

ILLINOIS POLLUTION CONTROL BOARD  
February 7, 1980

IN THE MATTER OF: )

SULFUR DIOXIDE AND PARTICULATES )  
REGULATIONS, RULES 204(c)(1)(A) )  
AND (D) AND RULE 203(g)(1) OF )  
CHAPTER 2 )

R77-15, R78-14,  
R78-15, R78-16,  
R78-17

ORDER OF THE BOARD (by Mr. Goodman):

The Celotex Corporation's January 23, 1980 Motion for Clarification of Status is granted as follows.

Celotex, a participant at hearings in these proceedings, on April 17, 1979 proposed a site-specific sulfur dioxide emission limitation of 6.8 lbs. per million BTU actual heat input for its Peoria facility. The limitation happens to be the same one sought by Bemis Company, Inc. at hearing by way of a writing. On January 10, 1980 the Board ordered this writing, admitted as Exhibit 38, construed as an amendment to Ashland Chemical Company's proposal which initiated these proceedings.

The Board does not consider the amendments sought by either Bemis or Celotex as "comments", as Celotex states. They are suggestions as to what the wording of the proposed rule might contain at the time the Board finally issues its Order.

Therefore, although the motion is granted, the requested relief of considering the limitation Celotex seeks for its Peoria facility as a "regulatory proposal" is not given per se. What "proposal" refers to is that which when filed by industry is accompanied by 200 or more citizen signatures. What "amended proposal" refers to is oral or written evidence offered by any participant either at hearing or by public comment which seeks modifications of the first proposal filed to initiate regulatory proceedings; it may be a misnomer to the extent the modifications sought are material to the substance of the proposal.

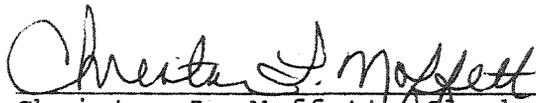
The docketing of each initial proposal of a substantive rather than procedural nature by the Board mandates the Illinois Institute of Natural Resources to conduct an economic impact study. But the INR is not required to conduct a study for every site-specific limitation sought thereafter within the same proceeding. This would constitute a waste of state resources inasmuch as the study is to be designed to account for the economic impact of all sites subject to the proposal.

To quote from the Board's Order of January 10, 1980:

Amended proposals are as fully considerable by the Board and by all participants at hearing as original proposals.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Order was adopted on the 7<sup>th</sup> day of February, 1980 by a vote of 4-0.

  
Christan L. Moffett, Clerk  
Illinois Pollution Control Board