

ILLINOIS POLLUTION CONTROL BOARD
March 10, 1988

IN THE MATTER OF:)
)
ORGANIC MATERIAL EMISSION) R86-18
STANDARDS AND LIMITATIONS:)
ORGANIC EMISSION GENERIC)
RULE)

DISSENTING OPINION (by J.D. Dumelle):

By a 4-3 vote identical to its original action the Board majority has today again chosen not to exempt the Viskase Corporation from this rule.

At stake are 400 manufacturing and 600 research and administrative jobs plus 650 jobs created through the multiplier effect. Illinois badly needs those 1,650 jobs. The March 2, 1988 newspaper stories of the closing of the nearby Campell Soup plant (460 jobs) in Chicago and the possible closing of Inland Steel's plants in nearby Indiana (750 to 1,450 jobs) emphasize the need to keep Viskase in operation in Bedford Park.

An article by David Moberg in the Chicago Tribune of March 2, 1988 titled "The human cost of 'restructuring'" states:

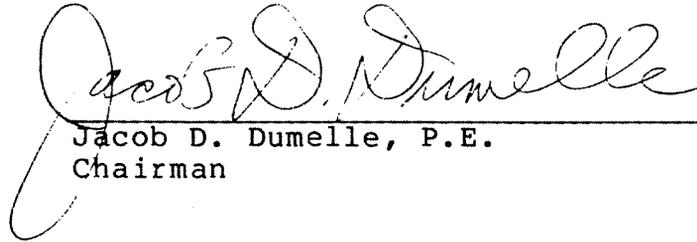
Whenever major employers shut down or move, even without this subsidy war, there are major costs for individual workers, state and local government and the networks of suppliers that have grown up around them. Wisconsin estimates the public cost of the Kenosha shutdown at \$100 million, not counting all the negative ripple effects on the economy. But those costs never show up on corporate books.

The shutdown of the Chrysler plant in Kenosha, Wisconsin, referred to above, terminates 5,000 jobs. The "public cost" according to Moberg's article is \$100,000,000. On a proportionate basis, Viskase's 1,000 jobs, if terminated, will result in a "public cost" to Illinois of \$20,000,000!

If this rule is finally enacted I can only urge Viskase to (a) immediately file a variance (which stays the effect of the rule) and (b) appeal to the Illinois Appellate Court.

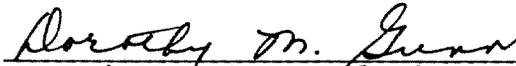
Since this rule involves the Board's determination of "reasonably available control technology" for Viskase the

Appellate Court will have to then decide whether such technology, which forces a major shutdown, is in fact and in law, "reasonable.



Jacob D. Dumelle, P.E.
Chairman

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Dissenting Opinion was submitted on the 17th day of March, 1988.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board