

ILLINOIS POLLUTION CONTROL BOARD
December 19, 1974

STATE OF ILLINOIS)	
DEPARTMENT OF MENTAL HEALTH)	
JACKSONVILLE STATE HOSPITAL,)	
Petitioner)	PCB 74-356
vs.)	
ENVIRONMENTAL PROTECTION AGENCY,)	
Respondent.)	

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

On October 1, 1974, Jacksonville State Hospital filed its Petition For Variance, seeking therein permission to operate its four coal-fired boilers beyond the particulate limits prescribed by this Board until October 1, 1975, during which period mechanical collectors will be designed and installed. Although not specifically cited in the Petition For Variance, Petitioner's general request would entail variance from the provisions of Rule 2-2.53 of the Rules and Regulations Governing the Control of Air Pollution and from the compliance date of May 30, 1975 contained in Rule 203(g) of Chapter 2, Part II of the Pollution Control Board Regulations.

Petitioner is a state owned medical facility rendering service to persons in need of mental treatment. Petitioner's facility, located in the City of Jacksonville, County of Morgan, Illinois, is comprised of fifteen separate buildings. Steam heat, hot water and electricity for the entire facility are produced in Petitioner's power plant, which includes four coal-fired boilers. The boilers, with chain and travelling grate stokers and forced draft fans, have the following specifications:

<u>Manufacturer</u>	<u>Number</u>	<u>Year Installed</u>	<u>Rate Heat Input (lbs per million BTU)</u>	<u>Lbs. of Steam</u>
Springfield	3	1946	59	40,000
Lasker	1	1968	66	45,000

The flue gases from Petitioner's boilers are discharged from a 200 foot stack. All of the boilers are presently equipped with gravity-fed fly-ash collectors and no more than two boilers are operated simultaneously.

Petitioner utilized 20,800 tons of coal during fiscal year 1974. Analysis of that coal is as follows:

Ash	5.82%
Sulfur	2.91%
BTU	11,269
Total Moisture	16.32%

The Agency has calculated Petitioner's present particulate emission rate to be 1.29 pounds per million BTU. The Agency is of the opinion that to achieve compliance with Rule 203(g), Petitioner must reduce its emissions 78% for its Springfield boilers and 80% for its Lasker boiler.

Petitioner proposes to achieve compliance with the installation of multi-clone fly-ash collection devices on each of the four coal-fired boilers. The project is estimated to cost \$180,000. Petitioner has not obtained construction permits from the Agency for these devices. Petitioner proposes to install the multi-clone collection devices under the following schedule:

Agreement made with architect - October 1, 1974
Design complete - January 1, 1975
Construction started - March 1, 1975
Construction complete - October 1, 1975

Construction of the control devices will be accomplished while two boilers are operating. Tie-in of the devices will be made alternatively while boilers are shut down for maintenance. The Agency is of the opinion that a properly designed multi-clone collection device is capable of achieving compliance with the regulations.

We are disposed to grant this variance as requested; however, certain comment is in order. Paragraph VI of the Petition For Variance is, in pertinent part, as follows:

"VI. Consequences of Variance Denial

Denial of variance to permit operation of boilers during the planned design and installation of the mechanical precipitators would force a complete shut down of Hospital. This would have far reaching implications including:

- A. Dismissal of a 670 person work force with a resulting loss of a \$6,831,300 annual payroll.
- B. Deny the people of the State of Illinois mental treatment at a regional facility.
- C. Increase the mental treatment burden of other state hospitals."

The Board has often stated that the denial of a petition for variance is not tantamount to shut-down; a denial merely subjects the petitioner to possible enforcement action. Short of a denial, this Board has the authority to require accelerated compliance schedules, with possible increased cost attendant thereto.

The Agency has noted two items which are deficient in Petitioner's schedule for achieving compliance. First, no mention is made of the date upon which the control devices will be purchased. Second, no indication is made of the date upon which compliance will be achieved. The Agency's observations are well taken and will be incorporated into our Order.

This Opinion constitutes the findings of fact and conclusions of law.

ORDER

IT IS THE ORDER of the Pollution Control Board that Jacksonville State Hospital be granted a variance until October 1, 1975, from the provisions of Rule 2-2.53 of the Rules and Regulations Governing the Control of Air Pollution and from Rule 203(g) of Chapter 2, Part II of the Pollution Control Board Regulations during which period the subject control devices will be installed, subject to the following conditions:

1. Within thirty (30) days of the date of this Order, Petitioner shall submit a detailed compliance plant to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706

Said compliance program shall contain the following dates:

- i. Petitioner's request for bids
- ii. Time required for consideration of bids
- iii. Letting contract
- iv. Shop drawing preparation time
- v. Fabrication by supplier time
- vi. Shipment time
- vii. Tie-in time
- viii. De-bugging time
- ix. Final completion date.

2. Petitioner shall submit quarterly reports to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706

outlining progress made toward completing installation of the multi-clone collection devices.

3. Petitioner shall apply for all necessary construction and operating permits from the Agency.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, do hereby certify that the above Opinion and Order was adopted on this 19th day of February, 1974 by a vote of 4 0.

Christan L. Moffett (gn)