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State/EPA Agreement

Fiscal Year 1981

U.S. Environmental Protection Agency - Region V

Illinois Environmental Protection Agency

State/EPA Agreement

Fiscal Year 1981

U.S. Environmental Protection Agency - Region V

Illinois Environmental Protection Agency

Illinois Environmental Protection Agency

U.S. Environmental Protection Agency - Region V

State/EPA Agreement (SEA)

Fiscal Year 1981

AGREEMENT

This State/EPA Agreement becomes effective when signed by the Regional Administrator of the U.S. Environmental Protection Agency (USEPA), Region V, and the Illinois Environmental Protection Agency (IEPA).

The Agreement identifies eleven environmental or programmatic problems as "Highlight Issues" and proposes a problem-solving approach for each. The proposed strategies and activities reflected in this Agreement are mutually acceptable to the parties who agree that all reasonable efforts will be made to achieve the objectives stated for each highlight according to the implementation schedule included.

USEPA guidance to the IEPA for the preparation of grant applications for Federal support and State work programs prepared pursuant thereto will recognize that the activities specified in this Agreement have funding priority within the limits of eligible funds allocated to the State of Illinois. The highlights may be included in the appropriate grant work programs by reference to this document if the level of detail is considered adequate. Progress on the implementation of the Agreement will be mutually evaluated in mid-year of the 1981 Federal fiscal year.

This Agreement may be amended at any time, except as limited by applicable laws or regulations. Amendments shall be made by supplemental Agreement, endorsed in writing by the parties hereto.

John McGuire
Regional Administrator
U.S. Environmental Protection Agency

Michael P. Mauzy
Director
Illinois Environmental Protection Agency

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I. INTRODUCTION

Federal Fiscal Year 1981 marks the second year in the evolution of the State/EPA Agreement (SEA) in Illinois. This Agreement is intended to be a key management tool which top managers in the U.S. Environmental Protection Agency (U.S. EPA) and the Illinois Environmental Protection Agency (IEPA) can use to focus attention on priority activities and problems. The goal of the SEA process is to maximize the use of available resources to solve priority environmental problems.

The issues which are highlighted in this SEA document are issues determined to need special priority attention from a program and funding standpoint in FY 1981. Other priority issues, which were identified in the SEA process and are earmarked for priority funding, are described in the media goals and direction statements of this document and in the IEPA's FY 1981 program work plans which are appended to this document by reference.

In delineating Federal and State roles under the Safe Drinking Water Act (SDWA), the Resource Conservation and Recovery Act (RCRA), the Clean Water Act (CWA), the Clean Air Act (CAA) and other environmental legislation, Congress clearly envisioned a Federal/State partnership. The State/EPA Agreement process, which addresses the above legislation, attempts to make that partnership real by encouraging the States and the U.S. EPA to negotiate their priorities in order to maximize the use of available resources.

The SEA development process for FY 1981, in the State of Illinois, began in January 1980, with the publication of a special issue of Environment Midwest-U.S. EPA's monthly magazine. This publication described the main issues highlighted in the FY 1980 SEAs, explained the process for FY 1981 and solicited citizen input on issues to be considered as highlights in the FY 1981 SEA agreement or to be addressed in the appropriate FY 1981 IEPA program work plans.

All public input was considered when developing program strategies for the coming year and identifying specific issues to be highlighted in the SEA document. All of the media specific issues selected as highlights for FY 1981 relate to issues raised by the public in this initial input. Many other issues raised in this process are addressed in the Illinois EPA's FY 1981 pollution control work programs, which are appended by reference to this document. There were a few additional issues raised which do not appear in either the SEA or the program work programs since they concern issues not under the perview of U.S. EPA or IEPA.

In March 1980, U.S. EPA and IEPA exchanged lists of issues, covering the air, water and hazardous/land media, to be given special attention in the coming year. A negotiation session between U.S. EPA and IEPA in early April resulted in the selection of those issues to be highlighted in the FY 1981 SEA document. Others were selected to be addressed in the detailed work programs. Extensive effort was put into developing problem solving approaches for addressing these issues, taking long range goals, available information, and current resources into consideration.

This SEA document contains the fruits of the months of discussion and negotiation between U.S. EPA and IEPA. It is divided into four main sections -- Air, Water, Hazardous Materials, and Miscellaneous issues. Each section, with the exception of Miscellaneous, contains a broad statement of the overall goals of that specific media program along with a description of those issues in Illinois, related to that medium, which need attention in FY 1981. Certain of these issues have been selected to be given special attention by being highlighted in the SEA document. Each highlighted issue is accompanied by a Problem Solving Approach (PSA) which outlines the actions to be taken by U.S. EPA and IEPA during FY 1981 to deal with this problem. The SEA document is completed by a list of pertinent back-up materials which are appended to the document by reference. These materials are available for review in the U.S. EPA or IEPA offices.

The award of federal grant funds to help the State carry out its pollution control programs is the final step in the SEA process. The following grant amounts (estimates) will be made available to the IEPA to support the efforts outlined in this agreement and the FY 1981 work programs which are appended.

- Clean Water Act

Sections 106	$1,831,000
205(g)	$3,483,200 (FY'80 funds)
208	$403,000*
314	Fund availability will be identified in FY'81.

- Clean Air Act

Section 105	$3,532,300

- Safe Drinking Water Act

Section 1443 (a)(1)	$1,047,000
Section 1443 (b)(1)	$145,600

- Resource Conservation and Recovery Act

Subtitle C Section 3011	$1,403,400
Subtitle D Section 4007-8	$410,720

- Toxic Substances Control Act

Section 28	Grant application is being reviewed by headquarters. No decision yet on funding.

*Still in negotiation.

In addition to funding the above grant programs operated by the IEPA, U.S. EPA will provide the following amounts (estimates) to local/regional units of government during FY 1981 to assist in the State's pollution control efforts.

- Clean Water Act, Section 208

1)	Northeastern Illinois Regional Planning Commission	$282,500*
2)	Southwestern Illinois Metropolitan and Regional Planning Commission	$153,337*
3)	Great Egypt Regional Planning and Development Commission	$112,500*

- Clean Air Act, Section 105

**1)	City of Chicago, Department of Consumer Services
**2)	Cook County, Department of Environmental Control
**3)	Granite City, Pollution Control Agency

* Amount still in negotiation
** $1,184,000 (Total amount available, individual amounts not yet negotiated.)

II. WATER QUALITY GOALS AND PROGRAM DIRECTION FOR FY 1981

The quality of our State's waters affects us all in many ways. As individuals we rely on supplies of fresh water (surface and/or ground water) as our source of water for drinking, other daily needs, as well as recreational activities. Industry also relies upon this water as a basic resource necessary for many production activities. In an attempt to control the quality of our surface and groundwater resources Congress passed two major pieces of legislation in the 1970s. The Clean Water Act (CWA), passed in 1972 and amended in 1977, and the Safe Drinking Water Act, passed in 1974 and amended in 1977.

A. The Federal Water Pollution Control Act (FWPCA) Amendments of 1972 (P.L. 92-500) and the subsequent Clean Water Act (CWA) of 1977 (P.L. 95-217) constitute two of the most complex and far-reaching pieces of environmental legislation to emerge from the U.S. Congress. They establish highly interrelated programs for setting water quality goals and standards, planning and constructing wastewater treatment facilities, awarding grants for design and construction of municipal sewage facilities, issuing permits for wastewater discharges and enforcement of the terms of these permits as necessary, and evaluating effects of diffuse nonpoint sources of water pollution and developing remedial programs.

The primary objective of the Clean Water Act Amendments of 1977 is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." To achieve this end the CWA set two national goals that (1) wherever attainable, water quality which provides for the protection and propogation of fish, shellfish, and wildlife and provides for recreation in and on the water be achieved by July 1, 1983; and, (2) the discharge of pollutants into the navigable waters be eliminated by 1985.

In attempting to meet the goals of the CWA the U.S. Environmental Protection Agency (U.S. EPA) and the Illinois Environmental Protection Agency (IEPA) have been working together in a number of program areas. These programs can be divided into four main categories. Those related to (1) planning for the proper management of our water quality resources; (2) management of a grants program to provide for adequate sewage treatment plant capability; (3) permitting of sources which discharge into our waterways and enforcement against violators; and (4) monitoring of the quality of our waterways and the discharges going into them.

During FY 1981 special priority emphasis will be given to certain activities in each of these general program areas described below:

1. Water Quality Management Planning

In order to provide a mechanism for integrating all of the water pollution control related activities into a well coordinated overall program, Congress stipulated, in Section 303(e) of the Clean Water Act that each state should maintain a "Continuing Planning Process" (CPP) for establishing and implementing the State's water quality standards. Section 208 of the CWA also calls for the development and carrying out of areawide water quality management plans to control point and nonpoint sources of pollution into our waterways so that the water quality standards can be maintained.

The water quality management plans for the three designated areas of Illinois Northeastern Illinois Planning Commission, (NIPC), Southwestern Illinois Metropolitan and Regional Planning Commission (SIMAPC), Greater Egypt Regional Planning and Development Commission (GERP&DC) and the non-designated portion of the State have been completed. The State's plan and the NIPC and SIMAPC plans have been certified by the Governor and approved by U.S. EPA. GERP&DC is undergoing review by IEPA and Region V.

It is now time to refine and begin to implement the solutions to the water quality problems identified in the initial planning process. Implementatation, tracking and evaluation of the plans is required in Illinois in order to keep management, planning and implementation moving in the right direction and to assess progress in meeting the desired water quality objectives within the State. Planning efforts will continue to address sources of pollution not adequately considered in the initial planning programs.

During FY 1981 the designated 208 agencies will continue to implement their plans, which have been certified and conditionally approved.

Obtaining adequate funding from local sources to support these activities will require aggressive planning on the part of the designated agencies.

The water quality management plan for the non-designated portion of Illinois identified nonpoint source pollution, particularly agricultural erosion, as a significant contributor to the water quality problems in that area.

Following additional refinement of the assessment of water quality impacts and causes, IEPA will narrow and tailor the long list of Best Management Practices (BMP) for control of the nonpoint sources of pollution to fit the particular needs of the affected river basins or segments. Additionally, in FY 1981 Illinois will develop a priority system for ranking Rural Clean Water Program projects and other BMP initiatives.

During FY 1981 revisions are also needed in the State's Continuing Planning Process (CPP) so that it clearly reflects current programmatic priorities and directions.

Illinois will also be planning for the protection of its precious groundwater sources during FY 1981. The State of Illinois currently does not have a unified policy for protection of groundwater resources throughout the State. Responsibility for groundwater is currently shared by several State agencies. During FY 1981 IEPA will be taking the lead to develop a comprehensive groundwater strategy which will outline the mechanisms to approach and solve the State's groundwater contamination problems. As part of this groundwater effort Illinois EPA will make application to assume the primary enforcement responsibility for the Underground Injection Control Program (UIC), which is mandated by the Safe Drinking Water Act. This high priority issue was selected to be highlighted in this SEA document. Additional detail on the scope of this effort and appropriate milestones can be found on page 11.

2. Municipal Facilities/Construction Grants

One of U.S. EPA's major goals is to reduce the pollutants discharged into waters from municipal wastewater treatment plants and to eliminate all untreated discharges. To aid in the control of this type municipal pollution U.S. EPA has been assisting communities by making grant funds available for the planning and construction of sewage treatment facilities. The operation of this grant program has been delegated to the IEPA.

The Clean Water Act amendments of 1977 provided a great number of amendments to the process for the planning of municipal sewage treatment facilites, all of which are essential for project quality and proper environmental management. Full implementation of these amendments will reap major environmental benefits, in terms of more efficient use of technology, use of innovative and alternative technology approaches, water and energy conservation, reuse of sludge and wastewater, cost savings to small communities, and prevention of urban sprawl. The environmental review process, including the Environmental Inventory, Mid-Course Facility Plan Peview and the Environmental Assessment,

has been established as a critical element in the Facility Plan Review process. The management of this process continues to be an important priority for FY 1981.

Substantial progress has been made in the State's management of this grant program through the implementation of the State Management Assistance Program (SMAP). State resources funded under Section 205(g) have significantly increased available personnel. In order to optimize the use of available resources, U.S. EPA, Region V, will maximize the contribution of Regional resources as well as available personnel from the U.S. Army Corps of Engineers (COE) to complement State personnel. The top priority for Regional personnel will be SMAP review, evaluation and feedback, while the COE will provide a Step 3 assistance function in the State's management of the program. Through the regularly scheduled delegation reviews, Region V has commented on the details of the State's review process. In general, the results have indicated that the project reviews being conducted by the State under delegation are acceptable.

3. Water Quality Permitting and Enforcement

In order to meet the 1983 goals for improved water quality U.S. EPA and IEPA have worked to implement the National Pollutant discharge Elimination System (NPDES) which requires permits for all point sources which discharge into our waterways. Point sources are industrial facilities and municipal wastewater treatment plants which discharge pollutants directly into the water through pipes and channels. NPDES permits regulate what may be discharged and how much. The permit commits a discharger to reduce or eliminate his discharges in an orderly fashion. These permit commitments are legally enforceable.

The permit system also requires dischargers to monitor their wastes and to report the amount and nature of all waste components. The State maintains a list of Major Dischargers which prioritizes dischargers for compliance tracking and possible follow-up enforcement activities. In the past, major dischargers have been determined soley by size. In FY 1981 pilot efforts will be undertaken to develop a list which takes the degree of the problem caused by the discharger into consideration, as well as the size, when identifying the sources to be included on the Major Discharger's List.

During FY 1981, IEPA will pursue legislative authority to use general permits, which are permits issued on an areawide basis to certain categories of dischargers. Some of the categories include: municipally owned sewage lagoons of less than 2,500 P.E. capacity, all dischargers less than 1,500 gallons per day, which discharge only domestic wastes, sand and gravel operations which have only run-off discharges, small POTW mechanical plants, and non-contact cooling waters.

In FY 1981 increased emphasis is being put on the control of discharges of toxicants into surface waters. The Clean Water Act amendments of 1977 increased the emphasis on the control of toxic pollutants. The States

and U.S. EPA have a responsibility to protect the public from exposure to dangerous pollutants by controlling the discharge of toxicants into the environment. Each year vast quantities of toxicants are generated which enter the environment. Discharge of toxicants to our waterways directly affect drinking water supplies, cause fish kills and degrade water quality for other important uses. Indirect discharges cause upsets in sewage treatment plant operation, water quality standards violations, render municipal sewage sludge unuseable for land application and also can contribute to ambient air standard violations.

The number of identified potential adverse health effects from environmental exposure to toxic chemicals is increasing. Since a large number of chemical manufacturing sites and a significantly larger number of chemical processors and user sites are located in Illinois, it is obvious why special attention is being given to controlling the discharge of toxics into our waterways.

In FY 1981 IEPA will develop a strategy and schedule to reissue effective NPDES permits that emphasize the control of toxicants to primary industries, major Publically Owned Treatment Works (POTWs), Federal facilities and major secondary industries. Control of toxicants will also be affected by Illinois' acceptance of the delegation of the pretreatment program which seeks to: (1) prevent the introduction of pollutants into POTWs which will interfere with the operation of the POTW or contaminate the sewage sludge; (2) prevent the introduction of pollutants into POTWs which will pass through the treatment works into receiving waters or the atmosphere or otherwise be incompatible with the work; and (3) improve opportunities to recycle and reclaim wastewaters and the sludges resulting from wastewater treatment.

The need to control the discharge of toxic substances, primarily from industrial sources, to surface waters of Illinois in order to protect human health and improve the quality of these waters has been selected as an issue to be highlighted in the SEA. Specific details of the activities to be taken by U.S. EPA and IEPA to address this issue can be found on page 13.

Special emphasis in FY 1981 will also be placed on activities aimed at increasing the municipal dischargers rate of compliance with permit requirements. Currently only a little more than one-half percent of the municipal permitees in Illinois are meeting their permit requirements. This issue has also been selected as one to be highlighted in this SEA document. The joint U.S. EPA/IEPA efforts which will be undertaken in this area are described in detail on page 16, and will include the initiation of a review of substantive issues regarding the National Municipal Policy and Strategy and the implementation of a system to integrate the three major program activities which relate to POTW/compliance, permits and pretreatment, construction grants and enforcement.

A high priority effort is needed to continue the operation of the compliance tracking and inspection program which will surface NPDES permit violations for appropriate enforcement action.

4. Water Quality Monitoring

The intent of the water monitoring program is to provide program managers with a valid data base which can aid them in their decision making, and is responsive to their needs. A most pressing concern is assurance of the protection of public health through control of toxic and hazardous sources of pollutants, especially those which have the potential for adverse impacts on public health.

IEPA's monitoring efforts will include compliance monitoring, ambient monitoring, intensive surveys, toxic monitoring, biological monitoring, ongoing Great Lakes monitoring, data interpretation and reporting, operation and maintenance and training, emergency response and quality assurance. Specific details on the IEPA monitoring efforts can be found in their FY 1981 Water Pollution Control Program plan, referenced in the Appendix.

In order to be most useful the samples collected in these various monitoring activities have to be analyzed in a quality controlled setting, in a timely fashion. The lack of adequate analytical data is one of the most serious obstacles facing environmental protection agencies (both federal and state) in their attempt to properly assess environmental problems.

New and emerging programs, such as hazardous toxic wastes, require more complete and costly analytical procedures and equipment to provide the data needed. It is therefore important to assess the capability and future needs of the laboratories which will have to provide these services. For this reason, the FY 1981 SEA includes a highlight issue which addresses the need to assess Illinois' capability to provide the necessary analytical data, either by its own laboratory, by contracting for laboratory services, or with the help of U.S. EPA lab support. More detail on the problem solving approach developed to address this issue can be found on page 39.

Quality controlled data obtained from the various State and Federal monitoring activities is used to provide information on the current status of water quality so that it can be seen whether the quality has improved, remained the same, or degraded. In some instances different agencies interpret the same data in different ways, resulting in confusion over the actual water quality. A standard, consistent type of water quality index is needed in order to show that we are accomplishing the national program for water pollution control. During FY 1981 U.S. EPA will be working with the states in Region V, including IEPA, to develop a consistent method for translating water quality data into a meaningful index of water quality.

B. The Safe Drinking water Act of 1974 (SDWA) amends the Public Health Service Act and is established to assure that the public is provided with safe drinking water. The Safe Drinking Water Act provides the legislative initiative under which Primary and Secondary Drinking Water Regulations are promulgated by EPA. These regulations which apply to water after treatment by all public drinking water systems are standards of purity, established to protect the public health. IEPA has assumed the management for the implementation and enforcement of the public water system supervision program.

The SDWA also (1) provides for the protection of underground sources of drinking water, (2) assures that there will be adequate supplies of chemicals needed to treat public water systems, and (3) establishes the National Drinking Water Advisory Council to make recommendations to the EPA about matters relating to this act.

The Safe Drinking Water Act marks the first time a truly national commitment was made to safeguard public drinking water supplies. The drinking water supplied to most American homes today is generally considered safe. However, at least 4,000 known cases of waterborne illnesses occur each year in this country. The actual total may be ten times greater. Further, medical science has not yet determined the effects on people of long-term, low-level exposure to contaminated drinking water. The Nation's water supplies are also being threatened by careless use of hundreds of chemical compounds and the improper disposal of toxic wastes.

The Interim Primary Drinking Water Regulations, established under the SDWA, require all public water systems to regularly monitor their water for various health-related contaminants, and to maintain concentration of these contaminants below specified levels, called maximum contaminant levels, or MCL's. The top priority for the Illinois Public Water System Supervision Program in FY 1981 is to assure that the community public water systems in Illinois are substantially in compliance with these regulations.

In Illinois 52 community water systems are known to exceed a chemical MCL -43 fluoride, 9 barium -- and approximately 75 systems are suspected of violating the MCL for radium. It should be noted that the radium violations, most of which are found in the northeastern part of Illinois, to the best of our knowledge are due to naturally occurring radioactivity in the areas geological formations. There were also a large number of bacterial MCL violations identified in Illinois during FY 1979. Bacterial contamination is usually transitory in nature, and normally poses a less severe long term or chronic health hazard than chemical or radiological contamination; however, if the safety of drinking water is to be better assured, the number of bacterial violations must be significantly reduced, and the public must be made aware of the violations which do occur. Illinois will be ensuring that all monitored violations at community systems will be followed up with the required public notices.

Another major concern this year is the presence of trihalomethanes in drinking water. Regulations governing monitoring and MCL requirements for trihalomethane will begin to take effect in November, 1980. IEPA, however, has already begun to monitor water systems that serve over 10,000 people, for the presence of trihalomethane violations.

U.S. EPA has determined that injestion of these synthetic organic chemicals, which are commonly formed when water is chlorinated, pose a risk to human health.

During FY 1981 IEPA will work to bring the mobile home park program up to par with the program for all other community water systems. Non-community water supply systems' compliance with the drinking water regulations will also

be emphasized. In Illinois the Illinois Department of Public Health (IDPH) is responsible for non-community supplies. IEPA has a cooperative agreement with the IDPH which outlines the work the IDPH will do in support of the IEPA responsibilities assumed as a result of accepting delegation of primacy for the public water system supervision program.

Probably the greatest overall problem with relation to public health is the contamination of groundwater and surface waters with toxic or carcinogenic compounds. A source of groundwater contamination of significant concern is the underground injection of fluids. Improper injection activities pose a direct threat to groundwater. All States including Illinois, have potentially large numbers of uncontrolled facilities, such as clandestine shallow injection wells, drainage wells and abandoned wells, all of which may pose a potential danger to underground sources of drinking water.

The abandoned wells will look particularly attractive as injection sites as land disposal restrictions are tightened. The severity of the hazard posed by these unsound practices is yet unknown. One thing is certain however, that there is a strong link between the Resource Conservation and Recovery Program (RCRA) and the Underground Injection Control (UIC) program, since wastes that are being tracked under RCRA may find their ultimate destination to be an injection well regulated under UIC. The necessity for coordination and consistency between the two programs is critical, so that no loopholes exist for the improper disposal of waste materials, whether it be above the surface or below.

In an effort to protect underground sources of drinking water from contamination, IEPA will be applying, in FY 1981, for primacy to operate the Underground Injection Program (UIC). IEPA will also be developing a comprehensive statewide strategy for groundwater protection which will outline the mechanisms needed to approach and solve the State's groundwater contamination problems. These groundwater protection activities were selected to be highlighted in this SEA document. Specific details can be found on page 11.

HIGHLIGHT ISSUE #1

Develop a comprehensive strategy for groundwater protection in Illinois.

DISCUSSION

The State of Illinois does not currently have a unified policy for protection of groundwater resources throughout the State. Responsibility for groundwater is currently shared by several State agencies, fostering a fragmented and incomplete approach to groundwater protection.

This highlight acknowledges the need to expand upon and meld the various groundwater protection components, ensuring consistency with requirements established under the Safe Drinking Water Act (SDWA), the Resource Conservation and Recovery Act (RCRA), the Clean Water Act (CWA), and other Federal legislation.

The problem solving approach for this highlight should result in the completion of a comprehensive strategy for groundwater protection in the State. This strategy, which will be developed on an intermedia basis, should result in the identification of aquifers to be protected, the sources to be controlled, the methods for regulation, and a systematic approach for detection and resolution of groundwater contamination cases. As a part of the groundwater strategy, IEPA will develop a program for seeking and maintaining primacy enforcement responsibility for the Underground Injection Control (UIC) program.

PROBLEM SOLVING APPROACH

1. Illinois' ground water task force composed of --- Illinois State Geological Survey, Illinois Department of Mines and Minerals, Illinois Department of Public Health, Illinois Environmental Protection Agency, Illinois Department of Agriculture, and Illinois Department of Transportation-Division of Water Resources will meet by November 1, 1980, to establish coordination channels and responsibilities relative to implementation of the various State and Federal programs designed wholly, or in part, to protect groundwater.

2. The task force, under the leadership of the IEPA, will develop a comprehensive statewide groundwater protection strategy which will outline the mechanisms to approach and solve the State's groundwater contamination problems. The scope of work, to be completed by January 1, 1981, will include the following items at a minimum:

A. Identification of existing programs that involve groundwater management and an evaluation of their effectiveness at preventing or resolving groundwater pollution problems, by January 1, 1981.

B. Identification of necessary intensive investigations to document specific problems and solutions by March 1, 1981.

C. Compile a statewide inventory and assessment of available hydrogeologic information and prioritize additional data needs by July 1, 1981.

This should include projects currently and previously developed under the CWA, SDWA, RCRA, etc.

D. Development of a comprehensive list of known or suspected areas of groundwater contamination by August 1, 1981.

E. Development of a prioritization and prioritize the list (See D above) to identify the most important groundwater contamination problems by area and by source. This should be completed by September 1, 1981.

F. Develop and conduct a public participation program.

G. Conduct a resource analysis to specify the comprehensive groundwater management strategy that can be accomplished within the existing resources and programs; and identify additional legislative, programmatic and resource needs that would improve groundwater protection. Prioritize the identified additional needs. These efforts are expected to be completed during the first quarter of FY 1982 (October - December, 1981).

3. Illinois will assume primary enforcement responsibility (primacy) for the Underground Injection Control (UIC) program by July, 1981, provided the State's financial resources are sufficient. Information developed by this program will be used in defining additional data needs in the comprehensive strategy document.

4. Illinois will prepare the following:

A. A first year status report by September 30, 1981

B. A final comprehensive strategy for groundwater protection in Illinois by December 31, 1981 (FY 1982)

RESOURCES

Section 208 grant, Clean Water Act; UIC grant; Section 1443, Safe Drinking Water Act; State funds.

Responsible Program Managers/Staff Contacts:

U.S. EPA: Joseph Harrison, Michael Phillips

IEPA: John Moore

HIGHLIGHT ISSUE #2

Control the discharge of toxic substances, primarily from industrial sources, to the surface waters of Illinois.

DISCUSSION:

The Clean Water Act of 1977 directed U.S. EPA and Illinois EPA to focus special attention on the control of toxicants which may cause harm to human health or the environment. Progress needs to focus on directing attention to the control of toxicants in the NPDES permit program and supporting surveillance and other activities. Illinois and Region V have in FY '80 started to consider toxicant monitoring and limitations in NPDES permits. Work also commenced to increase and integrate toxicant surveillance activities into the permit activities. Illinois and U.S. EPA agree to jointly work to resolve the prioritized implementation of this program issue to control toxicants of national and local concern.

The toxic substance control program is primarily in the problem assessment stage in Illinois. The major emphasis of the program involves efforts by both the State and U.S. EPA along with special monitoring and evaluations by select industries. The general program contains:

1. The implementation of existing or, where needed, development of reliable and accurate methods for measuring the level of toxic substances in the environment either directly by chemical analysis or indirectly by examining the toxic impact on indicator organisms, and

2. Development of appropriate and enforceable monitoring requirements and limitations for toxic substances believed to be a problem in Illinois or downstream waters.

To supplement existing monitoring procedures for conventional and toxicant pollutants, the IEPA has developed specialized equipment for collection of water samples which will be subjected to analysis for organic compounds present at trace levels. IEPA is also developing a comprehensive, statistically-based quality control program.

IEPA has proposed two related efforts to U.S. EPA for funding under Section 28 of TSCA. The major effort is an epidemiological investigation of excess cancer rates in certain parts of Illinois. The second effort is measuring the uptake and excretion in mammals of compounds, specifically (at this time), phenols identified in Illinois waters. This work will extend to similar studies of pollutants identified in the epidemiology study. A specific objective of the uptake work is to validate a model which relates the uptake in mammals to the potential uptake in humans. Implementation of these two programs is contingent upon receiving Federal funding under Section 28 of TSCA.

PROBLEM SOLVING APPROACH

1. In order to establish priorities for staff effort and U.S. EPA overview, the IEPA will have completed prior to FY 1981 a draft listing of those industrial facilities that: (1) have the highest potential for the discharge of toxicants; and, (2) should be evaluated as to the need to conduct process evaluations. The basis for this listing will be U.S. EPA's list of October, 1977, Illinois EPA's list of June, 1979, and U.S. EPA's NEIC SIC code categories IV-VI. U.S. EPA will have reviewed and provided comments on the listing within 30 days of receipt. Within an additional 30 days IEPA and U.S. EPA staff will jointly agree upon a priority listing.

2. During FY 1981, IEPA will monitor at least 8 municipalities for the presence of toxic pollutants as well as several public water supplies and industrial sites in conjunction with the instream bioassay work.

3. By December, 1980, the State will develop a fish and other tissue broad chemical analyses program as part of an ongoing toxicant surveillance support program. U.S. EPA has provided laboratory analyses for limited State collected fish in FY '79 and part of FY '80. Additional special Federal funding is not available for non-Great Lakes waters so the State needs to integrate the continuation of this high priority work into their ongoing program. They will do this as resources can be made available. This program is to be implemented in spring-summer 1981.

4. By December, 1980, U.S. EPA, Region V, will develop and begin to implement a plan to work with other U.S. EPA organizations such as Effluent Guidelines, Research and Development, etc., to obtain industrial toxicant data within the Federal system that would be of use to the State in its toxicant control effort. (An example is the ongoing ORD analyses of Effluent Guidelines industrial samples for additional toxicants beyond the 129 priority pollutants.) EPA will also seek to obtain technical assistance, including technical expert witnesses, needed by the State. A progress report will be prepared by April, 1981.

5. IEPA and U.S. EPA, Reagion V, will jointly agree upon a pretreatment program which meets at least the minimum national requirements, as well as addresses specific State concerns, by November, 1980. Programmatic considerations will be based upon technical data obtained from the statewide industrial survey and the nation-wide study of POTW effluents due to be comleted in the fall of 1980.

6. By November, 1980, IEPA will have incorporated pretreatment compliance schedules into 80 percent of all applicable major permits. By the end of December, 1980, IEPA and U.S. EPA will agree on a strategy for addressing the remaining 20 percent of all applicable permits.

7. By November 1, 1980, IEPA and U.S. EPA permits, construction grants and surveillance staff will agree on criteria for the creation of regional laboratory facilities with GC-MS or similar capabilities and will identify candidate POTWs for regional laboratories where possible.

8. Throughout FY 1981 IEPA will provide guidance to and work with POTWs in developing and implementing their pretreatment programs. This work will receive high priority for all of FY 1981.

9. Throughout FY 1981, IEPA will review pretreatment elements, submitted by municipal grantees, which will allow the processing of Step 2 and Step 3 construction grants per the requirements of 40 CFR 35.920 3(b)(9) and 3(c)(4), or as otherwise required by applicable NPDES permits.

RESOURCES

Sections 106 and 208 grants, Clean Water Act; State funds.

Responsible Program Managers/Staff Contacts:

U.S. EPA: Dale Bryson, Glenn Pratt, James Hanlon

IEPA: Roger Kanerva

HIGHLIGHT ISSUE #3

Increase the rate of Publicly Owned Treatment Works (POTWs) compliance with the requirements of the Clean Water Act.

DISCUSSION:

Publicly Owned Treatment Works (POTWs) treat wastewater from our homes, businesses, schools, etc. One of U.S. EPA's major goals is to reduce the pollutants discharged into our waters from POTWs and to eliminate all untreated discharges. The POTWs are granted National Pollutant Discharge Elimination System (NPDES) permits which regulate what and how much may be discharged. A permit commits the discharger to reduce or eliminate the discharges in an orderly fashion. Currently only a little more than one-half the major municipal permitees in Illinois are meeting their permit requirements and schedules. Improvement of compliance in many cases requires completion of the construction already funded or funding for the initiation of construction.

During the coming year U.S. EPA and IEPA will be reviewing the National Municipal Policy and Strategy and will be coordinating the activities of the three major water programs that relate to the control of municipal point source discharges: construction grants, permits and pretreatment, and enforcement. These efforts should alleviate some of the inconsistencies apparent in past dealings with municipalities and should provide for a more efficient attack on the sources of municipal pollution.

PROBLEM SOLVING APPROACH:

1. A task force of IEPA and U.S. EPA upper level staff members will address the substantive issues regarding the National Municipal Policy and Strategy which were raised by the State in the negotiation of the April 22, 1980, Advanced Waste Treatment (AWT) Settlement Agreement. The task force will identify where amendments are necessary to promote a more workable policy and will produce a draft amended policy by December 31, 1980. Concurrence in the amended policy will be sought from U.S. EPA Headquarters by April 30, 1981.

2. IEPA will implement a system to coordinate the three major water programs of permits (including pretreatment), construction grants, and enforcement which stresses accountability but retains flexibility. The system will be a written procedure which reflects the substance of the U.S. EPA's Municipal Management System yet is in a form most useful for IEPA. The written system is expected to be in place by October 1, 1980, at which time a "shake down" period will begin. By December 31, 1980, an evaluation of the system's effectiveness will be made and any necessary changes will be made by March 31, 1981.

3. IEPA will upgrade the quality of the Operation and Management (O&M) manuals required in the construction grant program in order to improve their usefulness, by May 1, 1981. U.S. EPA will provide technical assistance as requested by the State.

4. IEPA will complete a draft assessment of operator manpower and training requirements to assure the availability of the necessary skilled personnel to operate the POTWs by March 31, 1981. A complete assessment will be finished by September 3, 1981.

5. U.S. EPA and IEPA will work to evaluate treatment technology in order to reach an understanding of the technology needed to reach Advanced Secondary Treatment (AST) and Advanced Waste Treatment (AWT) effluent limitations. It is anticipated that mutual agreement on this issue can be reached by December 31, 1980.

RESOURCES:

Section 106 grant, Clean Water Act; Section 205(g), Clean Water Act; State funds.

Responsibile Program Managers/Staff Contacts:

U.S. EPA: John Kelley, Charles Sutfin, James Hanlon
Ken Fenner, Arnold Leder

IEPA: Roger Kanerva

III. AIR GOALS AND PROGRAM DIRECTION FOR FY 1981

The atmosphere has never been completely pure. It always contains contaminants from windblown dust, forest and range fires, gases emitted by organic decay, and other natural sources. But man-made contaminants have contributed thousands of tons per day from industrial smokestacks, automotive exhausts, waste incineration, fertilizer and pesticide applications, aerosol sprays, and innumerable other sources.

In sufficient concentrations, airborne pollutants increase the incidents of respiratory and heart diseases and can increase fatality rates. Acid and corrosive rains from an atmosphere polluted by sources hundreds or even thousands of miles away can damage our property and have adverse effects on our food and water supplies. The effects of unchecked air pollution are a clear and present threat to the public health and economic vitality of our region, our nation, and the entire world.

In order to accelerate the program of air pollution control and abatement, Congress passed the Clean Air Act (CAA) in 1970. The CAA directed U.S. EPA to develop and achieve acceptable air quality standards. Primary National Ambient Air Quality Standards (NAAQs) were set to provide for the protection of health. Secondary standards were set for the protection of welfare, which in the words of the Act, "included, but was not limited to, effects on soils, water, crops, vegetation, manmade materials, animals, wildlife, weather, visibility, and climate, damage to and deterioration of property and hazards to transportation, as well as effects on economic values and on personal comfort and well being."

Pollutants for which NAAQS have been established may be referred to as "criteria pollutants." Criteria air pollutants are those substances in the air which are reasonably anticipated to endanger public health or welfare and which are released into the air by numerous or diverse sources. The NAAQS promulgated under the CAA address particulate matter, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, and nitrogen dioxide. A primary standard for lead was added in 1978, and the standards for photochemical oxidants were amended in 1979. Other standards are currently under review by U.S. EPA and decisions on the appropriate levels of protection will be made over the next few years.

In addition to providing for health related standards, the law also laid the foundation for a strong, cooperative Federal-State program to clean-up the Nation's air. In response to the standards Illinois prepared a State Implementation Plan (SIP) which defined the process by which the air pollution standards would be met in Illinois. The original Illinois SIP was submitted to the U.S. EPA in 1972. Air quality improved as a result of this plan but the improvements fell short of the goals in many areas of the State. This was the case in most areas of the country. Therefore, Congress found that changes were needed to bring the CAA up-to-date -- to better cope with the realities and the problems encountered in implementing the 1970 law.

The result of the congressional reappraisal was enactment of the Clean Air Act Amendments of 1977. These new amendments required the States to update their SIPs. The revised SIP describes measures that will be implemented in Illinois to provide for the attainment of the primary National Ambient Air Quality Standards for sulfur dioxide (SO2), particulates (TSP and oxides of nitrogen (NOX) by December 31, 1982; and for the attainment of the ozone (O_3) and carbon monoxide (CO) standards by December 31, 1987, in those areas unable to meet the December 31, 1982 date. The main portion of the revised Illinois SIP was conditionally approved by U.S. EPA in February 1980. A notice of proposed rulemaking on that portion of the SIP which addressed the control of particulates in those non-atttainment areas where the problem is caused by iron and steel industries was published in the Federal Register on July 31, 1980.

The SIP addresses the control of pollution from two major categories of sources -- Mobile and Stationary. Mobile sources, cars and trucks, account for virtually all of the carbon monoxide related air quality problems in our urban centers and are major contributors to the areawide ozone nonattainment problem. In Illinois, Cook, DuPage, Kane, Lake, McHenry and Will counties are not attaining the carbon monoxide standards, or the ozone (O_3) standards. Madison and St. Clair counties are classified as non-attainment for ozone. An extension has been granted, until 1987, to allow these counties to attain these standards.

Programs to reduce emissions from mobile sources include the imposition of the Federal motor vehicle emission standards on new autos, State development of auto inspection/maintenance programs for the Chicago and East St. Louis metropolitan areas, efforts to hold down fuel switching and tampering, and the development of transportation systems management, all of which are included in the Illinois SIP.

There are approximately 1326 major sources of air emissions in Illinois. The recently revised SIP established new requirements for some additional sources and tightens requirements for many sources which are presently in compliance.

Sources which emit hydrocarbons are expected to be most significantly affected by changes in the revised SIP. Efforts to control SO_2 and TSP will be directed toward power plants and iron and steel making facilities. The SO_2 and TSP NAAQS are currently being reviewed by U.S. EPA.

The primary goal of the joint Illinois-U.S. EPA air pollution control program in the State is the protection of the health of Illinois' 11 million citizens. Over 9 million people in Illinois live in areas that exceed the health-related Federal air quality standard for ozone. Most of these people live in the Chicago and the Illinois portion of the St. Louis metropolitan areas. More than 4 million people live in areas which do not meet the National Ambient Air Quality Standards for particulates. The priority air quality goals identified for FY 1981 in Illinois are the reduction of the number of people exposed to unhealthy levels of ozone (O_3) and Total Suspended Particulates (TSP). These two issues have been selected as Highlight issues (Highlights #4 and #5) and additional details can be found on pages 24-27.

Activities to be undertaken in FY 1981 to address the ozone and TSP problem can be divided into four major areas:

1. Air Quality Monitoring and Analysis

Air quality monitoring provides the underlying basis for determining an areas attainment status and for analyzing trends in ambient air quality. There are 55 national air monitoring systems (NAMS) sites and 160 State and local monitoring systems (SLAMS) sites in Illinois. The acquisition and analysis of quality assured data from these stations will be a major task in FY 1981. Illinois will also be implementing the Pollution Standard Index (PSI) method for reporting air quality information to the public in the Chicago and East St. Louis areas in FY 1981. Both adequate monitoring and the public notification programs are essential ingredients in achieving the ozone and TSP priority air quality goals.

2. SIP Development

Several SIP development activities will be carried out by Illinois in FY 1981. They include: working toward the development of the 1982 ozone SIP in accordance with their approved work/study plan which can be found in Illinois' FY 1981 air pollution control work program; developing further stationary source hydrocarbon controls for additional industrial categories; working toward the implementation of the auto inspection/maintenance program in the Chicago and East St. Louis metropolitan areas; and, working on the development of a lead SIP.

U.S. EPA and IEPA recognize that the SIP development/revision process is very time-consuming. In an attempt to make this process more efficient it was agreed to highlight the SIP revision process in this SEA document. In FY 1981 U.S. EPA and IEPA will work together to improve and simplify U.S. EPA's rulemaking procedures with regard to Illinois submitted SIP revisions. Additional detail on this issue (Highlight #6) can be found on page 28.

3. Source Compliance and Enforcement

In Illinois, 95 percent of the major emission sources are currently in final compliance with emission requirements or on compliance schedules, which will be completed prior to 1982. In FY 1981 a large number of additional sources will become subject to new or tightened hydrocarbon control regulations. This will result in an increase in source non-compliance and may necessitate accelerated enforcement effort to insure achievement of the priority air quality goal of reducing ambient ozone levels. Increased surveillance and the installation of in-stack monitoring in certain major sources will be key elements in assuring that the TSP control equipment mandated for major sources of this pollutant is maintained and operated to achieve design removal efficiencies and thus will directly impact the achievement of the high priority air quality goal related to particulates.

4. New Source Review

All major new sources seeking to locate in Illinois in FY 1981 will be subject to review under one of two sets of regulations. Prevention of significant deterioration (PSD) regulations and the SIP govern in attainment areas. The requirements of Section 173 of The Clean Air Act, including lowest achievable emission rate (LAER) and offsets, apply in the priority standard ozone and TSP non-attainment areas. Insuring that all new major sources of these pollutants that locate in nonattainment areas meet the requirements of Section 173 is vital to the achievement and maintenance of the ambient standards.

U.S. EPA has targeted Final Action of the applicable Illinois SIP New Source Review (NSR) components for within 6 months after receipt of the final Illinois submittal. (Submitted June 19, 1980)

For selected categories of new industrial plants and for those that are substantially modified, the CAA mandates U.S. EPA set emission limits for certain designated pollutants. These limits--called "new source performance standards" (NSPS), not to be confused with the national ambient air quality standards--are specific to each industry. U.S. EPA has set NSPS for 28 industrial categories to date. They set the maximum amounts of each kind of pollutant (SO_2, TSP, HC, etc.) that can be emitted from that new plant's stacks for each unit of the plant's production. The limits are based on the best engineering knowledge of the industry's processing methods.

IEPA has identified 48 facilities subject to NSPS. During FY 1981 IEPA will be inspecting each identified NSPS facility for compliance at least two times a year, taking enforcement action where necessary. Determinations will also be made as to which proposed sources will be covered by the NSPS.

Section 112 of the CAA requires the setting of standards, called National Emission Standards for Hazardous Air Pollutants (NESHAP). Final standards have been adopted for asbestos, beryllium, mercury and vinyl chloride. A proposed standard for benzene has also been issued. IEPA has identified 35 facilities in Illinois which are subject to these standards and during FY 1981, IEPA will be continuing its efforts to inspect these sources, at least four times per year, taking enforcement action as necessary. IEPA will also be reviewing any plans for construction or modification of sources subject to NESHAP.

In addition to the problems and activities previously mentioned, U.S. EPA and IEPA will be directing some attention to areas which historically have not been included in the basic pollution control efforts but are becoming increasingly important. These include the problem of interstate air pollution, the relationships between energy and air quality and the control of toxicant emissions.

1. Interstate Air Pollution

Interstate air pollution problems fall into three broad categories. The first is the direct impact of emissions from a source in one State on the attainment of an ambient air quality standard in an adjoining State. In addition to the obvious health implications of nonattainment the impacted State must also concern itself with the the potential restriction of its economic growth as a result of any resulting nonattainment designation. A subset of this issue is the question of the setting of equitable emission limits for sources whose emissions affect interstate air quality. While the Clean Air Act does not require equality of emission limits, the U.S. EPA is concerned that the consumption of available air quality within an interstate air shed not be done in a discriminatory manner.

The long range transport of pollutants beyond the State in which they originate will be an increasingly important issue in FY 1981. This issue has special importance in Illinois because sources in the Midwest are believed to contribute to the acid rain problem in the northeastern United States and Canada. It is important to get more information on this question so that the problem can be properly assessed and to begin to implement policies aimed at addressing the problem.

One important factor which will become increasingly apparent is that the U.S. EPA cannot itself solve many of these air quality related interstate problems but instead must serve a facilitator role to aid the involved States themselves in reaching solutions acceptable to all parties. Action to develop interstate mechanisms to deal with these types of problems is already underway and will continue to receive increased emphasis.

The second issue is associated with the development of new sources in clean areas and the attendant consumption of the available air quality increment under the prevention of significant deterioration regulations. The question of how to allocate the available increment between States has already arisen several times and will remain a significant cause of controversy into the forseeable future. As one part of this effort Region V in cooperation with other U.S. EPA Regions is to actively promote a dialogue between affected States to aid in resolving these problems.

The third and more generalized concern is the long-range transport of the precursors of ozone and acid rain.

2. Energy and Air Quality Relationships

The use of the Region's abundant reserves of high sulfur coal in an environmentally sound manner is the single most important issue linking energy and the environment in Illinois, as well as in Region V. Given the slow rate of growth in electrical generating capacity and the continuing reluctance on the part of the utility industry to retrofit sulfur dioxide control technology (scrubbing) on existing generating capacity it does not appear that there will be significant increases in the use of high sulfur coal in Illinois in FY 1981.

U.S. EPA is exploring the opportuniiies that coal washing and other coal preparation techniques may provide for increased high sulfur coal use under current air quality requirements. It must be understood that burning high sulfur coal and meeting environmental health related standards are not mutually exclusive.

3. Toxicant Emissions

Recognition is given to the need to control hazardous air pollutants in Section 112 of the Clean Air Act. However, to date only four National Emission Standards for Hazardous Air Pollutants (NESHAPs) have been established and therefore only a small fraction of the thousands of potential toxicants which are emitted in a highly industrialized area such as Region V are subject to the direct regulatory control of the Federal air quality program. Stationary sources of the four designated NESHAPs pollutants (Asbestos, Mercury, Berylium and Vinyl Chloride) have been identified in Region V. Virtually all of these sources are in compliance with emission requirements and enforcement actions are actively being pursued against all known violators.

A major challenge to the Region's air quality program is the need to develop a strategy, in concert with State officials, to minimize the emission of toxicants by agressively monitoring those source categories of particulate and hydrocarbon emissions which also are likely to be significant toxicant sources. In addition, the setting of emission limits to meet the requirements of Lowest Achievable Emission Rate (LAER), Best Available Control Technology (BACT) or Reasonable Available Control Technology (RACT), should be done with the full knowledge and active technical consideration on a case by case basis of potential toxicant emissions.

Finally, non-regulatory measures to reduce toxicant emissions in advance of the standard setting process should be developed.

HIGHLIGHT ISSUE #4

Control/reduce excessive levels of Total Suspended Particulate (TSP) in Southeast Cook County.

DISCUSSION

More than 4 million people in Illinois live in areas which do not meet the health based National Ambient Air Quality Standards for Total Suspended Particulates (TSP). Most of these people are located in the southeastern portion of Cook County, an area whose heavy industry contributes to this problem. TSP is a measurement of particles in the air (such as soot, flyash and smoke) and includes non-toxic materials (dust and dirt) as well as more toxic substances (lead, asbestos, sulfates). Manmade sources contribute to TSP which can affect our respiratory systems in varying degrees depending upon particle size and chemical composition. During the coming year U.S. EPA and IEPA will be working toward reducing the levels of TSP in southeast Cook County.

PROBLEM SOLVING APPROACH

A. U.S. EPA/IEPA enforcement activities to address this problem will include:

1. U.S. EPA and IEPA recognize the need to install continuous monitors in all major stack sources emitting TSP in southeastern Cook County, except those in which installation is impractical or those whose nature of operation does not lend itself to continuous monitoring techniques. By mid-November 1980, U.S. EPA and IEPA will agree on a list of candidate sources which will be required to install continuous monitors. U.S. EPA and IEPA will then agree on a division of the sources identified and each agency will proceed with requiring installation for their respective portion of the list.

2. IEPA will maintain a high rate of compliance inspections for major sources of TSP in southeastern Cook County in accordance with the inspection schedule contained in their approved FY 1981 air pollution control program plan.

3. U.S. EPA and IEPA will continue to coordinate enforcement action strategies for major TSP sources in southeastern Cook County on a 4-week to 6-week basis throughout FY 1981.

4. U.S. EPA and IEPA will monitor and expedite, where possible, any initiated enforcement actions taken against TSP sources in southeastern Cook County. Any newly identified violators will receive prompt, appropriate action.

B. TSP State Implementation Plan SIP activities to address this problem:

1. IEPA will devote high priority management attention and appropriate resources to achieve the TSP SIP schedule commitments and to complete the TSP SIP related studies related to Cook County (SIP approval issues).

2. IEPA will implement a program to assure that all new major TSP sources in southeastern Cook County meet the requirements of Section 173 of the Clean Air Act (New Source Review) upon final U.S. EPA approval of the applicable Illinois SIP components. U.S. EPA Final Action on the New Source Review SIP elements is targeted for within 6 months after receipt of final Illinois submittal. (Submitted June 19, 1980)

C. Monitoring activities to address this problem:

1. IEPA will resolve any remaining problems involved in the implementation of the National Air Monitoring System (NAMS) in southeastern Cook County.

2. IEPA will carry out any remaining activities necessary to implement public reporting of the Pollution Standard Index in Chicago.

RESOURCES

Section 105 grant, Clean Air Act; State funds

Responsible Program Managers/Staff Contacts:

U.S. EPA: David Kee, Tom Mateer, John Doolan, David Ullrich

IEPA: Dan Goodwin

HIGHLIGHT ISSUE #5

Control/reduce excessive levels of ozone in the Chicago and East St. Louis metropolitan areas.

DISCUSSION

Over nine million of Illinois' eleven million citizens live in areas that exceed the health related Federal air quality standard for ozone (03). Most of these people live in the Chicago metropolitan area and in the Illinois portion of the St. Louis metropolitan area (East St. Louis). Ozone is the principal constituent of modern smog and serves as an indicator of all the other photochemical oxidants. It is a highly reactive form of oxygen that irritates the mucous membranes of the breathing system, causing coughing and impaired lung function. It aggravates chronic respiratory diseases like asthma and bronchitis. All oxidants are formed by the chemical combination of nitrogen oxides and hydrocarbons induced by sunlight. Emissions from motor vehicles contribute heavily to this problem.

Illinois has been given until 1987 to meet the National Ambient Air Quality Standard for ozone. During the coming year increased effort will be directed toward trying to reduce the excessive levels of ozone in the Chicago and East St. Louis metropolitan areas.

PROBLEM SOLVING APPROACH

1. U.S. EPA and IEPA have agreed to the following schedule for reducing hydrocarbon (HC) emissions in the Chicago and East St. Louis metropolitan areas.

Objectives

A. IEPA will identify all major HC stationary emission sources and compliance schedule date requirements, and provide information to U.S. EPA.

B. IEPA will establish a tracking mechanism with U.S. EPA assistance to identify sources not meeting schedules.

C. IEPA and U.S. EPA will develop procedures to insure that action is taken against violating sources promptly.

D. Insure high compliance rates by pursuing appropriate remedies for all violations with IEPA in the lead.

Implementation Milestones

A. October 1, 1980 - Tracking procedure in place with all schedule dates identified;

B. January 1, 1981 - All violators identified;

C. April 1, 1981 - Enforcement action, as appropriate, commenced against all violators within 3 months of identification.

2. IEPA will work toward the development of the 1982 ozone SIP in accordance with their approved work/study plan which can be found in their approved FY 1981 air pollution control work program.

3. IEPA will devote high priority management attention and appropriate resources to resolve conditional ozone SIP approval issues.

4. IEPA will implement an Inspection/Maintenance program in accordance with the federally approved SIP schedule, or an approved revision submitted by the IEPA. (See FY 1981 air pollution control work program for additional details.)

5. IEPA will implement a program to assure that all new major hydrocarbon stationary sources in the Chicago and East St. Louis areas meet the requirements of Section 173 of the Clean Air Act (New Source Review) upon final U.S. EPA approval of the applicable Illinois SIP components. U.S. EPA approval of the New Source Review SIP elements is targeted for within 6 months after receipt of final Illinois submittal. (Submitted June 19, 1980)

6. IEPA will carry out any remaining activities necessary to implement public reporting of the Pollution Standard Index in the Chicago and East St. Louis areas.

RESOURCES

105 grant, Clean Air Act; 175 funding, Clean Air Act; State funds.

Responsible Program Managers/Staff Contacts:

U.S. EPA: David Kee, Tom Mateer, John Doolan, David Ullrich

IEPA: Dan Goodwin

HIGHLIGHT ISSUE #6

Improve and simplify U.S. EPA rulemaking procedures with regard to Illinois submitted SIP revisions.

DISCUSSION

The State Implementation Plan (SIP) for air pollution control is a complex, technical blueprint for restoring and preserving a healthy atmospheric environment in Illinois. The SIP which is mandated by the Clean Air Act, defines the process by which air pollution goals will be achieved, explains why certain air pollution goals were selected over alternatives and describes the relationships among the organizations involved in restoring and maintaining a healthy environment in Illinois.

The Illinois SIP, which was recently revised to set emission limitations needed to achieve attainment of the primary National Ambient Air Quality Standards (NAAQS) by December 31, 1982, is a dynamic document. In order to insure that additions to and modifications of the SIP are approved as quickly as possible, U.S. EPA and IEPA have agreed to work toward improving and simplifying U.S. EPA's rulemaking procedures with regard to Illinois SIP revisions, during the coming fiscal year.

PROBLEM SOLVING APPROACH

A. U.S. EPA agrees to process Illinois SIP revisions in the priority order mutually agreed to by the IEPA and U.S. EPA and to honor IEPA requests for expedited processing when special circumstances warrant.

B. U.S. EPA, Region V, will attempt to provide coordinated Agency input into the Illinois SIP rulemaking process prior to final State action.

C. U.S. EPA and IEPA agree to jointly investigate possibilities for making the total State/U.S. EPA SIP rulemaking process more efficient.

1. A work group to look into this problem will be named by U.S. EPA and IEPA by November 1, 1980.

2. The work group will prepare a list of recommendations by February 1, 1981.

3. The recommendations will be forwarded to the appropriate parties.

RESOURCES

105 grant funds, Clean Air Act; State funds.

Responsible Program Managerstaff Contacts:

U.S. EPA: David Kee, Gary Gulezian

IEPA: Dan Goodwin

IV. HAZARDOUS WASTE GOALS AND PROGRAM DIRECTION for FY 1981

Hazardous wastes are unavoidable by-products of our technology which, if improperly managed, can pose a serious threat to our health and the environment, particularly since many of them are not readily neutralized or destroyed. These wastes are generated by many segments of our society--industry, hospitals, research laboratories, and all levels of government. For years the disposal of hazardous wastes was largely unregulated, resulting in thousands of abandoned and inactive disposal sites that now threaten to contaminate our air, water and food supplies.

In 1976, Congress passed the Resource Conservation and Recovery Act (RCRA) in order to insure that hazardous wastes would be properly managed and would be regulated from "cradle to the grave." One of the major goals of this legislation is to protect the public health and the environment from the mismanagement of hazardous wastes during its generation, transport, treatment, storage and disposal. Working toward the achievement of this goal has become one of U.S. EPA, Region V's top priorities.

RCRA charged the U.S. EPA with the responsibility to implement and administer the program, including the development of a regulatory framework to identify hazardous wastes and properly manage their disposal. The first phase of U.S. EPA's RCRA regulations were promulgated on February 26, 1980, and provided standards for generators and transporters of hazardous waste under Sections 3002 and 3003 of RCRA. The main part of the RCRA Subtitle C regulations were promulgated on May 19, 1980. These voluminous regulations contain the permit procedures and guidelines for the approval of State hazardous waste programs under Sections 3005 and 3006 of the Act. These regulations also provide the first phase of the RCRA Section 3001 hazardous waste list and characterics and the Section 3004 facility standards. U.S. EPA plans to amend its Sections 3001 and 3004 regulations later in 1980 to bring additional wastes into the hazardous waste management system and to add additional facility standards. These regulations will become effective on November 19, 1980, and will create a new framework which will fundamentally change the ways in which industry manages its wastes. These regulations are not the final solution to the problem but just the first step toward preventing the creation of new hazards to the public health and the environment.

A successful hazardous waste management program will take close cooperation between the States and the Federal government. Illinois had been actively pursuing a program to insure the proper management of hazardous wastes in the State prior to the promulgation of the RCRA regulations. We are firmly committed to attain the primary goal of the joint State/ Federal hazardous waste management program in Illinois which is the protection of the environment and the health of the State's 11 million citizens. A major hazardous waste goal in Illinois in FY 1981 is the reduction of the number of people unnecessarily exposed, through assuring an environment free from improporly managed and disposed hazardous wastes.

The State of Illinois ranks second among all States nationally by generating, as well as we can estimate, anywhere from .8 to 2.6 million tons per year of hazardous wastes; this is approximately 6.7 percent of the estimated national total. It is estimated that there are anywhere from 2,700 to 3,900 hazardous waste generators in the State. These facts place Illinois high in national ranking with respect to the magnitude of hazardous waste which must be managed.

Illinois has been in the forefront in developing a hazardous waste management regulatory program (and authorization plan) toward the level necessary to qualify for Federal authorization to deal with this problem. Some additions to the State program will be necessary to assure the implementation of a regulatory program which is substantially equivalent to that defined in the Federal hazardous waste regulations and standards. The State-wide and inter-State nature of the hazardous waste management problem raises significant issues with respect to required State Program equivalence and consistency determinations leading to authorization. Situations must not exist where it is "easier" to dispose of wastes in one State than in another.

The operation of a State hazardous waste management program that is substantially equivalent to the Federal RCRA program is included as a highlight issue in this SEA document. Additional details on the implementation of this program can be found on page 33.

Proper management of hazardous wastes demands a sufficient number of properly designed and operated disposal sites. Currently our Nation lacks sufficient hazardous waste management facilities. Establishment of new facilities almost always results in intense opposition by local citizens. Current public hostility to new waste disposal facilities is understandable; people are afraid. But industry can't properly manage wastes without sites at which improved management can take place. Hence every citizen has a personal stake in the resolution of the siting issue. Our society needs new processes and procedures whereby sites can be selected at which the best technologies can be applied to assure the safe management of hazardous wastes. During the coming year U.S. EPA will be developing a policy which articulates U.S. EPA's position on locating hazardous waste disposal sites. During the coming year Illinois will also continue to examine the State's role in the area of siting. They have been considering the various aspects of this issue for the past few years.

U.S. EPA and IEPA are also seeking new solutions to the problems created by hazardous wastes. One way to reduce our dependence on land disposal is to increase the development of waste exchanges. This is based on the principle that one company's waste may be another's raw material. IEPA plans to act as a focal point for companies on the exchange of information on wastes which can then be physically exchanged. This waste exchange effort should be in operation early in FY 1981.

The increasing incidence of toxic contamination is another major environmental concern. Toxic substances, are regulated by the Toxic Substances Control Act (TSCA) of 1976. TSCA specified that: (1) an inventory be compiled on existing commercial chemicals; (2) manufacturers submit to U.S. EPA a pre-manufacturing

notice 90 days prior to producing any chemical not listed in the inventory; and (3) U.S. EPA's Administrator may prohibit or limit the manufacture, processing, distribution, use, or disposal of a chemical substance or mixture if he finds that it presents or may present an unreasonable risk of injury to health or the environment.

Throughout the United States increasing occurances of toxic chemicals contaminating our environment have been reported. Often these incidences have posed a threat to human health. While programs are being developed to deal with hazardous wastes, toxic air and water discharges from industries and municipalities, the contamination of drinking water and the manufacture and distribution of chemicals, a need remains to effectively manage contamination from these and other sources. The primary goals of any Federal or State toxic chemical control program is the protection of human health from environmentally related exposure to toxic chemicals at unsafe levels as well as protecting the environment from contamination. The development of State programs for interagency coordination in dealing with toxic contamination episodes and improving the Federal/State interaction on these issues is necessary.

During FY 1981 U.S. EPA and IEPA will be working to improve inter and intra-agency coordination on toxic contamination events at the Federal and State levels. This effort is highlighted in the FY 1981 SEA and additional details can be found on page 36. Basically, the goals of this Federal/State interaction will be the establishment of (1) management procedures among all appropriate State agencies to ensure that coordinated action is taken on identified environmental toxic contamination problems and (2) procedures for responding to possible health effect problems attributed to environmentally related exposure to toxic chemicals.

HIGHLIGHT ISSUE #7

Protect human health and the environment from potential exposure to hazardous wastes during its generation, transport, treatment and disposal.

DISCUSSION

Hazardous wastes are by-products of our chemical and industrial society. If improperly managed these wastes can result in serious damage to human health and the environment. It is estimated that only a small percentage of the hazardous waste generated in our country is properly managed, although this varies from State to State. U.S. EPA has promulgated regulations dealing with the proper management of these wastes.

Illinois has been in the forefront in developing a hazardous waste management program. During FY 1981 U.S. EPA and IEPA will be working together to reduce the number of people unnecessarily exposed to mismanaged hazardous wastes. A main means to that end is the development of a state program which is substantially equivalent to that defined in the Federal hazardous waste regulations and standards.

PROBLEM SOLVING APPROACH

A. Objectives

1. During FY 1981, IEPA with assistance from U.S. EPA, will develop a State hazardous waste program that is substantially equivalent to the Federal RCRA Program.

2. If necessary, prior to the granting of interim authority, U.S. EPA and the State may develop a cooperative arrangement for the IEPA to implement those portions of the Federal program that the State can carry out.

3. U.S. EPA obtains from Illinois a complete, approvable request for Phase I interim authorization and U.S. EPA expeditiously grants that authority.

4. U.S. EPA obtains from Illinois a complete, approvable request for Phase II interim authorization and U.S. EPA expeditiously grants that authority.

5. U.S. EPA and Illinois continue to conduct a joint program to effectively deal with instances of mismanaged hazardous wastes which pose a substantial endangerment to human health and the environment. This program will be integrated into the RCRA regulatory program in Illinois.

6. Illinois develops a strategy to reduce waste of energy and material resources, and creation of hazardous waste by encouraging resource recovery/recycling.

7. The State develops a strategy for siting new facilities and for increasing capacity of existing facilities for disposal of hazardous wastes, if needed.

B. Implementation Milestones

The letter-number following each milestone refers to the appropriate objective listed above.

9/80 Illinois submits a final application for interim authorization. (A-3)

10/80 The cooperative arrangement, if determined to be necessary, may be implemented and operated until the State fully implements a substantially equivalent program. (A-2)

12/80 U.S. EPA expeditiously processes a complete, approvable request for Phase I interim authorization and makes a positive determination. (A-3)

1/81 State submits hazardous waste facilities assessment as element of State Solid Waste Management Plan. (A-1)

1/81 State submits strategy for the maximization of resource conservation and recovery from solid and hazardous waste, specifically addressing front-end consideration by generators of recycling options, as element of State Solid Waste Management Plan. (A-6)

2/81 U.S. EPA provides the State with a determination of statutory and regulatory changes needed for the State to qualify for final full authorization. (A-1)

2/81 State submits a draft Phase II interim authorization application. (A-4)

2/81 State establishes data base, including notifictions, Part A permit applications, and other pertinent State regulatory program information. (A-5)

2/81 State and U.S. EPA design a strategy for the enforcement and/or clean-up on inactive sites not under the purview of the RCRA hazardous waste management regulatory system. (A-5)

3/81 State compares sites identified through uncontrolled sites program to this data base. Active sites on uncontrolled sites' list will be incorporated into hazardous waste management program enforcement effort. (A-5)

3/81 State submits a legislative package prepared January, 1981, to provide the State with the authority to conduct a program equivalent to RCRA. (A-1)

4/81 State submits a complete, approvable Phase II interim authorization application. (A-4)

7/81 *U.S. EPA makes a final determination as to the approvability of the State's Phase II interim authorization application. (A-4)

7/81 *State commences formal regulatory process to effect regulatory changes needed in order to qualify for final authorization. (A-1)

RESOURCES

Section 3011, RCRA; State funds.

Responsible Program Managers/Staff Contacts:

U.S. EPA: Bill Constantelos, Karl Klepitsch, Joel Schaffer

IEPA: John Moore

* Dependent on legislation being passed and signed by the Governor, action on Interim Authorization and federal resources.

HIGHLIGHT ISSUE #8

Develop inter-agency (and intra-agency) coordination for dealing with toxic chemical contamination events.

DISCUSSION

The primary goals of any Federal or State toxic chemical control program is the protection of human health from environmentally related exposure to toxic chemicals, as well as protecting the environment from contamination. While programs are being developed to deal with hazardous wastes, toxic air and water discharges from industries and municipalities, the contamination of drinking water and the manufacture and distribution of chemicals, there still remains a need to effectively manage contamination from other sources and to effectively and efficiently deal with toxic chemical contamination events when they occur.

Although the State of Illinois has already devoted effort to control environmental contamination and the subsequent human exposure to toxic chemicals, there remains a need to establish a single State coordinating mechanism to clarify roles, jurisdictions and relationships between State agencies in dealing with toxic chemicals. During FY 1981 U.S. EPA and IEPA will work toward improving inter and intra-agency coordination at the Federal and State levels for dealing with toxic contamination events. Attention will also be directed at improving the Federal/State interaction on these issues as necessary.

PROBLEM SOLVING APPROACH

1. In November, 1980, IEPA will establish a formal State plan identifying appropriate Illinois State agencies and contacts to ensure coordinated response to identified toxic chemical contamination problems. The plan will identify both health and environmental agencies, as well as a single focal point (person) for the implementation of the plan.

2. The State of Illinois will implement this plan, as necessary throughout the year, in order to respond to toxic chemical environmental contamination problems which may effect the health of humans, wildlife, or domestic animals.

3. Prior to the beginning of FY 1981, U.S. EPA staff developed a mapping program using data compiled from the Chemical Inventory under the Toxic Substances Control Act. Data relative to the Illinois chemical industry by geographic area, specific chemical and production quantity will be displayed. During October, 1980 - January, 1981, IEPA will evaluate these data and initiate appropriate action with respect to specific industries or geographic areas where toxic chemical contamination has occurred or is likely to occur. This information will be used to help guide the activities of existing programs (e.g., NPDES, Air, etc.), to focus available resources on areas of greatest potential concern.

Appropriate follow-up activity which may include inspections, environmental monitoring, or regulatory activity will be initiated during the remainder of FY 1981 and FY 1982. IEPA's plan for these follow-up activities will be reviewed by U.S. EPA during February and September, 1981.

RESOURCES

Section 1443, Safe Drinking Water Act

Section 105, Clean Air Act

Section 106, Clean Water Act

Section 4008, Resource Conservation and Recovery Act

Other Federal grant sources as applicable

State funds

Responsible Program Managers/Staff Contacts:

U.S. EPA: Bill Constantelos, Karl Bremer

IEPA: Michael Mauzy

V. MISCELLANEOUS

In addition to the issues identified in the media specific portions of this agreement--Water, Air and Hazardous Materials--issues were identified that affect all of the pollution control programs and therefore do not conveniently fit under one of the three categories. Three of these so-called miscellaneous issues were felt to be of sufficient importance to be included as highlights in the FY 1981 SEA. This is to insure that they receive the top level management attention necessary to address them.

Although these issues may not be directly related to the solution of specific environmental problems, actions to address these issues should result in more efficient, responsive programs to deal with specific environmental problems. Resources to accomplish the problem solving approaches for these issues will come from all of the various pollution control programs. Specific determination of costs to be assigned each program will be made by the State.

HIGHLIGHT ISSUE #9

Provide for adequate laboratory capability to insure the availability of acceptable analytical data required to support program needs.

DISCUSSION

An environmental protection agency needs an adequate analytical data base in order to properly identify and solve the problems with which they are confronted. The lack of adequate analytical data is the most serious obstacle to these agencies discharging their duties and protecting the health and welfare of their citizens. New and emerging programs, such as hazardous/toxic wastes, require even more complex and costly analytical equipment to provide the data needed to identify problems and take necessary corrective actions.

In order to assure that the necessary analytical data is available, careful assessment of future analytical needs by the environmental program offices is required, since a one to two year lead time is often needed for a laboratory to develop new and expanded analytical capability, the availability of qualified contract laboratories is limited, and U.S. EPA presently can provide only minimal laboratory support.

During FY 1981 U.S. EPA and IEPA will be working together to identify Illinois' projected program needs and laboratory capabilities.

PROBLEM SOLVING APPROACH

1. IEPA, with assistance from U.S. EPA, will project program needs for analytical data for at least three years. This projection will be updated and finalized by December 1, 1980.

2. IEPA, with assistance from U.S. EPA, will develop a multi-year implementation plan to bridge the gap between projected program data needs and IEPA's laboratory capabilities. This implementation plan will be completed by April 1, 1981.

3. U.S. EPA will incorporate the appropriate elements of the multi-year implementation plan into the FY 1982 State Specific Guidance by May 15, 1981. This practice will be continued in future years.

RESOURCES

Section 106, Clean Water Act

Section 105, Clean Air Act

Section 1443, Safe Drinking Water Act

Sections 4008 and 31, Resource Conservation and Recovery Act

State Funds

Responsible Program Managers/Staff Contacts

U.S. EPA: Curtis Ross

IEPA: John Anderson

HIGHLIGHT ISSUE #10

Allow for more meaningful State input into U.S. EPA's development and initiation of new program activities and directions, which may have the potential for significant resource implication, by providing for advance consultation on such issues to the maximum extent possible.

DISCUSSION

The operation of effective pollution control programs, to protect public health and welfare from pollution and environmental hazards, requires constant re-evaluation. Expanding data bases, new legal mandates and day-to-day experiences often result in the need for modifications to existing programs and/or more precise descriptions of program thrusts, which will impact implementation. These changes do not necessarily coincide with established planning schedules. As a result, State programs often have to be modified during the program (fiscal) year. This can necessitate the reprogramming of existing resources, requests for additional appropriations, etc.

State and Federal dollars for pollution activities have tended to remain constant over the past few years, due to the state of the economy. Even where dollar amounts have remained constant or have increased slightly the net result is less "buying power" due to the high rate of inflation.

State and Federal funds to support pollution control efforts in Illinois are appropriated by the Illinois General Assembly. These appropriations cannot be made without sufficient lead time which allows the General Assembly to review the proposed program and request, and take action, in light of their existing schedule.

In order to operate a pollution control program which is responsive to the needs of the citizens of Illinois, the IEPA must be made aware of the possibility of new program directions and activites, as soon as possible. Therefore, they will have adequate opportunity to comment on these from the State's perspective, and to initiate any actions necessary to insure that the necessary resources are made available either by reprogramming existing resources or requesting an additional appropriation of Federal and/or State dollars from the General Assembly.

State input on such possible program modifications at an early stage should enable the U.S. EPA to more thoroughly review the State's comments and to provide program guidance/direction which more clearly reflects the State's needs.

PROBLEM SOLVING APPROACH

1. U.S. EPA will notify IEPA through personal or telephone contact of potential/possible changes in program direction or scope, as soon as it is possible. Care will be taken to prevent "false starts" or premature notification.

2. U.S. EPA will transmit the appropriate memos, policy papers, Headquarters guidance to IEPA for review and comments as soon as they are received for distribution. IEPA will provide comments where appropriate in timely fashion.

RESOURCES

Section 105, Clean Air Act

Section 106, Clean Water Act

Section 1443, Safe Drinking Water Act

Sections 4008 and 3011, Resource Conservation and Recovery Act

State funds

Responsible Program Manager/Staff Contacts

U.S. EPA: Mary Canavan

IEPA: Michael Mauzy

HIGHLIGHT ISSUE #11

Provide for more efficient oversight of federally funded State pollution control programs and delegations.

DISCUSSION

A Federal-State partnership is at the base of our Nation's pollution control efforts. A concerted effort is needed to make sure this partnership works. Both parties must constantly strive for good communication and inter-action. This Federal-State partnership should result in more effective, non-duplicative programs.

U.S. EPA has pursued a policy of supporting State pollution control efforts through direct financial support and through delegation of certain Federal responsibilities to the State. U.S. EPA supports State pollution control programs with grants to share in the cost of these activities. U.S. EPA provides grant support to the IEPA for the following programs:

1. Water Pollution Control Program
2. Air Pollution Control Program
3. Public Water System Supervision Program
4. Construction Management Assistance Program
5. Solid and Hazardous Waste Management Programs
6. Water Quality Management Planning Program
7. Clean Lakes Program
8. Underground Injection Control Program

Due to the nature of the program grant and delegation mechanisms, U.S. EPA is responsible for insuring that federally supported programs and delegations are consistent with the Congressional mandate. Overview of State efforts should not result in duplication of efforts at the Federal/or State levels, but should provide necessary direction and assessments of efforts to result in more effective, efficient programs.

With limited resources available at the Federal and State levels, it is necessary to make the best use of them. Effective oversight of State programs and delegations should result in more efficient use of State and Federal person-power and resources.

During FY 1981 the U.S. EPA and IEPA will jointly review the existing oversight mechanisms, identifying those program areas where oversight can be improved and to what extent. Based on this review U.S. EPA and IEPA will identify any areas where changes in the existing procedures would be beneficial. Modifications will be made in the current overview approach where appropriate.

PROBLEM SOLVING APPROACH

1. U.S. EPA and IEPA will independently identify the following by December 1, 1980.

   a. Current oversight functions by program/delegation.

   b. Basis (legal/policy/etc.)/rationale for oversight.

   c. Frequency of oversight (actual vs. recommended).

   d. Positive and negative aspects of oversight.

   e. Suggested modifications to existing oversight activity.

2. U.S. EPA and IEPA will exchange the information prepared according to to milestone #1 above, by January 1, 1981.

3. U.S. EPA and IEPA will arrange a meeting to discuss the current process and any changes/modifications which should be made in the existing system.

4. U.S. EPA, with the assistance of IEPA, will produce a revised overview strategy of federally supported IEPA pollution control programs by April 1, 1981.

RESOURCES

Section 105, Clean Air Act

Sections 106, 205(g), 208, 314, Clean Water Act

Section 1443, Safe Drinking Water Act

Sections 3011 and 4008, Resource Conservation and Recovery Act

State funds

Responsible Program Managers/Staff Contacts:

U.S. EPA: John McGuire, Mary Canavan, Laird Starrick

IEPA: Michael Mauzy

VI. APPENDICES

The following documents are appended to this Agreement by reference. Copies of these documents are available for review at the U.S. Environmental Protection Agency, 230 S. Dearborn Street, Chicago, Illinois 60604, or the Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706. Individual copies of some of the documents are available upon request.

1. Region V Guidance for the development of grant applications under:

   Section 106, Clean Water Act

   Section 314, Clean Water Act

   Section 208, Clean Water Act

   Section 205(g), Clean Water Act

   Section 105, Clean Air Act

   Section 1443, SDWA

   Section 1421, SDWA

   Section 3011, RCRA

   Section 4008, RCRA

2. State grant work plans developed for the above listed grant applications, effective upon grant award.

3. EPA Operating Year Guidance - February, 1980

4. EPA Handbook for FY 1981 - State/EPA Agreements

5. EPA Profile of Environmental Quality, Region V, 1979