

ILLINOIS POLLUTION CONTROL BOARD
November 22, 1974

STATE OF ILLINOIS)
DEPARTMENT OF MENTAL HEALTH)
LINCOLN STATE SCHOOL)
PETITIONER)
)
)
v.) PCB 74-348
)
)
ENVIRONMENTAL PROTECTION AGENCY)
RESPONDENT)

OPINION AND ORDER OF THE BOARD (by Mr. Marder)

This action involves a request for variance filed on September 24, 1974, by the Lincoln State School. Relief is sought from Rule 203 (g) (1) (B) of the Illinois Pollution Control Board's Air Pollution Regulations as it pertains to Petitioner's two power plants. The Agency has interpreted this petition to include a request for variance from Rule 2-2.53 of the Rules and Regulations Governing the Control of Air Pollution as well as a 203 (g) (1) (B) request. Although a specific request for a Rule 2-2.53 variance was not requested, the Board will consider the 203 (g) (1) (B) request to include both pleadings.

Petitioner owns and operates a State School (residential facility) for approximately 1900 mentally retarded and otherwise developmentally disabled persons. The major facilities are divided into two campuses known as main campus and annex campus. The facilities are located in proximity to the city of Lincoln, Illinois. Separate power plants are required in that these two campuses are approximately 2 1/2 miles apart from each other.

The main campus has as its power plant facility three 50 x 10⁶ BTU/hr boilers which utilize about 18,000 tons of coal per year. The plant is used for heating as well as electric generation. This facility services 1000 persons. The annex power plant is comprised of two 38 x 10⁶ BTU/hr and one 28 x 10⁶ BTU/hr boilers. These boilers are used for heating purposes; however, no mention is made of electric generating capacity in the Petition.

Petitioner contends that its discharges of particulates are approximately 0.82 pounds per million BTU. Rule 2-2.53 has an allowable emission rate of 0.80 pounds per million BTU. Agency calculations using Compilation of Air Pollutant Emission Factors, AP-42, Table 1.1-1, reveal the following:

Main Campus Emissions	0.707#/10 ⁶ BTU
Annex Campus Emissions	1.41#/10 ⁶ BTU
Allowable 2-2.53	0.80#/10 ⁶ BTU
Main Campus Allowable 203(g)	0.32#/10 ⁶ BTU
Annex Campus Allowable 203 (g)	0.38#/10 ⁶ BTU

From the above, it is clear that only the annex power plant is in need of a variance from Rule 2-2.53, and both plants will require variance from 203 (g).

Petitioner has undertaken a compliance plan which will yield meeting 203 (g) specifications by November 1, 1975. Said compliance plan includes the installation of multi-clone devices at a cost of \$260,000. Petitioner offers the following compliance dates:

Project Approved by State	Sept. 11, 1974
Architectural Design	Oct. 1, 1974
Complete Design	Jan. 1, 1975
Start Construction	March 1, 1975
Compliance	Nov. 1, 1975

The Agency (Reco Pg. 4) states that the above compliance plan is reasonable, and the Board concurs in this conclusion.

While on its face the compliance plan would indicate an undue lack of initiative on Petitioner's part, the past history of this facility shows otherwise. During 1972 plans were initiated to convert all boilers to oil firing; indeed, funds were appropriated (\$225,000) in 1973 for such conversion. However, due to the shortfall of #2 oil, this compliance plan was abandoned. The above compliance plan was then drawn up to supplant that which was invalidated by factors beyond Petitioner's control.

Although information on the subject of environmental impact is very sparse, the Board takes note that the location of the subject facilities are in an area which is not normally of high particulate readings. The Agency also reports that no citizen complaints have been received pertaining to nuisances in the area.

Petitioner claims a hardship will occur should this variance be denied. It is alleged that services for the some 1900 persons in their care would be impossible without the heat and electricity generated by these units. The Board again states that failure to grant a variance is not a shutdown order but merely subjects Petitioner to possible enforcement action. However, in this case the possible hardship generated would not be on Petitioner but on those not able to care for themselves, and is thus more severe.

In light of the reasonable attempt made at compliance, the minimal environmental impact, and the potential hardship, the Board will grant the requested variance.

In closing, the Agency noted that there were specific operational boiler deficiencies which would serve to reduce the already low particulate capture efficiency. The Agency has pointed out that weekly settling chamber cleanouts would serve to maintain rated efficiency. This cleanout procedure will become part of our order.

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

ORDER

IT IS THE ORDER of the Pollution Control Board that:

Variance is granted from Rule 2-2.53 of the Rules and Regulations Governing the Control of Air Pollution for the Annex Campus boilers until May 30, 1975.

Variance is granted from Rule 203 (g) for the Annex Campus boilers from May 30, 1975, to November 1, 1975.

Variance is granted from Rule 203 (g) for the Main Campus boilers from May 30, 1975, to November 1, 1975.

Variance is dismissed as moot from Rule 2-2.53 of the Rules and Regulations Governing the Control of Air Pollution for the Main Campus boiler.

The above variances are granted subject to the following conditions:

- A) Petitioner shall apply for all necessary construction and operating permits for its coal-fired boilers.
- B) Petitioner shall submit quarterly operating reports to the:
Illinois Environmental Protection Agency
Division of Air Pollution Control
Control Program Coordinator
2200 Churchill Road
Springfield, Illinois 62706

Such reports shall contain at a minimum a detailed timetable of the entire control program and progress made toward completing the installation of the multi-clone collection devices.
- C) Petitioner shall clean fly ash from the existing chamber on the Annex Campus boilers at least once per week.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted by the Board on the 22nd day of November, 1974, by a vote of 4 to 0.

