

ILLINOIS POLLUTION CONTROL BOARD  
October 4, 1974

CENTRAL ILLINOIS PUBLIC SERVICE    )  
  )  
                                  v.        )  
  )  
ENVIRONMENTAL PROTECTION AGENCY    )  
  )        PCB 73-185

Mr. Thomas Cochran of Sorling, Catrone & Hardin, appeared for Central Illinois Public Service;  
Mr. Delbert B. Haschemeyer, Assistant Attorney General, appeared for Environmental Protection Agency.

OPINION AND ORDER OF THE BOARD (by Mr. Dumelle):

Central Illinois Public Service (CIPS) filed a Petition for Variance with the Environmental Protection Agency (Agency) on May 2, 1973. The Agency filed a recommendation on June 21, 1973, approving the variance subject to certain conditions. A hearing was held on July 23, 1973, at which time the parties submitted a stipulation.

CIPS operates an electric power generating station known as the Meredosia Station located near Meredosia, Illinois. CIPS seeks a variance from Chapter 2, Part II, Rule 204(e) of the Pollution Control Board Rules and Regulations (Air Rules) to allow the continued use of high sulfur coal in its boilers. CIPS is currently in compliance with the 6.0 lb/MBTU emission standard (Rule 204(c)(1)(B)(i) of the Air Rules). However, under an elevated temperature inversion, emissions from CIPS short stacks could result in a violation of Rule 204(e) of the Air Rules in that the site emissions from the Meredosia Station could violate the 1300 ug/m<sup>3</sup> three-hour SO<sub>2</sub> secondary standard. In order to achieve compliance, CIPS would have to spend \$2,000,000 to construct higher stacks for its boilers.

CIPS is currently complying with the particulate emissions requirements of Rule 3-3.112 of the Rules and Regulations Governing the Control of Air Pollution and has filed a compliance with Rule 203(g)(1)(c) of the Air Rules, which shows that it will meet the 1975 deadline on February 1, 1974. Thus the synergistic effects of SO<sub>2</sub> and particulates should be at a minimum. The Agency has not received any public criticism concerning the operation of the Meredosia Station.

While the Petitioner has not come forth with a definite plan to bring the SO<sub>2</sub> emission into compliance, the Board feels that the variance should be granted. The forecasted violation of the secondary standard will only occur when the station is at peak load, is burning 3% sulfur coal, and an elevated temperature inversion exists. The likelihood of all three occurring simultaneously is small. Moreover, both CIPS' and the Agency's dispersion models, that predicted a violation of Rule 204(e), have not been calibrated to observed air quality, since no data is available at the Meredosia site. CIPS and the Agency have agreed to CIPS' establishing a sulfur dioxide monitoring program for its Meredosia Station, details of which were set out in the stipulation as follows:

"5. CIPS will establish a sulphur dioxide (SO<sub>2</sub>) monitoring program for its Meredosia Power Station, Meredosia, Illinois, to include the following equipment and procedures:

a. Three continuous SO<sub>2</sub> monitoring stations with instruments approved by the Agency.

b. One meteorological station to measure wind speed and direction with continuous recording. This station is in existence and its equipment and location have been approved by the Agency.

c. The equipment in a and b above will be maintained and calibrated in accordance with methods acceptable to the Agency. The three SO<sub>2</sub> monitoring sites will be located in a northeasterly direction from Meredosia Power Station at approximately 1/4 mile, 1 to 1-1/4 miles and 2 to 2-1/2 miles from that station. The exact sites will be approved by the Agency after permission by property owners is secured by CIPS to allow utilization of their property for SO<sub>2</sub> monitoring.

d. Necessary equipment, including the necessary monitoring devices, will be ordered within 10 working days after receipt of any Order from the Pollution Control Board granting the variance.

e. Equipment will be installed and placed in service within 10 working days of receipt of all equipment, providing an approved site is available as in c above.

f. Monitoring data from the stations mentioned in a and b above will be made available to the Agency on a monthly basis."

This monitoring system should allow the comparison of the predicted levels with those actually occurring.

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

#### ORDER

The Pollution Control Board hereby grants CIPS a variance from Rule 204(e) of the Air Rules until October 4, 1974, subject to:

1. CIPS shall establish the agreed to SO<sub>2</sub> monitoring program as set out above.
2. CIPS shall post a \$5,000 bond with the Agency by November 1, 1973 to guarantee its compliance with this Order.

IT IS SO ORDERED.

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 4<sup>th</sup> day of October, 1973, by a vote of 5 to 0.

Christan L. Moffett

