

ILLINOIS POLLUTION CONTROL BOARD

August 12, 1976

OLIN CORPORATION, )  
 )  
 ) Petitioner, )  
 )  
 ) v. ) PCB 76-165  
 )  
 ) ENVIRONMENTAL PROTECTION AGENCY, )  
 )  
 ) Respondent. )

OPINION AND ORDER OF THE BOARD (by Dr. Satchell):

This matter comes before the Board on a petition filed by Olin Corporation (Olin) on May 27, 1976 seeking relief from Rule 505, Chapter 2, Air Pollution Control Regulations (Regulations) to permit the destruction by burning of four small buildings of frame construction covered with construction paper siding and roofing material which for about thirty years had been used for handling and processing various dry explosives and pyrotechnic mixes at Olin's East Alton, Illinois facility. The facility is part of Olin's Winchester-Western Division and consists of an area of about 1,732 acres; and at which about 6,000 employees currently produce, among other things, ammunition and explosive products. The aforementioned buildings have accumulated by dusting, spillage, etc. dangerous amounts of explosive contaminants which, in spite of extensive cleaning and decontamination procedures, remain a definite fire and explosion hazard (Pet. 2,3), and, since Olin abandoned the use of the buildings in 1972 in favor of a chemical method to destroy scrap explosives, they no longer serve a useful purpose. Previous attempts to dismantle similar buildings even with known precautionary measures resulted in serious injury to two workmen (Pet. 3).

In the Agency Recommendation filed on July 20, 1976 it is pointed out that Olin has previously sought several variances pertaining to explosive wastes at this facility. In cases PCB 70-4, 70-11, 70-25, 71-7, 71-371, and 73-427 variances were sought for the burning of wastes; also, in PCB 74-28 Olin obtained a variance from Rule 203(e) to operate an incinerator until May 29, 1975; more importantly, in PCB 72-281 Olin was granted a variance to burn 31 buildings contaminated by explosive wastes according to well-defined

conditions specified by the Board. Olin has received all necessary permits concerning air pollution emission sources and control equipment at the East Alton facility.

Mr. Mike Elbl, Agency Field Operations Engineer for Region IV, conducted an investigation on site on June 7, 1976 finding that the buildings contained no materials comprised of asbestos fibers; the aggregate of all explosive wastes was no greater than 25 pounds; and the nearest residence is about 1,000 feet south of the buildings.

While no reliable emission factors are available for the open burning of the materials of issue, the Agency, based on Table 2.4-1 of AP-42, A Compilation of Air Pollution Emission Factors, USEPA, offers a rough estimate of 1,000 pounds or less particulate emissions from the proposed burning. Also, the Agency estimates the emission of the following gases: equal to or less than 1,250 pounds carbon monoxide; 300 pounds organic material; 60 pounds nitrogen oxides and 10 pounds of sulfur oxides. These emissions are equated by the Agency as being the amount a single Wood River refinery would emit in about one-half hour of operation.

The nearest Agency ambient air quality station (Wood River Station located at 54 Wolcott) is about two and one half miles southwest. At this station, in 1975, annual geometric mean for particulates was 78 ug/m<sup>3</sup>; sulfur dioxide readings gave an arithmetic mean of 0.032 ppm; and also the 24-hour maximum sulfur dioxide primary standard was violated on several occasions. No other violations were recorded. On June 8, 9, 10 and 11 of 1976 an ozone yellow alert was called for the Wood River/Alton area and it is expected that additional ozone violations will occur at this station during the summer months.

The Agency states that it is doubtful that the burning of Olin's four buildings will have a measurable impact on the air quality in the Alton/Wood River area because of the minor amount of emissions and the few hours of burn. The small amount of explosive emissions would pose no health threat to area residents (Rec. 3).

The Agency agrees with Olin that open burning is the safest method of disposing of the contaminated buildings and, if performed under the special conditions given, the Agency is amenable to waiving the posting of a performance bond.

The Agency agrees that the failure to grant Olin a variance would present a danger to the employees and the East Alton facility that would be an arbitrary and unreasonable hardship. While two citizen requests to not grant the variance

have been received, the Board is convinced that disposing of the buildings under selected and favorable conditions will be less likely to cause annoyance or hazard than by chance burning and/or explosion.

Under the conditions set forth in the Order, the Agency recommends that the variance be granted. The Board finds no viable alternative method of disposing of the contaminated buildings and is convinced that the buildings pose a threat not only to Olin's facility and employees but possibly also to the area. While realizing that the emissions from such open burning will contribute to the already polluted area, the environmental damage appears minimal when compared to the possible hazard of allowing the buildings to remain. Therefore, the Board shall grant Olin a variance from Rule 505 of the Regulations, subject to strict adherence to the conditions enumerated in the Order.

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

#### ORDER

The Pollution Control Board hereby grants the Olin Corporation a variance from Rule 505, Chapter 2: Air Regulations to permit the disposal by burning of buildings designated as T-313, T-306, T-300 and T-307 at Olin's facility in East Alton, Illinois subject to the following conditions:

1. At least one week prior to the date burning is scheduled to take place, Petitioner shall notify the Agency's Region IV Office at the following address:  
  
Illinois Environmental Protection Agency  
115A West Main Street  
Collinsville, Illinois
2. The Petitioner shall notify the Agency's Region IV Office via telephone on the day of the scheduled burning, but before such burning shall take place. If ambient air quality and/or weather conditions are not favorable to burning, the Agency shall have the right to instruct Petitioner to postpone the burning until improved conditions warrant the scheduling of the burning period.

- 3. Petitioner shall file a written report with the Agency within thirty (30) days after the destruction of the buildings, giving details of said destruction.
- 4. Within fourteen (14) days after the date of this Order, the Petitioner shall execute and forward to the Control Program Coordinator at

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

the Certification of Acceptance and agreement to be bound by 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 76-165, hereby accept said Order and agree to be bound by all the terms and conditions thereof.

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


Title \_\_\_\_\_

Date \_\_\_\_\_

IT IS SO ORDERED.

Mr. Dumelle dissented.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Opinion and Order were adopted on the 12<sup>th</sup> day of August, 1976 by a vote of 4-1.

  
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 Christan L. Moffett, Clerk  
 Illinois Pollution Control Board