

ILLINOIS POLLUTION CONTROL BOARD
June 20, 1974

AMOCO CHEMICALS CORP.)	
PETITIONER)	
)	
)	PCB 74-121
v.)	PCB 74-122
)	PCB 74-123
)	
ENVIRONMENTAL PROTECTION AGENCY)	
RESPONDENT)	
)	

OPINION AND ORDER OF THE BOARD (by Mr. Marder)

These cases come to the Board on Petition of Amoco Chemicals Corp., filed April 21, 1974.

PCB 74-121 requests a variance from Rule 204 (f) for operation of Petitioner's multi-purpose additives plant at Amoco Oil's Wood River Refinery, until February 28, 1975.

PCB 74-122 requests variance from Rule 205 (g) for operation of Petitioner's detergent additives plant, at Amoco Oil's Wood River Refinery, until February 21, 1975.

PCB 74-123 requests variance from Rule 205 (g) for operation of Petitioner's multi-purpose additive plant, at Amoco Oil's Wood River Refinery until March 31, 1975.

These Petitions are related to variances granted in PCB 73-399, 73-400, 73-401. In these matters the Board granted variances for the units until June 30, 1974.

The reader is urged to refer to our earlier opinion on these matters as to the units' operations and the control methodology being installed (PCB 73-397 - 401, December 20, 1973, Vol. 10, Pg. 439, of the Board's published opinions).

No hearing was held.

PCB 74-121: The Agency in its recommendation suggests that this variance only be granted until January 21, 1975.

Petitioner states as its reason for variance extension that key equipment will not be delivered on time, in order to comply with our earlier Order. Petitioner further alleges that other than the proposed control system, the only other way to comply is to shut down the unit.

Petitioner has submitted documents showing an effort to expeditiously complete its control system (Exhibits A,B, and C attached to Petition) The Board finds that Petitioner is diligently pursuing its control program.

Petitioner alleges, and submits supporting documents, that at monitoring stations surrounding the Wood River Refinery the Federal Primary and Secondary Ambient Air Quality Criteria are being met for sulphur dioxide while this unit is operating. Therefore, Petitioner alleges that there will be no adverse environmental impact on the ambient air quality in the area (Petition Pp. 2-3, Exhibit D attached). The Agency concurs that Petitioner's program will aid in attainment of the Federal Ambient Air Quality Standards (Agency Rec. P. 4).

The Agency further states that it has received no comments from the public regarding this variance (Agency Rec. P. 4).

The Agency believes that as Petitioner's past compliance has been timely and cooperative that Petitioner's action in seeking this variance extension is in good faith (Agency Rec. P. 3).

The Agency only objects to the sketchy timetable for completion, and therefore recommends that variance be granted only until January 31, 1975. The Board feels that since we are talking about a month's delay only, that the Board will grant the variance for the full time requested, subject to the condition that monthly reports be filed with the Agency, and that Petitioner shall complete its project in the shortest possible time.

PCB 74-122: The Agency recommends that this variance be granted only until December 31, 1974.

Petitioner is requesting an extension of a variance granted by the Board in PCB 73-400 from Rule 205 (g) for operation of its detergent additives plant until February 21, 1975.

Petitioner states as reason for its variance extension request that after testing and research, it was not able to eliminate a step in their processing which was hoped would eliminate the emission problem. Elimination of the process step caused a product that did not prove adequate when tested in two series of tests, ending in the fall of 1973 and Feb. 21, 1974 (Pet. P. 2).

Since Amoco must now return their filtration step in the process, it feels that 12 months are necessary in order to bring the unit into compliance (Pet. P. 3). This work will entail modifications in the completely enclosed pressure system (Agency Rec. P. 2).

Petitioner alleges, and has provided supporting documents (Exhibit A attached to Petition) referring to a study done in December 1972 and January 1973, that Petitioner's hydrocarbon emissions did not cause ambient concentrations likely to produce damage to vegetation, humans, c animals. (Pet. P. 3) Amoco also alleges that changes over the year since the test was conducted would show significant reductions in emissions by Petitioner, and, in fact, others in the area (Pet. P. 3).

Amoco has assumed that if total ambient hydrocarbon levels were due to Amoco, the unit in question would still only amount to 0.009 ppm (Pet. P. 4).

The Agency states that based on information supplied by the Petitioner, non-methane hydrocarbons were 2.02 ppm during a test period a year ago. The allowable ambient air standard is .24 ppm hydrocarbons. The Agency also mentions Petitioner's allegation that hydrocarbon emissions have been reduced by 2/3 since the tests were conducted (Agency Rec. P. 3).

The Agency is of the opinion that the proposed control system will bring Petitioner's unit into compliance with Rule 205 (g) (Agency Rec. P. 3).

The Agency also feels that Petitioner is exercising good faith and diligence in seeking the variance extension (Agency Rec. P. 3).

The Agency only objects to the length of time requested by Petitioner for the variance. The Agency feels the variance should only be extended until December 31, 1974, because of Petitioner's failure to allege a proper time schedule for project completion. Also, the Agency feels that Petitioner's emissions are so much above the standard that the unit should be brought into compliance as soon as possible. The Board will grant Amoco the variance for the time requested, subject to its filing a project completion schedule with the Board and the Agency within 21 days of the issuance of this Order.

PCB 74-123: The Agency recommends that this variance be granted until December 31, 1974.

Petitioner states as its reason for extension of its previously granted variance that late equipment delivery precludes completion of the control project before the expiration of the previously granted variance.

Amoco has experienced difficulty in preparation of a cost estimate. There was also a two-month delay in an appropriation approval from the company headquarters.

Amoco has also experienced numerous delays in receiving approval drawings from its supplier. An order was placed on December 7, 1973. Approval drawings were to be received by Petitioner six weeks after placing the order, but to the date of the Petition they had not been received.

Amoco alleged that certain of the equipment would be delivered in early May, 1974. If this equipment is received and installed, over one-half of the emissions will be eliminated by June 30, 1974 (Pet. P. 2).

Petitioner alleges that emissions from the entire refinery are not dangerous to vegetation, humans, or animals. Hourly concentrations

in excess of 0.08 ppm could have been expected only twice a year instead of only once as permitted by the national primary and ambient air quality standards. (Pet. P. 3) Assuming Petitioner is responsible for ambient hydrocarbons, taking this unit as a 3.4% contributor of the total refinery, this unit's contribution can be estimated at .069 ppm ambient concentration (Pet. P. 3, Exhibit A attached to Petition).

The Agency in its recommendation states that there are numerous other sources in the area. While the allowable ambient air standard is 0.24, testing last year by Petitioner showed the average non-methane hydrocarbon level at 2.02 ppm (Agency Rec. P. 3).

The Agency is of the opinion that this control program will bring about compliance with Rule 205 (g).

The Agency also states its belief that Petitioner is exercising good faith in its request for this variance (Agency Rec. P. 3).

The Agency's sole objection to the requested variance is to its length. The Agency believes that Petitioner should be able to finish work on the control system by December 31, 1974 (Agency Rec. P. 4), whereas Petitioner is requesting additional time to allow for equipment delivery slippage (Pet. P. 4).

The Board finds that Amoco shall be granted a variance from Rule 205 (g) for the full time requested, subject to the condition that as equipment is received, it shall be installed as soon as possible and placed in operation.

Hardship for granting these variances was adequately proved in the earlier cases, but as a brief resume, the Board found that should these variances not be granted, the only method of controlling the emissions from these units is by shutting them down. Such shutdown would then necessitate closing the entire refinery, thereby causing a lack of 110,000 barrels of oil being refined. This would cause substantial loss to the Petitioner and to the public.

This Opinion constitutes the findings of fact and conclusions of law of the Board.

ORDER

IT IS THE ORDER of the Pollution Control Board that:

- 1) Petitioner is granted a variance from Rule 204 (f) of the Board's Rules and Regulations for its multi-purpose additive plant until February 28, 1975, or to the date when the proposed control equipment is installed, whichever is shorter.
- 2) Petitioner is granted a variance from Rule 205 (g) of the Board's Rules and Regulations for its detergent additives plant, until February 21, 1975, or to the date when the

proposed control system is completed, whichever is shorter, subject to the condition that Petitioner submit within 21 days of the issuance of this Order a project completion schedule as to its compliance program.

- 3) Petitioner is granted variance from Rule 205 (g) for operation of its multi-purpose additives plant until March 31, 1975, or to the date when the proposed control equipment is installed, whichever is shorter, subject to the condition that as such control equipment is received, it shall be put into service as soon as possible.

Orders 1, 2, and 3 above are conditioned by the following:

- A) Petitioner shall apply for all necessary construction and operating permits from the Agency.
- B) Petitioner shall supply monthly progress reports to the Agency on the control equipment projects for the three units and a final report upon completion of each project.
- C) Petitioner shall keep in effect the bond ordered in the previous opinion of the Board for \$50,000 to guarantee installation of air pollution control equipment as ordered above.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, certify that the above Opinion and Order was adopted by the Board on the 20th day of June, 1974, by a vote of 5 to 0.

