

ILLINOIS POLLUTION CONTROL BOARD
December 30, 1982

IN THE MATTER OF:)
)
SULFUR DIOXIDE EMISSION) R80-22
LIMITATIONS: RULE 204)
OF CHAPTER 2)

CONCURRING OPINION (by J.D. Dumelle and N.E. Werner):

We concur in this proceeding and point out the failure of the Illinois Environmental Protection Agency ("Agency") to adequately study possible looser sulfur dioxide limits in the Chicago area.

The Agency is under a statutory duty to study this possibility. Section 9.2 of the Environmental Protection Act is quite explicit about this duty. The Agency's comments of July 14, 1982 (filed July 19, 1982) indicate that setting emission limits for more than 40 coal burning sources using air dispersion modelling would be "mind-boggling" and could cost "well over \$100,000" for computer time (pp. 3-4).

No notation appears that these funds were ever requested from the Illinois Department of Energy and Natural Resources which funds exactly these types of environmental and energy studies.

Furthermore, it is possible that cheaper and simpler "roll-back" modelling could be used. The Board Opinion itself lists two examples where the Agency used "rollback methodology" to compute recommended limits for two Caterpillar plants and the Sherex plant in the Peoria area (p. 8).

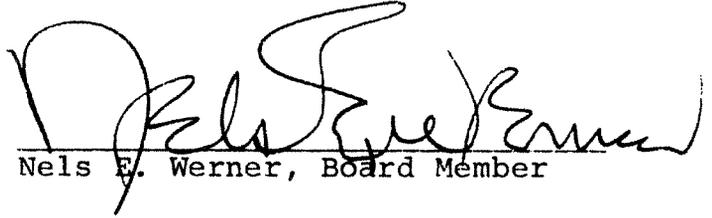
An examination of the air quality data in the Agency's 1980 Annual Air Quality Report shows that the 24-hour primary standard is the limiting one. The second highest reading in 1980 was 0.089 ppm at the Chicago Heights monitor. The standard is 0.14 ppm. Thus the 0.089 ppm could rise about 57% to reach 0.14 ppm. If we use a 50% increase to be conservative, the 1.8 lbs. sulfur dioxide standard could then be loosened to 2.7 lbs.

Furthermore, the 1.8 lbs. or the suggested 2.7 lbs. figures apply only to "existing" plants. New plants must meet a 1.2 lbs. limit or tighter. Thus the Board could have provided for even looser levels in say 1987 and 1992 as "existing plants" get retired.

The intent of Section 9.2 of the Act was to "enhance the use of Illinois coal" consistent with federal standards. We feel that the 1.8 lbs. sulfur dioxide emission limit in the Chicago area is unnecessarily tight. We agree with the July 16, 1982

and October 27, 1982 comments of CPC International, Inc. which go to this subject and raise the possibility of a national "freeze" on sulfur dioxide emissions. A national "freeze" would permanently damage Illinois industry in the Chicago area.


 Jacob D. Dumelle, Chairman


 Nels E. Werner, Board Member

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Concurring Opinion was filed on the 4th day of January, 1983.


 Christan L. Moffett, Clerk
 Illinois Pollution Control Board