

ILLINOIS POLLUTION CONTROL BOARD
October 10, 1972

ILLINOIS POWER CO. (HENNEPIN STATION))
)
)
 v.) #72-297
)
)
 ENVIRONMENTAL PROTECTION AGENCY)

Opinion of the Board (by Mr. Currie):

In Illinois Power Co. v. EPA, #71-193, 2 PCB 547 (Sept. 30, 1971), we approved a control plan that envisioned erection of a 99% precipitator on Hennepin Unit 2 by June 30, 1972, which would cause particulate emissions from the two Hennepin units operating at the same time and discharging through a single stack to comply with the then applicable regulations. The opinion observed that the company's ability to meet the standard by controlling only one of the two units "demonstrates the laxity of the existing standard," which has since been tightened with a future effective date. PCB Regs., Ch. 2, Rule 203(g). To meet this new standard, and recognizing that it may on occasion be necessary to operate Unit #1 alone when #2 is temporarily inoperable, Illinois Power now proposes to install a 99.5% precipitator on Unit #1 by June 30, 1974, eleven months before the effective date of the new standard. A variance is sought to allow use of Unit #1 by itself, when necessary, before that date, although this will result in emissions exceeding those allowed by the presently effective standard.

The Agency agrees that such permission should be granted when indispensable to avoid interruption of electric service, and we note that the total weight of emissions during such a period, while in violation of the standard, will be less than those lawfully emitted when both units operate at once. The company agrees to other conditions suggested by the Agency to assure that there is a real need for the use of Unit #1 by itself. The Agency's principal concern was that perhaps several months could be cut from the schedule for precipitator construction, but upon the submission of further affidavits by the company the Agency agrees that the schedule is reasonable and we accordingly approve it.

ORDER

Illinois Power Co. is hereby granted a variance allowing particulate emissions from Hennepin Unit #1 in excess of those

permitted by Rule 2-2.21 of the Rules and Regulations Governing the Control of Air Pollution until October 10, 1973, subject to extension upon a proper showing until June 30, 1974, provided the following conditions are met:

1. That the Variance shall apply only when all of the following requirements are met:
 - a. Unit #2 and its precipitator are not in operation due to malfunctions or necessary maintenance; and
 - b. Interruptible gas is not available at the residential rate to Unit #1; and
 - c. Demand conditions for electrical supply, or the maintenance of spinning reserves, or the maintenance of adequate voltage on the Petitioner's electrical network is such to require the additional generating capacity of Unit #1, and
 - d. Operation of Unit #1 is necessary until other controlled units of Petitioner or other controlled systems can be brought into operation.
2. That records be submitted along with the required program report stating the date, length of operation, and reasons for the operation of Hennepin Unit #1 in violation of the present particulate emission regulations.
3. That Petitioner maximize utilization of its Baldwin Unit, Wood River Units #4 and #5, and Havana Units (all of which are presently in compliance with particulate emission regulations) before utilizing Hennepin #1.
4. That Petitioner utilize Hennepin #1 in preference to Wood River Units #1, #2 and #3 until Wood River Units #1, #2 and #3 become in compliance with particulate emission regulations.
5. That emissions from Hennepin Unit #1 shall receive the best practicable control consistent with existing control equipment;

6. That Illinois Power shall diligently pursue the construction of the Unit #1 precipitator in accordance with its own schedule, as follows:

Completion of design	December, 1972
Construction of model and model testing	March, 1973
Submission of Model test report to consulting engineers	June, 1973
Flue gas duct design	June, 1973
Commencement of on-site construction	July, 1973
Shipment of precipitator	Oct. -Dec. 1973
Construction and Performance Test Completed	June 30, 1974

I, Christan Moffett, Clerk of the Pollution Control Board, certify that the Board adopted the above Opinion this 10th day of October, 1972, by a vote of 5-0.

Christan J. Moffett