

uncontrolled emission rate of 67 TPY¹. (R.6). The original Petition also states that the current emission level (after some control) for the 42 sources is 44 TPY. (Pet. p.2).

The March 2, 1989 Illinois Environmental Protection Agency (Agency) Recommendation states:

If uncontrolled, emissions from the NCB process would be 67 tons per year.

* * *

The allowable emissions for the NCB process after April 1, 1989 [the compliance date prescribed by 35 Ill. Adm. Code 215.966] are 12.73 tons per year... The current emissions, if uncontrolled would be approximately 67 tons per year.

(Ag. Rec. p.3,4).

The Agency also recommends as a variance condition "that total VOM emissions from the NCB sources shall not exceed 44 TPY during the variance period." (Ag. Rec. p.4).

The Agency Recommendation seems to suggest that the total uncontrolled emissions of the NCB process is currently 67 TPY. However, Monsanto seems to be asserting that only the 42 sources of the NCB process which are subject to the variance request have an uncontrolled emission rate of 67 TPY and that there are other NCB sources subject to Subpart RR of Part 215 which are not a part of the variance request. The record is not clear on the issue of Monsanto's total uncontrolled emissions.

Monsanto is directed to respond to the following questions: 1) Is the total amount of uncontrolled process emissions from sources not regulated by Subparts B, E, F, N, P, Q, R, S, U, V, X, Y, or Z of Part 215, at Monsanto's W.G. Krummsich Plant, equal to or greater than 100 TPY?, and 2) Given the current uncontrolled emissions estimates does Subpart RR apply to Monsanto's plant?

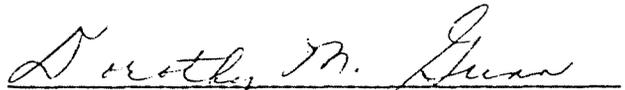
As this question concerns facts not already in the record, appropriate affidavits should verify Monsanto's response. Monsanto's response should be received by the Board and the Agency not later than April 17, 1989. If the Agency wishes to

¹ Monsanto also made changes to its proposed compliance plan at hearing. (R. 6-7). Given the amendments to Monsanto's Petition, the Board finds that the 120-day statutory decision period started anew beginning March 3, 1989. The Board intends to act on this case as expeditiously as possible.

respond to Monsanto's filing it should file its own response on or before April 24, 1989.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the 6th day of April, 1989, by a vote of 7-0.


Dorothy M. Gunn, Clerk
Illinois Pollution Control Board