

ILLINOIS POLLUTION CONTROL BOARD  
August 5, 1976

M & S WOOD & PAPER CORPORATION, )  
 )  
Petitioner, )  
 )  
v. ) PCB 76-164  
 )  
ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
Respondent. )

OPINION AND ORDER OF THE BOARD (by Mr. Goodman):

On May 26 1976, Petitioner M & S Wood and Paper Corporation (M & S) filed a petition for variance before the Pollution Control Board (Board). M & S seeks extension of a prior variance from Rule 502(a) of the Air Pollution Control Regulations (Chapter 2) in order to burn clean, untreated wood waste and landscape waste in an air curtain destructor. The Environmental Protection Agency (Agency) filed its recommendation on July 8, 1976.

M & S operates a paper recycling and wood reclaiming business at a site in Boone County, one mile east of Belvidere, Illinois.

M & S originally obtained a variance to burn landscape waste in an air curtain destructor during the latter part of 1972. Since that time, M & S has sought and obtained several extensions of the original variance and has gradually improved the operation of its air curtain destructor. (See PCB 72-236, PCB 73-368, PCB 74-243, and PCB 75-417.) M & S seeks to continue to burn 20 to 25 tons per day of wood waste which cannot be reused. All wood to be burned will be clean, untreated and unpainted. M & S plans to burn wood waste five days each week, from 8:00 a.m. until 3:00 p.m. The Agency recommendation indicates that a representative of the Agency observed the operation of the air curtain destructor and found it to be in a well maintained condition and operating well.

The Agency recommendation suggests that emissions from burning clean, untreated wood waste are quite similar to emissions from burning landscape waste. The expected emissions from open burning landscape waste as compared to using an air curtain destructor are

as follows:

EMISSION FACTOR IN lbs/ton

<u>Contaminant</u>	<u>Open Burning</u>	<u>With Air Curtain</u>
Particulates	17	4.6
Carbon Monoxide	50	Not available
Hydrocarbons	4	0.25
Nitrogen Oxides	2	4.0

M & S has alleged that the financial costs of alternate means of disposal are substantially higher now than they were in the past, which creates an economic necessity for disposing of the wastes in the air curtain destructor. The Agency has received no complaints concerning M & S's operations during the term of the existing variance. The Board finds that the benefits from M & S's recycling operation outweigh any slight environmental damage resulting from the grant of this variance and that, therefore denial of the requested variance would impose an arbitrary and unreasonable hardship upon Petitioner. Moreover, the Board adopts the Agency's recommendation that the variance from Rule 502(a) be granted for a five-year period.

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

ORDER

It is the Order of the Pollution Control Board that Petitioner M & S Wood and Paper Corporation be and is hereby granted variance from Rule 502(a) of Chapter 2 until July 1, 1981, in order to burn clean, unpainted and untreated wood wastes in an air curtain destructor, subject to the following conditions:

1. Petitioner shall maintain the housekeeping at its facility so as to eliminate possibility of fires caused by sparks igniting litter and nearby waste materials.
2. An operator must be in attendance at all times when wood waste is being burned.
3. The feed to the air curtain destructor shall be adjusted so as to prevent any visible emissions from the destructor above 10% opacity.
4. Material used to promote combustion shall not be lower in quality than #2 fuel oil.

5. Burning shall be conducted only on days when the wind velocity is between 8 and 40 kilometers per hour.
6. Burning shall be conducted only between the hours of 8:00 a.m. and 4:00 p.m.
7. The burning site shall be provided with adequate fire protection and with such equipment as necessary to control accidental fires.
8. The air curtain destructor shall be operated in accordance with the manufacturer's operating instructions.
9. Within 35 days of this Order, Petitioner shall execute and forward to the

Control Program Coordinator  
Division of Air Pollution Control  
220 Churchill Road  
Springfield, Illinois 62706

a Certification of Acceptance and agreement to be bound to all terms and conditions of the variance. The form of said Certification shall be as follows:

CERTIFICATION

I (We), \_\_\_\_\_ having read and fully understanding the Order of the Illinois Pollution Control Board in PCB 76-164 hereby accept said Order and agree to be bound by all the terms and conditions thereof.

Signed by \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 5<sup>th</sup> day of August, 1976 by a vote of 5-0.



Christan L. Moffett, Clerk  
Illinois Pollution Control Board