CONVERSATION RECORD

TIME: 1:45 | DATE: 1/6/86

TYPE: ☐ VISIT ☐ CONFERENCE ☒ TELEPHONE ☒ INCOMING ☐ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO.
Mary Rehmann	IL EPA	217-782-5544

SUBJECT: IL Boiler Regs

ROUTING	
NAME/SYMBOL	INT
Bill McDowell	
DGreen	
Paisie	

SUMMARY

IL's revised TSP boiler regs are now in Second Notice w/ the IL Pollution Control Board. IL EPA recently filed a notice w/ the Board objecting to a change made by the Board to the rule's opacity provision. The change leaves intact the 30% opacity limit for existing sources but restricts its enforceability by stating that "... the exceedance [of the 30%] shall only be a violation for purposes of the establishment of permit conditions concerning monitoring and reporting requirements." Of course, such a change eliminates the clout of the 30% rule.

Mary would like someone (e.g., Bill McD, Doma G., Jim D. etc) to give her a call and discuss the Region's reaction to this change i.e., approvability, examples in other states etc. The Board meets Thursday but will likely defer action for 2 weeks to allow industry time to rebut IEPA's objections.

Any Region V comments Tues. or Weds. would be appreciated.

ACTION REQUIRED

Call IEPA 3:00

call Karen [illegible] 51.19 c

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
	Timothy J. Mellord	1/6/86

ACTION TAKEN

SIGNATURE	TITLE	DATE

Mary Rehman
Jan. 8 3:00

1 set regulation was struck down for coal fired boilers

As the regulation had previously

The rule does say that an opacity violation doesn't count if the source can prove that they were in compliance with the mass emission limitation

The utilities don't want an enforceable opacity requirement because they want to avoid CEM

Could have a rule by the end of March at the earliest
but by the end of July if the Board needs to have another public comment period.

all State have Particulate limits + opacity limits for boilers

'81 summary prepared by PEDCO

If they change the rules, they would not be merely correcting procedural errors but giving us a new rule

Mary Rehmann will be in around 12:00 or 1:00