

ILLINOIS POLLUTION CONTROL BOARD
February 17, 1972

OLIN CORPORATION (E. Alton Plant))
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 v.) PCB 71-374
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 ENVIRONMENTAL PROTECTION AGENCY)
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Dissenting Opinion (by Mr. Dumelle)

The Board by a 4-1 vote has again extended a matter which needed no extension in my view. Olin has 1200 tons of 1.14% coal purchased for \$16,000. The Board's own episode regulations require 1% sulfur coal.

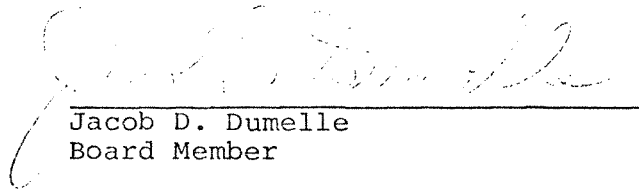
Episodes are what kill people. The dead of Donora, of New York, of London and even of Chicago (in November 1969) are proof of that.

And the Board after hearings on episode strategy has decreed a 1.0% sulfur limit on emergency coal. Olin, by the Agency's recommendation received by the Board of February 10, 1971 (p. 2) will put almost 3/4 of a ton of additional sulfur dioxide into the atmosphere each day of an episode. The 4-day design episode will then add 3 tons more sulfur dioxide to an overburdened atmosphere.

Dr. Bertram Carnow, who heads the Institute for Environmental Quality's Medical Task Force believes that there may be no threshold for health effects from sulfur dioxide. If he is correct then the less sulfur dioxide the better.

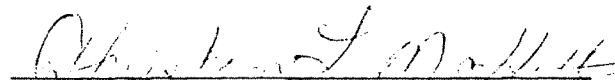
Olin, could simply buy a small amount of lower sulfur coal, say of 0.7% content, and blend it with the present stock to reduce the overall average to the regulation. Simple mathematics will show that only 560 tons of 0.7% sulfur coal need be purchased. Using Olin's average cost of \$13.33 per ton for the 1.14% sulfur coal and increasing it to, say \$16 per ton for the 0.7% sulfur coal results in a cost of 560 (16) or \$8,960 to achieve the Board regulation. But this is really not the cost to Olin. The cost is far less. Because the \$8,960 represents fuel that would be burned anyway. The cost to Olin then is simply the annual carrying charge on the \$8,960. If the cost of money to a corporation is 10%, then Olin's added cost is less than \$900 per year!

Is this too much for a major corporation to spend to protect the public health in an episode? I think not.



Jacob D. Dumelle
Board Member

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify the above Dissenting Opinion was filed on the 15th day of February, 1972.



Christan L. Moffett, Clerk
Illinois Pollution Control Board