

ILLINOIS POLLUTION CONTROL BOARD
March 28, 1972

IMPERIAL SMELTING CORPORATION)
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 v.) PCB 71-393
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 ENVIRONMENTAL PROTECTION AGENCY)
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Supplemental Statement by Jacob D. Dumelle

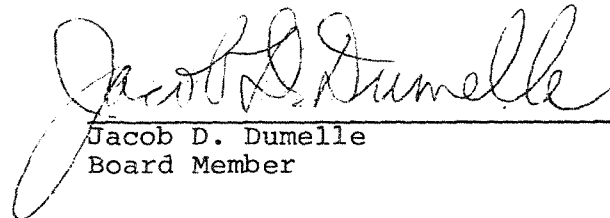
While I agree and voted for the grant of the variance I do not agree with Paragraph 4 of the Order requiring stack tests on each piece of control equipment. The opinion on page 3 states:

3. Stack tests will be required by Imperial. This is necessary so that the Agency and Imperial know whether the equipment installed is in compliance with the law.

On its face this is dangerous language. It would require stack tests on all control equipment everywhere in Illinois at an enormous cost. I do not think the Board wants to make that blanket requirement.

In the Board's discussion it was brought out that stack tests were a means of accumulating needed technical data on new control technology. I agree with that. But stack tests are expensive and we are here imposing a costly requirement of perhaps \$3,000 to \$5,000. Should not the U.S. Environmental Protection Agency, with its national control technology needs, be the agency to decide where research is needed?

In this case the stipulation showed emissions only 23.2% over the standard. It seems obvious that a 95% efficient wet scrubber if properly operated and 99% efficient baghouses will easily meet the standard and the opinion so states (p.2, paragraph 4). Stack tests then should not have been required.



Jacob D. Dumelle
Board Member