installed in 1941 and has a rated heat input of 420 MMBTU per hour. Both boilers were originally coal-fired but in 1949 they were converted to burn natural gas as well. Each have mechanical dust collectors. Calculated at 85% efficiency for the collectors, the boilers, when using pulverized coal, emit 1.5 lb per MMBTU per hour (R 140). However, the collectors are probably less than 85% effective (R 164). Rule 3-3.112 of the Rules and Regulations Governing the Control of Air Pollution set a limit of 0.6 lb. per MMBTU and Rule 203 (9)(1)(B) of the Air Regulations prohibits particulate emission rates from exceeding 0.1 lb. per MMBTU.

Due to a curtailment of natural gas supply, Boilers #5 and #6 were operated, intermittantly from April 28 and April 21, respectively, with pulverized low sulfur coal (R 83-4). These Boilers provided CILCO with 70 megawatts (Pet. X-4). The first time CILCO had knowledge of the impending gas shortage was in 1971 (R 27). In 1972 CILCO

experienced a 3 month curtailment; in 1973, a 7 month curtailment; and 1974, a 12 month curtailment (R 28). In 1974 CILCO's natural gas allocation was curtailed 27% and through April, 1975, 34% (R 29). CILCO never approached other power companies to obtain firm purchase power. CILCO states that it considered various supplementary devices to control its particulate emissions and comply with the Air Regulations. However, no device could be installed before October when they intended to take the Boilers off the line (R 144-50). Petitioner also rejected converting to oil as the time was too short (R 49). Therefore, CILCO, considering this to be an emergency, began operating the subject boilers on a last on first off basis (R 63). Indeed, CILCO asks that this variance be granted for emergency purposes (Pet. 5).

The parties stipulated to the admission of the following air quality data for the Peoria area: (a) the 24 hour primary particulate standard was exceeded one day at a monitor one half mile northeast of CILCO; (b) the annual geometric mean of 75 ugm/m^3 was exceeded at the Pekin station some ten miles southwest of CILCO (R 130-32). Petitioner submitted a Battelle study which monitored the Peoria Air Quality from four stations during the period of April, 1974, through March, 1975. At first glance this report states that Peoria is meeting the primary ambient air quality standards. Battelle arrived at this conclusion by averaging the monitor reports. Actually the report shows that Peoria exceeded the annual geometric mean at one monitor (R 154-66).

Petitioner states on page 5 of its November 21, 1975, "Proposed Findings of Fact and Order" that it is meeting the emission limitations for SO_2 . Therefore a variance from Rule 204 (c)(1)(A) is not needed and one will not be granted.

The Board has often stated that it will not grant variances for use in emergency situations, Galesburg State Research Hospital v. EPA, PCB 75-198 (1975); State of Illinois, Department of Mental Health, Manteno State Hospital v. EPA, PCB 74-352 (1974); Stein Hall and Company v. EPA, PCB 73-561. In addition, the record reflects the failure of the area to meet the ambient air quality standards. The Board also notes that Petitioner has failed to provide a compliance plan even though there appears to be a good chance of a gas shortage for next year (Pet. X 1-3). The Board holds that CILCO has failed to meet its burden and, therefore, the Board must deny the relief sought.

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

ORDER

It is the Order of the Pollution Control Board that CILCO's petition for variance from Rule 3-3.112 of the Rules and Regulations Governing the Control of Air Pollution and Rules 203(g)(1)(B) and 204(c)(1)(A) of the Air Regulations be and is, hereby, denied.

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 11th day of December, 1975 by a vote of 4-0.


Christan L. Moffett, Clerk
Illinois Pollution Control Board