

ILLINOIS POLLUTION CONTROL BOARD
February 19, 1987

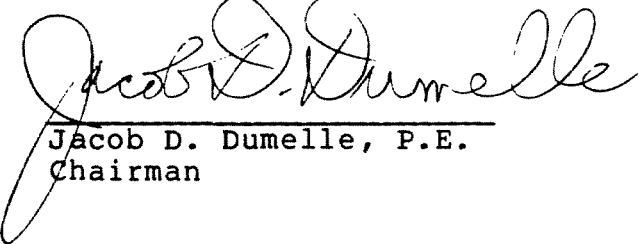
GENERAL MOTORS CORPORATION)
(ELECTRO-MOTIVE DIVISION))
)
Petitioner,)
)
v.) PCB 86-195
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

SUPPLEMENTAL STATEMENT (by J.D. Dumelle and J. Theodore Meyer):


The issue of the use of 40 gallons of paint in a year or 65 gallons or even 80 gallons (at full production) represents a de minimus situation to us.

The paint at issue has 6.01 lbs. of VOC per gallon. The rule requires 4.3. Thus, the difference between these two figures is the excess emitted over the rule if the somewhat controversial solids content correction is neglected. The excess emissions for the 40 gallons estimated to be used in 1987 is thus $40 (6.01 - 4.3) = 68.4$ lbs. Using 250 working days, the excess emissions compute to 4.4 ounces of VOC per day of plant operation! That is de minimus and the Board should so find.

If Electromotive can sell enough locomotives to get back to full production capacity it might reasonably add about 5,000 jobs to its present 5,055. At full production, 80 gallons per year of the paint in question would be required. The excess emissions would then double to 8.8 ounces per day or about a half pound a day. That is so small as to be minimal in environmental impact and de minimus in the legal sense.



Jacob D. Dumelle, P.E.
Chairman



J. Theodore Meyer
Board Member

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Supplemental Statement was filed on the 20th day of February 1987.

Dorothy M. Gunn

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board