

ILLINOIS POLLUTION CONTROL BOARD
August 2, 1984

MODINE MANUFACTURING COMPANY,)

Petitioner,)

v.)

ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,)

Respondent.)

PCB 82-111

DISSENTING OPINION (by J. D. Dumelle):

While I generally agree with other aspects of the majority order, I do not agree on the un-ionized ammonia portion.

The Board agrees that un-ionized ammonia content of the effluent follows the variables of temperature, pH, and total ammonia. I agree that 10 mg/1 total ammonia is appropriate to use since the highest value measured in a recent 12-month period was 7.8 mg/1. But to set the un-ionized ammonia limit based upon a pH or a temperature different than what can occur is not reasonable.

Is Modine to refrigerate the lagoon discharges? Is Modine to add acid to the discharges to reduce the pH well below 9°? At what cost? And where is the basis for all of this in the record?

Whatever un-ionized ammonia levels are occurring now will continue to occur. The instant variance is a short one designed to gather more data for a better determination by this Board in the near future. I would not have computed the un-ionized ammonia limits at conditions other than the maxima possible for temperature and pH.



Jacob D. Dumelle
Chairman

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Dissenting Opinion was filed on the 6th day of August, 1984.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board