

BIBLIOGRAPHY

PREPARED FOR

WORLD ENVIRONMENT

DAY

JUNE 5, 1979

U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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BIBLIOGRAPHY OF SELECTED DOCUMENTS
ON THE
UNITED NATIONS ENVIRONMENT PROGRAM'S TOPICS FOR
WORLD ENVIRONMENT DAY JUNE 5, 1979

SELECTED UNEP TOPICS	<u>Page No.</u>
NOISE	1
PESTICIDES	5
SCHISTOSOMIASIS	8
TOURISM	10

[Note: The documents listed in this bibliography are
available in the EPA Headquarters Library unless
otherwise indicated. X = not owned]

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NOISE

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AN INTRODUCTORY GUIDE TO THE STATUTORY AUTHORITIES OF
THE U.S. ENVIRONMENTAL PROTECTION AGENCY

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U.S. Environmental Protection Agency

ACKNOWLEDGEMENTS

This guide originated from a speech I gave to some OSHA employees some months ago. One of the topics which I was asked to address was the responsibilities of the U.S. EPA. The first draft of the guide was prepared for that speech. In preparing the draft, I realized that my knowledge of other program areas was deficient. Consequently, to aid other employees, to reduce the number of misdirected phone calls in the Agency, and to provide better service to the public, I decided to develop this multipurpose directory.

I wish to thank my Unit Chief, George Marsh, for his support, and the many people who reviewed and commented on the early drafts. This guide would not have been possible without their help. Though I remain responsible for any errors of omission or commission, I wish to extend my gratitude to the following people for their assistance in the development of this guide:

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TABLE OF CONTENTS

CONTENTS	PAGE NUMBER
Acknowledgements.....	i
Clean Air Act (CAA).....	1
Clean Water Act (CWA).....	5
Safe Drinking Water Act (SDWA).....	9
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).....	12
Toxic Substances Control Act (TSCA).....	16
Resource Conservation and Recovery Act (RCRA).....	20
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).....	25
Evaluation Form	29

I. AIR MANAGEMENT DIVISION

CLEAN AIR ACT (CAA) OF 1970, as amended in 1974, 1977, 1981

Congress passed the Clean Air Act of 1970, and amended it in 1974 and in 1977, in order to achieve a broadly defined nationwide goal: the protection and enhancement of the nation's air quality.

Title I of the Clean Air Act gives the U.S. Environmental Protection Agency (EPA) the responsibility to set three different kinds of national air standards. EPA is required to set and periodically review National Ambient Air Quality Standards (NAAQS), which define the maximum concentrations of certain air pollutants allowable in ambient air in order to protect public health and welfare. EPA also is required to define allowable New Source Performance Standards (NSPS), which establish allowable emissions limitations for different kinds of stationary sources. Finally, EPA is required to set National Emissions Standards for Hazardous Air Pollutants (NESHAP) for which no ambient air quality standards exist.

Once NAAQS have been set by EPA, individual state governments have the responsibility to determine how they can be met and maintained most efficiently at the local level. The main administrative mechanism used by state governments to characterize local air quality and define strategies to achieve national standards is the state implementation plan (SIP). Another of EPA's major responsibilities under the Clean Air Act is the review, approval, and general oversight of all SIPs.

Congressional intent to forge a federal/state partnership is also evident in Clean Air Act requirements for air emissions permitting programs for stationary sources. Although EPA was given the responsibility to develop regulations, including general criteria for preconstruction permit programs, for new and modified stationary sources of air emissions, the Congress envisioned that individual permits should be issued and enforced at the state level. The Congress recognized that state governments were best suited to issue and enforce permits, because they best understood local air quality and local economic circumstances.

Title II of the Clean Air Act also gives EPA standard-setting, program development, and oversight responsibilities regarding the prevention and control of air emissions from mobile sources. EPA is required to prescribe and revise emission standards for new motor vehicle engines for certain vehicle categories. EPA must develop and manage programs to test and certify new motor vehicle engines for compliance with national standards. Finally, EPA has the responsibility to enforce provisions related to in-use emissions from vehicles.

Although the Clean Air Act assigns EPA the responsibility and provides authority to regulate a wide variety of hazardous air pollutants, that responsibility does not appear to extend to pollution in the indoor environment. The air's legislative history, which refers to the discharge of pollutants from motor vehicles and industry onto the atmosphere, makes it clear that the Congress was addressing pollution occurring in the outdoor "ambient" air. There is no discussion in the legislative history about sources of indoor air pollution or the problem of indoor air pollution. Except for ozone, which is regulated by the Food and Drug Administration, there are no federal health standards for nonoccupational exposure to indoor air pollutants. Nonetheless, EPA has recently set a recommended safety limit for indoor levels of radon gas of 4 picocuries/liter of air.

1. AIR MANAGEMENT DIVISION

CLEAN AIR ACT (CAA) OF 1970, as amended in 1974, 1977, 1981

[40 CFR Parts 50-87]

	<u>CAA Cite</u>	<u>40 CFR Part</u>
◦ Designation of areas for air quality planning purposes	§ 107	81
◦ Sets Primary National Ambient Air Quality Standards (NAAQS) in order to protect human health (including sensitive populations) [the six criteria pollutants are: sulfur dioxide, carbon monoxide, ozone, particulate matter, nitrogen oxides, and lead]	§ 109	50
◦ Sets Secondary National Ambient Air Quality Standards (NAAQS) in order to protect public welfare, plants, animals, and materials from the criteria pollutants	§ 109	50
◦ Sets criteria for State Implementation Plans (SIPs)	§§ 110, 171-178	51
◦ Approval and promulgation of SIPs	§§ 110, 171-178	52
◦ Establishes standards of performance, New Source Performance Standards (NSPSs), for new stationary air pollution sources	§ 111	60
◦ Sets National Emission Standards for Hazardous Air Pollutants (NESHAPs) The six listed NESHAPs substances are: asbestos, benzene, beryllium, mercury, radon-222, and vinyl chloride	§ 112	61
◦ Stack height rule requirements	§ 123	51
◦ Ozone layer protection through VOC controls	§§ 150-159	51.18
◦ Prevention of significant deterioration of air quality	§§ 160-169A	51.24 & 52.21
◦ SIPs requirements for air quality nonattainment areas	§§ 171-178	51
◦ Motor vehicle emission & fuel standards (includes fuel additive & fuel economy improvement standards)	§§ 202-216	80, 85-86
◦ Aircraft emission standards	§§ 231-234	87

I. AIR MANAGEMENT DIVISIONCLEAN AIR ACT (CAA) OF 1970, as amended in 1974, 1977, 1981

CAA CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Ms. Linda Bennett	IEPA	Division of Air Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 785-5152
INDIANA	Mr. Walter Kulakowski Assistant Commissioner for Air Management	IDEM	Office of Air Management 105 S. Meridian Street Indianapolis, IN 46225	(317) 232-8222
MICHIGAN	Mr. Michael Koryto	MDNR	Air Quality Division P.O. Box 30028 Lansing, MI 48909	(517) 322-1330
MINNESOTA	Mr. Brad Beckham	MPCA	Division of Air Quality 1935 W. County Road B2 Roseville, MN 55113	(612) 296-7265
OHIO	Mr. James Orlemann	OEPA	Division of Field Operations Office of Air Pollution Control P.O. Box 1049 Columbus, OH 43266-1049	(614) 466-7390
WISCONSIN	Mr. Ralph Patterson	WDNR	Bureau of Air Management P.O. Box 7921 Madison, WI 53707	(608) 267-7546

I. AIR MANAGEMENT DIVISIONCLEAN AIR ACT (CAA) OF 1970, as amended in 1974, 1977, 1981

REGION V CAA CONTACTS

SUBJECT	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
Air Toxics	Ms. Harriet Croke	U.S. EPA	Air Management Division 5 AR-26	(312) 353-6009
NESHAPS	Mr. Bruce Varner	U.S. EPA	Air Management Division 5 AC-26	(312) 886-6793
Ambient Air Quality Monitoring & Data Analysis	Mr. Steve Goranson	U.S. EPA	Environmental Services Div. 5 SEM-10	(312) 886-6229
Radon & Radiation	Mr. Larry Jensen	U.S. EPA	Air Management Division 5 AR-26	(312) 886-6175
NAAQS Criteria Pollutants:				
Lead	Mr. Dom Abella	U.S. EPA	Air Management Division 5 AR-26	(312) 886-6543
NO _x	Mr. Jim Dewey	U.S. EPA	Air Management Division 5 AR-26	(312) 353-5954
Ozone	Mr. Ed Doty	U.S. EPA	Air Management Division 5 AR-26	(312) 886-6057
Particulate Matter (TSP)	Mr. Jim Dewey	U.S. EPA	Air Management Division 5 AR-26	(312) 353-5954
SO _x	Mr. Mike Koerber	U.S. EPA	Air Management Division 5 AR-26	(312) 886-6061
VOC	Mr. Steve Rosenthal	U.S. EPA	Air Management Division 5 AR-26	(312) 886-6052

II. WATER DIVISION

CLEAN WATER ACT (CWA) OF 1972, as amended in 1977, 1981

The Clean Water Act has its origins in the Federal Water Pollution Act of 1956, which with its subsequent amendments, forms the basis of the federal water pollution control program. The underlying objective of the Clean Water Act is "...to restore and maintain the chemical, physical and biological integrity of the Nation's waters."

To help meet these objectives, Congress required EPA to establish water quality criteria for the development of water quality standards, technology-based effluent limitation guidelines, pretreatment standards, new source performance standards, and a national permit program to regulate the discharge of pollutants. The individual states were given the responsibility for developing water quality management programs and setting water quality standards.

The Clean Water Act's technology-based limitations prescribe minimum standards of performance for municipal and industrial dischargers without regard to the quality of receiving waters. Water quality standards, by contrast, identify intended uses of particular water bodies and, on the basis of water quality criteria guidance developed by EPA, set forth the biological and chemical conditions necessary to sustain those uses. Generally, technology-based standards set minimum control requirements which all dischargers are required to meet. Where those limitations are not adequate to achieve a particular state-designated use, state water quality based standards then come into play and prescribe the additional controls necessary to meet the designated use.

Under the Act, direct dischargers of pollutants can be classified as either point or nonpoint sources. To control point sources, the CWA provides for the National Pollutant Discharge Elimination System (NPDES) which incorporates and applies effluent limitations in individual permits for both municipal and direct industrial dischargers. Under these permits, dischargers are subject to both technology-based treatment requirements and, where necessary to protect a designated use, controls based on water quality standards.

Technology-based effluent limitations do not require EPA to prescribe specific control technologies. Rather, EPA reviews the various treatment techniques presently in use or available in each industrial sector to determine what limitations are achievable. Once EPA adopts effluent limitations for a particular industry, each company is free to use any method it chooses to achieve these limitations.

The Clean Water Act Amendments of 1977 established three classes of pollutants for which technology-based standards were to be developed. These classes are conventional pollutants, toxic pollutants, and nonconventional pollutants.

Water quality standards which are set by the states, are not technology based. Rather they consist of two elements: first, a designated use for a specific body of water, such as a public water supply or recreation; and second, criteria which are defined as instream numerical concentrations of pollutants sufficiently low to protect the designated use. States have the primary responsibility for developing water quality standards, for determining the attainability of beneficial uses, and for designating those uses. EPA is responsible for developing pollutant criteria and technical policy guidance for the states.

II. WATER DIVISION

CLEAN WATER ACT (CWA) OF 1972, as amended in 1977, 1981

[40 CFR Parts 104-140, 401-469]

	<u>CWA Cite</u>	<u>40 CFR Part</u>
◦ Requires each state to set water quality standards for every significant body of surface water within its borders	§ 303	131
◦ Requires states to set water quality goals and standards, and to address those through construction and other water quality planning and management activities	§§ 106 205(g)&(j) 208, 303, 305	130
◦ Requires Publicly-Owned Treatment Works (POTWs), industrial point dischargers, and any other point source dischargers to obtain permits under the National Pollution Discharge Elimination System (NPDES)	§ 402	122
◦ Develops criteria and standards for the NPDES	§§ 301, 304 316, 405	125
◦ Requires POTWs to provide secondary treatment of wastewater prior to discharge	§§ 301(b)(1)(B) & 304	122.44(a) 125, 133
◦ Requires all non-POTW point sources to meet national treatment-based effluent limitations [Best Practicable Control Technology (BPT), Best Conventional Pollutant Control Technology (BCT), or Best Available Technology Economically Achievable (BAT)]	§§ 301(b)(1)(A) 301(b)(2)(A) & 301(b)(2)(E)	122.44(a) 125
◦ Establishes effluent guidelines to define BPT, BCT, and BAT, and standards of performance for new sources	§§ 304 & 306	401-469
◦ Requires all point sources to meet more stringent water quality-based effluent limitations if technology standards of CWA 301 do not protect water quality as defined in CWA § 303	§ 301(b)(1)(c)	122.44(d)
◦ Establishes effluent standards for certain toxic pollutants	§ 307	129
◦ Requires industries that discharge to POTWs to meet pretreatment standards	§§ 301(b)(1)(A) 301(b)(2)(A) & 307(b)	403

** USEPA (under § 404) and the U.S. Army Corps of Engineers are jointly responsible for protecting waterways (including wetlands) against degradation & destruction

II. WATER DIVISIONCLEAN WATER ACT (CWA) OF 1972, as amended in 1977, 1981

NPDES PERMITS CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Mr. Tim Kluge Manager, Industrial Unit	IEPA	Division of Water Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-0610
INDIANA	Mr. Larry Kane Chief, Permits Section	IDEM	Office of Water Management 105 S. Meridian Street Indianapolis, IN 46225	(317) 232-8705
MICHIGAN	Mr. Chang Bek Chief, Industrial Permits Unit	MDNR	Water Quality Division P.O. Box 30028 Lansing, MI 48909	(517) 373-8088
MINNESOTA	Mr. Doug Hall Chief, Permit Unit	MPCA	Division of Water Quality 1935 W. County Road B2 Roseville, MN 55113	(612) 296-7252
OHIO	Mr. Robert Phelps Chief, Division of Industrial Wastewater	OEPA	P.O. Box 1049 Columbus, OH 43266-1049	(614) 466-2390
WISCONSIN	Mr. Mike Witt Chief, Industrial Wastewater Section	WDNR	Bureau of Water Resources Management P.O. Box 7921 Madison, WI 53707	(608) 266-1494
<u>REGION V</u>	Mr. Almo Manzardo Chief, Permits Section	U.S. EPA	230 S. Dearborn Street 5 WQP-TUB-8 Chicago, IL 60604	(312) 353-2105
	Mr. Donald Schregardus Chief, Compliance Section	U.S. EPA	230 S. Dearborn Street 5 WQC-TUB-8 Chicago, IL 60604	(312) 886-6760

II. WATER DIVISIONCLEAN WATER ACT (CWA) OF 1972, as amended in 1977, 1981

WATER QUALITY STANDARDS CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Mr. Toby Frevert	IEPA	Division of Water Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-3362
INDIANA	Mr. Dennis Clark Water Quality Surveillance and Standards Branch	IDEM	Office of Water Management 105 S. Meridian Street Indianapolis, IN 46225	(317) 243-5037
MICHIGAN	Mr. Dennis Swanson	MDNR	Surface Water Quality Division P.O. Box 30028 Lansing, MI 48909	(517) 373-2867
MINNESOTA	Dr. David Maschwitz Monitoring & Analysis Section	MPCA	Division of Water Quality 1935 W. County Road B2 Roseville, MN 55113	(612) 296-7252
OHIO	Mr. Robert Heitzman Division of Water Quality Monitoring & Assessment	OEPA	P.O. Box 1049 Columbus, OH 43266-1049	(614) 466-9092
WISCONSIN	Mr. Duane Schuettpelz Chief, Surface Water Standards & Monitoring Section	WDNR	Bureau of Water Resources Management P.O. Box 7921 Madison, WI 53707	(608) 266-0156
<u>REGION V</u>	Mr. Noel Kohl Chief, Monitoring & Standards Unit	U.S. EPA	230 S. Dearborn Street 5 WQS-TUB-8 Chicago, IL 60604	(312) 886-0132

II. WATER DIVISION

SAFE DRINKING WATER ACT (SDWA) OF 1975 as amended in 1976, 1979, and 1986

The Safe Drinking Water Act provides for the safety of drinking water supplies throughout the United States by establishing and enforcing national drinking water quality standards. Under the Act, EPA has the primary responsibility to establish the national drinking water quality standards, to review and approve applications from the various states to assume primacy in the enforcement of those standards, and to supervise public water supply systems and other sources of drinking water.

In addition to the establishment of primary regulations governing public water supplies for the protection of public health and secondary regulations regarding the taste, odor, and appearance of drinking water, the Act includes provisions to control the underground injection of water and other substances which might endanger drinking water sources.

EPA establishes maximum contaminant levels (MCLs) for chemical substances often found in drinking water supplies. MCLs are legal limits for public water supplies, although variances and exemptions may be granted under certain conditions. Recommended maximum contaminant levels (RMCLs) are suggested limits on the concentration of specific chemical substances, they are not enforceable. In addition, EPA issues health advisories for specific contaminant on the basis of contamination incidents reported by state and local officials. The advisories provide information on contaminants while allowing the affected states and systems to select the best method of response to fit local circumstances. Other federal programs (e.g., RCRA and CERCLA) which regulate separate sources of toxic contamination threatening drinking water sources, are advised by the drinking water program regarding technical options. A state may qualify for primary enforcement responsibility of drinking water quality standards and underground injection control if it meets certain basic conditions.

The recent amendments to the Safe Drinking Water Act contain several interesting provisions, and additional duties for EPA. The new amendments would require EPA to set MCLs for a list of 83 contaminants, that have been found in water but are now unregulated, within three years of passage. Final MCLs have been set for only 22 contaminants. In addition, the Act: requires EPA to promulgate regulations requiring every public water supply (PWS) to conduct monitoring for unregulated organic compounds; requires each state to establish a plan to protect wellhead areas surrounding public water wells; and prohibits lead pipe, solder or flux in installation or repair of public water systems, or plumbing for human consumption. The Region V contacts listed on the following page should be reached for information on safe drinking water/underground injection control, or for referral of public inquiries.

II. WATER DIVISION

SAFE DRINKING WATER ACT (SDWA) OF 1975 as amended in 1976, 1979, and 1986

[40 CFR Parts 141-149]

	<u>SDWA Cite</u>	<u>40 CFR Part</u>
° Establishes National Interim Primary Drinking Water Regulations (NIPDWRs) for contaminants in drinking water (based upon health effects, cost, and treatment technology)	§ 1412	141
° Establishes National Secondary Drinking Water Regulations (NSDWRs) (based on aesthetic qualities)	§ 1412	143
° Establishes National Interim Primary Drinking Water Regulations Implementation	§§ 1413, 1414 1415, 1416	142
° Establishes Underground Injection Control (UIC) program for chemicals	§§ 1421, 1422 1423, 1424	144-147

** Due to the recent passage of SDWA amendments, communicate with the Region V contacts listed on the next page for information on new developments in the drinking water and underground injection control regulations, or for referral of public inquiries

** All Region V states, except Indiana, have primacy over the drinking water programs

** Recommended Maximum Contaminant Levels (RMCLs) = health-based advisories

** Maximum Contaminant Levels (MCLs) = regulatory standards for drinking water

** Some Region V states have primacy over UIC

II. WATER DIVISION

SAFE DRINKING WATER ACT (SDWA) OF 1975 as amended in 1976, 1979, and 1986

REGION V DRINKING WATER & UNDERGROUND INJECTION CONTROL CONTACTS

SUBJECT	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
Drinking Water Treatment	Mr. Harry Von Huben Chief Drinking Water Section	U.S. EPA	230 S. Dearborn Street 5 WD-TUB-9 Chicago, IL 60604	(312) 886-6206
Drinking Water Health Effects	Ms. Denise Steurer Drinking Water Section	U.S. EPA	230 S. Dearborn Street 5 WD-TUB-9 Chicago, IL 60604	(312) 886-0245
UIC	Mr. Gregory Parker Chief, Underground Injection Control Section	U.S. EPA	230 S. Dearborn Street 5 WD-TUB-9 Chicago, IL 60604	(312) 886-1492

III. ENVIRONMENTAL SERVICES DIVISION

FEDERAL INSECTICIDE, FUNGICIDE, & RODENTICIDE ACT (FIFRA) OF 1947
as amended in 1972, 1975, 1978

The Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA), as amended by Congress, is the primary basis for the EPA regulation of pesticide substances which include products to control insects, weeds, and disease vector control (e.g., mosquitoes or rabid animals), and as hospital or home disinfectants and sterilants. FIFRA directs EPA to regulate such pesticide substances to ensure that they do not cause "unreasonable adverse effects" on humans or the environment, requiring a balancing of risks against benefits to agriculture, public health, and the economy.

A pesticide product can be registered with the federal government on determination that it is not hazardous to health or the environment when used as directed, and is effective for the purposes claimed in the labeling. Federal registration and regulation extend to all pesticides, including those distributed or used within a single state.

III. ENVIRONMENTAL SERVICES DIVISION

FEDERAL INSECTICIDE, FUNGICIDE, & RODENTICIDE ACT (FIFRA) OF 1947
as amended in 1972, 1975, 1978

[40 CFR Parts 152-180]

	<u>FIFRA Cite</u>	<u>40 CFR Part</u>
<ul style="list-style-type: none"> ◦ Regulates the use of pesticides. Every pesticide marketed in the U.S. must obtain premarket clearance (registration) from EPA 	§§ 2(ee), 4, 12	170, 171
<ul style="list-style-type: none"> ◦ Registers pesticides. Industry must bear the burden of proof to provide basic health and safety data to support proposed registration 	§ 3	158, 162
<ul style="list-style-type: none"> ◦ Pesticide residue tolerances (legally acceptable levels) or exemptions must be established by EPA for pesticides used on food or feed 	§ 3	180
<ul style="list-style-type: none"> ◦ Enforces Good Laboratory Practices (GLPs) for conducting studies in support of registration of pesticide products 	§§ 3 & 8	160
<ul style="list-style-type: none"> ◦ Authorizes U.S. EPA to approve state programs for the certification and training of pesticide applicators 	§ 4	171
<ul style="list-style-type: none"> ◦ Regulates the reporting of pesticide production & distribution data 	§§ 7, 8 & 9	169
<ul style="list-style-type: none"> ◦ Sets guidelines for storage and disposal of excess pesticides and pesticide containers 	§ 19	165
<ul style="list-style-type: none"> ◦ Authorizes U.S. EPA to enter into Cooperative Agreements with states 	§ 23	30, 33 35, 171

** The states have primacy for enforcement of pesticide use violations
 ** USEPA sets levels for pesticide residues in raw agricultural commodities
 ** USDA inspects meat and poultry for pesticide residues
 ** FDA sets levels for pesticide residues in food, processed food, and food additives, and enforces tolerances in these items
 ** OSHA regulates protection for pesticide manufacturing workers
 ** USEPA regulates genetically engineered microbial pesticides (GEMPs) under FIFRA
 ** USDA regulates genetically engineered microbes used solely for non-pesticidal use
 ** USEPA under RCRA (or authorized states under equivalent laws) regulates the treatment, storage, and disposal of: some pesticides based upon their concentration in a waste; some pesticide production wastes; and many pesticides when they are discarded or intended to be discarded

III. ENVIRONMENTAL SERVICES DIVISION

FEDERAL INSECTICIDE, FUNGICIDE, & RODENTICIDE ACT (FIFRA) OF 1947
as amended in 1972, 1975, 1978

PESTICIDE CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Agricultural Uses			
	Mr. William Anderson Chief, Bureau of Plant & Apiary Protection	IDA	Illinois Dept. of Agriculture Illinois State Fairgrounds Springfield, IL 62706	(217) 785-2427
	Non-Agricultural (Structural Pest Control) Uses			
	Mr. Harvey Dominick Division of Sanitation	IDPH	Illinois Dept. of Public Health 535 W. Jefferson Street Springfield, IL 62671	(217) 782-4674
INDIANA	Mr. L.O. Nelson Pesticide Administrator	OISC	Office of the Indiana State Chemist Department of Biochemistry Purdue University West Lafayette, IN 47907	(217) 494-1587
MICHIGAN	Mr. John Dreves Chief, Plant Industry Division	MDA	Michigan Dept. of Agriculture P.O. Box 30017 Lansing, MI 48909	(517) 373-1087
MINNESOTA	Mr. William Bulger Director, Agronomy Services Division	MDA	Minnesota Dept. of Agriculture 90 West Plato Boulevard St. Paul, MN 55107	(612) 296-1161

III. ENVIRONMENTAL SERVICES DIVISION

FEDERAL INSECTICIDE, FUNGICIDE, & RODENTICIDE ACT (FIFRA) OF 1947
as amended in 1972, 1975, 1978

PESTICIDE CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
OHIO	Mr. Oren Spilker Specialist-in-Charge of Pesticide Regulation	ODA	Plant Industry Division Ohio Dept. of Agriculture Reynoldsburg, OH 43068	(614) 866-6361
WISCONSIN	Mr. William Simmons Assistant Administrator	WDATCP	Agricultural Resources Management Division Wisconsin Dept. of Agriculture, Trade, and Consumer Protection 801 W. Badger Road Madison, WI 53708	(608) 266-7131
<u>REGION V</u>	Mr. John Ward Chief, Pesticides Section	U.S. EPA	230 S. Dearborn Street 55-P&TSB-7 Chicago, IL 60604	(312) 886-5220
	Pesticide Information Hotline: (800) 858-7378			

III. ENVIRONMENTAL SERVICES DIVISIONTOXIC SUBSTANCES CONTROL ACT (TSCA) OF 1976

The Toxic Substances Control Act (TSCA) gives EPA broad regulatory authority over chemical substances during all phases of their life cycle, from before their manufacture to final disposal, and establishes a national effort to prevent unreasonable risk to human health and the environment.

TSCA's activities center around three major activities: (1) the premanufacture notification program provides for scrutiny of the health and environmental effects of each new chemical, insuring its safety before manufacture or subsequent release into the environment; (2) the testing of new or existing chemicals can be required when EPA believes that a chemical may present an unreasonable risk to health or the environment. In order to require testing, EPA must find that there is insufficient data on the chemical substance and that further testing is necessary before a risk determination can be made; and (3) the control of existing chemicals found to pose an unreasonable risk to health or the environment.

Any chemical intended to go into commercial production after July 1, 1979, is required to go through TSCA's premanufacture notice (PMN) process. This screening process identifies those new chemicals which may present unreasonable risks or for which additional information should be developed. EPA review addresses the entire life cycle of a new chemical substance including occupational exposure, releases to air, water and land, and consumer exposure. A "new chemical substance" is one not included on the TSCA Chemical Inventory (which is intended to be a listing of all of the chemicals in commercial production). The list currently contains approximately 63,000 chemical substances.

111. ENVIRONMENTAL SERVICES DIVISION

TOXIC SUBSTANCES CONTROL ACT (TSCA) OF 1976 [40 CFR Parts 702-799]

TSCA Cite	40 CFR Part
§ 4(a)	N.A.
<ul style="list-style-type: none"> ° Authorizes EPA to require the development of data to assess the health and environmental risk posed by exposure to chemical substances or mixtures if there is inadequate information to evaluate such effects and if in the absence of such information, the substance may cause or significantly contribute to an unreasonable risk to health or the environment. EPA must by rule require that testing be conducted on such substances or mixtures 	
§ 4(b)	796, 797, 798
<ul style="list-style-type: none"> ° Describes standard guidelines for chemical fate, environmental effects, and health effects testing of chemical substances or mixtures 	
§ 4(b)	792
<ul style="list-style-type: none"> ° Prescribes Good Laboratory Practices (GLPs) for conducting studies relating to health effects, environmental effects, or chemical fate testing 	
§ 4(e)	N.A.
<ul style="list-style-type: none"> ° Establishes the Interagency Testing Committee (ITC) to recommend to EPA chemical substances and mixtures for priority consideration in promulgating chemical test rules 	
§ 5	720
<ul style="list-style-type: none"> ° Prohibits the manufacture or import of all new chemicals (after 7/79) not on the TSCA Inventory unless a premanufacturing notification (PMN) is submitted to the Administrator at least 90 days before manufacturing or processing commences 	
§ 5(a)(2)	721
<ul style="list-style-type: none"> ° Authorizes EPA to determine that a use of a chemical substance is a "significant new use." EPA must make this determination by rule (a SNUR). Once a use is determined to be a significant new use, persons must submit a notice to EPA at least 90 days before they manufacture, import, or process the substance for that use 	
§ 6(a)	763
<ul style="list-style-type: none"> ° Requires public and private elementary and secondary schools to identify friable asbestos-containing building materials, to maintain records of their analysis and the location of friable materials, and to notify school employees and parents when friable asbestos is found 	
§ 6(e)	761
<ul style="list-style-type: none"> ° Bans (with few exceptions) the manufacture (including importation), processing, distribution in commerce, and use of polychlorinated biphenyls (PCBs). Regulates the recordkeeping, marking, storage and disposal of materials containing PCBs. Requires owners of PCB transformers to register with local fire response personnel 	

111. ENVIRONMENTAL SERVICES DIVISION

TOXIC SUBSTANCES CONTROL ACT (TSCA) OF 1976 [40 CFR Parts 702-799]

	<u>TSCA Cite</u>	<u>40 CFR Part</u>
<ul style="list-style-type: none"> ◦ Authorizes EPA to require persons who manufacture, import, or process a chemical substance to submit such reports on that substance as the Agency may reasonably require. A broad range of data may be obtained including information on chemical identity and structure, production, use, exposure, disposal, and health and environmental effects 	§ 8(a)	704(A), 710
<ul style="list-style-type: none"> ◦ Requires U.S. EPA to compile, and periodically amend, a list of chemical substances manufactured or processed for commercial purposes (the TSCA Inventory) 	§ 8(b)	710
<ul style="list-style-type: none"> ◦ Requires recordkeeping for allegations that chemical substances cause significant adverse reactions to health or the environment 	§ 8(c)	717
<ul style="list-style-type: none"> ◦ Requires submission of unpublished health & safety studies for designated chemical substances or mixtures 	§ 8(d)	716
<ul style="list-style-type: none"> ◦ Requires immediate notification to the Administrator of information concerning substantial risk of health or environmental impact from any chemical substance or mixture 	§ 8(e)	N.A.
<ul style="list-style-type: none"> ◦ Regulates the import and export, for commercial purposes, of all chemicals except those excluded from coverage under TSCA. Excluded from coverage under TSCA are: pesticides (EPA, FIFRA); tobacco or any tobacco product; foods, food additives, drugs, or cosmetics (Food & Drug Administration); meat, eggs, poultry, or their products (USDA); radioactive materials (Nuclear Regulatory Commission); and firearms and ammunition subject to taxes (Treasury) 	§§ 12 & 13	707
<p>** Unlike most other environmental statutes, U.S. EPA alone implements the programmatic responsibilities of TSCA (except for PCB compliance inspections conducted by MDNR & OEPA pursuant to Cooperative Agreements)</p>		
<p>** OSHA regulates worker protection from asbestos exposure, except that USEPA regulates worker protection requirements for asbestos abatement projects performed by state or local employees not covered under OSHA worker protection standards</p>		
<p>** USEPA regulates products of genetically engineered organisms not specifically covered by other regulatory statutes under TSCA</p>		
<p>** FDA regulates food, food additives, drugs, cosmetics, or medical devices (or such substances derived from genetically engineered microorganisms)</p>		
<p>** The Consumer Product Safety Commission has authority over consumer products (e.g., CPSC bans on TRIS treated flame-retardant in childrens' clothing and asbestos in spackling compound)</p>		

III. ENVIRONMENTAL SERVICES DIVISION

TOXIC SUBSTANCES CONTROL ACT (TSCA) OF 1976

REGION V TSCA CONTACTS

SUBJECT	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
PCBs	Mr. John Connel Chief, PCB Unit	U.S. EPA	230 S. Dearborn Street 5 P&TSB-7 Chicago, IL 60604	(312) 886-6832
TSCA Chemical Information	Mr. George Marsh Chief, PMN Unit	U.S. EPA	230 S. Dearborn Street 5 P&TSB-7 Chicago, IL 60604	(312) 886-6294
Asbestos in Schools	Mr. Tony Restaino Chief, Asbestos Control Unit	U.S. EPA	230 S. Dearborn Street 5 P&TSB-7 Chicago, IL 60604	(312) 886-6879
Health Effects or Questions	Mr. David Dolan or Dr. Milt Clark	U.S. EPA	230 S. Dearborn Street 5 P&TSB-7 Chicago, IL 60604	(312) 886-5518 (312) 886-3388
Occupational Safety or Health Questions	Receptionist	OSHA	230 S. Dearborn Street Room 3244 Chicago, IL 60604	(312) 353-2220
Nuclear Reactor or Radioactive Materials Questions	Receptionist	NRC	799 Roosevelt Road Building 4 Glen Ellyn, IL 60137	(312) 790-5500
Consumer Products Safety Questions	Receptionist	CPSC	230 S. Dearborn Street Room 2944 Chicago, IL 60604	(312) 353-8260

TSCA Assistance Office Hotline: (800) 424-9065

IV. WASTE MANAGEMENT DIVISION

RESOURCE CONSERVATION & RECOVERY ACT (RCRA) OF 1976 reauthorized as the

HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) OF 1984

The Resource Conservation & Recovery Act of 1976 (RCRA) established the first the statutory framework for comprehensive federal and state regulation of hazardous wastes. The Act requires the identification and listing of hazardous wastes, taking into account such factors as the toxicity, persistence, and degradability in nature, the potential for accumulation in tissue, and other characteristics. It directs promulgation of such standards for generators of hazardous waste as may be necessary to protect human health and the environment. These standards are to include requirements for recordkeeping labeling of containers, disclosure of components, use of a manifest system to track hazardous waste movements ("cradle to grave"), and reporting to EPA. Similar standards are described for transporters of hazardous wastes in cooperation with the Department of Transportation.

The development of performance standards is prescribed for owners and operators of hazardous waste treatment, storage, and disposal (TSD) facilities. The Act requires the establishment of a permitting system to control the treatment, storage, and disposal of hazardous wastes. This provision is meant to ensure that all facilities which handle hazardous wastes will be operating under the conditions specified in a RCRA permit.

One of the key provisions of the RCRA program deals with the authorization of state hazardous waste programs. It directs EPA to promulgate guidelines to assist states in the development of their own hazardous waste programs and to authorize states with programs equivalent to the federal program to operate in lieu of the federal program.

The second major part of RCRA, Subtitle D, provides for developing and encouraging methods for the disposal of solid wastes which are environmentally sound and which conserve valuable resources. These objectives are to be accomplished through federal technical and financial assistance to states and regional authorities for comprehensive planning pursuant to federal guidelines. Utilizing these guidelines and assisted by federal grants, each state is to develop its own solid waste management plan.

A major theme of the Hazardous and Solid Waste Amendments of 1984 (HSWA) is the protection of groundwater through the following programs:

- New technological standards for land disposal facilities: double liners, leachate collection systems, groundwater monitoring;
- New requirements for the management and treatment of smaller quantities of hazardous waste, such as those generated by auto repair shops or dry cleaners;
- New regulations for underground tanks that store liquid petroleum or chemical products;
- Upgraded criteria for disposing of municipal solid waste in landfills; and
- Restrictions on the future land disposal of many untreated hazardous wastes.

IV. WASTE MANAGEMENT DIVISION

RESOURCE CONSERVATION & RECOVERY ACT (RCRA) OF 1976 reauthorized as the

HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) OF 1984 [40 CFR Parts 260-280]

RCRA Cite

40 CFR Part

- Identifies hazardous waste by listing or meeting specific criteria § 3001 261
- Establishes training, recordkeeping, and packaging standards for hazardous waste generators § 3002 262
- Establishes recordkeeping standards for hazardous waste transporters § 3003 263
- Establishes interim status standards and permit requirements for hazardous waste treatment, storage, and disposal facilities (TSDs) §§ 3004, 3005 264-265
- Establishes interim standards for new hazardous waste land disposal units §§ 3004, 3005 267
- Schedules for prohibitions on land disposal of specified wastes and determinations on all listed hazardous wastes § 3004 268
- Regulations for assorted hazardous waste recycling activities §§ 3001, 3010 266
- Regulation of Underground Storage Tanks (USTs) §§ 9001-9010 280

** Most Region V states, with the exception of Michigan and Ohio, are authorized to implement the RCRA program including issuance of permits and enforcement.

No Region V state is yet authorized to implement the requirements of HSMA.

** "Cradle-to-grave" tracking of hazardous waste movements via a uniform manifest system

IV. WASTE MANAGEMENT DIVISIONRESOURCE CONSERVATION & RECOVERY ACT (RCRA) OF 1976 reauthorized as theHAZARDOUS AND SOLID WASTE AMENDMENTS (HSMA) OF 1984

RCRA CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Mr. Larry Eastep Manager, Permit Section	IEPA	Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-9882
	Mr. Michael Nechvatal Manager, Compliance Monitoring Section	IEPA	Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-9844
	Mr. Thomas Cavanagh Manager, Field Operations Section	IEPA	Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-9844
	Mr. Gary King Chief Attorney, DLPC	IEPA	Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-9830
INDIANA	Mr. Terry Gray Chief, Permits & Plan Review Section	IDEM	Solid & Hazardous Waste Management Branch 105 S. Meridian Street Indianapolis, IN 46225	(317) 232-4534
	Mr. James Hunt Compliance Monitoring Section	IDEM	Solid & Hazardous Waste Management Branch 105 S. Meridian Street Indianapolis, IN 46225	(317) 232-4535
	Mr. Tom Russell Chief, Enforcement Section	IDEM	Solid & Hazardous Waste Management Branch 105 S. Meridian Street Indianapolis, IN 46225	(317) 232-3408

IV. WASTE MANAGEMENT DIVISION

RESOURCE CONSERVATION & RECOVERY ACT (RCRA) OF 1976 reauthorized as the

HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) OF 1984

RCRA CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
MICHIGAN	Mr. Ken Burda Chief, Facility Permit Unit	MDNR	Hazardous Waste Division Technical Services Section Stevens T. Mason Building P.O. Box 30028 Lansing, MI 48909	(517) 373-2730
	Mr. John Bohunsky Chief, Compliance Section	MDNR	Hazardous Waste Division Technical Services Section Stevens T. Mason Building P.O. Box 30028 Lansing, MI 48909	(517) 373-2730
MINNESOTA	Mr. Steven Reed Hazardous Waste Permits, Public Participation	MPCA	Hazardous Waste Regulatory Compliance Section Solid & Hazardous Waste Div. 1935 W. County Road R2 Roseville, MN 55113	(612) 296-7786
	Mr. Roger Bjorlie Supervisor, Hazardous Waste Enforcement Unit	MPCA	Hazardous Waste Regulatory Compliance Section Solid & Hazardous Waste Div. 1935 W. County Road R2 Roseville, MN 55113	(612) 296-7279

IV. WASTE MANAGEMENT DIVISIONRESOURCE CONSERVATION & RECOVERY ACT (RCRA) OF 1976 reauthorized as theHAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) OF 1984

RCRA CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
OHIO	Mr. Thomas Carlisle Manager, Technical Assistance & Waste Management Section	OEPA	P.O. Box 1049 361 E. Broad Street Columbus, OH 43216	(614) 462-6735
WISCONSIN	Mr. Richard O'Hara Chief, Hazardous Waste Management Section	WDNR	Bureau of Solid Waste Management P.O. Box 7921 Madison, WI 53707	(608) 266-0833
<u>REGION V</u>				
RCRA Permits	Mr. Karl Bremer Chief, Technical Programs Section	U.S. EPA	230 S. Dearborn Street 5 HS-13 Chicago, IL 60604	(312) 353-0398
Enforcement	Mr. William Munro Chief, RCRA Enforcement Section	U.S. EPA	230 S. Dearborn Street 5 HE-12 Chicago, IL 60604	(312) 886-4434
Underground Storage Tanks	Mr. Gale Hruska	U.S. EPA	230 S. Dearborn Street 5 HS-13 Chicago, IL 60604	(312) 886-0989
Small Quantity Generators	Mr. Gerry Phillips Chief, Solid Waste & Tanks Unit	U.S. EPA	230 S. Dearborn Street 5 HS-13 Chicago, IL 60604	(312) 886-6159
Waste Oil Regulations	Ms. Shirlee Brauer	U.S. EPA	230 S. Dearborn Street 5 HE-12 Chicago, IL 60604	(312) 886-4591
RCRA/CERCLA Hotline: (800) 424-9346				

IV. WASTE MANAGEMENT DIVISION

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980

Following several well-publicized incidents caused by the uncontrolled and dangerous disposal of toxic chemicals, it became apparent that the primarily prospective regulatory framework established by RCRA was not adequate to cope with the remedial needs of such sites. Although thousands of uncontrolled sites already had been identified, the lack of funds and legal authority impaired real progress. In response, Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, which soon became known as "Superfund." Among other things, this legislation established a \$1.6 billion fund to cover the costs of the cleanup of abandoned hazardous chemical sites.

Superfund was envisioned as a 5-year program to spearhead both federal and state efforts to respond to releases of hazardous substances into the environment. The goals of the legislation are to eliminate the most serious threats to public health and the environment posed by hazardous substance spills and uncontrolled chemical waste sites, and to respond to such hazardous substance threats in a cost-effective manner.

Title I of CERCLA deals with the release of hazardous substances, the liability to be imposed for releases, and the compensation to be paid for the damages and costs resulting from such releases. Title II imposed certain "environmental taxes" on the petroleum and chemical industries and sets up the Hazardous Substance Response Trust Fund. This funding mechanism for Superfund expired at the end of September 1985. Taxes are also imposed on the owners and operators of qualified hazardous waste disposal facilities in order to establish a second fund, known as the Post-Closure Liability Trust Fund. Reauthorization of Superfund is expected in the near future.

CERCLA defines "hazardous substance" by incorporating within its language those substances listed in the key sections of several other environmental statutes, including the CAA, CWA, RCRA, and TSCA. However, the Act also directs EPA to promulgate and revise regulations designating as hazardous other substances found to pose a substantial danger to the public health when released into the environment. In addition, regulations were promulgated which establish the threshold quantity of a hazardous substance spill. Environmental releases or spills in excess of the Reportable Quantity (RQ) trigger notification and response requirements under the Act.

CERCLA requires that any person in charge of a vessel, or facility, who has knowledge of the release of a hazardous substance from that vessel or facility in an amount greater than the RQ, to notify immediately the National Response Center. The Act also requires the owners or operators of hazardous substance storage, treatment, and disposal sites to notify EPA of the existence of such facilities, the amount and type of hazardous substances found there, and whether any known or suspected releases have occurred. In the event of the release of a hazardous substance, the procedures and methods to be followed are set forth in the National Contingency Plan (NCP). The NCP presents procedures for the discovery, investigation, evaluation, and removal (where necessary) of hazardous substances. The NCP provides for three types of CERCLA actions for incidents involving hazardous substances discovered at a site: (1) Immediate removal actions -- are to provide prompt response (within hours or days) to prevent immediate and significant harm to human life, health, or the environment; (2) Planned removal actions -- are those that allow time to plan the cleanup activities; and (3) Remedial actions -- are intended to achieve a permanent remedy or cleanup of hazardous waste sites.

IV. WASTE MANAGEMENT DIVISION

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980

[40 CFR Parts 300 & 302]

	<u>CERCLA Cite</u>	<u>40 CFR Part</u>
<ul style="list-style-type: none"> ◦ Designates as "hazardous substances" those "elements, compounds, mixtures, solutions, and substances which when released into the environment may present substantial danger to the public health or welfare or the environment" 	§ 102	117, 302
<ul style="list-style-type: none"> ◦ Regulates the reporting of releases of hazardous substances in excess of the Reportable Quantity (RQ) 	§ 103	117, 302
<ul style="list-style-type: none"> ◦ Response authorities of the Agency 	§ 104	N.A.
<ul style="list-style-type: none"> ◦ Requires the development of a National Contingency Plan (NCP) which details the procedures and standards for responding to releases, or the threatened release, of hazardous substances 	§ 105	300
<ul style="list-style-type: none"> ◦ Enforcement authorities to require responsible party actions at sites 	§ 106	N.A.
<ul style="list-style-type: none"> ◦ Establishes liability for abandoned sites, but promotes voluntary private cleanup by Potentially Responsible Parties (PRPs) 	§ 107	N.A.
<ul style="list-style-type: none"> ◦ Establishes a trust fund to pay for the cleanup of hazardous substances through the imposition of taxes on petroleum and certain chemicals (expired 9/85, awaiting reauthorization) 	§ 104, Title 11	N.A.

** Although known as CERCLA, it is better known as "Superfund"

** As the CERCLA program has not been delegated to the states (though many state-lead sites exist) it is advised to always check first with our Regional contacts

** Establishes the National Priorities List (NPL) as a mechanism to rank (via the Hazard Ranking System (HRS) sites for cleanup. However, sites do not need to be proposed for the NPL in order to be under CERCLA

IV. WASTE MANAGEMENT DIVISIONCOMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980

CERCLA CONTACTS

STATE	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
ILLINOIS	Mr. James Frank Manager, Hazardous Substances Control Section	IEPA	Division of Land Pollution Control 2200 Churchill Road Springfield, IL 62706	(217) 782-6411
INDIANA	Mr. Glenn Pratt	IDEM	5500 Bradbury Avenue Indianapolis, IN 46241	(317) 243-5010
MICHIGAN	Mr. Andrew Hogarth	MDNR	Hazardous Waste Division Technical Services Section Stevens T. Mason Building P.O. Box 30028 Lansing, MI 48909	(517) 373-8448
MINNESOTA	Mr. Gary Pulford	MPCA	Solid & Hazardous Waste Div. 1935 W. County Road B2 Roseville, MN 55113	(612) 296-7290
OHIO	Mr. Roger Hannahs	OEPA	P.O. Box 1049 361 E. Broad Street Columbus, OH 43216	(614) 462-6747
WISCONSIN	Mr. Richard O'Hara Chief, Hazardous Waste Management Section	WDNR	Bureau of Solid Waste Management P.O. Box 7921 Madison, WI 53707	(608) 266-0833

IV. WASTE MANAGEMENT DIVISION

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980

REGION V CERCLA CONTACTS

SUBJECT	CONTACT PERSON/TITLE	AGENCY	ADDRESS	TELEPHONE NUMBER
Spills	Mr. Robert Bowden Chief, Emergency Response Section	U.S. EPA	230 S. Dearborn Street 5 HR Chicago, IL 60604	(312) 886-6236
Enforcement	Mr. Norman Niedergang Chief, CERCLA Enforcement Section	U.S. EPA	230 S. Dearborn Street 5 HS Chicago, IL 60604	(312) 353-0398
Remedial Response	Mr. Gregory Vanderlaan Chief, Site Management Section	U.S. EPA	230 S. Dearborn Street 5 HR Chicago, IL 60604	(312) 886-6217

RCRA/CERCLA Hotline: (800) 424-9346
National Response Center: (800) 424-8802

[REDACTED]

EVALUATION FORM

I envision this guide being updated periodically, perhaps twice each year, in order to keep up to date with regulatory and personnel changes. In the interest of accuracy and utility, please submit any changes or comments you may have to me. Please complete and return the attached form also. Thank you. DGD

1. Do you find the guide useful?
2. How frequently do you use the guide?
3. What contacts do you need which were not supplied?
4. What contacts do you use now?
5. Is the level of detail in the guide sufficient?

COMMENTS

Return to: David Dolan
5S P&TSB-7