

ILLINOIS POLLUTION CONTROL BOARD  
November 29, 1973

ENVIRONMENTAL PROTECTION AGENCY )  
 )  
 )  
 v. ) PCB 72-491  
 )  
 )  
 COMMONWEALTH EDISON COMPANY )  
 (Waukegan Station) )

ENVIRONMENTAL PROTECTION AGENCY )  
 )  
 )  
 v. ) PCB 72-492  
 )  
 )  
 COMMONWEALTH EDISON COMPANY )  
 (Sabrooke Station) )

COMMONWEALTH EDISON COMPANY )  
 )  
 )  
 v. ) PCB 73-40  
 )  
 )  
 ENVIRONMENTAL PROTECTION AGENCY )  
 (Waukegan Station, Sabrooke Station) )  
 )

ORDER OF THE BOARD (by Mr. Dumelle):

Commonwealth Edison filed a Motion for Stay of the October 4, 1973 Order. The Motion for Stay was received on November 9, 1973. Edison requests that payment of the \$31,000 penalty be stayed until the Illinois Supreme Court decides whether the Board's discretionary authority to impose monetary penalties violates the Illinois Constitution in City of Waukegan v. EPA. The Board has been granting stays of the payment of all penalties, when requested to do so, pending final resolution of this question. Edison further

placed in service, in order to verify the effects of such operation on ambient air quality in the Waukegan area; modify the restrictions on the operation of the Waukegan station imposed by Section 2(b) of the Order to allow Edison to operate Waukegan units at those minimal units loadings not requiring the use of No. 2 distillate fuel oil which minimum loadings were not included in the record of the proceedings; and modify the schedule for shutdown of the Sabrooke Units 3 and 2 (and correct the scheduling date for the shutdown of Unit 1) for conversion to oil-firing to reflect the delays that Edison has experienced in the availability of equipment. Because of the potential for major health risks demonstrated in the record, the Board feels that Powerton Units 1-4 should be operated before Waukegan above a minimal value. The Board notes that at a minimum, Powerton Units 1-4 would be operated at a level to insure first contingency protection and prevent icing on transmission lines during the six-month period that the Waukegan variance is in effect. The Board therefore retains the Order of Operation which required Edison to operate Powerton Units 1-4 ahead of Waukegan above a minimal level contained in Section 2(b) of the Order in PCB 73-40 with one exception. Edison will operate all available coal-fired units before placing peaking units in operation. This modification is in light of the critical supply of No. 2 fuel oil and natural gas which Edison uses as peaking fuel.

Edison has taken steps to comply with Section 2(b) of the Order which required them to install ambient air monitoring equipment. Edison seeks to modify the operating restrictions placed on the Waukegan Station in order to allow it to operate Waukegan Station at full load once the ambient air monitoring installations have been placed in service, in order to verify the effects of such operation on ambient air quality in the Waukegan area. The Board, therefore modifies the operating restrictions found in Section 2(b) in order to allow Edison to conduct such ambient air monitoring tests. If, short term particulate and SO<sub>2</sub> primary air quality standards are violated, Edison shall immediately notify the Agency and take such steps as is necessary to protect the citizens of Waukegan.

Edison has presented the Board, through an Affidavit of Mr. Gilliom, Superintendent of the Waukegan Station, information which shows the minimum loading which may be maintained by all coal operation. The 315 megawatt operating restriction is hereby amended to read 355 megawatts which is the minimum net operational level which may be maintained by coal-firing alone. To maintain the 315 megawatt restriction, Edison would need to use between 650 to 2,000 gallons of No. 2 oil per hour to insure that the flame in each unit is stabilized in order to prevent boiler explosions. Edison may, therefore operate Units 5, 6, 7, and 8 at 24, 24, 153, and 153 megawatts, respectively.

Edison has presented additional testimony, as shown in the Affidavit of Mr. DeChaud, that delay in the receipt of equipment has prevented the performance of all necessary work to insure conversion of the Sabrooke Units to oil. Edison has requested several brief extensions of the conversion date. Because of the short time period involved, one month, the Board amends its Order to reflect the date. The Board hereby amends its Order as follows:

A. By amending Section 2(b) relating to the Waukegan Station to read:

"From the single stack emission limit of 0.60 lbs/MBtu and the site emission limit of 0.24 lbs/MBtu, Rule 3-3.112 of the Air Rules, and Rule 203(g), on the condition that the total Waukegan Station not be operated above 355 megawatts (the minimum loadings not requiring the use of distillate oil) unless all other available Edison capacity (including the Sabrooke Station and Powerton Units #1-4 but excluding the fast-start peaking units) has been placed in service."

B. By amending Subsection 3, one of the paragraphs containing terms and conditions of the Waukegan Station variance, to read:

"Edison is to establish a nine station network of Hi-Vol samplers and SO<sub>2</sub> monitoring devices. Locations of the monitoring networks and all other relevant details shall be subject to Agency direction and approval. Daily data is to be furnished to the Agency. Once the network of monitoring stations has been placed in service, the limitation on the operation of the Waukegan Station herein specified shall be suspended to allow the accumulation of relevant data to enable the Board to better evaluate the actual effects of Waukegan Station emissions on ambient air quality. If either 24 or 3 hour SO<sub>2</sub> and particulate air quality standards are exceeded, Edison shall immediately notify the Agency and take necessary steps to protect the surround citizens as Edison or the Agency deem necessary. This suspension only applies during testing periods.

C. By amending Section 1(b) relating to the Sabrooke Station to read:

"For Units #3, 2, and 1, until those units can be shut down for conversion to oil firing on January 1, 1974, May 1, 1974 and September 30, 1974, respectively, on the condition that in the interim these units will be operated only after all other available Edison capacity (excluding Powerton Units #1-4, the fast-start peaking units, and the Waukegan Station above 355 megawatts) has been placed

in service, except that any one of the units may be operated at the minimum level necessary to provide steam for water demineralizing and heating the station, or to prevent stack deterioration."

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Order was adopted on the 29<sup>th</sup> day of November, 1973 by a vote of 5 0.

Christan L. Moffett  
Christan L. Moffett, Clerk  
Illinois Pollution Control Board