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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

DEC 08 2000

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)

PROPOSED NEW 35 Ill. ADM. CODE 217, SUBPART U,)
NOx CONTROL AND TRADING PROGRAM FOR)
SPECIFIED NOx GENERATING UNITS, SUBPART X,)
VOLUNTARY NOx EMISSIONS REDUCTION PROGRAM,)
AND AMENDMENTS TO 35 ILL. ADM. CODE 211)

R01-17
(Rulemaking-
Air)

NOTICE OF FILING

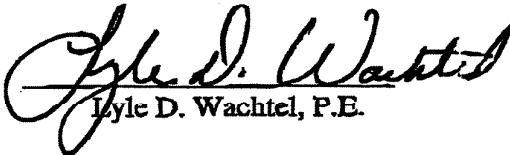
TO: Ms. Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601
(VIA FAX and Certified U.S. MAIL)

Bobb A. Beauchamp, Esq.
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601
(VIA FAX and Certified U.S. MAIL)

PLEASE TAKE NOTICE that I have filed today with the Office of the Illinois Pollution Control Board testimony on behalf of the University of Illinois, a copy of which is herewith served upon you.

Respectfully submitted,

OFFICE FOR PLANNING AND BUDGETING
UNIVERSITY OF ILLINOIS

By: 
Lyle D. Wachtel, P.E.

Dated: December 8, 2000

Lyle D. Wachtel, P.E.
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Thank you for the opportunity to provide testimony on the draft proposed rule expanding the NOx control requirements in Illinois. The University of Illinois (University) has always supported reasonable regulations when real and scientifically justifiable environmental benefit can be shown. In light of the necessary NOx reductions identified by the USEPA for Illinois, the University understands the need for reductions from smaller facilities. The University also believes that the burden of reducing NOx emissions is a shared responsibility between the state and its affected emission units. As such, the University requests that future compliance tracking requirements allow for alternative monitoring methodologies that are cost effective and flexible.

The University is pleased that the IEPA has attempted to allow for some flexibility in the monitoring requirements by stating that the owner or operator may monitor by an alternative method pursuant to 40 CFR 75, Subpart E (35 IAC 217.656 (c)(3)(B)). However, the University is concerned that USEPA has not approved such an alternative monitoring system since Part 75 was promulgated in 1993. This indicates that, although use of an alternative monitoring procedure may be allowed, actually obtaining IEPA and USEPA approval for such a procedure will be very difficult.

The proposed rule affects one boiler (Boiler #7) at the University of Illinois campus in Champaign-Urbana. Like many other owners and operators of smaller, older boiler units across the state, the University will face serious economic hardship if required to install continuous emissions monitoring. Older units located in much older facilities will have to work within the confines of structures designed many years ago,


when such complex monitoring programs could not be anticipated. In the University's case, Boiler #7 shares a common stack with other units that are not affected by the proposed rule, making it very difficult and expensive to properly install a continuous monitoring system specifically for Boiler #7. In addition, Boiler #7 (265 mmbtu/hr) has scarcely the nameplate capacity to even be considered an affected unit under the proposed rules. The nameplate capacity for Boiler #7 is 265 mmbtu/hr, which exceeds the applicability limit (250 mmbtu/hr) by only 15 mmbtu/hr. This factor, when considered with the age and configuration of the stack, strengthens the need for alternative compliance monitoring approaches and raises even more concern for the strict use of continuous emissions monitoring.

Flexibility is needed to ensure cost-effective compliance tracking for sources covered under this rule. The University encourages the consideration of alternative compliance monitoring approaches and requests that IEPA consider more flexible language in the proposed rule to make such alternatives feasible. For example, the source should be able to use one or an appropriate combination of the following alternative methods: Predictive Emissions Monitoring Systems, parametric monitoring, raw material pollutant content/mass balance, documentation of work practices, inspections and maintenance/recordkeeping, and periodic (stack/portable performance) testing.

CONCLUSION

The University requests that specific examples of alternative monitoring be included in the proposed rule language to ensure cost-effective compliance tracking methods for sources affected by this rule. The University hereby submits this testimony and appreciates the Board's consideration.

Respectfully submitted,
UNIVERSITY OF ILLINOIS

By: 
Lyle D. Wachtel, P.E.
Director
Office for Planning and Budgeting

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