ILLINOIS POLLUTION CONTROL BOARD October 5, 1982

TROJAN CORPORATION (Wolf Lake),)	
Petitioner,)	
v.)	PCB 82-23
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,)	
Respondent.)	

ORDER OF THE BOARD (by D. Anderson):

Petitioner, Trojan Corporation, is hereby granted a variance from Rule 502 of Chapter 2: Air Pollution, and from 35 Ill. Adm. Code 725.482, subject to the following conditions:

- 1. This variance will expire on July 1, 1985, or upon completion of the burning authorized by this variance, whichever happens first.
- 2. This variance shall apply to burning conducted at Trojan's Wolf Lake facility. As used in this Order, "facility" includes areas of U. S. Forest Service property controlled in part by Trojan which are contiguous to property owned by Trojan.
- 3. This variance authorizes the burning of the following buildings (building numbers refer to Exhibit 4; 6 and 7 are treated as a single building):

Building Number	Exhibit	Description
1 2 3	5 5 6	High explosive production building High explosive production building Slurry production building Pack house
4 5 6/7 8	8 9 10	Dynamite production building Dynamite production building High explosive production building
9 10 11 12	11 12, 13 14 15	Production building Wet mix house and Dry mix house High explosive production building Wet mix house
13 14 15	16 17 18	Blasting agent building Blasting agent building Blasting agent building

Building Number	Exhibit	Description
18	19	Dryer
19	19	Dryer
20	19	Dryer
21	19	Dryer
22	19	Dryer
23	20	Slurry building

4. This variance authorizes the burning of the following explosive wastes:

	Approximate Quantity (pounds)	Location
Seismic Cans	600,000	Crab Orchard
Ball Powder	300,000	Ponds at Wolf Lake
Nitrostarch	55,000	Buildings at Wolf Lake
Washdown Sludge Obsolete Powder	156,000 24,000	Barrels at Wolf Lake Building, Wolf Lake

- 5. For purposes of this variance, a "unit" shall consist of any one of the following:
 - a. A total of 8,000 pounds of explosive waste, with other material necessary for proper burning, burned in quantities of less than 1,000 pounds per burn;
 - b. One building;
 - c. Any quantity up to the total amount of ball powder contained in any one pond.
- 6. Petitioner shall burn no more than one unit, as defined in Paragraph 5, per day.
- 7. Buildings shall be burned in place.
- 8. Explosive waste shall be burned in the area designated in PCB 80-133.
- 9. Ball powder may be burned in place in ponds, in which case the weight limitations of Paragraphs 5(a) and 6 and the burning location of Paragraph 8 do not apply. Petitioner may burn all of the ball powder in a pond at one time or may pump water to expose only a portion of the ball powder and burn only the exposed part, at Petitioner's election. As specified in Paragraph 5(a), a partial or complete burning of a pond is a unit of burning. Alternatively,

Petitioner may, at its election, remove all or part of the ball powder from the ponds, in which case it becomes, like other explosive waste, subject to the weight limitations and burning locations of Paragraphs 5(a), 6 and 8.

- 10. Petitioner shall not pump water from the ponds in such a manner that it may reach waters of the State.
- 11. Petitioner shall conduct burning only during daylight hours when atmospheric conditions are conducive to good smoke dissipation.
- 12. No burning shall occur when the wind is blowing from the east.
- 13. Buildings 5, 6/7, 8, 10, 11 and 23 shall be burned when the wind is from a westerly direction which is north of southwest (225°) and south of northwest (315°).
- 14. Petitioner shall not conduct open burning during episodes declared pursuant to Part IV of Chapter 2: Air Pollution. Petitioner shall not cause violation of air quality standards of Part III of Chapter 2: Air Pollution.
- 15. Petitioner shall construct and maintain an adequate firebreak around its burning area.
- 16. Petitioner shall have adequate firefighting equipment and personnel on hand during open burning and watchmen at night after burning.
- 17. Petitioner shall construct and/or maintain an earthen berm around its explosive waste burning area. Petitioner shall not cause or allow rainwater runoff from the burning area, or runoff from firefighting in the berm area, to enter Wolf Lake.
- 18. Burning shall be conducted under the direction of personnel trained in explosive burning procedures.
- 19. Petitioner shall notify the local office of the U.S. Forest Service in advance of burning. This shall be done daily, or by a schedule in advance of burning, with notification prior to any deviations.
- 20. On or before the 5th day of each month, Petitioner shall report to the Agency in writing the following (for the previous month):

- a. Time and place of each burning;
- b. Identification of the building or waste and quantity burned;
- c. Meteorological conditions in the vicinity, including wind direction, wind speed, temperature, pressure, relative humidity, type of cloud cover and visibility.
- 21. Petitioner shall notify the Agency within 5 days of completion of the burning authorized by this variance.
- 22. Before the first waste is burned, Petitioner shall comply with the interim status requirements of 35 Ill. Adm. Code 700.105. This will include filing an amended Part A application with the Illinois Environmental Protection Agency reflecting at a minimum the current ownership of the Wolf Lake facility and the current plan for waste disposal.
- 23. This shall not be construed as a variance from other applicable portions of 35 Ill. Adm. Code: Subtitle G, including Part 725, Subparts G and H, relating to closure and financial responsibility.
- 24. Petitioner shall comply with the manifest requirements of 35 Ill. Adm. Code 722, 723 and 725 for all waste moved to the Wolf Lake facility from other facilities.
- 25. Within 45 days of the date of this Order, Petitioner shall execute and forward to the Illinois Environmental Protection Agency, Variance Section, 2200 Churchill Road, Springfield, Illinois 62706, a Certificate of Acceptance and Agreement to be bound to all terms and conditions of this variance. This 45 day period shall be held in abeyance for any period this matter is being appealed. The form of the Certificate shall be as follows:

CERTIFICAT	CION
I, (We), fully understanding the Caccept that Order and agreems and conditions.	, having read and order in PCB 82-23, hereby ree to be bound by all of its
SIGNED	
TITLE	

DATE	
IT IS SO ORDERED.	
I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the, 1982 by a vote of	
Mieta Lindberg	
Christan L. Moffett, Clerk Illinois Pollution Control Board	