

ILLINOIS POLLUTION CONTROL BOARD
March 14, 1986

COMMONWEALTH EDISON COMPANY,)
(Joliet Generating Station)
Units 7 & 8),)
)
Petitioner,)
)
v.) PCB 86-39
)
ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondent.)

OPINION AND ORDER OF THE BOARD (by W.J. Nega):

This provisional variance request comes before the Board upon a March 14, 1986 Recommendation of the Illinois Environmental Protection Agency (Agency). The Agency recommends that a 30-day provisional variance be granted to the Petitioner from 35 Ill. Adm. Code 304.124 as it pertains to total suspended solids (TSS) and from 35 Ill. Adm. Code 304.102(a) as it relates to emergency discharges from the coal pile area runoff basin for Units 7 and 8 at Commonwealth Edison Company's Joliet Generating Station. (Rec. 1).

Commonwealth Edison Company owns and operates a coal-fired electrical generating station known as the Joliet Generating Station which is located on the Des Plaines River at Route 6 and Larkin Avenue in Joliet, Illinois. The Petitioner's coal pile area runoff basin is served by an emergency discharge point system. Flows into the coal pile area runoff basin are from eight primary sources which include: (1) Unit 7 and 8 coal pile runoff; (2) Unit 7 and 8 drive house floor drains; (3) Unit 7 roof drains; (4) Unit 7 and 8 turbine room floor drains; (5) the coal cracker sumps (both east and west); (6) the crusher building sump; (7) the demineralized water tank area runoff, and (8) the equipment storage building floor and roof drains. Intermittent flows result, with the volume of water being largely dependent on the amount of rainfall during a given time period. (Rec. 1).

At the present time, the coal pile area runoff treatment system consists of two 500 gallon per minute (gpm) pumps. These two pumps transfer the effluent from the coal pile area runoff basin to oil coalescers for further treatment. The water is subsequently discharged to the Des Plaines River. During heavy rainfall, the volume of water entering the coal pile area runoff basin rapidly increases. On such occasions, the filters in the oil coalescers become clogged because of the high amounts of solids in the incoming water. This clogging of the oil coalescer

filters decreases the flow rate through the filters at the precise time when maximum flow rate is most needed. Accordingly, the coal pile area runoff basin overflows through the emergency overflow line to the Des Plaines River during periods of very heavy rainfall. (Rec. 1).

The Petitioner installed a 1,000 gallon per minute pump to transfer water from the runoff basin to the ash pond for treatment as an interim solution to these troublesome emergency discharges. However, experience has shown that a more permanent solution to this problem is needed.

Therefore, Commonwealth Edison Company is requesting a 30-day provisional variance to allow sufficient time to install two 4,000 gallon per minute submersible pumps on a concrete platform in the coal pile area runoff basin. These two 4,000 gpm pumps will discharge through a new 16 inch line to the Petitioner's ash pond, thereby hopefully solving the company's emergency discharge problem. (Rec. 1-2).

The Petitioner anticipates that approximately half of the coal pile area runoff basin will need to be dewatered and cleared of sludge in order to install the necessary submersible pumps and concrete platform. Although the Petitioner intends to process as much water as possible through the normal treatment process (or transfer such water to the ash pond for subsequent processing) during the term of the requested provisional variance, the company has asserted that the possibility of an emergency discharge still exists and necessitates the requested relief. (Rec. 2).

In regard to the possibility of such emergency discharges, the Agency has indicated that it believes that the Petitioner will take appropriate precautions to prevent, or at least minimize, any emergency discharges during the proposed variance period. (Rec. 2). However, the Agency has determined that the Petitioner's provisional variance request "fulfills Standard Condition 12(b) (Anticipated Non-compliance) of Petitioner's NPDES permit" and "as such, it is the Agency's opinion that Petitioner may use this outfall in the case of an emergency only." (Rec. 2). Thus, the Agency has concluded that "relief from 35 Ill. Adm. Code 309.102(a) is unnecessary" in the present case. The Board finds the Agency's reasoning persuasive in reference to the aforementioned matter and will therefore follow the Agency's recommendation not to grant relief from Section 309.102(a).

The Agency believes that the environmental impact of the proposed provisional variance will be minimal "due to the precautions Petitioner will be taking during the variance" and notes that there are no federal regulations which would preclude the granting of the requested relief from 35 Ill. Adm. 304.124 as

it pertains to total suspended solids. (Rec. 2).

The Agency has concluded that compliance with the provisions of 35 Ill. Adm. Code 304.124 as it relates to total suspended solids would impose an arbitrary or unreasonable hardship upon the Petitioner and emphasizes that "the end result of the provisional variance will be the solution to a longstanding problem". (Rec. 2). Accordingly, the Agency has recommended that the Board grant the Petitioner a provisional variance from 35 Ill. Adm. Code 304.124 as it pertains to total suspended solids, subject to specified conditions.

Pursuant to Section 35(b) of the Illinois Environmental Protection Act, the Board hereby grants the provisional variance as recommended.

This Opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

Commonwealth Edison Company (Joliet Generating Station Units 7 & 8) is hereby granted a provisional variance from 35 Ill. Adm. Code 304.124 as it pertains to total suspended solids, subject to the following conditions:

1. This provisional variance shall commence on March 17, 1986, and shall continue for 30 days or until installation of the two 4,000 gpm submersible pumps, concrete platform, and 16 inch line to the ash pond is completed, whichever comes first.
2. The Petitioner shall, as indicated, take all measures necessary to prevent or minimize any emergency discharges from this system during the variance period.
3. Any emergency discharges from this system shall be limited to 50 mg/l TSS.
4. The Petitioner shall notify Mr. Dan Ray of the Agency's Compliance Assurance Section via telephone at 217/782-9720 when the work described above commences and when it is completed. Each such notification shall be confirmed in writing within 5 days to:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Compliance Assurance Section
2200 Churchill Road
Springfield, Illinois 62706
Attention: Dan Ray

5. During the term of this provisional variance, the Petitioner

shall sample each emergency discharge which occurs from this system and analyze it for TSS. The results of this analysis along with information as to length of time the discharge occurred and volume discharged shall be submitted to Mr. Dan Ray at the address given above in Item #4 for each emergency discharge that occurs from this system.

6. During the provisional variance period, the Petitioner shall submit to the Agency a request to modify its NPDES Permit #IL0064254 to include the emergency overflow line from the coal pile area runoff basin serving Units 7 & 8.

7. The Petitioner shall complete the work described as expeditiously as possible.

8. The Petitioner shall apply for a construction permit for this project.

9. Within 10 days of the date of this Board's Order, the Petitioner shall execute a Certificate of Acceptance and Agreement which shall be sent to Mr. James Frost of the Agency at the following address:

Mr. James Frost
Illinois Environmental Protection Agency
Division of Water Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

This certification shall have the following form:

CERTIFICATION

I, (We), _____, having read the Order of the Illinois Pollution Control Board in PCB 86-39, dated March 14, 1986, understand and accept the said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

By: Authorized Agent

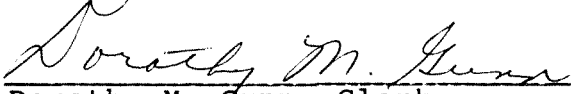
Title

Date

10. The Petitioner's request for relief from 35 Ill. Adm. Code 309.102(a) is hereby denied as unnecessary.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 14th day of March, 1986 by a vote of 7-0.


Dorothy M. Gunn, Clerk
Illinois Pollution Control Board