

ILLINOIS POLLUTION CONTROL BOARD
December 2, 1982

GRANITE CITY STEEL DIVISION)
OF NATIONAL STEEL CORPORATION,)
)
Petitioner,)
)
v.) PCB 82-109
)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)
)
Respondent.)

MR. RANDALL ROBERTSON AND MR. ERIC ROBERTSON, LUEDERS, ROBERTSON & KONZEN, APPEARED ON BEHALF OF PETITIONER;

MS. HEIDI E. HANSON, DIVISION OF AIR POLLUTION CONTROL, APPEARED ON BEHALF OF RESPONDENT.

OPINION AND ORDER OF THE BOARD (by I. G. Goodman):

On September 3, 1982 Granite City Steel Division of National Steel Corporation (GCS) filed this petition for variance from Rule 203(d)(5)(B)(iii) of Chapter 2, Air Pollution, to allow intermittent, uncontrolled coke pushing from two existing coke ovens during the rebuilding of a third oven. Hearing was held on October 26, 1982. Both citizen testimony and public comments have been received by the Board in this matter.

This situation is substantially similar to a previous request for variance by GCS in PCB 81-44. In that case the Board granted variance for reconstruction of one of the other coke ovens. The increase in emissions in this proposed variance would be approximately twice that of the variance granted in PCB 81-44 since two existing coke ovens will be in operation rather than one. Since the basic situation is the same as that delineated in the June 25, 1981 Board Opinion in PCB 81-44, the Board shall not reiterate the details, but rather shall incorporate that previous Opinion by reference.

This situation results from the continuing project by GCS to rebuild three coke oven batteries. During the first phase of construction involving renovation of Battery "C", the enclosed pushing emissions control systems car serving Batteries "A" and "B" will be unable to service the last fourteen coke ovens. These fourteen coke ovens, however, can be serviced by the uncontrolled conventional pushing systems car resulting in increased particulate emissions. Failure to use these fourteen ovens in

their normal sequence would result in physical damage to the batteries. GCS estimates that the uncontrolled pushing will occur on approximately 176 calendar days intermittently over a period of approximately two years (R. 7). It is estimated that uncontrolled pushing will definitely take place 53 days at 24 hours per day, with a possibility of an additional 60 days at 24 hours per day, and another 63 days during daylight hours only.

The Illinois Environmental Protection Agency (Agency) estimates that the grant of the proposed variance would create an additional 30 tons per year of particulate emissions. For purposes of comparison, this is approximately one-half of the total emissions allowed Battery "C" when it is in operation. The facility is in a Non-attainment Area for particulate matter with monitoring data showing consistent violations of Rule 307 of Chapter 2, Ambient Air Quality Standards.

The Agency has received six objections to this variance petition. These objectors are concerned mainly with the possibility of carcinogenic emissions which might threaten health and the enjoyment of property. As the Agency points out in its Recommendation, however, the carcinogens are contained in those coke oven emissions which are driven off during the coking process. Emissions which occur during the pushing process, which is subsequent to the coking process, are thought to be less carcinogenic than other coke oven process emissions. At hearing, thirteen of the fourteen citizens testifying were in favor of the proposed variance citing for the most part their interest in the construction jobs and future increased employment at the plant.

GCS alleges that should the Board refuse to grant the proposed variance, it must either risk damaging its existing coke oven batteries or forego rebuilding Battery "C". If it is unable to rebuild Battery "C", GCS alleges it will be forced to continue to purchase part of its coke requirement from "foreign countries." The estimated cost of the proposed construction is \$70 million and it will involve 150 to 250 construction workers over the period of construction. Upon completion, Battery "C" will require the permanent employment of an additional 43 people at the facility. All the citizens and groups who support the petition for variance cite the present economic situation and the need for jobs in the area.

The Agency recommends that variance be granted subject to certain conditions citing the hardship to the public due to the loss of both construction and permanent jobs in Illinois balanced against the minimal and temporary environmental impact. The Board agrees. Although there is no question that the operation of Batteries "A" and "B" without the use of the enclosed pushing emissions control system car will further burden an area where the primary particulate Air Quality Standard is already being exceeded, that burden is indeed minimal and probably contains the least troublesome of the plant's emissions. In addition,

as the Agency points out in its Recommendation, the total emissions caused by the variance would constitute less than one-half the emissions now allowed Battery "C" when it is in operation. It is also noted that ultimately the renovation of Battery "C" will result in a permanent reduction in the amount of particulates contributed by GCS to the area. The Board shall therefore grant the variance requested under certain conditions. To be consistent with the prior variance granted in PCB 81-44, the Board shall grant variance from Rules 102, 203(d)(5)(B)(iii) and 307 of Chapter 2, Air Pollution.

This Opinion constitutes the finding of facts and conclusions of law of the Board in this matter.

ORDER

Granite City Steel Division of National Steel Corporation is hereby granted variance from Rules 102, 203(d)(5)(B)(iii) and 307 of Chapter 2 of the Board's Regulations for pushing operations related to Batteries "A" and "B" at its Granite City, Madison County, Illinois facility through December 1, 1984, subject to the following conditions:

1. Granite City Steel Division of National Steel Corporation shall adhere to the construction schedule contained in Exhibit A, Table 1 in its variance petition filed September 3, 1982, which schedule is hereby incorporated by reference as if fully set forth herein.
2. Granite City Steel Division of National Steel Corporation shall give notice of the start and finish of each of the five construction phases at least five days prior to their occurrence and shall immediately give notice of any occurrence which might affect its ability to comply with the schedule incorporated in paragraph 1 above. Such notice shall be sent to the Illinois Environmental Protection Agency, 115A West Main Street, Collinsville, IL 62234.
3. Within forty-five days of the date of this Order, Petitioner shall execute and forward to the Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706, a Certificate of Acceptance and Agreement to be bound to all terms and conditions of this variance. This forty-five day period shall be held in abeyance for any period this matter is being appealed. The form of the certificate shall be as follows:

CERTIFICATE

I, (We), _____, having read the Order of the Illinois Pollution Control Board in PCB 82-109, dated _____, understand and accept the said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

By: Authorized Agent

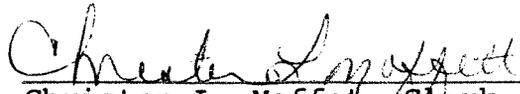
Title

Date

IT IS SO ORDERED.

Board Member J. Dumelle concurred.

I, Christan L. Moffet, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 2ND day of December, 1982 by a vote of 5-0.



Christan L. Moffet, Clerk
Illinois Pollution Control Board