

ILLINOIS POLLUTION CONTROL BOARD  
November 8, 1990

IN THE MATTER OF: )  
 )  
LIMITS TO THE VOLATILITY ) R88-30(B)  
OF GASOLINE ) (Rulemaking)  
 )

PROPOSED RULE. SECOND NOTICE.

CONCURRING OPINION (by J. C. Marlin):


I concur with today's order given the necessity of having an ozone control program stronger than that mandated by USEPA in force in 1991.

However, I believe that the proposal as passed will add unnecessary complexity to the overall petroleum distribution system. Current regulations require the use of 9.5 RVP gasoline in Southern Illinois, Missouri, and most southern states during July and August of 1991. As a practical matter gasoline is formulated near the 9.0 RVP level to meet this standard.

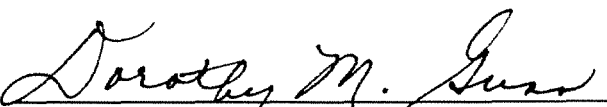
The adopted rule sets a standard of 9.0 but allows a 0.3 tolerance, which as a practical matter means that gasoline must be formulated at 8.8 to 9.0 to meet the tolerance. This is the standard the federal rules will use in 1992.

Using the current 9.5 standard for June-August would keep Illinois gasoline in line with that used in the Southern states for the summer of 1991. This would eliminate the additional confusion and distribution problems associated with marketing gasoline formulated for an "Illinois only" rule. It would also make enforcement easier since the 1991 federal procedures would be directly applicable.

Both proposals will do essentially the same job, but the 9.5 would keep things simple, and that is no small consideration given the overall magnitude of efforts needed to address today's air pollution problem.

  
John C. Marlin

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board hereby certify that the above Concurring Statement was submitted on the 13<sup>th</sup> day of November, 1990.

  
Dorothy M. Gunn, Clerk  
Illinois Pollution Control Board