ILLINOIS POLLUTION CONTROL BOARD
April 19, 1971

GAF Corporation	)	
	)	
v.	)	#PCB 71-11
	)	
Environmental Protection Agency	)	

Opinion of the Board (by Mr. Dumelle)

GAF Corporation filed a petition for variance on January 27, 1971. After a hearing we grant the petition subject to certain conditions enumerated below.

GAF Corporation (GAF), a multi-plant, diversified chemical and manufacturing company, operates a plant located on the Des Plaines River immediately north of the City of Joliet in Will County. At that plant GAF manufactures asphalt roofing products, felted roofing paper, and automobile insulation. The company has petitioned the Pollution Control Board (Board) for a variance to be allowed to discharge wastes into the Des Plaines River in excess of the amount allowed by regulation and to be allowed a further extension of time, before undertaking construction of secondary treatment facilities for their mill and manufacturing waste water.

The aqueous wastes discharged from the GAF plant come from four sources; (1)felt mill, (2)roofing mill, (3)automobile products plant and (4)power house. The several waste streams are combined and discharged into the river through a single outfall pipe in a daily volume of 3,000,000 gallons.

Mr. Horace Holloway, Corporation Environmental Engineer for GAF testified that the biochemical oxygen demand (BOD) discharge from the plant is presently approximately 20 times the maximum permitted by existing regulation. The plant is discharging 600 mg/l (milligrams per liter) while the limit imposed by regulation SWB-8, is 30 mg/l. Expressed another way this amounts to approximately 15,000 pounds per day. At present the plant's effluent is wholly untreated (R. 49). The burden of the plant's BOD effluent is equivalent to the waste discharge of 90,000 persons.[1] This represents a greater pollution load on the river

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1] One population equivalent is equal to 0.17 pounds of 5-day biochemical oxygen demand. That is, it will require 0.17 pounds of oxygen in water to supply the needs of the microscopic biological organisms which feed upon, over a 5-day period, the bodily wastes of one person for one day.

than if the entire population of the city of Joliet were to dump its sewage untreated into the river. 2]

Mr. Holloway further testified that the amount of suspended solids being discharged from the plant is approximately 23 times the amount allowable. The plant is discharging approximately 800 mg/l while the regulation sets 35 mg/l as the maximum allowable (R.50-51). Mr. Anthony Melchiorre, senior staff engineer for GAF and project engineer for the treatment facilities, testified that the suspended solids of 800 mg/l amounts to approximately 15,000 pounds per day (R.133). Simple arithmetic and a later witness, however, tell us that this figure is more like 20,000 pounds per day of suspended solids (R.209). Using the accepted population equivalent of 1 person generating 0.2 pounds of suspended solids, this waste stream is equivalent to the raw sewage discharge of a community of 100,000 persons. Another perspective in which the GAF pollutional load on the river can be viewed is to consider that the amount of suspended solids being discharged from GAF is equivalent to that amount which would be coming from the treated (secondary treatment) effluent of a community of 1,000,00 persons.

In addition to BOD and suspended solids there is testimony that the plant discharges about 10 times the amount of lead allowed by regulation. The discharge of lead, which appears to come in with the ink on the waste paper used in the process, is approximately 1 mg/l. This amounts to approximately 25 pounds per day (R.135-136).

Initially it should be noted that GAF's filing of its petition for variance was not timely. The petition was filed on January 27, 1971 seeking relief in the nature of being allowed a further extension of time in which to pollute the Des Plaines River while the construction of treatment facilities was begun and completed. The last day by which the company had, under earlier variances granted, to begin construction of secondary treatment facilities was December 1, 1970. In its petition the company stated that it was seeking "a variance...specifically limited to the date of the start of the construction". Yet it filed its petition almost 2 months after the previous variance had run out.

2] 1970 census, preliminary report, population 78,623.

Rules and Regulations SWB-8, setting water quality standards for the lower section of the Des Plaines River, were adopted in 1966. In March, 1968, the Sanitary Water Board adopted as part of SWB-8 an implementation plan that specifically required of industries the equivalent of at least secondary treatment and a reduction of BOD to 30 mg/l and suspended solids to 35. The implementation plan specifically listed GAF's predecessor, The Ruberoid Co. (GAF purchased the operation in May, 1967), specifying that biological treatment must be provided and that construction of the necessary facilities must begin by July 1, 1969. The plan further provided that plans and specifications were to be completed 18 months and construction contracts awarded 12 months before the scheduled date of completion. Thus, roughly equating the award of contracts with the start of construction, plans for primary and secondary facilities were due February 1, 1969, and completion of the facilities by July 1, 1970. (SWB-8, Rule 1.08, paragraphs 8, 11b, 12 and 15.)

GAF testified that it knew of these requirements as early as 1967 (R.23). First believing that the size of necessary secondary facilities could be reduced by "the installation of a disc filter and revisions to the plant's Felt Mill Water System". The Company abandoned this idea in October, 1967, upon discovery that it would result in a buildup of solids detrimental to the product (R.23-24). In November, GAF began inquiries as to the possibility of putting its wastes into Joliet's municipal system. In March, 1968, the company reported that pre-treatment would be necessary in order to accomplish such a connection and the Sanitary Water Board advised that this avenue be pursued (R.25). In January, 1969, the City formally spelled out the conditions of a connection, which would require annexation, pretreatment, payment of current rates and the installation of a connecting sewer (R.27). GAF's consultants then prepared a study, submitted in April, 1969, that showed "major advantages" to a city connection but subject to verification by company management as to "certain economic assumptions concerning GAF's corporate tax and fiscal policies" and to evaluation of the consequences of annexation, the availability of land, and the securing of an easement (R.28). At the same time, according to GAF, it engaged a consultant "to determine the feasibility of extended aeration for biologically treating effluent." The results of this study, reported in December, 1968, "necessitated commencement of a survey to determine the factors influencing design and the location of the aerated stabilization basin process." (R.26).

In July, 1969, upon this record, GAF obtained from the Sanitary Water Board an extension of six months, until January 1, 1970, for the start of construction (R.29).

Bids were then solicited for the design of primary treatment facilities alone, but prospective contractors reported that insufficient

effluent data was available for this purpose, and in October, 1969, a consultant was hired to make a "waste characterization study as a prerequisite to determine the most appropriate type of facility to be constructed." (R.29-30). On the basis of the consultant's report and of GAF's "inability after many attempts and meetings to acquire either the land or an easement for the installation of a connecting sewer," the company in January, 1970, abandoned the thought of connecting to Joliet's sewer and decided to employ a contractor to design and construct a complete treatment facility (R.30-31). The Sanitary Water Board, reciting that GAF "had shown diligence," granted a further extension of the deadline for starting construction of facilities to meet SWB-8 until December 1, 1970 (see letter of C. W. Klassen to GAF Corp., April 10, 1970, appended to EPA recommendation).

Armed with this second free pass, GAF proceeded to negotiate in October, 1970, a sublease of property on which to build the secondary treatment facilities. The land is owned by the Metropolitan Sanitary District of Greater Chicago, which is withholding approval of the sublease pending state approval of the proposed facility (R.33-34) At the same time, the company says, it could not obtain plans and designs for the secondary facility because "the use of the Sanitary District land was in doubt" and because manufacturers were "delayed" in submitting reports respecting alternative treatment processes (R.34-35). Thus, the September, 1970 date in the latest extension agreement for the submission of fiscal plans was not met (R.35). In November, GAF informed the Agency that five to seven months more would be required for engineering and purchase of the primary facilities and that it had decided to abandon the proposed aeration lagoons for secondary treatment in favor of "the more efficient and reliable activated sludge process" (R.36-37). Installation of the primary facilities, GAF conceded in November, could not begin before April 1, 1971; although "some preliminary work, such as site preparation prior to beginning equipment installation," was to be done starting December 1 "so other work associated with the solids removal system on GAF property (i.e., the primary system) could proceed when Catalytic completed the necessary construction drawings"(R.38-39). Building permits for the primary facilities were to be obtained later in the week of the hearing (March 22, 1971) (R.43). Installation was to have begun April 1 and be completed by November 30 (R.48-44).

As for the secondary facilities, GAF says it cannot even complete the plans for construction until the sublease is approved by the Sanitary District and permits for the discharge are obtained from the State Division of Waterways and the Army Corps of Engineers (R.43).

Thus, GAF is unable even today to give us an indication of when it expects to have the secondary facilities under construction, two months are estimated for completion of design and another eleven months for the construction itself, all after the permits and the sublease are approved. GAF has no idea when that will be (R.75) and, indeed, was told by the Corps on March 22 of this year -- the date of the hearing -- that the Corps had not yet established guidelines for the issuance of permits (R.47).

This history demonstrates beyond cavil that GAF has been, as the Agency says in its recommendation, "incredibly dilatory." The Sanitary Water Board was most lenient with repeated excuses for non-performance. Yet, despite two extensions, GAF has missed still another deadline. Construction of both primary and secondary facilities was to begin, under the original schedule, July 1, 1969, and completion of both was required by July 1, 1970. Under the latest extension, GAF was required to begin construction of both by December 1, 1970, and to complete them by December 1, 1971. It concedes it has not even completed the design of the secondary facilities, much less started building them; its own schedule (13 months from the grant of permits not yet in hand) shows it intends to miss the deadline for final compliance as well.

Moreover, even the construction of primary facilities which would not suffice under SWB-8, was not commenced by the specified extension date. This fact is conclusively shown by the Company's own testimony, recited above, despite GAF's effort to equate the tearing down of old buildings with the erection of new. The record shows that three weeks of site preparation work took place in December, in an obvious effort to pay lipservice to the law. This flurry was followed by months of inactivity, actual installation of the primary facilities, the company acknowledged, was not to begin until April 1. On December 1, by its own admission, GAF had no plans and no building permit; it did not know what it was going to build, and to start building it without a permit would have been illegal. As the court said in Kansas Quality Construction, Inc. v. Chaisson, 112 Ill. App. 2d 277, 282 (1969). "Construction , at the very least, means getting off the ground by going either up or down, not just thinking about it." The company's attempt to show it was in compliance with the latest extension is frivolous.

Equally without merit is the company's attempt to justify its lack of progress. The delay in starting construction of the primary facility GAF blames on an unexplained delay in receiving additional reports from its suppliers as to alternate treatment processes. But we have held elsewhere that one cannot simply shift the onus of performance to a contractor without exercising any supervision to assure that the schedule is met. See Marblehead Lime Co. v. EPA, #70-52 (March 17,1971); City of Mattoon v. EPA, #71-8 (April 14, 1971). The burden of proof in a variance case is on the petitioner, and GAF has made no effort to show it did what it should have done to meet the December deadline. We think it had a special obligation to be diligent in light of the special and repeated dispensation given it by the Sanitary Water Board. The time for deciding what treatment methods to use was long since past; the extension called for getting down to the nitty-gritty of actual design and construction.

But even if we could find excusable, as we cannot, the delay in starting construction of the primary facilities, we could by no stretch of the imagination condone the continuing delay with regard to the secondary. In addition to the same unexplained delay blamed upon equipment manufacturers, which we have already held as inadequate excuse, GAF relies in this regard upon the doubt, last autumn, over the availability of the Sanitary District's land due to a pending lawsuit over the rents payable to the District by its lessee (R.33-34) and upon the alleged necessity for obtaining several permits before getting down to business. But the former excuse is feeble; GAF failed to show it had tried to obtain District approval of the sublease last fall, as the District is willing to grant now, conditioned upon whatever rent adjustment comes out of the lawsuit (R.95); there is no attempt to explain, and it is not obvious, why a dispute over the lessee's rent should make the land potentially "unavailable" to GAF.

The excuse relating to the present need for leases and permits is wholly circular. GAF in one breath argues that it cannot complete its plans because it has no sublease and that it cannot get its sublease because it has not got its plans approved. A polluter may not thus play governmental agencies against one another in order to go on dumping wastes indefinitely. It has been GAF's obligation for some time to further its plans and submit them for EPA approval; the fact it might have to make a few changes later on to satisfy the Sanitary District, even if this is a real danger,[3] is a risk the company was obliged to run.

3] The District itself testified that its interest was "to be sure before the sub-lease was issued that Environmental Control had approved the plans for such construction" (R.94). The District indicated no desire to conduct an independent plan review.

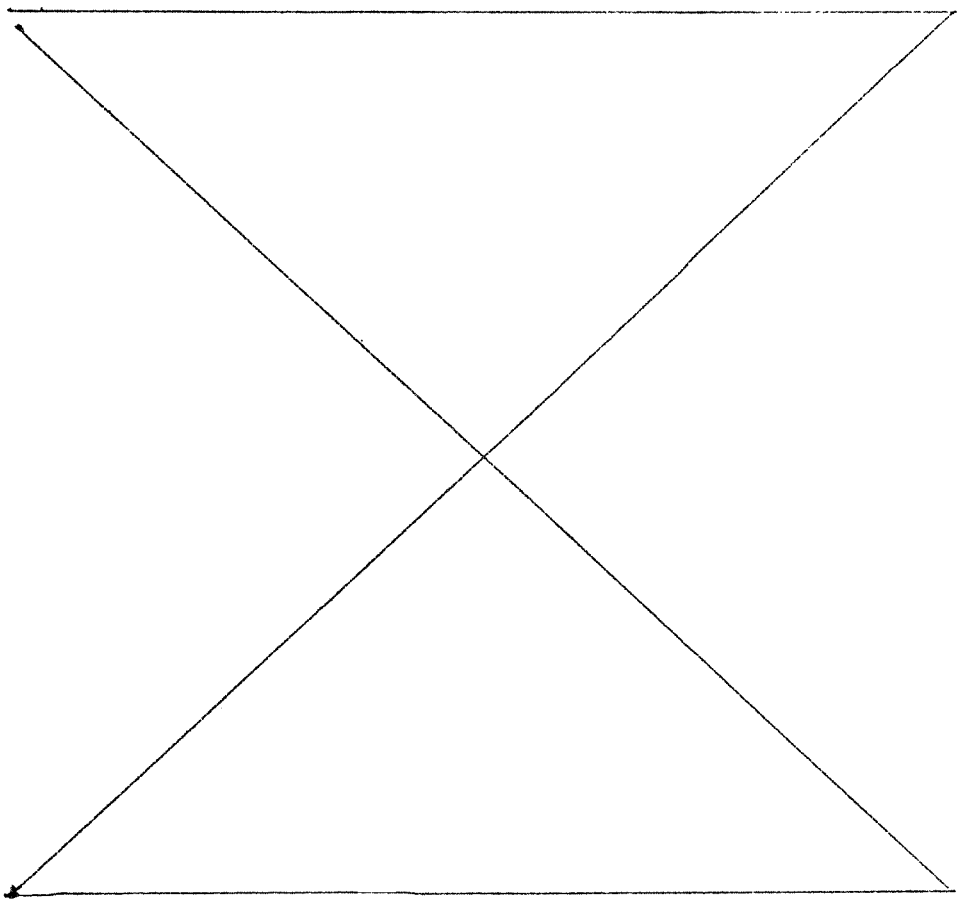
The argument respecting permits from other agencies is subject to the same objection. There is no reason given for waiting until the late date to consider applying for such permits except that they may be contingent on EPA approval and that, incredibly, GAF was unaware of the need for such permits until October, 1970 (R. 37). Ignorance of the long-standing Illinois requirement of a permit from the Division of Waterways cannot be excusable for a corporation of GAF's size and sophistication. As for the Corps of Engineers permit, the company is apparently prepared to delay construction until the Corps gets around to establishing permit procedures at some indefinite future time, it has exhibited no intention to shut off its present untreated discharge for lack of the federal permit that has been required since 1899. It is also noteworthy that both the Corps and Waterways permits requirements apply to the primary as well as to the secondary facilities, and that construction of the former, while delayed for other reasons, is to begin before such permits are procured. The company is attempting to pervert the new federal permit policy, designed as a weapon against polluters, as a defense for prolonging pollution. Finally, GAF's repeated insistence that approval by other agencies hinges on approval by the EPA has a very hollow ring in view of the admitted fact that GAF has never yet applied to EPA for a permit and incredibly maintains it does not know an EPA permit is required (R. 69). It is not oppressive legal requirements that are holding up the construction of GAF's facilities; it is the company's dilatory failure to get off its inanimate backside and fulfill its civic obligations.

The statute provides for variances only if the petitioner affirmatively demonstrates that compliance with the law and regulations would impose an "arbitrary or unreasonable hardship". To assess whether the hardship of compliance would be arbitrary or unreasonable requires a balancing of the cost of compliance against the harm to the community if the discharge continues. The balance, as we have held in past cases, is not an even one; the presumption is strong in favor of compliance. See, e.g., Environmental Protection Agency v. Lindgren Foundry Co., #70-1 (Sept. 25, 1970).

The burden is on the petitioner to demonstrate that the balance is heavily in his favor. This requires, as our rules make clear, allegation and proof of both the costs and the benefits of compliance. The present petition is deficient in that it fails to allege the effect of uncontrolled discharges on the river, and the record is almost completely silent on this crucial point. One witness opposing the variance and two favoring it said the river was in bad shape, and we can take official notice that it is.[4] This stream receives the entire effluent from the treatment plants of the Metropolitan Sanitary District of Greater Chicago, together with stormwater overflows

4] In an ancient but prescient Illinois Supreme Court case the court took judicial notice of the incidence of stream pollution that is greatly less severe than the instant situation. The court in Hayes v. Village of Dwight 150 Ill. 273, 37 N.E. 218 (1894) stated:

> "Despite witnesses' testimony that in their opinion the proposed discharge of sewage would not have the affect of materially polluting the stream, the court held that little weight is to be given to the testimony of witnesses who attempt to swear contrary to known and established natural laws. That the sewage of a village of 1600 inhabitants, discharged into a small stream will materially pollute the waters of the stream and render it unfit for domestic use, for at least a few rods below the point of discharge, is a proposition too plain and too thoroughly verified by ordinary experience and observation to admit of reasonable doubt."



of raw sewage at many points (see transcript, #R70-12, Tertiary Treatment, Des Plaines River). Despite secondary treatment of the effluents, these discharges place an enormous burden of oxygen demand on the river, to the extent that the dissolved oxygen standard is set below that required to support fish life, and the stream has been designated for industrial use only. Unfortunately, therefore, it is all too probable that even the immediate cessation of GAF's effluent would leave the river in a condition far less than satisfactory. The improvement would not be as dramatic as in the case of an equivalent discharge to an otherwise clean stream. On the other hand, however bad the river's condition, adding wastes equal to the raw sewage of 90,000 people cannot but have a markedly adverse effect. If there is oxygen enough in the stream above GAF to avoid nuisance conditions, the discharge is bound to deplete it substantially. If the stream is essentially devoid of oxygen already, the discharge stands to make the nuisance much worse. And in either event the discharge means it will take the river additional downstream miles in which to recover from its troubles. GAF has not adequately informed us as to its effect on the stream. But we know enough to indicate that the effect is grim.

The hardship that compliance today would entail is that the plant would be shut down. This would result in lost profits, with which on the record we have no concern whatsoever. GAF by its unconscionable delay has brought this loss upon itself, and we have held more than once that a self-inflicted hardship is not to be considered in a variance case. e.g., EPA v. Lindgren Foundry Co., supra. More serious is the testimony that closing the plant would cause the layoff of 700 employees. We have commented in the past that the employees are not altogether innocent if they fail to utilize their bargaining power to put an end to pollution; the threat that pollution may put them out of work should make labor unions an aggressive force for cleaning the environment. Lipsett Steel Prods. v. EPA, #70-50 (March 22, 1971). Nor is it without relevance that an employee who loses his job through the employer's deliberate or negligent failure to meet his obligations to the environment may have legal remedies against his employer. Cf. City of Mattoon v. EPA #71-8 (April 14, 1971). Moreover, there are analogous fields in which employees must suffer undeserved losses as a result of the company's transgressions. A plant is shutdown if the owner fails to pay his taxes or his light bill; a time must also come when it is shut down because he fails to stop polluting. It is also true in the present case that, as the company testified, the roofing operation could be kept going even if the polluting felt mill were shut down, if felt could be obtained from another source. GAF tells us that none is to be had, but we are not convinced by the company's bare conclusion in the absence of supporting facts. If felt

can be bought, closing the felt mill would not cost 700 jobs.

We are left with considerable doubt whether the closing of the felt mill would impose an arbitrary or unreasonable hardship, because GAF's proof leaves much to be desired. Moreover, the statute imposes an additional requirement for the extension of a variance, as in the present case: further time may be allowed only "if satisfactory progress has been shown". The extensions granted by the Sanitary Water Board were variances in fact, since they allowed what would otherwise have been violations of the regulations. Cf. EPA v. Commonwealth Edison Co., #70-8, (Feb. 1971). This statutory provision reflects the policy stated elsewhere in this opinion, that the balance of costs and benefits shifts over time, and that a hardship ceases to be unreasonable after a polluter has failed to make use of available opportunities for achieving deferred compliance. It is obvious from the facts and conclusions recited above that GAF has not made satisfactory progress.

Thus we would have ample justification for denying the variance request outright. And we do refuse to grant the extensive and open-ended relief requested. Not only is there inadequate proof as to the costs and benefits of compliance, but there has been no significant progress.

Yet to deny relief altogether is not a wholly satisfactory solution either. It might be that upon further proof we would find the improvement in the river from an immediate shutdown not yet worth 700 jobs. More important, since we are not in the habit simply of allowing rehearings for petitioners who have failed to prove their case, it is not certain that a blanket denial would be the quickest means toward an abatement of GAF's pollution. For a variance denial, while making clear that discharges in excess of the regulations will not be condoned, is not itself an order to shut down. A petitioner might conceivably decide to go on violating the law in the hope that an enforcement proceeding might not be brought, or (in the case of a large operation like this one) in the belief that the penalties ultimately assessed, even at the statutory maximum, would be more than made up for by profits during the months before a second proceeding could be concluded. Jail sentences would appear highly appropriate in such a situation, of course, but a petitioner might gamble on the traditional and inexcusable reluctance of judges to put "respectable" people like polluters behind bars. In any event, it seems best while GAF is before us to see to it the company gets to work at once, and since the case before us is a variance case, this can best be done by granting a limited variance subject to stringent conditions.

We shall allow GAF two months in which to continue polluting. At the end of that period, in order to obtain more time, the company must show that it has complied with the following conditions, violation of which will also be grounds for revocation of the present variance.

First, GAF and its contractors shall work double time and move toward completion of its primary and secondary facilities. This fact shall be demonstrated by detailed time sheets showing that the maximum number of men were employed at least sixteen hours each day, seven days each week, on these projects. At the end of the two months GAF shall have progressed with construction of the primary facilities; completed the designs of the secondary; obtained all necessary leases, permits, and the like; and commenced the actual installation of the secondary facilities.

Second, GAF shall post a bond or other adequate security with the Agency, in the amount of $2,600,000., to be forfeited in the event the company violates the order. The bond is required by statute, and the amount is set to make it as expensive for GAF to violate the order as to build the needed facilities. Anything less would be insufficient incentive. See Marquette Cement Mfg. Co., v. EPA, #PCB 70-23 (January 6, 1971).

Third, GAF shall pay a penalty in the amount of $10,000. plus $1,000. a day from the expiration of the last extension on December 1 to today, for a total of $149,000. We cannot forgive GAF's calluous disregard for its obligations. To let the company off scot free would encourage others -- and GAF itself -- to be dilatory in the future. The amount involved is none too large for such a large and profitable business, causing such enormous pollution, after such a history of disobedience. It would be larger had not the Sanitary Water Board forgiven substantial delays in the past. To pay the sum now will avoid the imposition of additional money penalties for operation during the next two months.

Fourth, GAF shall submit to the Board and to the Agency, in addition to the progress reports required above, a petition for further variance containing a complete, quick, and detailed schedule for the remaining work and accompanied by affidavits respecting the availability of felt from other sources and the effect of its discharge upon the river. A second hearing will be held at which the company must prove its progress and its entitlement to additional time. Upon timely receipt of such a petition the Board may extend the variance briefly without hearing pending resolution of the merits.

The statute expressly authorizes the Board to impose such conditions on the grant of a variance [5] as may be required by the policy of the Act. The Act's stated policy is to reduce pollution; the conditions we impose today are necessary in order to achieve compliance as quickly as possible and to deter future violations. We have imposed similar conditions, including the payment of money, in numerous prior cases[6]. To do so also serves to avoid the delays and relitigation of issues that would occur if we simply denied the variance and waited for an enforcement proceeding. Without this power a variance would be nothing but a license to pollute, while the statute contemplates it as a means of achieving compliance. And without the power to impose conditions we would not be disposed to grant a variance at all in the present case.

This opinion constitutes the Board's findings of fact and conclusions of law.

ORDER

The Board, having considered the petition, recommendation, transcript and exhibits in this proceeding, hereby grants the petition of GAF Corporation for a variance, subject to the following conditions:

1. This grant of variance extends to June 19, 1971 to allow discharge of suspended solids, BOD and lead into the Des Plaines River in excess of the amount allowed by regulation. This variance is granted to allow the company to make progress toward installing primary and secondary waste treatment facilities to meet all applicable effluent and water quality standards.

2. GAF shall submit to the Environmental Protection Agency and the Board before June 19, 1971 a supplemental petition, together with supporting information as described in the Board's opinion. Such petition shall contain a firm program for reducing lead discharges to acceptable levels.

3. GAF and its contractors shall work sixteen hours each day, seven days each week, to complete its primary and secondary treatment facilities, and shall have completed plans, obtained all leases and permits and begun construction

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5] Environmental Protection Act, § 36 (a).
"In granting a variance the Board may impose such conditions as the policies of this Act may require..."

Environmental Protection Act, § 2 (b).
"It is the purpose of this ACT...to restore, protect and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them."

6] See Marquette Cement Mfg. Co. v. EPA, PCB 70-23; City of Springfield v. EPA, PCB 70-55; Malibu Village Land Trust v. EPA, PCB 70-15; Greenlee Foundries, Inc. v. EPA, PCB 70-33; City of Mattoon v. EPA, PCB 71-6.

of the secondary facilities, by June 19, 1971.

4. GAF shall post with the Environmental Protection Agency on or before May 19, 1971, and in such form as is satisfactory to the Agency a bond or other adequate security in the amount of $2,600,000. which sum shall be forfeited to the State of Illinois in the event that the conditions of the order are violated or the manufacturing plant is operated and wastes discharged after June 19, 1971 without an extension of this variance and without primary and secondary treatment of wastes sufficient to reduce the concentrations of pollutants below the limit allowed by regulation.

5. GAF shall pay to the State of Illinois, on or before May 19, 1971 the sum of $10,000. plus $1,000. per day for each day from December 1, 1970 to the present day, as a penalty for failure to commence construction of secondary treatment facilities by the extended deadline for doing so and for continued violations of the statute and regulations with regard to the discharge of BOD, suspended solids and lead into the Des Plaines River from their manufacturing plant. The total amount of this penalty is $149,000.

6. During the period that this variance is in effect GAF shall not increase the pollutional nature of its discharge either in strength or in volume.

7. GAF shall take whatever measures are feasible, short of curtailing production to reduce its pollution of the Des Plaines River during the period of the construction of the primary and secondary treatment facilities.

8. The failure of the petitioner to adhere to any of the conditions of this order shall be grounds for revocation of the variance.

I concur:

I dissent:

Dr. Samuel Aldrich will file a separate concurring opinion.

I, Regina E. Ryan, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above opinion and order this 19th day of April, 1971.

Regina E. Ryan, Clerk
Illinois Pollution Control Board