ILLINOIS POLLUTION CONTROL BOARD

September 27, 1974

DECATUR MEMORIAL HOSPITAL,
Petitioner,

v. PCB 74-276

ENVIRONMENTAL PROTECTION AGENCY,
Respondent.

OPINION AND ORDER OF THE BOARD (by Dr. Odell)

On July 19, 1974, Decatur Memorial Hospital (DMH) filed a Petition for Variance, seeking relief from Rule 203(e)(3) of the Air Pollution Regulations (Chapter Two), which limits emissions of particulate matter from incinerators to no more than 0.2 grains per standard cubic foot of effluent gases corrected to 12 per cent carbon dioxide. In its disposal operations, Petitioner uses several pathological and hospital waste incinerators. A Goder hospital waste incinerator is used to burn approximately 183 pounds per day of contaminated waste material generated from the Hospital's treatment of patients who suffer from highly contagious diseases such as tuberculosis, staph aureus, and hepatitis. The contaminated waste is sealed in large bags and hauled to the Hospital's waste incinerator. DMH is a not-for-profit community hospital serving Decatur and environs. 16,000 patients are admitted yearly; another 80,000 patients are treated annually on an out-patient basis.

Petitioner stated that alternative means were not presently available to dispose of the waste. First, a pathological incinerator could be utilized but would "present grave dangers of cross-contamination to personnel and the environment." Danger would result from employees having to open the large sealed bags in order to put the contaminated waste into the incinerator. DMH offered no explanation why smaller sealed bags could not be burned in the pathological incinerator. Second, hauling the waste to a landfill would create the possibility of contamination to the public; this procedure was strongly condemned by the Macon County Health Department. Petitioner now is investigating other disposal methods, including incineration, sterilization, recycling, and compaction. DMH estimated that whatever system is chosen, it can be operating by approximately May, 1975. Petitioner stated that neither odor nor particulate emission complaints have been received from area residents.

The Environmental Protection Agency (Agency) filed its Recommendation on August 22, 1974. The Agency advised that the Variance be granted. The Agency's investigation revealed that contaminated material is collected daily from around the hospital and taken to the incinerator for burning. Two years ago, approximately 1500 pounds per day of waste were classified as contaminated and required incineration. This has been reduced to 183 pounds. The Agency estimated that 0.6 pounds per hour of particulates are emitted when 183 pounds per day of material are burned. Allowable emission rate under Rule 203(e)(3), as converted, is 0.44 pounds per hour.

The Agency agreed with the Petitioner that the alternative means of disposal presently available - pathological incineration and landfill disposal - both create potential health hazards; the Agency stated that no member of the public objected to the grant of the Variance.

We grant the Variance. To deny it would impose an unreasonable hardship upon the Hospital and expose the public to a health risk. Alternative means of compliance are not presently available, but efforts are underway to bring about conformity with Rule 203(e) (3). Finally, it appears unlikely that the excess emission of approximately 0.16 pounds per hour of particulate matter will have any severe impact on the environment.

ORDER

Decatur Memorial Hospital is granted a Variance to operate one of its existing Goder incinerators in excess of the standard set forth in Rule 203(e)(3) of Chapter Two until May 1, 1975, subject to the following conditions:

- (a) Petitioner shall burn no more than 183 pounds per day of contaminated waste in its Goder incinerator unless demanded by reasons of public health and safety.
- (b) Petitioner shall make attempts to utilize small sealed bags capable of being burned without opening in its pathological incinerator. Such bags should be utilized to enable Petitioner to comply with Rule 203(e)(3).
- (c) Within sixty (60) days from the adoption of this Order, Petitioner shall submit to:

Illinois Environmental Protection Agency Division of Air Pollution Control Control Program Coordinator 2200 Churchill Road Springfield, Illinois 62706

a program and a schedule for purchase of a complying incinerator or other alternate method of compliance to be instituted at said hospital by May 1, 1975.

(d) Petitioner shall institute proper procedures to insure the use of the primary burner on the Goder incinerator during its operation.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the day of _______, 1974, by a vote of _______ to O

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