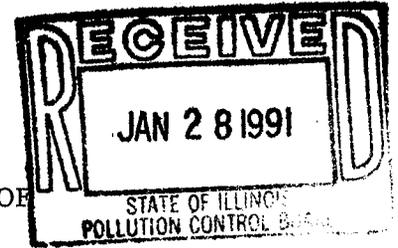


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BEFORE THE POLLUTION CONTROL BOARD OF
THE STATE OF ILLINOIS

BF GOODRICH CORPORATION,)	
)	
Petitioner,)	
)	
v.)	PCB 91 - 17
)	(Permit Appeal)
ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

Ms. Dorothy M. Gunn, Clerk	Bernard Killian, Director
Illinois Pollution Control	Illinois Environmental Protection
Board	Agency
100 West Randolph Street	2200 Churchill Road
Suite 11-500	P.O. Box 19276
Chicago, IL 60601	Springfield, IL 62794

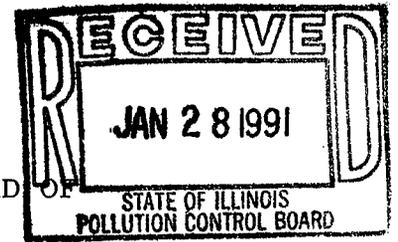
PLEASE TAKE NOTICE that on Monday, January 28, 1991, we filed the attached Petition to Amend Permit Appeal with the Clerk of the Illinois Pollution Control Board, a copy of which is herewith served upon you.

Respectfully submitted,

BF GOODRICH CORPORATION

By: Lisa Marie Anderson
One of Its Attorneys

Richard J. Kissel
Lisa Marie Anderson
GARDNER, CARTON & DOUGLAS
321 North Clark Street
Suite 3100
Chicago, Illinois 60610-4795
(312) 644-3000



BEFORE THE POLLUTION CONTROL BOARD OF
THE STATE OF ILLINOIS

BF GOODRICH CORPORATION,)	
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Petitioner,)	
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)	(Permit Appeal)
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)	
Respondent.)	

PETITION TO AMEND PERMIT APPEAL

Petitioner, BF Goodrich Corporation, ("BF Goodrich"), by its attorneys, Gardner, Carton & Douglas, hereby petitions the Illinois Pollution Control Board (the "Board"), to amend its permit appeal in this matter. In support thereof, BF Goodrich states as follows:

1. On Thursday, January 24, 1991, BF Goodrich filed its Permit Appeal in this matter. Additional information has been discovered which prompts BF Goodrich to seek to amend that permit appeal to include the language in paragraphs 2-5 below.

Load and Concentration Effluent Limitations

2. On pages 2-5 of the permit, the Agency has included load or mass limitations for each of the chemical parameters outlined in the OCPSF regulations promulgated by the U.S. EPA. 40 C.F.R. Section 414.90 et seq. BF Goodrich understands that the specific chemicals require regulation but believes that the duplicative limitations are unnecessary and that the calculations are erroneous.

3. Essentially, the federal regulations require:

Any point source subject to this subpart must achieve discharges not exceeding the quantity (mass) determined by multiplying the process wastewater flow subject to this subpart times concentrations in the following table. 40 C.F.R. Section 414.90.

It is clearly the intent of the regulations, and moreover, is expressly stated in the regulations, that the discharger must achieve compliance by not exceeding the "quantity (mass) limits." The regulations clearly did not intend to, nor do they require, a discharger to comply with concentration limitations. The concentrations provided are to be used to calculate the mass effluent limitations and were not intended to be a limitation or standard themselves. BF Goodrich questions whether the concentration effluent limitations might be better characterized as concentration reference values for purposes of reference and calculation only.

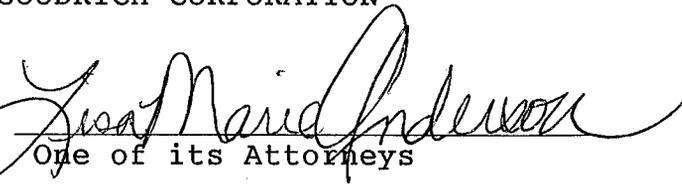
4. As the regulations clearly intended the limitations to be mass and not concentration based, it is duplicative and unnecessary to require BF Goodrich to comply with two effluent limitations. While BF Goodrich recognizes that it is generally within the Agency's discretion to include certain concentration limitations, the federal statute expressly intended only to require a mass effluent limitation for OCPSF chemicals. Therefore, the Agency's inclusion of the concentration limitations is not necessary to accomplish the purposes of the Act.

5. Additionally, it appears that the Agency has calculated the daily average based on the monthly average flow amount. BF Goodrich believes that to do so ignores the daily flow variations and in turn could result in daily maximum load limitation excursions even when the concentration based limitations are being met. Thus, BF Goodrich believes that the calculations for the OCPSF load limits should correspond with the maximum daily flows and maximum thirty day average flow, respectively, rather than the average flow.

WHEREFORE, BF Goodrich Corporation hereby requests that the Board amend BF Goodrich's permit appeal and provide additional relief consistent with the language included in this petition.

Respectfully submitted,

BF GOODRICH CORPORATION

By: 
One of its Attorneys

Richard J. Kissel
Lisa Marie Anderson
GARDNER, CARTON & DOUGLAS
321 North Clark Street
Suite 3100
Chicago, Illinois 60610-4795
(312) 644-3000
1411a

CERTIFICATE OF SERVICE

The undersigned, being sworn, states that copies of the attached Petition to Amend Permit Appeal, were filed with the Clerk of the Illinois Pollution Control Board, a copy of which is attached hereto and served upon you by U.S. Mail, on Monday, January 28, 1991.



Subscribed and sworn to before me this 28th day of January, 1991.


Notary Public

1411a

