

On July 26, 1974, Permit No. 249-A was issued to Pollution Controls, Inc. (Graco Chemical Corporation) for the construction of a chemical waste disposal facility. The permit was modified on September 24, 1976, to reflect changes in design and to authorize the limited operation of the applicant's incinerator for purposes of curing refractories and testing design calculations. The most substantial limit imposed by the modified permit was the fuel limitation, i.e., prohibition of the incineration of materials which would not be easily decomposed by thermal oxidation. On July 13, 1977, the applicant requested that the operating parameters which are specified under the terms of Permit No. 249-A, as modified September 24, 1976, be expanded in order that the incinerator can assume economic operation. Since March of this year, the incinerator has operated in conformance with the terms of the modified permit except for a period between June 13 and June 18, 1977, during which period the incinerator used "PCL bottoms" as a fuel under carefully controlled tests conducted by EPA's contractor and under the supervision of personnel from this Department and EPA.

Although the final report of EPA's testing program is not yet available, telephone conversations with personnel of EPA and its contractor indicate that the design criteria are being substantially met or exceeded. Further, the tests indicate complete destruction of "PCL bottoms," a material containing certain chlorinated hydrocarbons and generally regarded as being difficult to thermally destroy. More specifically, the results of the stack tests indicate less than (a) 1 lb/hr of carbon monoxide, (b) 7.5 lbs/hr of SO<sub>2</sub>, (c) 5.0 lbs/hr of NO<sub>2</sub>, (d) 2.0 lbs/hr of HCl, (e) 7.5 lbs/hr of particulate (thought primarily to be NaCl and CaCl<sub>2</sub>), (f) no detectable components of "PCL bottoms" and (g) no detectable chlorinated hydrocarbons. Further, analyses of the effluent from the unit's scrubber indicate no detectable chlorinated hydrocarbons thereby indicating that the absence of such materials in the stack results from complete combustion and not from "scrubbing."

In view of the foregoing, the Commission hereby modifies the fuel limitations imposed by Permit No. 249-A, as modified September 24, 1976, in the following manner and with the following qualifications:

1. The applicant is prohibited from burning any material which is recognized to be more difficult to thermally decompose than "PCL bottoms" (taking into account relevant test data, the kinetic and thermodynamic properties of the materials existing at the incinerator's operating conditions and the scrubber's ability to remove decomposition products from the stack gases) unless such material is burned under test conditions supervised by personnel of EPA, its contractor, or this Department.

COMMISSIONERS

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CHAIRMAN

SUBMITTED BY Jarrell E. Southall

DATE PASSED 7/22/77

