

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS  
POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
)  
SITE SPECIFIC PETITION OF )  
MOBIL OIL CORPORATION FOR )  
RELIEF FROM 35 ILL. ADM. CODE 304.122, )  
AMMONIA NITROGEN EFFLUENT STANDARDS )

R97-28  
(Water - Regulatory)

*P.C. #3*

**NOTICE**

See Attached Service List

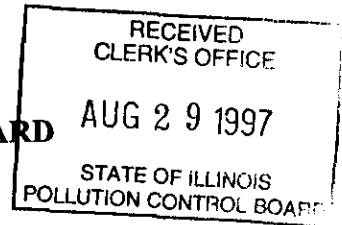
PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S COMMENTS** for the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: *Margaret P. Howard*  
Margaret P. Howard  
Assistant Counsel  
Division of Legal Counsel

DATE: August 25, 1997

Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/782-5544



**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**IN THE MATTER OF:**

**SITE SPECIFIC PETITION OF  
MOBIL OIL CORPORATION FOR  
RELIEF FROM 35 ILL. ADM. CODE 304.122,  
AMMONIA NITROGEN EFFLUENT STANDARDS**

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**R97-28  
(Water - Regulatory)**

**COMMENTS OF THE  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA") by its attorney, Margaret P. Howard, and files its Comments in regard to Comments filed by the Office of the Illinois Attorney General ("IAGO") on August 6, 1997.

In its comments, the IAGO suggested that Mobil Oil Corporation ("Mobil") design and implement a breakpoint chlorination and de-chlorination system. (Comments of the Attorney General's Office, p.4) The Illinois EPA cannot support this suggestion. The Illinois EPA has been concerned about breakpoint chlorination over the past twenty-five years due to the formulation of trihalomethanes during the process. Trihalomethanes are toxic and, when found in public water supplies, are considered to be carcinogenic to humans. For this reason, the Illinois EPA has, as a general practice, disallowed the process. The Illinois EPA has only permitted the process at one or two facilities in the state. In addition to this general advisory about the potential formation of trihalomethanes in the breakpoint chlorination process, the risk of such formation in a refinery effluent where unknown hydrocarbon materials created by the biological treatment process may exist, is also a concern that must be considered. The Metcalf and Eddy reference, included with the IAGO'S comments as Attachment A, lists the formation of the trihalomethanes as one of several disadvantages of breakpoint chlorination. Other disadvantages include: the potential to produce high chlorine residuals which are toxic to aquatic organisms, the process' pH sensitivity and the elevation

of dissolved solids concentrations in effluent. (Comments of the Attorney General's Office, Attachment A)

WHEREFORE, the Illinois EPA recommends that breakpoint chlorination not be utilized at the Mobil Oil facility. Mobil detailed its consideration of alternative technologies in its Petition for Site-Specific Relief from 35 Ill. Adm. Code 304.122, Ammonia Nitrogen Effluent Standards ("Petition") on pages 13-14. The Illinois EPA reviewed the Petition, as well as the testimony and exhibits entered at the hearing held on July 2, 1997. In addition, the Illinois EPA has been involved with the issues raised by Mobil, that has led to the filing of the Petition, since the spring of 1996. (T. at 12) All of the possible alternatives have been considered and, as stated at the hearing, the Illinois EPA maintains that the site specific relief requested by Mobil should be granted. (T. at 12)

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: Margaret P. Howard  
Margaret P. Howard  
Assistant Counsel

Dated: August 25, 1997

2200 Churchill Rd.  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

THIS FILING SUBMITTED ON RECYCLED PAPER

G:\WP51\HOWARD\Mobil Oil\COMMENTS

STATE OF ILLINOIS                    )  
  )  
COUNTY OF SANGAMON                )

**PROOF OF SERVICE**

I, the undersigned, on oath state that I have served the attached **ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S COMMENTS** upon the person to whom they are directed, by placing a copy of each in an envelope addressed to:

See Attached Service List

and mailing them from Springfield, Illinois on August 25, 1997 with sufficient postage, as indicated.

*Joyce Embree* \_\_\_\_\_

SUBSCRIBED AND SWORN TO BEFORE ME

this 12th day of August, 1997.

*Cynthia L. Wolfe* \_\_\_\_\_  
Notary Public



97-28  
MOBIL SITE SPECIFIC RULEMAKING  
SERVICE LIST

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