



Illinois
Environmental
Protection Agency

Enforcement Programs
2200 Churchill Road
Springfield, Illinois 62706

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HAZARDOUS WASTE ENFORCEMENT IN ILLINOIS

110524

Fiscal Year 1986
(July 1, 1985-June 30, 1986)

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Hazardous Waste Enforcement
in Illinois

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Enforcement Programs

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62794-9276
November 1987

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NCJRS

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ACQUISITIONS

Enforcement

Background

The Illinois Constitution in Article XI sets out as state public policy the recognition of responsibility to "provide and maintain a healthful environment for the benefit of this and future generations" and calls for the General Assembly to provide the laws for implementation and reinforcement of this public policy.

With the creation of the Illinois Environmental Protection Agency in 1970, environmental protection became a state mandate. The Agency (IEPA) was designated the regulatory enforcement arm of a triumvirate which also included the Illinois Pollution Control Board (Board) as the quasi-judicial-legislative entity and the Institute for Natural Resources as the research Agency.

Over the last 17 years, amendments to the Environmental Protection Act have refined the state's environmental protection mechanism, though not altering the Act's basic identity as an integrated comprehensive environmental law concerned with water, air, noise and land pollution, and the protection of drinking water. Lately, regulation of auto emissions in some parts of the state has been added to its responsibilities.

Another change has seen the Institute for Natural Resources become the Department of Energy and Natural Resources (ENR), with expanded research responsibilities.

The present document is the second in response to Public Law 83-1444, adopted in 1983 and effective Sept. 14, 1984. It requires the IEPA to provide an annual accounting of all notices the Agency issued under its statutory authority in the previous year which in any manner involved hazardous wastes or materials.

The authority cited in 83-1444, however, deals only with issues to be taken before the Pollution Control Board by the Office of the Attorney General. This course is only one of several enforcement options available to the Agency, which can also make enforcement referrals to the USEPA or to local state's attorneys.

Based on specific case evaluations, the Agency and the Attorney General as its designated legal representative select the most appropriate judicial or quasi-judicial response.

There are advantages and disadvantages to each.

While the Attorney General is the designated lawyer to bring enforcement actions in state or federal courts or before the Board, that Office reserves the right to make the final decision on whether or not to proceed in a specific case which has been referred by IEPA. As a result, some cases never advance beyond the Attorney General's Office, and in those cases where action is carried forward, the process is often still a long-drawn and deliberate one.

In those cases where the Attorney General elects not to proceed, motivation virtually disappears for a violator to negotiate a voluntary compliance agreement.

In some instances, IEPA refers enforcement actions to the USEPA, but in those instances the Agency relinquishes control over any settlements reached, and any benefits from assessed penalties revert to the federal government.

A third enforcement avenue is available through the 102 States' Attorneys in Illinois, who may bring action in the Circuit Courts of their own counties. One advantage in this course is that county officials are often already acquainted with environmental problems of concern in their own jurisdictions, and may be free to devote more time to the cases, spurred by an actively involved citizenry eager for steady, consistent and visible progress toward resolution of a clearly perceived local problem.

Overview

In compiling this report, the IEPA believes the legislative directive would be most reasonably served by using the State's fiscal year as the time frame for these reports. Accordingly, the Agency has here included data from fiscal year 1986 (July 1, 1985 to June 30, 1986). For purposes of comparison, figures from the 1985 fiscal year (July 1, 1984 to June 30, 1985) have also been included and, where available, some figures for the 1987 fiscal year.

Notifications dealt with here are those required by the Pollution Control Board's regulatory rule which provides that enforcement actions must be commenced with service of a notice and formal complaint (35 Ill. Adm. Code 103.122 [a]) and notification to respondents that they may be required to attend a hearing at a date to be set by the Board (103.122 [b]).

To further an understanding of the state's enforcement of hazardous waste laws, the Agency has prepared two lists which trace enforcement activity in this area.

The first isolates the statutorily mandated information on Section 31 (a) notices involving hazardous waste or materials in any manner, as required by the General Assembly in PA 83-1444 (Appendix I).

The second incorporates this data but expands the scope to include all enforcement activity involving hazardous materials or wastes (Appendix II). This comprehensive listing shows that in the period in question, a total of 852 inspections were made which determined that a violation had occurred. Of these, 726 were resolved and 126 are still pending, with the resolved cases concluded within an average of 112 days from the violation's discovery.

After May 1982, the IEPA had interim federal authorization to operate the state's hazardous waste program in lieu of the federal program for Phase I waste generators, transporters, treatment, storage and disposal facilities for a limited range of activities such as financial assurance, record keeping and groundwater monitoring.

In early 1986, Illinois received final federal authorization to administer a hazardous waste management program under RCRA, giving IEPA primary permit and enforcement authority to regulate hazardous waste generators, transporters, and treatment, storage and disposal sites, subject to limitations imposed by the Hazardous and Solid Waste Amendments of 1984.

This authorization means regulated facilities will no longer be obligated to obtain both State environmental permits from IEPA and RCRA permits from USEPA to operate legally. Instead, IEPA is now authorized to approve or deny RCRA permits pursuant to Pollution Control Board waste disposal regulations.

The USEPA, however, retains an active oversight role in this format, reviewing reports prepared by the Agency's Land Division on facility compliance in the state. This review, supplemented by field audits, forms the basis for USEPA's evaluation of IEPA's enforcement performance of the hazardous waste laws.

This federal evaluation also provides the groundwork for state/federal enforcement agreements which are pivotal prerequisites in the federal grant process. (The most recent federal evaluation of the RCRA program is attached as Appendix III.)

Areas of Enforcement Responsibilities

Within each division, a staff of technically and professionally qualified individuals based in regional offices are directly or indirectly involved with the implementation of the Agency's enforcement strategies.

These technical staff members are located in offices in each of the Agency's seven regions, which also have responsibility for inspecting facilities within the region. They are located at Rockford (Region I), Maywood, (Region II), Peoria (Region III), Champaign (Region IV), Springfield (Region V), Collinsville (Region VI) and Marion (Region VII).

Regional boundaries are displayed in Appendix IV.

Once collected by divisional field staff members, field samples are analyzed by the Division of Laboratories which operates analytical facilities in Chicago, Champaign and Springfield where data is generated on the chemical, physical and biological nature of various substances.

Organic analyses are performed at the Springfield laboratory, which can test for pesticides, PCBs, PPBs, volatile chlorinated compounds, organic solvents, NESHAP compounds, priority pollutants, oil identification and specifically requested organic analyses.

Bacteriological and inorganic analyses are performed in the Chicago and Champaign laboratories, with all EP Toxicity tests performed

in Chicago and either the Chicago or Champaign laboratory facility doing "total digest approach" tests to determine total metal content in any solids.

Laboratory results of sample tests are used in evaluating permit application information, facility compliance, environmental problems, effectiveness of control actions and to determine adequacy of operations and support of environmental cases.

In hazardous waste cases, IEPA inspectors perform four basic types of inspections, all of which follow federal guidelines. They include compliance evaluation inspections (CEI), comprehensive groundwater monitoring evaluations (CME), sampling inspections and follow-up inspections.

Violations involving hazardous wastes found by inspection and subsequent compliance/enforcement actions are reported monthly to USEPA as a part of the federal Hazardous Waste Data Management System (HWDMS). Each action is tracked until the violation is resolved.

In anticipation of future compliance and enforcement actions, evidence of violations is obtained during inspections both through formal inspection reports and photographs. Evidence gathered is handled under strict "chain of custody" procedures which assure that physical evidence such as water or waste samples, and photographs, will be admissible in court.

RCRA regulations of the Pollution Control Board require annual reports by March 1 of each year from approximately 1,500 hazardous waste generators and approximately 300 hazardous waste treatment, storage and disposal facilities.

In addition, Illinois Public Act 93-906 requires the IEPA to conduct a survey of generation, storage and disposal of hazardous wastes and

publish an annual report of its findings, a requirement which is stricter than the USEPA regulations which only demand a biennial report.

Compliance efforts against those who fail to submit required reports are undertaken once the March 1 deadline passes. Initial action usually consists of informal activities such as a letter or telephone call. Those who fail to respond become the target for more formal enforcement actions beginning with a Compliance Inquiry Letter (CIL), with other routine enforcement actions then following in due course.

Some hazardous waste management facilities, notably certain incinerators and treatment operations, merit attention by more than one division, and an escalating concern to the Agency has been the extent of multi-media violations.

To deal more effectively with these violations as a single source though they involve two or more disciplines within the Agency, a Coordinated Review of Permit Applications (CROPA) group has been designed.

The review group consists of division permit managers and the manager of enforcement programs. It maintains an overview of those permits which are applied for by facilities crossing media boundaries.

Agency policy is to involve divisional field managers in CROPA meetings, a bridging of permit and inspection functions which allows the Agency to deal in an effective and coordinated manner with multi-media episodes.

Whether in single or multi-media operations, the Agency has found that many violations of environmental regulations generate an economic benefit to the violator. The Agency therefore has adopted a stance of demanding a monetary penalty in every formal enforcement case, to create an incentive to the regulated community to comply with the environmental laws. This rationale moves to take away the economic benefits a violator gains by not expending capital for needed

environmental control equipment. In addition, the Agency weighs in the degree of recalcitrance involved and the estimated environmental damage done in assessing a penalty value in each case.

IEPA Enforcement Procedures

Enforcement in each media division follows common patterns and utilizes uniform enforcement tools which are then tailored to address the divisions' individual needs. (In this summary, when variations from the overall pattern occur, those which apply to hazardous waste enforcement cases will be used.)

Each IEPA division has an enforcement management system (EMS) the purpose of which is to formalize the procedures by which that division carries out its enforcement policies. The EMS for the Division of Land Pollution Control is included as Appendix V, and an Agency organizations chart is shown in Appendix VI.

Attorneys employed by IEPA are assigned to divisions for enforcement work, with their activities coordinated under the management of the division's senior attorney.

As the initial step in securing compliance once an enforcement action is initiated, the Agency may seek compliance through an agreement if the violator is willing to take timely corrective action as specified by the Agency. In the absence of such agreement, the attorneys may prepare a case with recommendations for prosecution.

Violations which are the principal subject of this report are chiefly substantive violations of the Act or of regulations promulgated by the Pollution Control Board.

For purposes of enforcement involving hazardous wastes, scoring is on a priority rating developed by USEPA which specifies "Class I" and "Class II" violations, "high priority" violators and "significant" violators.

"Class I" violations are those which result in a release or a serious threat of release of hazardous waste to the environment, or failure to assure that groundwater will be protected, that proper closure and post-closure activities will be undertaken, or that hazardous wastes will be destined for and delivered to permitted or interim status facilities.

"Class II" violations include violations of any RCRA requirements not covered by Class I violations.

"High priority" violators are those with either a Class I violation or violations which create a substantial likelihood for potential or actual exposure to hazardous waste, realize a substantial economic benefit as a result of noncompliance, are chronic or recalcitrant violators or have intentionally committed violations.

"Significant" violators are defined as major handlers with a Class I violation or violations of specific subparts of the RCRA regulations.

In any division, enforcement action is triggered when a violation is identified. The Agency may identify violations as a result of disclosures made as part of the permit application process, through routine inspections, from citizen complaints or from self-monitoring by those regulated.

The usual next step is the Pre-Enforcement Conference Letter (PECL) or an Enforcement Notice Letter (ENL).

(It should be understood that the Agency, where possible, combines notifications and other enforcement steps for the most expeditious approach to the desired goal--compliance--so that charts of enforcement activities may not all reflect the same sequence of steps.)

In cases which the Agency believes will be brought before the PCB, attempts are made to use the PECL or the ENL as the statutorily required notice. To date, the Attorney General's Office has been

receptive to this procedure, and if the specified settlement terms are concurred in, the agreement is filed with an appropriate court or the PCB to secure the entry of an enforceable order.

In each division, decisions on the appropriate enforcement response to apparent violations are made by an Enforcement Decision Group (EDG), which includes the division manager, senior attorney and field operations manager.

The EDG meets monthly, bringing together key management personnel to review information from field offices and compliance assurance, and determines when preparation of an enforcement brochure and referral is warranted, or to specify the appropriate alternative action when formal enforcement actions do not appear to represent the best option. The EDG also defines remedies to be sought if litigation is pursued and reviews the status of pending cases.

Formal settlements usually involve a penalty in addition to a technical compliance program.

Where the Agency is unsuccessful in achieving compliance through one of the various pre-referral methods, referral is then made to a prosecuting authority.

Referral is made in the form of a narrative brochure with the required documentation attached. The brochure contains the Agency's demand for settlement, i.e., a technical compliance program, and a proposed penalty.

Based on the information provided by the Agency in its referral, a formal complaint (in the case of the Office of the Attorney General) or an administrative order (in the case of USEPA) will be prepared, with the Agency attorney who prepared the referral maintaining an active role in the case and participating in negotiations.

More than 90 percent of the referred cases are settled without coming to litigation, with Agency attorneys functioning as negotiators in the

resolution process in conjunction with the Assistant Attorney General handling the case.

In common with most other IEPA regulatory programs, development of a hazardous waste site previously hinged on a two phase permit system which required separate permits to develop a facility and to operate it once the initial development was completed in accordance with specifications.

Under the state's delegation to administer RCRA regulations, a single permit approach has been adopted, under which no new or modified hazardous waste facility will be permitted to start operation until the Agency has inspected and approved the facility as complying with 35 Ill. Adm. Code Part 703. (The so-called "chapter 7" permit system as promulgated by the State Pollution Control Board will continue to apply to non-hazardous waste sites and any non-hazardous waste management activities at hazardous waste sites.)

While the permit application is under review, a decision not to permit may result if permit requirements are not met, or if an operator is found to have a past history of improper activity within certain specified statutory criteria.

The IEPA's enforcement program relies heavily on the permit system, and utilizes a coordinated permit review process.

In dealing with hazardous waste, primary compliance activities include operation of a manifest tracking system, review of facility monitoring data and operation reports, reviews of financial assurance documents, performing drill rig investigations at suspected problem sites, and developing and maintaining electronic data management systems.

Summation

Given the task of enforcing Illinois environmental protection laws and regulations, the Illinois Environmental Protection Agency seeks to carry out its directive to protect and correct in a manner which obtains the most beneficial environmental results in the most efficient fashion.

Within a framework which requires certain notifications and incorporates various due process protections, the Agency seeks to select in each instance the most appropriate response to violations of the state and federal regulations.

Whenever possible, the Agency seeks to merge certain notifications and responses with the goal of arriving, with a minimum of delay and duplication, at a situation in which an identified violator comes into compliance with the regulations.

The present compilation of materials reflects the most recent data available on IEPA's enforcement efforts overall as well as the specific information on hazardous waste notifications as required by General Assembly action.

APPENDIX I

HAZARDOUS FY86 REFERRALS TO AG
RESULTING IN FILINGS BEFORE PCB

FACILITY

Super Container Company
Will County

INVESTIGATION DATE

2/11/85

EPA NOTICES

PECL, 4/5/85
Section 31(d) Notice, 4/5/85

PECL WITH SECTION 31(d) NOTICE

4/5/85

REFERRAL TO AG

3/28/85; 5/23/85 (for RCRA violations)

FILED WITH PCB

4/14/86, PCB 86-51

SECTION 31(d) COMPLAINT
SERVICE AND NOTICE

4/14/86

STATUS:

Air-Land Enforcement Case. Incinerator burning paint residue in pails without permit and in violation of air regulations. John Jagiella, d/b/a Super Container Corporation, filed petition for bankruptcy reorganization (Chapter 11); Petition has been converted to liquidation (Chapter 7). Attorney General did not obtain service in the case. For this reason, it will voluntarily dismiss the case and refile the case to obtain proper service.

APPENDIX II

10/26/87

DIVISION OF ENFORCEMENT PROGRAMS
ENFORCEMENT/COMPLIANCE TRACKING REPORT
SUMMARY FOR LPC RESOLVED RECORDS
07/01/85 THROUGH 06/30/86

1. NUMBER OF RESOLVED ENFORCEMENT ACTIONS

726

AVERAGE LAPSE TIME

112

2. NUMBER OF COMPLIANCE INQUIRY LETTERS SENT

678

AVERAGE LAPSE TIME

23

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT PROGRAMS
ENFORCEMENT/COMPLIANCE TRACKING
RESOLVED

RESPONDENT NAME	COUNTY	INVESTI- GATION DATE	CIL DATE	LAPSE DATE	PRE-BNF. CONF. LETTER DATE	RESOLVED DATE	LAPSE 31 D NOTICE DATE
** DIVISION LPC							
* REGION 1							
ALCO DISPENSING	CARROLL	05/02/86	05/06/86		4 / /	06/20/86	49 / /
AMERICAN HOECHST	LASALLE	01/14/86	02/03/86		20 / /	02/28/86	45 / /
AMERICAN NICKELOID	LASALLE	12/13/85	01/23/86		41 / /	05/13/86	151 / /
AMERICAN NICKELOID	LASALLE	03/25/86	04/02/86		8 / /	04/17/86	23 / /
AMERICAN NICKELOID	LASALLE	11/07/85	11/26/85		19 / /	03/25/86	138 / /
AMBOCK	WINNEBAGO	12/11/85	01/07/86		27 / /	07/03/86	204 / /
AMEROCK CORP	WINNEBAGO	04/29/86	05/22/86		23 06/11/86	09/18/86	142 06/11/86
ANOCO OIL TERMINAL	OGLE	04/04/86	05/02/86		28 / /	05/20/86	46 / /
ANCHOR COUPLING	LEE	04/28/86	05/01/86		3 / /	05/16/86	18 / /
ANIXTER	WHITESIDE	05/02/86	05/22/86		20 07/18/86	09/03/86	124 07/18/86
AQUARIUS INTL	WINNEBAGO	04/11/86	05/08/86		27 / /	05/08/86	27 / /
ARMOLLOY	DEKALB	02/14/86	03/06/86		20 / /	07/15/86	151 / /
BARBER-COLEMAN (LP)	WINNEBAGO	11/20/85	12/24/85		34 02/05/86	06/05/86	197 02/05/86
BASSICK	BUREAU	06/13/86	07/02/86		19 09/30/86	09/11/86	90 09/30/86
BASSICK COMPANY	BUREAU	04/22/86	04/25/86		3 / /	05/16/86	24 / /
BELoit CORP	WINNEBAGO	05/13/86	06/12/86		30 / /	07/22/86	70 / /
BENNETT PROD., INC.	WINNEBAGO	06/02/86	06/04/86		2 08/05/86	09/05/86	95 08/05/86
BESLY PRODUCTS	WINNEBAGO	06/10/86	06/24/86		14 / /	10/20/86	132 / /
BFI/DAVIS JCT	OGLE	08/21/85	09/06/85		16 10/16/85	01/07/86	139 10/16/85
BFI/DAVIS JUNCT	OGLE	01/03/86	01/16/86		13 / /	02/05/86	33 / /
BFI/DAVIS JUNCT	OGLE	03/25/86	04/02/86		8 / /	04/23/86	29 / /
BFI/DAVIS JUNCT	OGLE	03/12/86	04/24/86		43 05/14/86	06/17/86	97 05/14/86
BFI/DAVIS JUNCT	OGLE	10/01/85	10/17/85		16 03/10/86	05/08/86	219 03/10/86
BFI/DAVIS JUNCT	OGLE	10/10/85	10/28/85		18 / /	01/30/86	112 / /
BFI/DAVIS JUNCT	OGLE	12/03/85	12/30/85		27 / /	02/03/86	62 / /
BORG-WARNER	LASALLE	06/17/86	07/07/86		20 / /	08/18/86	62 / /
BOUZIANE PLATING	WINNEBAGO	02/20/86	02/26/86		6 05/23/86	05/30/86	99 05/23/86
CAPRON MANU	BOONE	07/29/85	08/14/85		16 10/07/85	12/19/86	508 10/07/85
CARBIDE ENERGY CORP	WINNEBAGO	04/04/86	05/01/86		27 06/24/86	07/25/86	112 06/24/86
CARBIDE ENERGY CORP	WINNEBAGO	04/04/86	05/01/86		27 06/12/86	07/03/86	90 06/12/86
CENTRAL QUALITY IND	OGLE	08/19/85	09/10/85		22 / /	01/21/86	155 / /
CENTRAL QUALITY	OGLE	10/28/85	10/31/85		3 / /	11/19/85	22 / /
CHRYSLER CORP	BOONE	03/04/86	03/10/86		6 04/25/86	07/30/86	148 04/25/86
CHRYSLER CORP	BOONE	10/30/85	11/20/85		21 / /	02/10/86	103 / /
CHRYSLER CORP.	BOONE	04/22/86	04/22/86		0 / /	05/01/86	9 / /
CTS-KNIGHTS DIV	DEKALB	11/01/85	11/06/85		5 / /	12/17/85	46 / /
DEL MONTE	OGLE	09/17/85	10/09/85		22 / /	04/28/86	223 / /
DIAMOND BATHURST	LASALLE	07/26/85	08/12/85		17 / /	08/30/85	35 / /
DON HULLBRY'S	LEE	03/07/86	04/24/86		48 05/23/86	07/17/86	132 05/23/86
DRIV-LOK	DEKALB	10/18/85	11/12/85		25 / /	05/22/86	216 / /
DYNA-BURR	WINNEBAGO	08/27/85	09/04/85		8 08/06/85	10/16/85	50 08/06/85
ELCO INDUSTRIES	WINNEBAGO	01/22/86	/ /		0 02/27/86	05/08/86	106 02/27/86

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT PROGRAMS
ENFORCEMENT/COMPLIANCE TRACKING
RESOLVED

RESPONDENT NAME	COUNTY	INVESTIGATION DATE	CIL DATE	LAPSE	PRE-BNF. CONF. LETTER DATE	RESOLVED DATE	LAPSE 31 D NOTICE DATE
EMCO BONDING	WINNEBAGO	06/10/86	06/23/86	13	/ /	09/05/86	87 / /
FASCOTE	WINNEBAGO	10/16/85	11/01/85	16	/ /	01/30/86	106 / /
FENNER STONE	WINNEBAGO	11/07/85	11/21/85	14	/ /	12/31/85	54 / /
FRANTZ MANU CO	WHITESIDE	09/06/85	10/02/85	26	/ /	03/12/86	187 / /
FRINKS IND. WASTE	WINNEBAGO	12/06/85	12/27/85	21	/ /	01/30/86	55 / /
GC ELECTRONICS	WINNEBAGO	11/04/85	11/21/85	17	11/27/85	02/24/86	112 11/27/85
GENERAL ELECTRIC	WHITESIDE	06/25/86	07/16/86	21	/ /	09/18/86	85 / /
GENERAL ELECTRIC	WHITESIDE	09/19/85	09/24/85	5	/ /	11/01/85	43 / /
GENERAL ELECTRIC	DEKALB	10/30/85	11/18/85	19	/ /	12/16/85	47 / /
GENERAL WEB DYNAMIC	WINNEBAGO	03/07/86	04/03/86	27	/ /	06/27/86	112 / /
GWB METALS DIV	CARROLL	07/01/85	07/17/85	16	/ /	11/12/85	134 / /
GORDON BARTELS	WINNEBAGO	04/03/86	05/08/86	35	10/07/86	09/26/86	176 10/07/86
GREENLEE TOOL	DEKALB	04/28/86	06/13/86	46	10/07/86	09/23/86	148 10/07/86
GREENLEE TOOL CO	WINNEBAGO	08/08/85	08/22/85	14	/ /	09/24/85	47 / /
HAAS & HAAS, INC	WHITESIDE	02/21/86	03/31/86	38	/ /	04/25/86	63 / /
HARRINGTON SIGNAL	ROCK ISLAND	09/06/85	10/04/85	28	12/04/85	11/25/85	80 12/04/85
HEICC INC.	LASALLE	03/03/86	03/12/86	9	/ /	06/24/86	113 / /
HIATT BROTHERS	DEKALB	11/22/85	12/23/85	31	/ /	04/23/86	152 / /
ILL. WATER TREATMENT	WINNEBAGO	11/26/85	12/19/85	23	02/04/86	03/24/86	118 02/04/86
ILL. WATER TREATMENT	WINNEBAGO	11/26/85	12/19/85	23	02/04/86	03/24/86	118 02/04/86
ILLINOIS WATER TRBAT	WINNEBAGO	06/06/86	06/11/86	5	/ /	06/17/86	11 / /
IMAGE TECH. SYST. INC.	WINNEBAGO	06/06/86	06/11/86	5	/ /	06/23/86	17 / /
INGERSOLL CUTTING TOOLS	WINNEBAGO	06/06/86	06/11/86	5	/ /	07/01/86	25 / /
INTERSTATE POLLUTION	WINNEBAGO	09/18/85	11/04/85	47	12/16/85	01/21/86	125 12/16/85
ISPBW COMM HEAT	BOONE	07/03/85	07/16/85	13	/ /	11/26/85	146 / /
JOHN DEBBE WORKS	ROCK ISLAND	09/04/85	09/24/85	20	/ /	11/07/85	64 / /
JOHN GREEN PRESS	WINNEBAGO	02/24/86	03/21/86	25	05/15/86	05/30/86	95 05/15/86
KABLE PRINTING	OGLE	04/14/86	05/19/86	35	/ /	09/18/86	157 / /
KABLE PRINTING	OGLE	08/09/85	08/26/85	17	/ /	12/20/85	133 / /
LASALLE BOLLING M	LASALLE	01/17/86	01/22/86	5	/ /	06/11/86	145 / /
LAWRENCE BROS #2	WHITESIDE	03/21/86	04/15/86	25	/ /	05/22/86	62 / /
MAGNETIC DATA	WINNEBAGO	05/01/86	05/14/86	13	07/03/86	09/26/86	148 07/03/86
METRO RUBBER PROD.	CARROLL	06/18/86	06/20/86	1	/ /	06/30/86	12 / /
MICRO SWITCH	STEPHENSON	12/31/85	01/24/86	24	/ /	02/28/86	59 / /
MIDWEST PLATING CORP	BOONE	08/27/85	10/02/85	36	/ /	06/13/86	290 / /
MIG INVESTMENTS	BOONE	05/09/86	/ /	0	/ /	06/27/86	49 / /
MOD-TEE, INC	WHITESIDE	06/18/86	06/23/86	5	/ /	07/01/86	13 / /
MODERN PLATING	STEPHENSON	01/31/86	/ /	0	02/03/86	04/15/86	74 02/03/86
MOLINE PAINT MANU	ROCK ISLAND	08/19/85	08/29/85	10	/ /	10/21/85	63 / /
MOTOR WHEEL	LASALLE	01/27/86	02/21/86	25	/ /	07/17/86	171 / /
MOTOR WHEEL CORP	LASALLE	07/02/85	07/19/85	17	/ /	08/22/85	51 / /
NAT METAL CRAFTERS	WINNEBAGO	03/26/86	/ /	0	04/17/86	04/28/86	33 04/17/86
NATIONAL METALWARBS	LASALLE	07/17/85	07/29/85	12	09/12/85	10/07/85	82 09/12/85
NORTHWESTERN	WHITESIDE	12/31/85	01/06/86	6	03/06/86	05/09/86	129 03/06/86
NORTHWESTERN	WHITESIDE	03/07/86	04/01/86	25	/ /	05/22/86	76 / /

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RESPONDENT NAME	COUNTY	INVESTI- GATION DATE	CIL DATE	LAPSE	PRE-ENP. CONF. LETTER DATE	RESOLVED DATE	LAPSE	31 D NOTICE DATE
NSM INC.	LASALLE	06/18/86	06/20/86	2	/ /	06/30/86	12	/ /
NYLINT CORP	WINNEBAGO	07/18/85	08/05/85	18	/ /	08/27/85	40	/ /
OHS	WINNEBAGO	08/19/85	09/17/85	29	11/12/85	05/16/86	270	11/12/85
OWENS ILLINOIS	LASALLE	07/24/85	08/05/85	12	/ /	10/11/85	79	/ /
PACIFIC SCIENTIFIC	WINNEBAGO	09/05/85	09/16/85	11	/ /	12/17/85	103	/ /
PAINTED PARTS	WINNEBAGO	04/16/86	05/20/86	34	/ /	07/15/86	90	/ /
PARK PLATING	WINNEBAGO	01/17/86	01/22/86	5	/ /	06/16/86	150	/ /
PARK PLATING & METAL	WINNEBAGO	08/19/85	08/29/85	10	/ /	10/09/85	51	/ /
PIERCE CHEMICAL	WINNEBAGO	04/15/86	04/24/86	9	05/23/86	06/27/86	73	05/23/86
PIERCE CHEMICAL	WINNEBAGO	04/15/86	04/24/86	9	05/23/86	06/27/86	73	05/23/86
PIERCE CHEMICAL CO	WINNEBAGO	08/02/85	08/06/85	4	/ /	10/24/85	83	/ /
PIERCE CHEMICAL CO	WINNEBAGO	10/17/85	11/06/85	20	/ /	12/13/85	57	/ /
RAY CARL PROD	WINNEBAGO	09/18/85	10/07/85	19	/ /	11/12/85	55	/ /
RC BOTTLING CO	WINNEBAGO	03/03/86	03/31/86	28	06/04/86	02/19/87	353	06/04/86
REGAL-BELOIT	WINNEBAGO	04/23/86	05/22/86	29	/ /	06/24/86	62	/ /
REGAL-BELOIT	WINNEBAGO	06/13/86	06/24/86	11	10/08/86	11/20/86	160	10/08/86
REGAL-BELOIT	WINNEBAGO	06/13/86	06/24/86	11	09/26/86	11/20/86	160	09/26/86
ROCKFORD PROD 3	WINNEBAGO	11/18/85	12/06/85	18	/ /	07/25/86	249	/ /
ROCKFORD PRODUCTS	WINNEBAGO	02/07/86	03/14/86	35	/ /	04/01/86	53	/ /
ROCKFORD PRODUCTS 2	WINNEBAGO	05/07/86	05/23/86	16	07/07/86	07/25/86	79	07/07/86
ROCKWELL	WINNEBAGO	09/24/85	09/24/85	0	11/01/85	11/19/85	56	11/01/85
RONKEN IND. INC.	BUREAU	04/22/86	04/28/86	6	/ /	05/08/86	16	/ /
RUSSELL BURDSALL &	WHITESIDE	03/27/86	04/16/86	20	06/11/86	06/27/86	92	06/11/86
RUSSELL BURDSALL &	WHITESIDE	03/27/86	04/16/86	20	06/11/86	06/27/86	92	06/11/86
SCHNECK AVIATION	WINNEBAGO	04/01/86	04/03/86	2	/ /	05/01/86	30	/ /
SESTOR & SON	DEKALB	07/26/85	08/06/85	11	09/10/85	01/21/87	544	09/10/85
SEYMORE OF SYCAMORE	DEKALB	01/21/86	02/28/86	38	/ /	04/01/86	70	/ /
SEYMORE OF SYCAMORE	DEKALB	01/21/86	03/24/86	62	/ /	05/19/86	118	/ /
SPAULDING FIBRE	DEKALB	11/26/85	12/06/85	10	/ /	02/26/87	457	/ /
ST MARGARET HOSP	BUREAU	03/13/86	04/09/86	27	/ /	07/23/86	132	/ /
ST SERVICES	LASALLE	12/23/85	01/16/86	24	/ /	04/01/86	99	/ /
ST SERVICES	LASALLE	12/23/85	01/16/86	24	/ /	04/01/86	99	/ /
STEWART-WARNER	BUREAU	04/02/86	05/01/86	29	/ /	08/29/86	149	/ /
SUNDSTRAND	LASALLE	06/17/86	07/08/86	21	/ /	07/23/86	36	/ /
SUNDSTRAND AVAIT. 10	WINNEBAGO	08/23/85	09/16/85	24	/ /	10/16/85	54	/ /
SUNDSTRAND AVIATION	WINNEBAGO	08/19/85	08/29/85	10	/ /	10/09/85	51	/ /
SUNDSTBAND PLT 1	WINNEBAGO	07/17/85	07/29/85	12	/ /	10/16/85	91	/ /
SUNDSTRAND PLTG	WINNEBAGO	07/31/85	08/14/85	14	/ /	10/16/85	77	/ /
TOLEDO SCREW MACH	WINNEBAGO	12/10/85	01/16/86	37	/ /	03/12/86	92	/ /
TREKKEB CHEMICAL CO	LASALLE	08/05/85	08/15/85	10	/ /	10/09/85	65	/ /
TREKKEB CHEMICALS	LASALLE	05/30/86	06/25/86	26	/ /	07/21/86	52	/ /
U.S. ECOLOGY	BUREAU	06/16/86	08/15/86	60	12/11/86	01/28/87	226	12/11/86
US ECOLOGY	BUREAU	02/05/86	03/07/86	30	/ /	04/24/86	78	/ /
US ECOLOGY	BUREAU	03/31/86	04/02/86	2	/ /	06/06/86	67	/ /
US.ARMY SAVANNA	JODAVIESS	10/07/85	10/25/85	18	/ /	01/30/86	115	/ /

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VALSPAR	WINNEBAGO	11/12/85	11/25/85	13	/ /	12/19/85	37 / /
VALSPAR CORP	ROCK ISLAND	02/20/86	02/26/86	6	/ /	06/27/86	127 / /
VALSPAR CORP	ROCK ISLAND	10/28/85	10/31/85	3	/ /	11/18/85	21 / /
VAN AEREN HYDRO	WINNEBAGO	10/24/85	11/08/85	15	/ /	01/08/86	76 / /
WOODWARD GOVERNOR	WINNEBAGO	02/03/86	/ /	0	03/17/86	08/29/86	207 03/17/86
WOODWARD GOVERNOR	WINNEBAGO	11/01/85	11/06/85	5	03/05/86	03/06/86	125 03/05/86
WOODWARD GOVERNOR	WINNEBAGO	10/24/85	11/13/85	20	01/17/86	03/06/86	133 01/17/86
WOODWARD GOVERNOR	WINNEBAGO	10/24/85	11/13/85	20	03/05/86	03/06/86	133 03/05/86
* REGION 2							
A FINKL & SONS	COOK	11/26/85	12/27/85	31	/ /	04/24/86	149 / /
A.B. DICK CO.	COOK	06/04/86	06/06/86	2	/ /	06/16/86	12 / /
A.O. SMITH	KANKAKEE	08/02/85	08/16/85	14	/ /	09/27/85	56 / /
ABLE ELECTROPOLISH	COOK	08/13/85	09/10/85	28	/ /	10/16/85	64 / /
ACCESS PLATING IND.	DUPAGE	06/03/86	06/05/86	2	/ /	06/16/86	13 / /
ACID-OHMAN BOILER	KANE	04/04/86	04/08/86	4	07/16/86	08/29/86	147 07/16/86
ACME EYELET	KANE	01/15/86	03/25/86	69	/ /	05/07/86	112 / /
ACME GRAPHICS	COOK	04/09/86	04/15/86	6	/ /	05/19/86	40 / /
ACME PRINTING INK	COOK	04/04/86	04/08/86	4	/ /	04/28/86	24 / /
AIRCRAFT GEAR CO	COOK	04/09/86	04/14/86	5	/ /	04/25/86	16 / /
ALANSON MANUFACT.	COOK	11/04/85	12/06/85	32	01/14/86	04/23/86	170 01/14/86
ALL STEEL INC.	KANE	07/12/85	08/07/85	26	/ /	11/13/85	124 / /
ALLIED CORP. AMPH.	DUPAGE	06/04/86	06/06/86	2	/ /	06/20/86	16 / /
ALLIED GOLF CO.	COOK	06/04/86	06/06/86	2	/ /	07/14/86	40 / /
ALLIED METAL	COOK	01/22/86	03/21/86	58	/ /	06/27/86	156 / /
ALLIED PRODUCTS	COOK	09/20/85	/ /	0	09/20/85	03/26/87	552 09/20/85
ALLIED TUBE&CONDUIT	COOK	08/05/85	/ /	0	08/20/85	10/10/85	66 08/20/85
ALLIS CHALMERS CORP	COOK	05/02/86	05/06/86	4	/ /	05/16/86	14 / /
ALPHA CIRCUIT CORP	COOK	06/03/86	06/05/86	2	/ /	06/23/86	20 / /
ALUMAX MILL PROD	GRUNDY	06/27/86	07/29/86	32	/ /	09/24/86	89 / /
ALUMINUM COIL CORP.	COOK	04/01/86	04/03/86	2	/ /	05/05/86	34 / /
AMAX PLATING #1	KANE	04/23/86	06/12/86	50	/ /	07/28/86	96 / /
AMAX PLATING #2	KANE	04/23/86	05/27/86	34	/ /	07/28/86	96 / /
AMBER PLATING WORKS, INC.	COOK	04/04/86	04/09/86	5	/ /	04/14/86	10 / /
AMCO ENGINEERING CO	COOK	03/12/86	04/15/86	34	07/06/86	07/25/86	135 07/06/86
AMER SPRING WIRE	KANKAKEE	04/02/86	04/22/86	20	06/26/86	10/08/86	189 06/26/86
AMER WASTE PROCESS	COOK	01/13/86	/ /	0	01/31/86	06/27/86	165 01/31/86
AMER WASTE PROCESS	COOK	03/28/86	/ /	0	05/29/86	06/27/86	91 05/29/86
AMER WASTE PROCESS	COOK	05/02/86	/ /	0	05/29/86	06/27/86	56 05/29/86
AMER WASTE PROCESS	COOK	12/09/85	/ /	0	01/15/86	03/27/86	108 01/15/86
AMER WASTE PROCESS	COOK	03/26/86	04/03/86	8	05/29/86	06/27/86	93 05/29/86
AMER WASTE PROCESS	COOK	11/06/85	12/10/85	34	01/15/86	03/27/86	141 01/15/86
AMER WASTE PROCESS	COOK	11/25/85	12/10/85	15	01/15/86	03/27/86	122 01/15/86
AMER WASTE PROCESS	COOK	11/25/85	12/10/85	15	01/15/86	03/27/86	122 01/15/86
AMERICAN CAN	COOK	02/21/86	03/25/86	32	/ /	05/19/86	87 / /

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AMERICAN CORP. SIGNAL	COOK	06/04/86	06/06/86	2	/ /	06/19/86	15 / /
AMERICAN INKS&COAT	DUPAGE	05/02/86	05/06/86	4	/ /	06/06/86	35 / /
AMERICAN NAMEPLATE	COOK	07/25/85	08/14/85	20	/ /	10/16/85	83 / /
AMERICAN STAIR CORP.	COOK	06/04/86	06/06/86	2	/ /	06/30/86	26 / /
AMERICAN TECH, INC.	LAKE	02/20/86	03/25/86	33	/ /	05/31/86	70 / /
AMERICAN W. PROC.	COOK	03/11/86	03/28/86	17	05/14/86	01/06/87	301 05/14/86
AMERICAN W. PROC.	COOK	02/10/86	02/24/86	14	/ /	03/20/86	38 / /
AMOCO RESEARCH	DUPAGE	12/30/85	02/05/86	37	/ /	03/13/86	73 / /
AMOCO-NAPREVILLE	DUPAGE	04/18/86	04/23/86	5	/ /	05/15/86	27 / /
AMPHENOL	COOK	04/09/86	04/14/86	5	/ /	05/01/86	22 / /
APEX PLASTIC FIN.	COOK	06/02/86	06/05/86	3	/ /	06/13/86	11 / /
APOLLO METAL	COOK	03/07/86	04/01/86	25	07/08/86	08/04/86	150 07/08/86
APOLLO METALS	COOK	08/19/85	08/28/85	9	/ /	10/29/85	71 / /
ARCHER INC.	DUPAGE	07/30/85	12/27/85	150	/ /	02/10/86	195 / /
ARMSTRONG WORLD	KANKAKEE	08/12/85	09/06/85	25	/ /	12/17/85	127 / /
ASHLAND CHEMICAL	COOK	10/29/85	11/12/85	14	/ /	02/20/86	114 / /
ASTROBLAST, INC	COOK	06/03/86	06/05/86	2	/ /	07/16/86	43 / /
AT&T TECH SYSTEMS	COOK	11/08/85	12/02/85	24	01/24/86	03/24/86	136 01/24/86
AT&T TELETYPE CORP	COOK	04/09/86	04/11/86	2	/ /	05/16/86	37 / /
ATLAS PLATING WORKS	COOK	12/04/85	01/28/86	55	04/11/86	03/24/86	110 04/11/86
AUBBEY MFG. INC.	MCHENRY	04/09/86	04/11/86	2	/ /	05/01/86	22 / /
AUGUSTANA HOSPITAL	COOK	11/21/85	01/22/86	62	/ /	04/28/86	158 / /
AURORA CORD & CABLE	KENDALL	05/22/86	07/17/86	56	/ /	09/26/86	127 / /
AUTOMATIC DRAWN PROD.	COOK	06/04/86	06/06/86	2	/ /	07/03/86	29 / /
AUTOMATIC SPRING COIL.	COOK	06/02/86	06/04/86	2	/ /	06/13/86	11 / /
B & W CORPORATION	DUPAGE	07/10/85	08/08/85	29	11/15/85	09/02/86	419 11/15/85
BARBER-GREENE CO.	KANE	04/09/86	04/14/86	5	/ /	05/16/86	37 / /
BAUER ARNIE CAD.	COOK	06/02/86	06/04/86	2	/ /	06/17/86	15 / /
BRAVER OIL CO	COOK	03/18/86	04/14/86	27	06/18/86	05/30/86	73 06/18/86
BELL AND HOWELL CO.	COOK	06/04/86	06/06/86	2	/ /	06/23/86	19 / /
BELL LABORATORIES	DUPAGE	07/11/85	07/18/85	7	08/21/85	09/24/85	75 08/21/85
BENNETT INDUSTRIES	WILL	07/25/85	08/16/85	22	/ /	05/23/85	-63 / /
BFI-CBCOS	LAKE	04/14/86	/ /	0	06/05/86	06/17/86	64 06/05/86
BFI-CBCOS	LAKE	10/18/85	11/04/85	17	04/17/86	04/17/86	181 04/17/86
BIMET CORP.	GRUNDY	11/26/85	12/23/85	27	/ /	01/24/86	59 / /
BODINE ELECTRIC	COOK	07/18/85	08/08/85	21	/ /	09/27/85	71 / /
BORDEN CHEMICAL	KANE	03/19/86	04/30/86	42	/ /	05/30/86	72 / /
BORG SCALE/WST BEND	COOK	11/27/85	12/26/85	29	02/25/86	04/25/86	149 02/25/86
BORG-WARNER RESEARCH	COOK	02/11/86	02/28/86	17	/ /	04/10/86	58 / /
BRACO PLATING CO.	COOK	06/04/86	06/06/86	2	/ /	06/13/86	15 / /
BRAN AND LUBBE, INC.	COOK	06/02/86	06/04/86	2	/ /	07/03/86	31 / /
BRIGHTLY GALVANIZED	COOK	04/09/86	04/14/86	5	/ /	04/28/86	19 / /
BRITE-SOL	COOK	04/08/86	05/23/86	45	/ /	07/11/86	94 / /
BROWNING FERRIS IND.	LAKE	02/07/86	03/14/86	35	/ /	03/03/86	45 / /
BURGESS-NORTON	KANE	03/27/86	04/02/86	6	/ /	05/02/86	41 / /

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BURGESS WORTON MFG	TAHOE	08/10/85	02/06/86	20	03/14/86	04/24/86	254	03/14/86	
BURLINGTON WOODBURN	COOK	04/02/86	04/11/86	2	/ /	04/28/86	19	/ /	
INDIAN SPRING NO.	COOK	06/04/86	06/06/86	2	/ /	06/16/86	12	/ /	
THE METAL PROD.	COOK	06/04/86	06/06/86	2	/ /	06/16/86	12	/ /	
CAMPBELL AN CO. ART	DUPAGE	06/04/86	06/06/86	2	/ /	07/07/86	33	/ /	
CAMETCO, INC.	COOK	11/12/85	02/26/86	106	04/24/86	02/26/87	471	04/24/86	
CARGILL, INC.	KANE	03/27/86	05/01/86	35	/ /	06/05/86	70	/ /	
CARGILL, INC.	KANE	09/10/85	09/17/85	7	/ /	11/26/85	77	/ /	
CARGILL, INC.	COOK	09/17/85	09/17/85	0	/ /	11/26/85	70	/ /	
CARGILL, INC.	COOK	09/17/85	09/17/85	0	/ /	11/26/85	70	/ /	
CASTING ENG., QUAKER	COOK	04/04/86	04/08/86	4	/ /	06/02/86	59	/ /	
CBI INDUSTRIES BC	WILL	02/14/86	03/21/86	35	/ /	03/21/86	35	/ /	
CBI SERVICES	KANKAKEE	03/28/86	04/24/86	27	/ /	06/27/86	91	/ /	
CENTURY OIL	COOK	12/17/85	12/30/85	13	02/25/87	03/30/87	468	02/25/87	
CHEM WASTE MGMT	COOK	01/02/86	01/16/86	14	/ /	05/09/86	127	/ /	
CHEM-CLBAR, INC.	COOK	12/18/85	12/24/85	6	/ /	05/08/86	141	/ /	
CHEMICAL WASTE MGT.	COOK	06/04/86	06/06/86	2	/ /	07/23/86	49	/ /	
CHEMISPHERE, INC	COOK	04/01/86	04/03/86	2	/ /	07/07/86	97	/ /	
CHI PIN METALS	COOK	05/22/86	06/10/86	19	/ /	08/19/86	89	/ /	
CHICAGO AIR POWER, INC.	COOK	06/02/86	06/04/86	2	/ /	06/17/86	15	/ /	
CHICAGO MODERN PLAT.	COOK	04/09/86	04/11/86	2	/ /	05/23/86	44	/ /	
CHICAGO NAME PLATE	COOK	04/04/86	04/08/86	4	/ /	04/22/86	3671	/ /	
CHICAGOSTEEL&PICKL	COOK	04/28/86	05/02/86	4	/ /	06/10/86	43	/ /	
CHROME CRANKSHAFT	COOK	11/07/85	01/02/86	56	02/10/86	04/07/86	151	02/10/86	
CHROME-BITE CO	COOK	04/09/86	04/11/86	2	/ /	04/28/86	19	/ /	
CID #2	COOK	03/27/86	03/28/86	1	/ /	05/07/86	41	/ /	
CID 2 (ARBA 3)	COOK	06/17/86	06/20/86	3	07/14/86	10/03/86	108	07/14/86	
CID PROCESSING	COOK	03/27/86	04/02/86	6	/ /	05/07/86	41	/ /	
CIRCUIT INTRNL	DUPAGE	06/25/86	09/02/86	69	11/21/86	12/11/86	169	11/21/86	
CIRCUIT WORLD, INC.	COOK	06/04/86	06/06/86	2	/ /	06/26/86	22	/ /	
CITY OF CHICAGO ST.	COOK	06/02/86	06/04/86	2	/ /	06/27/86	25	/ /	
COCHRANE COMPRESSOR	COOK	06/04/86	06/06/86	2	/ /	06/16/86	12	/ /	
COLOB COMMUNICATION	COOK	08/06/85	03/13/86	219	02/20/87	04/16/87	618	02/20/87	
COLUMBIA TOOL&STEEL	COOK	04/01/86	04/03/86	2	/ /	04/08/86	7	/ /	
CON-ED, RIDGELAND	COOK	06/11/86	08/05/86	55	/ /	04/03/87	296	/ /	
CON-ED, RIDGELAND	COOK	06/11/86	08/05/86	55	/ /	04/03/87	296	/ /	
COMMERCE CLEARING	COOK	06/04/86	06/06/86	2	/ /	07/10/86	36	/ /	
CONSOLIDATED STAMP	COOK	06/04/86	06/06/86	2	/ /	06/19/86	15	/ /	
CONTINENTAL CAN	DUPAGE	04/01/86	04/03/86	2	/ /	05/01/86	30	/ /	
CONTINENTAL CAN PTS	COOK	03/20/86	04/09/86	20	/ /	05/12/86	53	/ /	
CORAL CHEMICAL, INC.	LAKE	06/04/86	06/06/86	2	/ /	06/15/86	11	/ /	
CORN PRODUCTS CO	COOK	04/04/86	04/09/86	5	/ /	04/28/86	24	/ /	
CUSTOM ORGANICS	COOK	11/27/85	12/20/85	23	/ /	04/10/86	134	/ /	
D.C. FRANCH CO	COOK	04/09/86	04/11/86	2	/ /	04/28/86	19	/ /	
D.R.&S.DISPLAYS	KANE	04/01/86	04/03/86	2	/ /	05/01/86	30	/ /	

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DAUBERT COATED PROD.	LEE	04/09/86	04/14/86		5 / /	04/28/86	19 / /
DEWEY & ALMY CHEM	COOK	09/16/85	09/25/85		9 11/04/85	01/06/86	112 11/04/85
DEWEY&ALMY CHEM DIV	COOK	02/27/86	03/19/86		20 / /	05/30/86	92 / /
DH & S DISPLAYS	KANE	12/12/85	01/10/86		29 / /	02/13/86	63 / /
DOB ARGONNE NAT LAB	DUPAGE	10/28/85	01/10/86		74 / /	02/27/86	122 / /
DRBISILKRE BLEC	DUPAGE	03/24/86	04/22/86		29 / /	06/05/86	73 / /
DUPAGE FOREST PRSRV	DUPAGE	11/14/85	12/09/85		25 / /	01/10/86	57 / /
DUPAGE PLATING	DUPAGE	02/26/86	04/03/86		36 06/23/86	10/20/86	236 06/23/86
DURACO, INC.	COOK	06/04/86	06/06/86		2 / /	06/19/86	15 / /
E.I. DuPONT DENEMOURS	COOK	04/09/86	04/11/86		2 / /	04/22/86	13 / /
BATON CORP	DUPAGE	03/27/86	05/08/86		42 / /	06/27/86	92 / /
ECM MOTOR	COOK	02/26/86	04/22/86		55 06/10/86	11/24/86	271 06/10/86
BDIT CHICAGO VIDEO	COOK	06/04/86	06/06/86		2 / /	07/17/86	43 / /
BLECPAC, INC	MCHENRY	04/01/86	04/03/86		2 / /	07/07/86	97 / /
ELECTRONIC PLATING	COOK	05/22/86	/ /		0 08/07/86	02/02/87	256 08/07/86
ESL	WILL	08/02/85	10/11/85		70 / /	03/05/86	215 / /
EUR-AM, INC	COOK	06/04/86	06/06/86		2 / /	07/03/86	29 / /
EVERPURE, INC.	DUPAGE	06/04/86	06/06/86		2 / /	06/23/86	19 / /
EWR, INC	GRUNDY	06/05/86	/ /		0 06/26/86	08/14/86	70 06/26/86
EWR, INC	GRUNDY	05/09/86	05/15/86		6 06/26/86	08/14/86	97 06/26/86
EXCELLO COLOR	COOK	10/11/85	10/29/85		18 / /	04/30/86	201 / /
EXHIBIT GROUP	COOK	04/25/86	05/23/86		28 / /	08/29/86	126 / /
F&B MANUF. CO.	COOK	06/04/86	06/06/86		2 / /	06/23/86	19 / /
FANSTBEL VR-WESSON	LAKE	01/08/86	02/27/86		50 / /	04/07/86	89 / /
FANSTBEL, INC.	LAKE	01/08/86	02/04/86		27 / /	03/12/86	63 / /
FANSTBEL, INC.	LAKE	04/01/86	04/03/86		2 / /	05/01/86	30 / /
FAUSKE & ASSOCIATES	DUPAGE	12/16/85	03/24/86		98 / /	04/16/86	121 / /
FEDERAL MOGUL	COOK	07/01/85	07/18/85		17 / /	06/11/86	345 / /
FERRI NAT ACCBL LAB	KANE	10/30/85	11/21/85		22 / /	01/07/86	69 / /
FIBLD CONTAINER CORP	COOK	04/04/86	04/09/86		5 / /	05/01/86	27 / /
FIBLD CONTAINER CORP.	COOK	04/01/86	04/09/86		8 / /	05/01/86	30 / /
FLENDER CORP.	KANE	06/26/86	09/02/86		68 10/30/86	12/15/86	172 10/30/86
FLORENCE CORP.	COOK	09/20/85	/ /		0 10/21/85	04/11/86	203 10/21/85
G.B.-M.A. MFG DIV	COOK	09/19/85	09/24/85		5 / /	11/01/85	43 / /
G.B.-SERVICE SHOP	COOK	09/19/85	09/24/85		5 / /	11/01/85	43 / /
GEARS SPROCKETS HDG	COOK	06/06/86	06/11/86		5 / /	06/30/86	24 / /
GENERAL AUTOMOTIVE	COOK	06/06/86	06/11/86		5 / /	07/03/86	27 / /
GENERAL ELEC.CO.	COOK	05/02/86	05/06/86		4 / /	05/21/86	19 / /
GENERAL ELECTRIC	COOK	03/14/86	04/16/86		33 / /	06/05/86	83 / /
GENERAL ELECTRIC	COOK	03/14/86	04/16/86		33 / /	06/05/86	83 / /
GENERAL FOODS CORP.	COOK	06/06/86	06/11/86		5 / /	06/27/86	21 / /
GENERAL INSTRUMENT	COOK	04/09/86	04/15/86		6 / /	05/19/86	40 / /
GENERAL INSTRUMENT	COOK	04/09/86	04/15/86		6 / /	05/19/86	40 / /
GENERAL INSTRUMENT	LAKE	08/19/85	08/28/85		9 / /	12/23/85	126 / /
GENERAL PACK PROD	COOK	01/10/86	03/24/86		73 / /	03/24/86	73 / /

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GENERAL TUBE CORP	COOK	05/02/86	05/06/86	4	/ /	05/19/86	17 / /
GEORGIA-PACIFIC	WILL	07/03/85	07/23/85	20	/ /	08/08/85	36 / /
GETTY SYN FUELS	COOK	01/13/86	01/28/86	15	/ /	05/08/86	115 / /
GETTY SYN FUELS	COOK	01/13/86	01/28/86	15	/ /	05/09/86	116 / /
GILBERT & BENNETT	COOK	03/18/86	03/21/86	3	05/15/86	01/28/87	316 05/15/86
GILBERT & BENNETT	COOK	03/25/86	04/10/86	16	/ /	05/30/86	66 / /
GILBERT&BENNETT MFG.	COOK	04/09/86	04/11/86	2	/ /	04/28/86	19 / /
GMC ELECTROMO. DIV	COOK	02/24/86	03/05/86	9	/ /	03/25/86	29 / /
GOLD SHIELD SCI.	COOK	05/05/86	05/13/86	8	/ /	05/29/86	24 / /
GOLD SHIELD SOLV	COOK	03/04/86	03/25/86	21	/ /	05/01/86	58 / /
GRAPHIC IMPRESSIONS	COOK	06/06/86	06/11/86	5	/ /	06/24/86	18 / /
GRAVURE PRINTING	DUPAGE	03/27/86	05/08/86	42	/ /	07/15/86	110 / /
GRIFF BROTHERS	COOK	06/17/86	07/18/86	31	10/30/86	12/23/86	189 10/30/86
GTE COMMUNICATIONS	COOK	02/28/86	03/25/86	25	/ /	05/27/86	88 / /
GUARDIAN ELBCT #2	MCHENRY	01/10/86	02/21/86	42	/ /	04/03/86	83 / /
GUARDIAN ELBCT MFG.	MCHENRY	01/10/86	03/24/86	73	/ /	04/29/86	109 / /
GUARDIAN ELECTRIC	MCHENRY	04/22/86	04/25/86	3	/ /	05/16/86	24 / /
GULF &MIDWEST ZINC	COOK	06/15/86	06/26/86	11	/ /	08/11/86	57 / /
H. KOHNSTAMM & CO.	COOK	06/06/86	06/11/86	5	/ /	06/20/86	14 / /
H.BOSKIN MOTOR SER.	COOK	06/15/86	07/02/86	17	/ /	08/07/86	53 / /
HAEGER POTTERIES	KANE	02/26/86	05/19/86	82	/ /	08/29/86	184 / /
HAEGER POTTERIES	KANE	05/12/86	05/19/86	7	/ /	08/29/86	109 / /
HAMILTON PAX, INC.	COOK	06/06/86	06/11/86	5	08/05/86	09/08/86	94 08/05/86
HARVARD PRECISION	MCHENRY	02/14/86	03/07/86	21	/ /	04/08/86	53 / /
HEALTHCARE LABBLS	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17 / /
HEICK DIE CASTING	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17 / /
HBLBNE CURTIS IND.INC.	COOK	04/09/86	04/14/86	5	/ /	04/28/86	19 / /
HENDRICKSON MFG.	DUPAGE	01/16/86	02/07/86	22	/ /	04/07/86	81 / /
HEWELL CORP.	KANKAKEE	05/23/86	08/25/86	94	/ /	11/05/86	166 / /
HENRY VALVE CO.	COOK	12/23/85	01/07/86	15	/ /	03/13/86	80 / /
HORIZON SCREEN PRINT	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17 / /
HOUSEHOLD MRECH. INC.	COOK	06/06/86	06/11/86	5	/ /	07/02/86	26 / /
HUGHES OPTICAL PROD.	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17 / /
HYDROSOL, INC.	COOK	02/06/86	02/27/86	21	03/27/86	04/30/86	83 03/27/86
IDBAL ROLLER & GRAPH	COOK	04/28/86	05/02/86	4	/ /	05/16/86	18 / /
IFF HYDRAULICS	COOK	03/06/86	03/27/86	21	05/15/86	09/26/86	204 05/15/86
IFF HYDRAULICS	COOK	03/06/86	03/27/86	21	05/01/86	07/31/86	147 05/01/86
ILLINOIS FABRICATORS	KANKAKEE	04/09/86	04/11/86	2	/ /	07/07/86	89 / /
IMPERIAL PLATING, INC.	COOK	06/06/86	06/11/86	5	/ /	06/25/86	19 / /
INDEP TANK CLEAN	WILL	11/26/85	/ /	0	12/13/85	02/27/86	93 12/13/85
INMARK METALABS	COOK	06/06/86	06/11/86	5	/ /	06/20/86	14 / /
INMONT CORPORATION	COOK	09/17/85	10/08/85	21	/ /	11/12/85	56 / /
INTERNATIONAL HOUGH	LAKE	07/30/85	08/30/85	31	/ /	10/16/85	78 / /
IRCON, INC.	COOK	06/06/86	06/11/86	5	/ /	06/30/86	24 / /
ITC FLAVOR & FRAG.	COOK	06/06/86	06/11/86	5	/ /	06/20/86	14 / /

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JAMES ELECTRONICS	COOK	04/09/86	04/15/86	6	/ /	05/01/86	22	/ /
JANSEN ART STUDIO	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17	/ /
JEMISON ELECTRIC	MCHENRY	06/06/86	06/11/86	5	/ /	06/23/86	17	/ /
JERO STEEL TREATING	COOK	12/05/85	01/02/86	28	/ /	09/02/86	271	/ /
JERO STEEL TREATING	COOK	12/05/85	01/03/86	29	/ /	09/02/86	271	/ /
JOANNA WESTERN MILL	COOK	07/19/85	08/19/85	31	/ /	11/04/85	108	/ /
JOSLYN MFG. & SUPPLY	COOK	05/02/86	05/06/86	4	/ /	05/21/86	19	/ /
K.A. STEEL CHEMICAL	COOK	07/30/85	08/06/85	7	/ /	04/16/87	625	/ /
KING FISHER	COOK	06/06/86	06/11/86	5	/ /	06/23/86	17	/ /
KOPPERS CO. INC	COOK	03/07/86	04/10/86	34	/ /	05/30/86	84	/ /
KRACK CORP	DUPAGE	12/04/85	03/14/86	100	/ /	05/07/86	154	/ /
L & S INDUSTRIES	DUPAGE	06/05/86	06/16/86	11	/ /	07/11/86	36	/ /
LAND & LAKES #3	COOK	03/25/86	04/03/86	9	/ /	04/22/87	393	/ /
LASERAGE TECH.	LAKE	06/06/86	06/11/86	5	/ /	06/20/86	14	/ /
LENZ OIL SERVICE	DUPAGE	04/01/86	04/03/86	2	/ /	04/24/86	23	/ /
LIBERTY COPPER/WIRE	DUPAGE	11/26/85	12/13/85	17	02/11/86	05/09/86	164	02/11/86
LIGHTING PRODUCTS	LAKE	04/09/86	04/11/86	2	/ /	04/28/86	19	/ /
LINDBERG HEAT TREAT	COOK	11/12/85	/ /	0	11/22/85	05/28/87	562	11/22/85
LINDBERG HEAT TREAT	COOK	08/06/85	09/24/85	49	/ /	10/29/85	84	/ /
LINE TOOL & STAMPING	COOK	06/15/86	07/08/86	23	/ /	08/05/86	51	/ /
LISSNER CORP	COOK	09/10/85	01/03/86	115	/ /	05/30/86	262	/ /
LOCKFORMER COMPANY	DUPAGE	11/14/85	12/16/85	32	01/28/86	03/12/86	118	01/28/86
LOVEJOY ELECTRONICS	DUPAGE	04/04/86	04/08/86	4	/ /	05/16/86	42	/ /
LTV (REPUBLIC) STL.	COOK	08/19/85	08/28/85	9	/ /	12/23/85	126	/ /
LTV STEEL	COOK	03/02/86	04/10/86	39	/ /	06/04/86	94	/ /
LUDWIG IND., INC.	COOK	04/09/86	04/14/86	5	/ /	05/09/86	30	/ /
M&W LABORATORIES, INC.	COOK	04/04/86	04/09/86	5	/ /	08/29/86	147	/ /
MACHINED PRODUCTS	COOK	06/18/86	06/20/86	2	/ /	07/10/86	22	/ /
MAGIE BROS.	COOK	08/19/85	09/09/85	21	11/04/85	04/20/87	609	11/04/85
MAJOR CORPORATION	COOK	01/06/86	/ /	0	01/14/86	01/22/87	381	01/14/86
MAJOR CORPORATION	COOK	10/24/85	11/21/85	28	01/14/86	01/24/86	92	01/14/86
MALCO, A MICRODOT CO.	COOK	04/01/86	04/07/86	6	/ /	07/07/86	97	/ /
MALCO, MICRODOT CO.	COOK	01/15/86	02/20/86	36	/ /	04/07/86	82	/ /
MARISON COMPANY	KANE	09/20/85	10/17/85	27	/ /	12/27/85	98	/ /
MASONITE CORP.	DUPAGE	09/06/85	10/04/85	28	/ /	02/03/86	150	/ /
MASURY COLUMBIA	COOK	06/18/86	06/24/86	6	/ /	07/07/86	19	/ /
MCKESSON CHEM CO.	COOK	03/25/86	04/16/86	22	/ /	05/29/86	65	/ /
MCWHORTER, INC.	KANE	10/30/85	11/06/85	7	/ /	02/03/86	96	/ /
MEAD CONTAINERS	COOK	12/17/85	/ /	0	01/06/86	05/12/87	511	01/06/86
MEAD FLUID DYNAMICS	COOK	05/02/86	05/06/86	4	/ /	05/23/86	21	/ /
MECH-TRONICS CO.	COOK	06/18/86	06/24/86	6	/ /	06/30/86	12	/ /
MECH-TRONICS CORP	COOK	03/07/86	04/16/86	40	06/18/86	07/31/86	146	06/18/86
MERKLE-KORFF IND.	COOK	06/18/86	06/24/86	6	/ /	07/16/86	28	/ /
METAL BOX CORP	COOK	03/11/86	04/17/86	37	07/08/86	06/23/86	104	07/08/86
METAL BOX CORP.	COOK	03/11/86	04/17/86	37	06/12/86	06/23/86	104	06/12/86

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MBTPATH, INC.	COOK	06/18/86	06/20/86	2	/ /	07/02/86	14 / /
MID-AMERICA PROTECTIVE	COOK	04/09/86	04/14/86	5	/ /	04/28/86	19 / /
MID-WEST SPRING	WILL	04/01/86	04/09/86	8	/ /	05/16/86	45 / /
MID-WEST SPRING	WILL	04/09/86	04/29/86	20	/ /	05/19/86	40 / /
MIDWEST DRCKS	DUPAGE	01/29/86	/ /	0	03/12/86	05/30/86	121 03/12/86
MIDWEST DRCKS	DUPAGE	01/29/86	/ /	0	03/03/86	06/12/86	134 03/03/86
MIDWEST BLECTRIC	COOK	09/06/85	10/04/85	28	/ /	11/12/85	67 / /
MIDWEST-DIV/SYBRON	COOK	05/02/86	05/06/86	4	/ /	05/23/86	21 / /
MIXING EQUIPMENT CO	DUPAGE	06/18/86	06/20/86	2	/ /	07/07/86	19 / /
MLW PRODUCTS	COOK	05/12/86	/ /	0	07/02/86	08/29/86	109 07/02/86
MLW PRODUCTS, INC.	COOK	04/09/86	04/15/86	6	/ /	06/19/86	71 / /
MOLON MOTOR & COIL	COOK	06/18/86	06/20/86	2	/ /	07/14/86	26 / /
MOODY BIBLE INS.	COOK	06/18/86	06/20/86	2	/ /	07/07/86	19 / /
MORAIN VALLY COMM.	COOK	06/18/86	06/20/86	2	/ /	08/20/86	63 / /
MORAIN VALLY COMM.	COOK	06/18/86	06/20/86	2	/ /	08/20/86	63 / /
MORGAN O'HARE, INC	DUPAGE	06/18/86	06/20/86	2	/ /	07/28/86	40 / /
MORTON METALCRAFT CO	TAZEWELL	04/09/86	04/11/86	2	/ /	04/28/86	19 / /
MORTON THIKOL	COOK	02/13/86	03/07/86	22	/ /	04/10/86	56 / /
MSCI, LTD.	COOK	08/22/85	09/10/85	19	/ /	10/29/85	68 / /
MULTIGRAPHICS	COOK	07/10/85	07/30/85	20	/ /	09/09/85	61 / /
McKESSON CHEM CO	COOK	03/25/86	04/16/86	22	/ /	05/29/86	65 / /
McKESSON ENV.	COOK	04/01/86	04/03/86	2	/ /	04/17/86	16 / /
NABISCO BRANDS INC.	COOK	06/18/86	06/20/86	2	/ /	07/02/86	14 / /
NATICO, INC.	COOK	04/04/86	04/08/86	4	/ /	05/01/86	27 / /
NATIONAL CASTINGS	COOK	09/23/85	09/23/85	0	/ /	10/30/85	37 / /
NATIONAL ELECTRONIC	KANE	01/09/86	02/05/86	27	06/10/86	07/25/86	197 06/10/86
NATIONAL MATERIAL CO.	COOK	06/18/86	06/20/86	2	/ /	07/02/86	14 / /
NATIONAL TOTE BIN	KANKAKEE	06/18/86	06/20/86	2	/ /	06/26/86	8 / /
NAVY PUBLIC WORKS CT	LAKE	04/01/86	04/09/86	8	07/16/86	10/08/86	190 07/16/86
NELSON WIRE CO.	COOK	10/23/85	11/12/85	20	/ /	05/09/86	198 / /
NOBERT PLATING CO	COOK	04/04/86	04/09/86	5	/ /	05/01/86	27 / /
NOR-AM AGRI.PRODUCTS	DUPAGE	05/02/86	05/07/86	5	/ /	05/13/86	11 / /
NORTHERN PETROCHEM	GRUNDY	04/21/86	/ /	0	04/25/86	06/06/86	46 04/25/86
NORTHERN PETROCHEM	GRUNDY	03/26/86	04/01/86	6	04/25/86	06/06/86	72 04/25/86
NORTHERN PETROCHEM	GRUNDY	04/04/86	04/10/86	6	/ /	07/08/86	95 / /
NORTHWESTERN CHEM.	DUPAGE	07/08/85	07/26/85	18	/ /	05/07/87	668 / /
NORTHWESTERN GOLF	COOK	05/02/86	05/06/86	4	/ /	05/21/86	19 / /
NOSCO INC.	LAKE	06/18/86	06/20/86	2	/ /	07/14/86	26 / /
OAK SWITCH SYSTEMS	MCHENRY	03/21/86	04/23/86	33	/ /	06/19/86	90 / /
OAK SWITCH SYSTEMS	MCHENRY	09/04/85	09/04/85	0	09/04/85	11/27/85	84 09/04/85
OLYMPIC CONTROLS CORP.	KANE	06/18/86	06/20/86	2	/ /	07/22/86	34 / /
OPTIFEX INC.	COOK	06/18/86	06/20/86	2	/ /	07/08/86	20 / /
OWENS-ILLINOIS	DUPAGE	04/22/86	04/25/86	3	/ /	05/15/86	23 / /
OXEQUIP HEALTH	COOK	06/18/86	06/20/86	2	/ /	07/01/86	13 / /
PARCO PRODUCTS	COOK	06/15/86	07/02/86	17	/ /	08/05/86	51 / /

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PHILLIPS MFG. CO.	COOK	11/08/85	/ /	0	11/15/85	05/04/87	542 11/15/85
PHILLIPS MFG. CO.	COOK	09/12/85	09/19/85	7	11/15/85	05/04/87	599 11/15/85
PIELET BROTHERS	COOK	04/21/86	05/27/86	36	/ /	06/18/86	58 / /
PLAYSKOOL, INC.	COOK	04/04/86	04/08/86	4	/ /	04/28/86	24 / /
PORTER EQUIP. CO.	COOK	04/09/86	04/15/86	6	/ /	04/28/86	19 / /
PRINTPACK, INC	KANE	05/02/86	05/06/86	4	/ /	05/21/86	19 / /
PROCTOR & GAMBLER	COOK	10/07/85	/ /	0	11/04/85	01/10/86	95 11/04/85
PROD FIN & FABRIC	COOK	08/27/85	09/17/85	21	02/13/86	05/30/86	276 02/13/86
PRODUCT FIN/FABRIC	COOK	01/15/86	/ /	0	02/28/86	05/30/86	135 02/28/86
PRYOR INDUSTRIES	DUPAGE	04/04/86	04/08/86	4	/ /	04/15/86	11 / /
PVS CHEMICAL CO.	COOK	08/08/85	10/02/85	55	11/18/85	06/04/87	665 11/18/85
PVS CHEMICALS, INC	COOK	03/25/86	04/10/86	16	/ /	05/30/86	66 / /
R R BRINK LOCK SYST	WILL	12/30/85	02/14/86	46	/ /	03/13/86	73 / /
RADCO INDUSTRIES	KANE	11/12/85	01/08/86	57	/ /	07/25/86	255 / /
RAYMOND CONTROL ST.	COOK	04/04/86	04/08/86	4	/ /	05/08/86	34 / /
RECON OPTICAL	LAKE	05/01/86	05/13/86	12	/ /	05/23/86	22 / /
REFLECTOR HARDWARE	COOK	12/17/85	01/13/86	27	/ /	04/09/86	113 / /
RELIABLE ELECTRIC	COOK	04/15/86	05/05/86	20	/ /	05/23/86	38 / /
RELIABLE ELECTRIC	COOK	07/15/85	07/29/85	14	09/16/85	04/22/87	646 09/16/85
RESINOID ENG. CORP.	COOK	04/09/86	04/14/86	5	/ /	04/28/86	19 / /
RHO CHEMICAL	WILL	01/23/86	02/28/86	36	/ /	05/07/86	104 / /
RICHARDSON GRAPHICS	COOK	04/28/86	05/01/86	3	/ /	05/12/86	14 / /
ROCK MACHINE TOOL	WINNEBAGO	04/09/86	04/14/86	5	/ /	04/22/86	13 / /
ROY C. INGERSOLL	COOK	07/18/85	08/01/85	14	/ /	03/03/86	228 / /
RR BRINK LOCKING SYS	WILL	06/04/86	06/06/86	2	/ /	06/19/86	15 / /
S C INDUSTRIES, INC	COOK	03/10/86	03/20/86	10	/ /	06/11/86	93 / /
S&R METAL CO.	COOK	04/04/86	04/08/86	4	/ /	05/16/86	42 / /
SAFETY KLEEN	COOK	03/01/86	04/04/86	34	09/30/86	08/04/86	156 09/30/86
SAFETY KLEEN	COOK	06/09/86	06/12/86	3	/ /	09/08/86	91 / /
SAFETY KLEEN	COOK	06/09/86	06/12/86	3	/ /	09/08/86	91 / /
SAFETY KLEEN	COOK	06/09/86	06/12/86	3	/ /	09/08/86	91 / /
SAFETY KLEEN	COOK	06/09/86	06/12/86	3	/ /	09/08/86	91 / /
SAFETY KLEEN	WILL	06/09/86	06/12/86	3	/ /	09/08/86	91 / /
SAFETY KLEEN CORP	COOK	05/01/86	05/16/86	15	/ /	06/18/86	48 / /
SAPORITO PLATING CO	COOK	05/19/86	06/11/86	23	/ /	08/19/86	92 / /
SCA CHEMICAL	COOK	01/16/86	01/24/86	8	/ /	02/24/86	39 / /
SEARLE PHARMACEUTICAL	COOK	04/09/86	04/11/86	2	/ /	05/01/86	22 / /
SHERWIN WILLIAMS	COOK	03/27/86	04/01/86	5	05/16/86	07/18/86	113 05/16/86
SHERWIN WILLIAMS	COOK	03/27/86	04/01/86	5	05/16/86	07/18/86	113 05/16/86
SHERWIN WILLIAMS	COOK	04/09/86	04/11/86	2	/ /	04/28/86	19 / /
SHERWIN-WILLIAMS	COOK	03/31/86	04/03/86	3	/ /	08/07/86	129 / /
SHURE BROS., INC.	COOK	04/09/86	04/14/86	5	/ /	05/16/86	37 / /
SID HARVEY SUPPLY	DUPAGE	06/06/86	06/11/86	5	/ /	07/08/86	32 / /
SIGNAL RESEARCH INC	COOK	03/05/86	03/19/86	14	/ /	05/13/86	69 / /
SIGNODE CORPORATION	COOK	05/29/86	07/02/86	34	09/16/86	08/26/86	89 09/16/86

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SINCLAIR VALENTINE	COOK	05/02/86	05/06/86	4	/ /	06/10/86	39 / /
SOO LINE RAILROAD	DUPAGE	04/30/86	07/02/86	63	/ /	09/26/86	149 / /
SOUTHERN CA. CHEM. SPECIFIED PLATING	MCHENRY	02/13/86	03/21/86	36	06/24/86	06/30/86	137 06/24/86
ST. OF IL. CENT. MAG.	COOK	04/21/86	05/16/86	25	/ /	06/11/86	51 / /
STANADYNE INC	COOK	06/06/86	06/11/86	5	/ /	08/19/86	74 / /
STANADYNE INC.	COOK	02/14/86	03/07/86	21	04/21/86	05/12/86	87 04/21/86
STANADYNE-CHGO DIV	COOK	02/14/86	03/07/86	21	04/21/86	05/12/86	87 04/21/86
STANADYNE-CHGO DIV	COOK	09/09/85	/ /	0	09/23/85	01/09/86	122 09/23/85
STANADYNE-CHGO DIV	COOK	07/17/85	07/29/85	12	09/23/85	01/09/86	176 09/23/85
STEMBRIDGE MANUF.	DUPAGE	03/04/86	05/19/86	76	07/11/86	07/11/86	129 07/11/86
STEPAN COMPANY	WILL	07/30/85	10/10/85	72	03/13/86	02/14/86	199 03/13/86
STEPAN COMPANY	WILL	07/19/85	10/10/85	83	/ /	07/10/87	721 / /
STEWART-WARNER	COOK	09/17/85	10/09/85	22	/ /	04/24/86	219 / /
SULLIVAN VARNISH CO.	COOK	04/04/86	04/09/86	5	/ /	05/01/86	27 / /
SUN CHEMICAL CORP	KANKAKEE	05/02/86	07/29/86	88	/ /	09/04/86	125 / /
SURAK LEATHER CORP.	COOK	10/02/85	/ /	0	11/07/85	03/24/86	173 11/07/85
SWITCHCRAFT, INC.	COOK	05/02/86	05/07/86	5	/ /	05/23/86	21 / /
TECHALLOY ILLINOIS	MCHENRY	07/15/85	09/09/85	56	11/05/85	02/14/86	214 11/05/85
TECHNICAL PETROLEUM	COOK	05/28/86	06/16/86	19	01/22/87	04/10/87	317 01/22/87
TECHNICAL PETROLEUM	COOK	05/28/86	06/16/86	19	01/22/87	04/10/87	317 01/22/87
TEXACO-LOCKPORT	WILL	03/27/86	04/01/86	5	/ /	04/16/86	20 / /
THE MACKINNEY CO.	COOK	06/18/86	06/20/86	2	/ /	07/03/86	15 / /
THOMAS STEEL	WILL	03/28/86	04/16/86	19	/ /	05/21/86	54 / /
THOMAS STEEL CRCO	WILL	09/18/85	09/27/85	9	04/09/86	06/12/86	267 04/09/86
THOMAS STEEL-CRCO	WILL	03/03/86	03/12/86	9	/ /	04/25/86	53 / /
TRANSFORMER MFG	COOK	05/16/86	/ /	0	07/02/86	10/31/86	168 07/02/86
U.S. PACKAGING CORP	COOK	07/10/85	08/08/85	29	/ /	11/04/85	117 / /
U.S. ARMY-JOILET	WILL	03/25/86	04/03/86	9	/ /	07/25/86	122 / /
U.S. ARMY-JOILET	WILL	02/20/86	05/08/86	77	/ /	07/25/86	155 / /
U.S. ARMY-JOILET	WILL	02/20/86	05/08/86	77	06/26/86	09/02/86	194 06/26/86
U.S. CAN COMPANY	COOK	04/24/86	07/16/86	83	/ /	12/18/86	238 / /
U.S. NAVAL BASE	LAKE	11/13/85	01/29/86	77	03/12/86	06/27/86	226 03/12/86
U.S. NAVY EXCHANGE	LAKE	11/13/85	12/16/85	33	02/11/86	10/30/86	351 02/11/86
UNION OIL	WILL	07/01/85	08/05/85	35	/ /	01/10/86	193 / /
UNION OIL CO	WILL	05/16/86	/ /	0	/ /	07/25/86	70 / /
UOP FLXONICS DIV	COOK	09/10/85	/ /	0	09/23/85	02/06/86	149 09/23/85
VALSPAR CORP	COOK	05/02/86	05/06/86	4	/ /	05/29/86	27 / /
WABASH DATATECH, INC.	MCHENRY	04/09/86	04/14/86	5	/ /	04/28/86	19 / /
WEST-TRONICS	DUPAGE	07/30/85	09/06/85	38	/ /	12/12/85	135 / /
WESTELL, INC.	DUPAGE	11/04/85	12/19/85	45	/ /	12/18/85	44 / /
WESTERN KRAFT PAPER	COOK	10/28/85	12/12/85	45	01/13/86	04/03/86	157 01/13/86
WILSON JONES CO.	COOK	04/28/86	05/01/86	3	/ /	06/02/86	35 / /
WITCO CHEMICAL	COOK	08/09/85	/ /	0	08/19/85	11/04/85	87 08/19/85
WITCO CORPORATION	COOK	02/21/86	03/19/86	26	/ /	04/22/86	60 / /
WOODSTOCK DIE CAST	MCHENRY	08/30/85	10/04/85	35	/ /	02/04/86	158 / /

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ZEGERS INC	COOK	02/11/86	03/28/86	45	05/15/86	06/27/86	136 05/15/86
ZENITH RADIO CORP	COOK	04/28/86	05/02/86	4	/ /	06/16/86	49 / /
* REGION 3							
A.A.WASTE OIL	ROCK ISLAND	10/07/85	01/14/86	99	04/21/86	04/21/86	196 04/21/86
ARATBX SERVICES	ROCK ISLAND	08/30/85	10/08/85	39	/ /	12/03/85	95 / /
BRADFORD IND., INC.	STARK	06/02/86	06/04/86	2	/ /	06/11/86	9 / /
CARL SANDBURG COL	KNOX	01/30/86	03/25/86	54	/ /	06/12/86	133 / /
CATERPILLAR	PEORIA	05/09/86	07/02/86	54	/ /	07/03/86	55 / /
CATERPILLAR #2	PEORIA	02/10/86	04/16/86	65	/ /	05/19/86	98 / /
CATERPILLAR TRACTOR	PEORIA	02/28/86	04/17/86	48	/ /	06/24/86	116 / /
CATERPILLAR TRACTOR CO	TAZEWELL	09/06/85	10/08/85	32	/ /	04/25/86	231 / /
CHROME LOCOMOTIVE.	ROCK ISLAND	06/04/86	06/06/86	2	/ /	06/23/86	19 / /
DMI	WOODFORD	11/21/85	01/13/86	53	/ /	02/24/86	95 / /
FLEMMING-POTTER	PEORIA	01/22/86	02/18/86	27	/ /	04/24/86	92 / /
GLIDE AWAY	PEORIA	01/17/86	01/24/86	7	03/07/86	09/18/86	244 03/07/86
HARRINGTON SIGNAL	ROCK ISLAND	09/06/85	10/04/85	28	/ /	02/28/86	175 / /
INTERNATIONAL PAPPE	PEORIA	05/05/86	05/19/86	14	/ /	06/09/86	35 / /
JOHN DEERE FOUNDRY	ROCK ISLAND	08/08/85	10/07/85	60	12/05/85	01/07/86	152 12/05/85
JOHN DEERE PARTS	ROCK ISLAND	09/11/85	10/04/85	23	/ /	11/07/85	57 / /
JOHN DEERE PLOW	ROCK ISLAND	09/13/85	10/01/85	18	/ /	11/13/85	61 / /
KEYSTONE STEEL	PEORIA	03/25/86	04/16/86	22	/ /	05/30/86	66 / /
KOPPPERS CO	KNOX	08/01/85	10/09/85	69	/ /	02/28/86	211 / /
KOPPPERS CO	KNOX	08/01/85	10/09/85	69	08/25/86	08/29/86	393 08/25/86
LIBBY OWENS FORD	LASALLE	01/16/86	03/25/86	68	/ /	05/30/86	134 / /
MCKAY PLATING	ROCK ISLAND	01/09/86	02/18/86	40	04/15/86	05/07/86	118 04/15/86
METAMORA IND INC	WOODFORD	01/31/86	02/14/86	14	03/20/86	08/22/86	203 03/20/86
McLAUGHLIN BODY	ROCK ISLAND	09/03/85	10/04/85	31	12/04/85	05/19/87	623 12/04/85
NSM INC	LASALLE	01/07/86	01/30/86	23	/ /	04/01/86	84 / /
PARSONS CO	WOODFORD	02/14/86	04/24/86	69	06/25/86	05/23/86	98 06/25/86
PBARSON INDUSTRIES	HENRY	02/20/86	02/26/86	6	/ /	06/12/86	112 / /
PEORIA DISPOSAL	PEORIA	02/07/86	03/11/86	32	/ /	04/01/86	53 / /
PEORIA DISPOSAL	PEORIA	03/27/86	04/01/86	5	/ /	04/24/86	28 / /
PEORIA DISPOSAL	PEORIA	04/17/86	04/30/86	13	/ /	06/16/86	60 / /
ROCKNER'S	TAZEWELL	06/25/86	08/22/86	58	/ /	01/12/87	201 / /
SAFETY-KLEEN	TAZEWELL	06/09/86	06/12/86	3	/ /	09/10/86	93 / /
STANDARD FORWARDING	ROCK ISLAND	02/07/86	03/11/86	32	/ /	04/21/86	73 / /
SUNSET HILLS CC	TAZEWELL	01/31/86	05/08/86	97	/ /	09/26/86	238 / /
UNR-ROHN	PEORIA	05/07/86	07/29/86	83	/ /	07/29/86	83 / /
WEBB-ROTE INC	PEORIA	01/22/86	02/26/86	35	06/05/86	08/29/86	219 06/05/86
* REGION 4							
A E STALEY	MACON	11/15/85	03/28/86	133	08/01/86	08/25/86	283 08/01/86
AMERICAN X-RAY	CHAMPAIGN	07/23/85	10/04/85	73	12/05/85	02/18/86	210 12/05/85
C E CARPENTER	DOUGLAS	07/12/85	/ /	0	07/26/85	12/30/85	171 07/26/85

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CABOT CHEM CORP	DOUGLAS	07/25/85	08/19/85	25	/ /	09/03/85	40	/ /
CABOT CORPORATION	DOUGLAS	05/13/86	05/16/86	3	/ /	06/12/86	30	/ /
CABOT CORPORATION	DOUGLAS	03/25/86	06/26/86	93	/ /	09/08/86	167	/ /
CATERPILLAR TRACTOR	MACON	12/19/85	03/04/86	75	06/20/86	07/08/86	201	06/20/86
CBLOTEX CORP	COLES	02/25/86	05/08/86	72	06/20/86	08/29/86	185	06/20/86
CONTINENTAL CAN	VERMILION	04/24/86	05/15/86	21	/ /	06/18/86	55	/ /
CORE-LUBE	VERMILION	08/27/85	/ /	0	10/03/85	01/31/86	157	10/03/85
DECATUR CONTAINER	MACON	10/09/85	12/27/85	79	03/12/86	05/30/86	233	03/12/86
DECATUR PLATING	MACON	03/20/86	05/22/86	63	08/15/86	10/31/86	225	08/15/86
ELMCO, INC.	MCLBAN	06/04/86	06/06/86	2	/ /	06/23/86	19	/ /
BUREKA CO	MCLBAN	06/26/86	09/02/86	68	/ /	10/28/86	124	/ /
FIRESTONE TIRE	MACON	02/13/86	/ /	0	05/23/86	08/29/86	197	05/23/86
FLO-CON SYSTEMS, INC.	CHAMPAIGN	04/28/86	05/02/86	4	/ /	05/08/86	10	/ /
FLO-CON SYSTEMS, INC.	CHAMPAIGN	05/02/86	05/06/86	4	/ /	05/16/86	14	/ /
FMC CORPORATION	VERMILION	08/28/85	09/24/85	27	/ /	01/31/86	156	/ /
FMC CORPORATION	VERMILION	09/19/85	09/24/85	5	/ /	01/31/86	134	/ /
GEN ELECT LAMP PLT	COLES	09/19/85	09/24/85	5	/ /	11/04/85	46	/ /
GENERAL ELECTRIC	MCLBAN	09/19/85	09/24/85	5	/ /	01/31/86	134	/ /
GENERAL ELECTRIC CO	MCLBAN	02/27/86	05/19/86	81	08/27/86	08/05/86	159	08/27/86
GMC BEN FOUNDRY DIV	VERMILION	02/24/86	03/03/86	7	/ /	03/24/86	28	/ /
ILL. DEPT. OF TRANS.	COOK	06/06/86	06/11/86	5	/ /	06/20/86	14	/ /
ILLINOIS POWER	DEWITT	09/10/85	09/27/85	17	/ /	11/12/85	63	/ /
ILLINOIS POWER CO	DEWITT	05/29/86	10/07/86	131	12/15/86	01/16/87	232	12/15/86
J H CLOUGH SERVICE	EFFINGHAM	06/11/86	06/25/86	14	/ /	07/18/86	37	/ /
MARATHON OIL CO	CRAWFORD	03/26/86	04/01/86	6	/ /	04/23/86	28	/ /
MARATHON OIL CO	CRAWFORD	03/25/86	04/10/86	16	/ /	05/30/86	66	/ /
MCKESSON CHEM	MCLBAN	10/29/85	01/10/86	73	/ /	03/27/86	149	/ /
MBANS SERVICES, INC.	MACON	12/10/85	02/05/86	57	/ /	04/01/86	112	/ /
MUELLER CO.	MACON	09/09/85	10/02/85	23	12/03/85	12/03/85	85	12/03/85
P.P.G. INDUSTRIES	MACON	01/24/86	04/17/86	83	/ /	07/22/86	179	/ /
PEABODY MYERS	LIVINGSTON	05/12/86	12/23/86	225	/ /	06/08/87	392	/ /
PBRERLESS OF AMERICA	EFFINGHAM	07/22/85	09/10/85	50	09/26/85	02/28/86	221	09/26/85
PBRERLESS OF AMERICA	EFFINGHAM	07/22/85	09/10/85	50	09/26/85	03/05/86	226	09/26/85
PETERSON-PURITAN	VERMILION	07/31/85	/ /	0	11/06/85	01/31/86	184	11/06/85
PETERSON-PURITAN	VERMILION	08/07/85	08/09/85	2	09/19/85	01/31/86	177	09/19/85
PETERSON-PURITAN	VERMILION	07/23/85	08/09/85	17	/ /	09/16/85	55	/ /
PULLMAN-TRAILMOBILE	COLES	08/08/85	09/25/85	48	12/23/85	01/31/86	176	01/17/86
PULLMAN-TRAILMOBILE	COLES	08/08/85	09/25/85	48	12/23/85	05/07/86	272	12/23/85
PULLMAN-TRAILMOBILE	COLES	09/19/85	09/25/85	6	12/23/85	05/14/87	602	12/23/85
R R DONNELLY	LIVINGSTON	12/16/85	/ /	0	01/03/86	/ /	0	01/03/86
R R DONNELLY	LIVINGSTON	07/30/85	09/23/85	55	01/03/86	10/02/85	64	01/03/86
R R DONNELLY	LIVINGSTON	07/30/85	09/23/85	55	01/03/86	05/19/86	293	01/03/86
R.B.DONNELLY & SONS	COLES	03/21/86	05/27/86	67	/ /	08/04/86	136	/ /
SAFETY KLEBN	CHAMPAIGN	06/09/86	06/12/86	3	09/30/86	09/08/86	91	09/30/86
SAFETY KLEBN	CHAMPAIGN	06/09/86	06/12/86	3	09/08/86	09/08/86	91	09/08/86

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TRW, INC.	CLARK	04/01/86	04/03/86		2 / /	05/01/86	30 / /
UARCO, INC.	IROQUOIS	08/09/85	09/23/85		45 / /	01/31/86	175 / /
UARCO, INC.	IROQUOIS	08/09/85	09/23/85		45 12/05/85	12/05/85	118 12/05/85
US INDUST CHEM	DOUGLAS	08/19/85	/ /		0 08/28/85	01/31/86	165 08/28/85
US INDUST CHEM	DOUGLAS	07/11/85	07/15/85		4 08/13/85	04/17/86	280 08/13/85
* REGION 5							
AT&T TECH. INC.	SANGAMON	06/04/86	06/06/86		2 / /	08/01/86	58 / /
BOHN HEAT TRANS	CASS	05/02/86	05/06/86		4 / /	05/23/86	21 / /
BORDEN CHEMICAL	SANGAMON	08/30/85	09/09/85		10 / /	11/06/85	68 / /
BRIGHTON LANDFILL	MACOUPIN	03/25/86	04/03/86		9 / /	05/30/86	66 / /
BUNN-O-MATIC	SANGAMON	11/27/85	01/13/86		47 02/27/86	05/23/86	177 02/27/86
CAN AM IND	ADAMS	10/31/85	12/27/85		57 01/24/86	03/03/86	123 01/24/86
CAPITOL RECORDS INC	MORGAN	06/04/86	06/06/86		2 / /	06/26/86	22 / /
COLT INDUSTRIES	ADAMS	07/23/85	08/27/85		35 11/06/85	02/26/86	218 11/06/85
COPLBY PRESS INC.	SANGAMON	06/04/86	06/06/86		2 / /	06/23/86	19 / /
CUSTOM CHEMICAL ENG	SANGAMON	07/25/85	07/25/85		0 10/02/85	10/21/85	88 10/02/85
ESSEX GROUP	CHRISTIAN	08/28/85	10/08/85		41 11/15/85	03/21/86	205 11/15/85
GARRETT AVIATION	SANGAMON	04/30/86	06/27/86		58 10/23/86	10/31/86	184 10/23/86
HARRIS CORP	ADAMS	10/24/85	12/12/85		49 / /	03/03/86	130 / /
ILL WOOD PRESERV	MONTGOMERY	08/16/85	10/08/85		53 / /	01/23/86	160 / /
JOHN DEERE	LOGAN	02/07/86	03/11/86		32 / /	04/21/86	73 / /
THE CENTER	SANGAMON	06/04/86	06/06/86		2 / /	06/23/86	19 / /
* REGION 6							
AFFILIATED METALS	MADISON	09/11/85	11/21/85		71 12/20/85	01/09/87	485 12/20/85
AFFILIATED METALS CO.	MADISON	06/04/86	06/06/86		2 / /	06/25/86	21 / /
AFFILIATED METALS CO.	MADISON	06/06/86	06/21/86		15 / /	01/09/87	217 / /
AIR-PRODUCTS CHEM.	MADISON	04/22/86	04/25/86		3 / /	05/16/86	24 / /
AMOCO-MAIN PLANT	MADISON	04/16/86	/ /		0 05/12/86	07/09/86	84 05/12/86
AMOCO-MAIN PLANT	MADISON	04/18/86	04/23/86		5 / /	05/15/86	27 / /
AMOCO-RIVERFRONT	MADISON	04/16/86	/ /		0 04/22/86	07/09/86	84 04/22/86
CARLISLE SYNTREX SYS	BOND	11/08/85	11/20/85		12 / /	12/19/85	41 / /
CERRO COPPER PROD	ST CLAIR	04/21/86	05/19/86		28 08/04/86	10/15/86	177 08/04/86
CLARK OIL & REFIN	MADISON	08/08/85	08/16/85		8 / /	01/31/86	176 / /
CLARK OIL & REFINING	MADISON	06/03/86	06/24/86		21 / /	07/14/86	41 / /
CLAYTON CHEM CORP	ST CLAIR	11/05/85	12/09/85		34 / /	01/07/86	63 / /
CLAYTON CHEM CORP	ST CLAIR	12/05/85	12/09/85		4 / /	01/07/86	33 / /
CLIMATE CONTROL	RANDOLPH	12/17/85	01/02/86		16 / /	02/11/86	56 / /
DIAMOND PLATING CO	MADISON	03/10/86	03/19/86		9 / /	06/13/86	95 / /
ETHYL PETRO ADDITIV	ST CLAIR	07/17/85	/ /		0 07/23/85	09/03/85	48 07/23/85
GRANITE CITY PICKLE	MADISON	10/09/85	10/22/85		13 / /	01/07/86	90 / /
HEIDTMAN STEEL PRD	MADISON	03/07/86	03/18/86		11 / /	05/05/86	59 / /
INDEP TANK CLEANING	MADISON	02/28/86	03/17/86		17 / /	05/07/86	68 / /
JENNISON-WRIGHT CORP	MADISON	03/25/86	04/11/86		17 / /	06/27/86	94 / /

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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RESPONDENT NAME	COUNTY	INVESTIGATION DATE	CIL DATE	LAPSE	PRE-BNF. CONF. LETTER DATE	RESOLVED DATE	LAPSE 31 D NOTICE DATE
KERR-McGER CHEM CORP	MADISON	03/25/86	04/14/86	20	/ /	05/05/86	41 / /
LACLEDE STEEL CO	MADISON	11/14/85	12/05/85	21	03/13/86	03/28/86	134 03/13/86
MARSH STENCIL MACH	ST CLAIR	04/11/86	04/30/86	13	07/24/86	08/04/86	115 07/24/86
MEAD CORP	MADISON	12/03/85	12/11/85	8	/ /	02/03/86	62 / /
MIKA LUMBER CO.	RANDOLPH	06/18/86	06/20/86	2	/ /	07/16/86	28 / /
MONSANTO RIVERFRONT	ST CLAIR	02/18/86	02/20/86	2	/ /	07/14/86	146 / /
MONSANTO-KRUMBRICH	ST CLAIR	01/30/86	/ /	0	04/10/86	05/13/86	103 04/10/86
MONSANTO-KRUMBRICH	ST CLAIR	02/18/86	02/20/86	2	03/24/86	04/29/86	70 03/24/86
MONTREY COAL CO	CLINTON	11/26/85	02/14/86	80	/ /	07/01/86	217 / /
MUSICK PLATING	ST CLAIR	03/12/86	03/28/86	16	/ /	04/18/86	37 / /
NATIONAL MARINE SRV	MADISON	03/25/86	04/11/86	17	/ /	05/30/86	66 / /
NATIONAL STEEL CORP	MADISON	04/02/86	04/16/86	14	/ /	05/27/86	55 / /
NATIONAL STEEL CORP	MADISON	05/14/86	05/30/86	16	/ /	06/25/86	42 / /
NATURAL GAS PIPELINE	FAVETTE	06/11/86	/ /	0	08/21/86	09/26/86	107 08/21/86
NESCO STEEL BARREL	MADISON	08/19/85	/ /	0	08/28/85	09/12/85	24 08/28/85
NESCO STEEL BARREL	MADISON	02/21/86	03/03/86	10	/ /	04/11/86	49 / /
OWENS-ILLINOIS INC	MADISON	05/28/86	06/16/86	19	/ /	07/17/86	50 / /
PFIZER INC	ST CLAIR	07/09/85	08/07/85	29	/ /	12/10/85	154 / /
PRECOAT METALS	MADISON	01/10/86	01/24/86	14	/ /	03/03/86	52 / /
REILLY TAR & CHEM	MADISON	01/16/86	01/28/86	12	/ /	02/18/86	33 / /
REILLY TAR & CHEM	MADISON	01/14/86	01/28/86	14	/ /	02/18/86	35 / /
REILLY TAR & CHEM	MADISON	03/25/86	04/02/86	8	/ /	05/05/86	41 / /
REILLY TAR AND CHEM	MADISON	08/22/85	/ /	0	10/01/85	10/02/85	41 10/01/85
ROADMASTER CORP.	RICHLAND	04/22/86	04/25/86	3	/ /	05/16/86	24 / /
ROCKOLA MANUFACT CO	COOK	01/29/86	02/19/86	21	/ /	05/21/86	112 / /
ROCKWELL INTER	MARION	04/23/86	05/15/86	22	/ /	06/09/86	47 / /
SAFETY-KLBBN CORP	ST CLAIR	03/06/86	03/19/86	13	/ /	04/25/86	50 / /
SHELL OIL CO	MADISON	06/05/86	06/16/86	11	/ /	07/08/86	33 / /
SHELL-WOOD RIVER	MADISON	03/12/86	03/17/86	5	04/29/86	08/21/86	162 04/29/86
ST LOUIS LEAD BECY	MADISON	07/16/85	09/16/85	62	/ /	01/31/86	199 / /
TODD CORP	MADISON	06/19/86	06/30/86	11	/ /	07/25/86	36 / /
TRADE WASTE INC..	ST CLAIR	06/06/86	06/12/86	6	/ /	06/27/86	21 / /
TWI	ST CLAIR	01/16/86	01/24/86	8	/ /	02/27/86	42 / /
* REGION 7							
AIRTEX PRODUCTS	WAYNE	06/13/86	07/16/86	33	/ /	08/15/86	63 / /
ALLIED CHEM CORP	MASSAC	04/30/86	06/06/86	37	/ /	07/09/86	70 / /
ALLIED CHEMICAL	MASSAC	08/14/85	09/16/85	33	/ /	10/02/85	49 / /
CHAMPION LABS	EDWARDS	06/18/86	/ /	0	08/11/86	10/31/86	135 08/11/86
CHAMPION LABS INC	EDWARDS	05/27/86	06/20/86	24	08/11/86	10/31/86	157 08/11/86
CHAMPION-W SALEM PLT	EDWARDS	06/18/86	/ /	0	08/11/86	10/31/86	135 08/11/86
CIPS GRAND TOWER	JACKSON	11/14/85	12/06/85	22	/ /	12/06/85	22 / /
LAIDLAW CORP	MASSAC	11/13/85	12/02/85	19	/ /	12/30/85	47 / /
LUBBER-FINER DIV	EDWARDS	05/27/86	07/03/86	37	06/11/86	10/31/86	157 08/11/86
MARK TWAIN MARINE	FRANKLIN	01/23/86	/ /	0	02/14/86	03/18/86	54 02/14/86

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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RESPONDENT NAME	COUNTY	INVESTI- GATION DATE	CIL DATE	LAPSE	PRE-BNF. CONF. LETTER DATE	RESOLVED DATE	LAPSE 31 D NOTICE DATE
MO. PORTLAND CEMENT	MASSAC	08/14/85	08/21/85	7	10/21/85	10/02/85	49 10/21/85
NORGE, DIV MAGIC CHF	WILLIAMSON	12/12/85	02/27/86	77	/ /	04/09/86	118 / /
NORTH AMERICAN LIGHT	CLAY	06/18/86	06/20/86	2	/ /	07/02/86	14 / /
OLIN CORP-EN TST RNG	WILLIAMSON	03/04/86	04/11/86	38	/ /	06/05/86	93 / /
PRABODY COAL CO	GALLATIN	05/08/86	06/09/86	32	07/15/86	09/19/86	134 07/15/86
PENN ALUMINUM INTBR.	JACKSON	02/13/86	04/16/86	62	/ /	06/05/86	113 / /
PRMA-TREAT OF IL	WILLIAMSON	07/08/85	08/27/85	50	/ /	01/31/86	207 / /
PRECISION NATIONAL	JEFFERSON	08/19/85	08/28/85	9	/ /	10/02/85	44 / /
R A WILKE MACH. CO	WILLIAMSON	09/12/85	10/04/85	22	12/03/85	01/31/86	141 12/03/85
SIU-CARBONDALE	JACKSON	01/01/86	03/04/86	62	/ /	04/09/86	98 / /
SPARTON MFG. CO.	CLAY	08/29/85	09/19/85	21	/ /	11/12/85	75 / /
SWAN CORPORATION	MARION	04/08/86	04/30/86	22	06/19/86	08/12/86	126 06/19/86
TEXACO	LAWRENCE	12/30/85	01/14/86	15	/ /	05/01/86	122 / /
TEXACO	LAWRENCE	11/21/85	12/30/85	39	/ /	02/27/86	98 / /
TROJAN CORP	WILLIAMSON	12/19/85	02/05/86	48	/ /	03/10/86	81 / /
VALLEY STEEL PROD	MARION	03/31/86	05/22/86	52	/ /	06/27/86	88 / /
VIENNA CORRECTIONAL	JOHNSON	07/14/85	08/27/85	44	/ /	09/25/85	73 / /
* REGION O							
A&B INDUSTRIAL	OUT OF ST.	06/15/86	07/03/86	18	/ /	08/29/86	75 / /
CHEM-MET SBRV.	OUT OF ST.	02/13/86	04/22/86	68	/ /	05/14/86	90 / /
JOHN DEERE	OUT OF ST.	02/07/86	03/11/86	32	/ /	04/21/86	73 / /
OSMOSE WOOD PRES.	OUT OF ST.	05/27/86	07/15/86	49	/ /	08/12/86	77 / /

10/26/87

DIVISION OF ENFORCEMENT PROGRAMS
ENFORCEMENT/COMPLIANCE TRACKING REPORT
SUMMARY FOR LPC RECORDS STILL PENDING
07/01/85 THROUGH 06/30/86

1. NUMBER OF ENFORCEMENT ACTIONS STILL PENDING
126
2. NUMBER OF COMPLIANCE INQUIRY LETTERS SENT
113
AVERAGE LAPSE TIME
23
3. NUMBER OF PRE-ENFORCEMENT CONFERENCE LETTERS SENT
90
4. NUMBER OF ENFORCEMENT LETTERS SENT
9
5. NUMBER OF 31 D NOTICES SENT
89
6. NUMBER OF REFERRALS
28
AVERAGE LAPSE TIME
231
7. NUMBER OF COMPLAINTS FILED
5
AVERAGE LAPSE TIME
217

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT PROGRAMS
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STILL PENDING

RESPONDENT NAME	COUNTY	INVESTIGATION DATE	CIL DATE	LAPSE	PRE-ENF. CONF. LETTER DATE	ENF. LETTER DATE	31 D NOTICE DATE	REFERRAL DATE	LAPSE	PROSC AUTH.	COMPLT FILED DATE	LAPSE
** DIVISION LPC												
* REGION 1												
ACME SOLVENT	WINNEBAGO	10/08/85	10/11/85	3	12/11/85	/ /	12/11/85	07/17/86	282	USEPA	/ /	0
BASSICK	BURBAU	06/13/86	07/02/86	19	09/11/86	/ /	09/11/86	/ /	0	/ /	/ /	0
BORG-WARNER CHEM LIN	LASALLE	07/18/85	08/01/85	14	09/11/85	06/08/87	09/11/85	/ /	0	/ /	/ /	0
BOUZIANE PLATING	WINNEBAGO	02/20/86	02/26/86	6	05/06/86	/ /	05/06/86	/ /	0	/ /	/ /	0
CARBIDE ENERGY CORP	WINNEBAGO	04/04/86	05/01/86	27	06/12/86	/ /	06/12/86	/ /	0	/ /	/ /	0
COUNSELOR CORP.	WINNEBAGO	06/04/86	06/06/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
GENERAL HYDRAULICS	WINNEBAGO	05/01/86	05/14/86	13	06/11/86	/ /	06/11/86	/ /	0	/ /	/ /	0
GENERAL WEB DYNAMIC	WINNEBAGO	03/07/86	04/03/86	27	/ /	/ /	/ /	/ /	0	/ /	/ /	0
HEICO, INC	LASALLE	09/05/85	10/11/85	36	/ /	/ /	/ /	/ /	0	/ /	/ /	0
JOHN GREEN PRESS	WINNEBAGO	02/24/86	03/21/86	25	05/01/86	/ /	05/01/86	/ /	0	/ /	/ /	0
MIG INVESTMENTS	BOONE	05/09/86	/ /	0	05/21/86	/ /	05/21/86	/ /	0	/ /	/ /	0
REED-CHATWOOD	WINNEBAGO	07/12/85	07/25/85	13	08/30/85	/ /	08/30/85	/ /	0	/ /	/ /	0
ROCKFORD PROD 3	WINNEBAGO	11/18/85	12/06/85	18	/ /	/ /	/ /	/ /	0	/ /	/ /	0
ROCKFORD PRODUCTS 2	WINNEBAGO	05/07/86	05/23/86	16	06/19/86	/ /	06/19/86	/ /	0	/ /	/ /	0
ROCKFORD WIRE TECH	WINNEBAGO	09/27/85	10/08/85	11	11/08/85	/ /	11/08/85	/ /	0	/ /	/ /	0
ROCKWELL INT.	WINNEBAGO	11/07/85	11/21/85	14	/ /	/ /	/ /	/ /	0	/ /	/ /	0
SESTOR & SON	DEKALB	08/28/85	/ /	0	09/10/85	/ /	09/10/85	/ /	0	/ /	/ /	0
STEWART-WARNER	BURBAU	04/02/86	05/01/86	29	/ /	/ /	/ /	/ /	0	/ /	/ /	0
* REGION 2												
ACID-OHMAN BOILER	KANE	04/04/86	04/08/86	4	07/16/86	/ /	07/16/86	09/19/86	168	USEPA	01/05/87	276
ALL AMERICAN TANK	COOK	06/04/86	06/06/86	2	08/29/86	/ /	08/29/86	/ /	0	/ /	/ /	0
ALLIED METAL	COOK	01/22/86	03/21/86	58	07/18/86	/ /	07/18/86	/ /	0	/ /	/ /	0
AMER WASTE PROCESS	COOK	05/02/86	/ /	0	05/14/86	/ /	05/14/86	/ /	0	/ /	/ /	0
AMER WASTE PROCESS	COOK	03/28/86	/ /	0	05/14/86	/ /	05/14/86	/ /	0	/ /	/ /	0
AMER WASTE PROCESS	COOK	03/26/86	04/03/86	8	05/14/86	/ /	05/14/86	/ /	0	/ /	/ /	0
AMERICAN PHOTO	COOK	06/03/86	06/05/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
AMFHEMOL	COOK	05/02/86	05/06/86	4	07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
AURORA CORD AND CAB	KEHDALL	06/03/86	06/05/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
BOND CHEMICAL CO	COOK	06/02/86	06/04/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
BOYAR SCHULTZ CORP.	COOK	06/04/86	06/06/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
BROWNING FERRIS IND.	LAKE	03/14/86	03/29/86	15	/ /	/ /	/ /	07/11/86	119	USEPA	07/21/86	129
BROWNING-FERRIS IND	LAKE	09/17/85	10/10/85	23	/ /	/ /	/ /	/ /	0	/ /	/ /	0
CARGILL, INC.	KANE	05/01/86	05/01/86	0	05/29/86	/ /	05/29/86	/ /	0	/ /	/ /	0
CARGILL, INC.	KANE	11/06/85	11/12/85	6	/ /	/ /	/ /	/ /	0	/ /	/ /	0
CETRON ELECTRONICS	KANE	07/23/85	08/02/85	10	01/10/86	06/08/87	01/10/86	/ /	0	/ /	/ /	0
CHEMFLOOR, INC.	COOK	06/04/86	06/06/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
CID II (ARBA 3)	COOK	08/09/85	10/08/85	60	11/04/85	/ /	11/04/85	01/06/86	150	USEPA	/ /	0
CHOS CIRCUITS, INC.	COOK	06/04/86	06/06/86	2	/ /	/ /	/ /	/ /	0	/ /	/ /	0
DANLY MACH CORP.	COOK	04/21/86	04/23/86	2	/ /	/ /	/ /	/ /	0	/ /	/ /	0
ELECTRONIC SUPPORT SYS.	DUPAGE	05/02/86	05/06/86	4	07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
EMERSON & CUMING	COOK	09/16/85	09/27/85	11	11/05/85	06/08/87	11/05/85	/ /	0	/ /	/ /	0

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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RESPONDENT NAME	COUNTY	INVESTIGATION DATE	CIL DATE	LAPSE DATE	PRE-ENF. CONF. LETTER DATE	ENF. LETTER DATE	31 D NOTICE DATE	REFERRAL DATE	LAPSE DATE	PROSC AUTH.	COMPLT FILED DATE	LAPSE
EMPIRE HARD CHROME	COOK	06/04/86	06/06/86		2 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
EXCELLO PRESS, INC.	COOK	06/04/86	06/06/86		2 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
G.E.-SPENT FUEL OP.	GRUNDY	09/19/85	09/24/85		5 11/04/85	/ /	11/04/85	/ /	0	/ /	/ /	0
GATX TERMINALS	COOK	07/02/85	07/22/85		20 08/21/85	06/16/87	08/21/85	/ /	0	/ /	/ /	0
GEAR SPECIALTIES CO.	COOK	06/04/86	06/06/86		2 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
GENERAL BLEC.CO.	COOK	05/06/86	05/21/86		15 / /	/ /	/ /	06/24/87	414 USBPA	/ /	/ /	0
GIL-BAR RUBBER PROD	COOK	06/06/86	06/11/86		5 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
GILBERT & BENNETT	COOK	03/25/86	04/10/86		16 / /	/ /	/ /	/ /	0	/ /	/ /	0
GILBERT AND BENNETT	COOK	09/04/85	09/12/85		8 10/11/85	/ /	10/11/85	/ /	0	/ /	/ /	0
GILBERT&BENNETT MFG.	COOK	04/11/86	04/28/86		17 / /	/ /	/ /	06/16/86	66 USBPA	07/30/86	/ /	110
HAMMOND ORGAN CO.	COOK	04/28/86	05/02/86		4 07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
INLAND METAL RFIN	COOK	03/25/86	04/03/86		9 / /	/ /	/ /	04/29/86	35 USBPA	/ /	/ /	0
INLAND METALS REF.	COOK	08/19/85	08/28/85		9 / /	/ /	/ /	/ /	0	/ /	/ /	0
ITT HARPER DIV.	COOK	07/16/85	07/29/85		13 01/10/86	/ /	01/10/86	/ /	0	/ /	/ /	0
JOANNA WESTERN MILL	COOK	09/12/85	/ /		0 10/04/85	/ /	10/04/85	/ /	0	/ /	/ /	0
K&K SCREW PROD.	DUPAGE	06/06/86	06/11/86		5 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
LANKIN LBATHER	COOK	06/06/86	06/11/86		5 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
LISSNER CORP.	COOK	09/10/85	01/03/86		115 / /	/ /	/ /	07/08/86	301 USBPA	/ /	/ /	0
M&W LABORATORIES, INC.	COOK	04/04/86	04/09/86		5 07/16/86	/ /	07/16/86	10/20/86	199 USBPA	/ /	/ /	0
MAGNETIC COMPONENTS	COOK	10/16/85	11/14/85		29 01/13/86	/ /	01/13/86	04/22/86	188 USBPA	/ /	/ /	0
METAL FINISH RSRCH	COOK	07/19/85	08/01/85		13 09/11/85	06/08/87	09/11/85	/ /	0	/ /	/ /	0
MIDWEST GALVANIZING	COOK	06/18/86	06/24/86		6 08/26/86	/ /	08/26/86	/ /	0	/ /	/ /	0
MIDWEST LAW PRINT CO.	COOK	06/18/86	06/20/86		2 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
MLW PRODUCTS	COOK	05/12/86	/ /		0 06/09/86	/ /	06/09/86	/ /	0	/ /	/ /	0
NATIONAL CASTINGS	COOK	04/01/86	04/03/86		2 07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
NATIONAL CASTINGS	COOK	04/28/86	05/02/86		4 07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
NIEDERMAIER DISPLAY	COOK	06/18/86	06/20/86		2 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
NCR-AM CHEM. CO.	WILL	06/18/86	06/23/86		5 08/26/86	/ /	08/26/86	/ /	0	/ /	/ /	0
FAXTON LANDFILL #2	COOK	03/25/86	04/03/86		9 / /	/ /	/ /	/ /	0	/ /	/ /	0
PEACOCK ENG. CO.	DUPAGE	06/18/86	06/23/86		5 08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
PRIDE (CLAYTOR) IND.	COOK	12/04/85	01/08/86		35 03/05/86	/ /	03/05/86	04/28/86	145 USBPA	02/02/87	/ /	425
PVS CHEMICALS, INC.	COOK	03/25/86	04/10/86		16 / /	/ /	/ /	/ /	0	/ /	/ /	0
RADCO INDUSTRIES	KANE	11/12/85	01/08/86		57 / /	/ /	/ /	07/31/86	261 USBPA	/ /	/ /	0
SAFETY KLEEN	COOK	06/09/86	06/12/86		3 / /	/ /	/ /	/ /	0	/ /	/ /	0
SCHWINN BICYCLE #1	COOK	08/19/85	08/28/85		9 12/23/85	/ /	12/23/85	/ /	0	/ /	/ /	0
SCHWINN BICYCLE #2	COOK	08/19/85	08/28/85		9 12/23/85	/ /	12/23/85	/ /	0	/ /	/ /	0
SCHWINN BICYCLE CO.	COOK	05/02/86	05/06/86		4 07/16/86	/ /	07/16/86	/ /	0	/ /	/ /	0
SCHWINN BICYCLE #4	COOK	08/19/85	08/28/85		9 12/23/85	/ /	12/23/85	/ /	0	/ /	/ /	0
SCLA ELECTRIC	COOK	07/09/85	07/18/85		9 08/21/85	/ /	08/21/85	06/19/87	710 USBPA	/ /	/ /	0
TEXTROM INC.	COOK	07/08/85	08/02/85		25 09/20/85	/ /	09/20/85	/ /	0	/ /	/ /	0
TRANSFORMER MFG.	COOK	05/16/86	/ /		0 06/10/86	/ /	06/10/86	/ /	0	/ /	/ /	0
U.S.ARMY-JOILBT	WILL	03/25/86	04/03/86		9 / /	/ /	/ /	08/22/86	150 USBPA	/ /	/ /	0
UNION OIL CO.	WILL	05/16/86	/ /		0 06/25/86	/ /	06/25/86	09/04/86	111 USBPA	/ /	/ /	0
ZEGERS, INC.	COOK	02/11/86	03/28/86		45 04/24/86	/ /	04/24/86	08/15/86	185 AG	/ /	/ /	0

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT PROGRAMS
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STILL PENDING

RESPONDENT NAME	COUNTY	INVESTI- GATION DATE	CIL DATE	LAPSE	PRE-ENF. CONF. LETTER DATE	ENF. LETTER DATE	31 D NOTICE DATE	REFERRAL DATE	LAPSE	PROSC AUTH.	COMPLT FILED DATE	LAPSE
* REGION 3												
CHROME CRANKSHAFT	ROCK ISLAND	07/24/85	09/24/85	62	/ /	/ /	/ /	/ /	0	/ /	/ /	0
DELBORG POLISHING	ROCK ISLAND	10/16/85	12/27/85	72	/ /	/ /	/ /	/ /	0	/ /	/ /	0
KEYSTONE STEEL	PEORIA	03/25/86	04/16/86	22	/ /	/ /	/ /	08/13/86	141	USBPA	/ /	0
NATIONAL COATINGS	KNOX	08/16/85	09/20/85	35	/ /	/ /	/ /	/ /	0	/ /	/ /	0
SUNSET HILLS CC	TAZEWELL	01/31/86	05/08/86	97	06/10/86	/ /	06/10/86	/ /	0	/ /	/ /	0
TECHNICAL SERVICES	HENRY	08/21/85	/ /	0	11/22/85	/ /	11/22/85	/ /	0	/ /	/ /	0
UNR-ROHN	PEORIA	03/25/86	04/16/86	22	/ /	/ /	/ /	/ /	0	/ /	/ /	0
* REGION 4												
BIGARD OIL	JASPER	07/19/85	07/25/85	6	09/04/85	/ /	/ /	07/22/86	368	USBPA	/ /	0
CABOT CORP.	DOUGLAS	11/08/85	01/17/86	70	/ /	/ /	/ /	/ /	0	/ /	/ /	0
CBLOTEX CORP	COLES	02/25/86	05/08/86	72	05/22/86	/ /	05/22/86	04/30/87	429	USBPA	/ /	0
CORB-LUBE	VERMILION	08/27/85	/ /	0	09/27/85	/ /	09/27/85	/ /	0	/ /	/ /	0
FARM BURBAU	DOUGLAS	07/12/85	/ /	0	07/24/85	/ /	07/24/85	/ /	0	/ /	/ /	0
FMC CORPORATION	VERMILION	08/28/85	09/24/85	27	/ /	/ /	/ /	/ /	0	/ /	/ /	0
KAL-KAN FOODS INC.	COLES	06/06/86	06/11/86	5	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
MARATHON OIL CO	CRAWFORD	03/25/86	04/10/86	16	/ /	/ /	/ /	07/09/86	106	USBPA	08/15/86	143
P&H MANUFACTURING	SHRELBY	08/28/85	10/17/85	50	12/11/85	/ /	12/11/85	03/04/86	188	AG	/ /	0
R R DONNELLEY	LIVINGSTON	12/16/85	/ /	0	01/03/86	/ /	01/03/86	/ /	0	/ /	/ /	0
R R DONNELLEY	LIVINGSTON	09/19/85	09/23/85	4	01/03/86	04/17/87	04/17/87	/ /	0	/ /	/ /	0
ROWE FOUNDRY	HACON	07/22/85	10/03/85	73	11/06/85	/ /	11/06/85	/ /	0	/ /	/ /	0
TRW, INC.	CLARK	04/03/86	04/18/86	15	/ /	/ /	/ /	05/30/86	57	USBPA	/ /	0
VELSICOL CHEM CORP	CLARK	02/19/86	05/09/86	79	08/26/86	/ /	08/26/86	12/23/86	307	USEPA	/ /	0
VELSICOL CHEM CORP	CLARK	08/21/85	05/09/86	261	06/27/86	/ /	06/27/86	/ /	0	/ /	/ /	0
* REGION 5												
BRAKE PARTS CO	MONTGOMERY	05/22/86	09/18/86	119	10/28/86	04/17/87	10/28/86	/ /	0	/ /	/ /	0
BRAKE PARTS CO.	MONTGOMERY	04/01/86	04/03/86	2	07/16/86	04/17/87	07/16/86	/ /	0	/ /	/ /	0
BRIGHTON LANDFILL	HACOUPI	03/25/86	04/03/86	9	/ /	/ /	/ /	06/27/86	94	USBPA	/ /	0
CAPITAL MACHINERY CO	SANGAMON	07/30/85	09/09/85	41	10/29/85	/ /	10/29/85	/ /	0	/ /	/ /	0
CERTIFIED EQUIPMENT	SANGAMON	06/04/86	06/06/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
DIAMOND SHAMROCK CHEM	LOGAN	06/04/86	06/06/86	2	08/05/86	/ /	08/05/86	/ /	0	/ /	/ /	0
FIAT ALLIS	SANGAMON	08/09/85	10/02/85	54	11/18/85	/ /	11/18/85	/ /	0	/ /	/ /	0
INDUSTRIAL CHEMICAL	SANGAMON	07/09/85	08/22/85	44	10/23/85	/ /	10/23/85	04/30/87	660	AG	/ /	0
NAT. STARCH & CHEM	MORGAN	08/26/85	09/03/85	8	05/22/87	/ /	05/22/87	/ /	0	/ /	/ /	0
* REGION 6												
JENNISON-WRIGHT CORP	MADISON	03/25/86	04/11/86	17	/ /	/ /	/ /	/ /	0	/ /	/ /	0
L.C. METALS, INC.	MADISON	11/21/85	12/20/85	29	02/04/86	/ /	02/04/86	/ /	0	/ /	/ /	0
MIDWESTERN DRUM	MADISON	11/07/85	11/18/85	11	12/20/85	/ /	12/20/85	/ /	0	/ /	/ /	0
NATIONAL MARINE SRV	MADISON	03/25/86	04/11/86	17	/ /	/ /	/ /	06/23/86	90	USBPA	/ /	0
NATURAL GAS PIPELINE	FAYETTE	06/11/86	/ /	0	07/21/86	05/18/87	07/21/86	/ /	0	/ /	/ /	0
PFIZER, INC.	ST CLAIR	11/27/85	12/10/85	13	05/21/87	/ /	05/21/87	/ /	0	/ /	/ /	0
ST LOUIS LEAD RECY	MADISON	07/16/85	09/16/85	62	/ /	/ /	/ /	10/02/86	443	USEPA	/ /	0

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TABACORP INDUSTRIES	MADISON	02/11/86	02/13/86	2	/ /	/ /	/ /	06/04/86	113	USBPA	/ /	0
* REGION 7												
PRECISION NATIONAL	JEFFERSON	10/16/85	11/27/85	42	12/30/85	/ /	12/30/85	/ /	0		/ /	0
R A WILKE MACH. CO	WILLIAMSON	09/12/85	10/04/85	22	11/26/85	/ /	11/26/85	/ /	0		/ /	0
* REGION 0												
FISHER-CALO	OUT OF ST.	12/18/85	01/06/86	19	/ /	/ /	/ /	/ /	0		/ /	0

APPENDIX III

17 MAR 1987

Richard J. Carlson, Director
 Illinois Environmental Protection Agency
 2200 Churchill Road
 Springfield, Illinois 62706

Dear Mr. Carlson:

Enclosed is a copy of the final Illinois Hazardous Waste Management Program Year-End Evaluation, which was prepared in accordance with 40 CFR 35.150. This report was developed following discussions between Region V and your staff on October 27-31, 1986. A draft of this report has been reviewed by members of your staff; no comments were offered.

Throughout FY'86, Illinois demonstrated its ability to meet program commitments. Major accomplishments include: performed high quality inspections, met or exceeded inspection commitments for all categories of inspections, compiled referral packages of good quality, successfully addressed or escalated 90 percent of the Class I violations identified in FY'86 (only 3 percent of which were referred to the Region), completed thorough Facility Management Plans, closure decisions were well documented and, in conjunction with the Region, developed the State Multi-Year Strategy and the Joint Permitting Procedures.

I would like to take this opportunity to thank you and your staff for your cooperation during the Year-End Evaluation. This report will now become part of your official file.

Sincerely yours,

/s/ original signed by
 Valdas V. Adamkus

Valdas V. Adamkus
 Regional Administrator

Enclosure

cc: William Child

bcc: B. Constantelos	D. Stringham	B. Miner
J. Kertcher	B. Muno	K. Bremer
J. Boyle	R. Kolzow	J. Mayka
J. Traub	R. Clarizio	A. Kawatachi
O. Warnsley	T. Golz	M. Canavan
A. Wolfe		

SWB:SPU:M.Murphy:IL Disk-01-1:ral:03/17/87

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AMM 8/17/87
ME 8/17/87

Final Illinois Year-End Evaluation
FY'86 RCRA Subtitle C Hazardous Waste Management Program

Illinois Year-End Evaluation
FY'86 RCRA Subtitle C Hazardous Waste Management Program

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Illinois Year-End Evaluation

FY'86 Subtitle C Hazardous Waste Management Program

The Year-End Evaluation of the Illinois Subtitle C Hazardous Waste Management Program was conducted at the Illinois Environmental Protection Agency (IEPA) offices in Springfield, Illinois on October 28-31, 1986. This evaluation of the Illinois program has been prepared in accordance with 40 CFR 35.150. The program assessments in this Evaluation cover the period from October 1, 1985 through September 30, 1986.

Participants in the Evaluation were:

U.S. EPA

William Miner, Chief, Hazardous Waste Enforcement Branch
Joe Boyle, Chief, IL/IN RCRA Enforcement Unit
Ron Kolzow, Chief, Enforcement Programs Unit #1
Jim Mayka, Chief, Illinois Permit Unit
Mary Murphy, Illinois State Project Officer
Tom Golz, Authorization Unit
Jim Rittenhouse, Enforcement Programs Unit #1
Oliver Warnsley, Enforcement Programs Unit #1

IEPA

William Child, Acting Division Manager
William Radlinski, Manager, Program Development
Larry Eastep, Manager, Permit Section
Glenn Savage, Manager, Field Operations Section
Gary King, Senior Attorney for Land
Harry Chappel, Manager, Facilities Permit Unit
Rama Chaturvedi, Manager, Permit Program Development Unit
Charles Zeal, Facilities Permit Unit, Northern Sub-Unit

EXECUTIVE SUMMARY

Performance by Illinois during FY'86 has been consistent and satisfactory in all Program Elements. The State received final authorization in January, of FY'86, and is making good progress toward maintaining RCRA authorization and maintaining HSWA authorization. IEPA's compliance program is aggressive; inspection commitments are historically exceeded and the quality of the State's inspections is good. Illinois does not have authority to issue Administrative Orders (AOs) with penalties, but is pursuing this option. In the interim, Significant Non-Compliance (SNCs) and High Priority Violators (HPVs) are being referred to the Region for penalties; referral packages are generally of good quality. The State is effectively addressing other Class I violations; of the cases due for an action, 90% were resolved or referred during FY'86, using the State's enforcement tools.

Illinois is in a good position to meet the statutory permit issuance due dates for land disposal facilities and incinerators. The State has already processed and approved the majority of land disposal closures. A significant effort was concentrated on facility management planning, to identify the best means for achieving compliance with RCRA. Illinois has and is using the Implementation Contract as an extension to its grant, to keep the permits moving. The quality of the State's work, especially with respect to closure plan review, has been very good.

Management and reporting continue at a satisfactory level at IEPA; the grants process is used effectively to meet RCRA objectives, and all State program managers participate in the process.

Over all the State is operating a quality RCRA program, consistent with National guidance and policy. There are no major deficiencies, and the Region anticipates that this level of performance will continue into FY'87.

1.

Program Element I: Program Development

Introduction

The primary Objective under Program Development for FY'86 was obtaining and maintaining final authorization. IEPA received final authorization on January 30, 1986 and completed the necessary statutory and regulatory development to maintain the program. The State is also making progress in developing authority under HSWA. A major output during the fourth quarter was the submission of the State's RCRA revision application. The State demonstrated good coordination during FY'86 with the Attorney General's (AG's) Office, and easily earned the 1.25 workyears allocated for this Program Element.

Summary of State Performance

IEPA completed a number of activities under this Objective, in accordance with commitments established in the grant work plan. The State developed and submitted a Joint Permit Strategy, reviewed and commented on the second draft of the capability assessment, submitted RCRA maintenance regulations, regulatory updates, and 3006(f) regulations and checklist, and reviewed/requested the A.G. to review the HSWA regulatory requirements. Under statutory development, IEPA submitted proposed administrative citation order legislation. Regulatory development included commenting on two delisting petitions and RCRA/HSWA regulatory updates submitted by the Board. Finally, the State submitted its HSWA authorization schedule on August 1, 1986, its RCRA Revision Application on August 7, and the RASPAR, also on August 7, 1986. State outputs were of good quality, although there were delays of up to one month at the A.G.'s office, and during IEPA's assembly of the Revision Application.

Conclusion

IEPA's performance under this Program Element during FY'86 has been satisfactory. There were no issues resulting from the transition from interim authorization to final authorization. The State has made good progress toward HSWA authorization, and the delays in schedules during the fourth quarter did not have a significant impact on the State's progress. Illinois appears to be working closely with the A.G.'s Office; the FY'87 workplan requires the State to notify Region V of any anticipated delays in the established schedules. The Region anticipates that during FY'87 IEPA will continue to meet its commitments, as work progresses on program development for HSWA. We anticipate the State submitting a RCRA/HSWA revision application in FY'87.

Program Element II: Enforcement

Introduction

Under the Enforcement program element, the State committed to the following activities:

- 1) Revising its Compliance Monitoring and Enforcement Strategy (CMES);
- 2) Conducting inspections;
- 3) Ensuring compliance with Subparts E, G, and H;
- 4) Participating in corrective action orders;
- 5) Taking timely and appropriate enforcement action; and
- 6) Reporting progress in returning handlers to compliance.

Specific commitments for inspections, by quarter, and FY'86 accomplishments, can be found in Attachment A.

IEPA did a good job of addressing the requirements under each of these objectives. In general, commitments were met or exceeded. The quality and timeliness of the State's actions were good. The five corrective measures outlined in the mid-year evaluation were implemented by the State, and the deficiencies have been corrected. Specific comments on each of the six Objectives are as follows.

Summary of State Performance

IEPA submitted a final revised CMES during the third quarter of FY'86; it was approved by the Region on August 2, 1986. The State did a good job of incorporating Regional comments and National guidance, and followed all established schedules for revising the documents. The CMES is now consistent with the Enforcement Response Policy.

IEPA carried out an aggressive inspection program during FY'86. Commitment to inspect all 67 land disposal facilities (LDFs) was met. The State completed three additional comprehensive groundwater monitoring evaluations (CMES), exceeded CEIs for other storage/treatment facilities by 24%, and CEIs for generator/transporters by 81%. Illinois performed 42 closure certification inspections, all within 90 days of the certification.

The Region audited 132 files during the fiscal year, and found that the quality of the inspections is good. Inspection checklists are complete and violations are being accurately classified and documented. Inspectors are using the comment field on the checklist for additional notes. Hard copies of all groundwater monitoring activities and data have been forwarded to the Region monthly.

IEPA is active in ensuring compliance with the manifest, closure, and financial requirements. The State's computerized manifest system readily identifies discrepancies, which are then addressed under the enforcement system, (See Attachment F-Hazardous Waste Manifest Activity). During FY'86 the State performed 78 record reviews for treatment, storage and land disposal facilities for Subparts G and H; major emphasis was on land disposal facilities. The Mid-Year Evaluation identified two concerns under this Objective, largely as a result of the file audit. The financial checklist developed by A.T. Kearney for IEPA to use for such reviews

was not in any of the files audited, and not all record reviews (specifically those reviewed where no violation were found) were being reported on the States CMEL printout. The State agreed to corrective measures for both of these concerns, which have been successfully implemented. The Region also requested IEPA to provide a quarterly summary of manifest discrepancies, which has been done.

During FY'86, U.S. EPA initiated corrective action against two Illinois facilities. IEPA actively participated in review of the RI/FS work plans, and prepared a scope of work for one facility. The State's contributions were of good quality, and have been beneficial to the Region.

The State began FY'86 with 46 fixed Significant Non-Compliers (SNCs); 21 of the 46 (45%) had been referred prior to October 1, 1985 and the remaining 25 required compliance or referral. Since the 90-day time-clock for the SNCs/HPVs had already expired during the negotiation of the final land disposal list, the clock was reset for a 90-day period beginning February 1, 1986. All 25 Fixed SNCs were appropriately addressed by the State by May 1, 1986. The quality of the referral packages was good. IEPA also indentified 10 dynamic SNCs during FY'86; 9 were resolved within 90 days of discovery, with one SNC resolved within 129 days of discovery.

The State identified a total 317 other Class I violations during FY'86. All 317 handlers received an enforcement action during FY'86. The average number of days to the initial action was 32, although 40% of the initial actions were greater than 30 days (See Attachment B and Figure 1). At the time of the Year-End Evaluation, the 210-day period had not expired for 105 of the 317 handlers. Of the 212 requiring return-to-compliance or an escalated action, 87% were resolved in less than 210 days, 2% were resolved in greater than 210 days, and 3% were referred (five to U.S. EPA and one to the A.G.). Only 18 handlers (8%) are currently over due for an escalated action (combination of FY'85 backlog and FY'86). The State has agreed to escalate or resolve all 18 cases by January 31, 1987.

IEPA is reporting all compliance information on a series of computer printouts, in lieu of Compliance Monitoring and Enforcement Logs (CMELs). Reporting has generally been timely and accurate. However, the printouts contain significantly more information than required on a CMEL, and as such, have not been functional entry documents for HWDMS. The State has been very cooperative in working with Region V to solve this problem. Transfer of data on floppy disks is currently being tried and evaluated; a doubled-spaced, pared-down data entry document has been submitted during the past several months. However, that document has not always been timely. The State and Region have agreed to reach a decision regarding use of the disk, in lieu of printouts, by the end of December.

The State has actively participated with the Region in monthly enforcement conference calls; these calls have been used as vehicles to track fixed SNCs, during the later half of the year, to identify and discuss dynamic SNCs.

Conclusion

IEPA has a solid, aggressive compliance and enforcement program. Inspection commitments are consistently exceeded, while the quality of the inspections remains high. The State's priorities are in accordance with National guidance; SNCs are actively being identified and referred to the Region or the A.G., as the State does not have AO authority. The CIL is the primary enforcement tool used to achieve compliance for other Class I violations, followed by the pre-enforcement conference. Of the 317 other Class I's identified during FY'86, 87% were successfully resolved within the 210 day timeframe, alleviating the need for additional referrals. The completeness and organization of the State's inspection/enforcement files has improved significantly over previous years. Reporting continues to be generally complete and accurate.

The Region has determined that at year-end the IEPA has performed all Objectives under this Program Element in a Satisfactory manner. The State has had an Outstanding year in the area of inspections. However, the inspections and record reviews identified a significant number of Class I violations, subject to the timely and appropriate criteria. Specifically, there is a lack of follow-up on financial record reviews other than LDFs, which identified Class I violations.

The Region encourages IEPA to continue to pursue AO authority with penalties to ensure a credible, comprehensive enforcement program.

The Region also encourages the State to consider the use of a contractor to review and address non-LDF financial documents. The Region is reviewing its ability to offer IEPA assistance via the A.T. Kearney contract.

Requirement for Corrective Program Action

The State must resolve or refer the 18 overdue Class I violations identified at year-end by 01/31/87.

Note: The Region received a verbal response (prior to 01/31/87) regarding the outstanding Class I violations. A written response dated February 9, 1987, indicates that five financial violations at storage/treatment facilities remain unresolved. Further discussion between the Region and IEPA is planned to determine what actions are necessary.

BASED ON A TOTAL OF 317 CASES

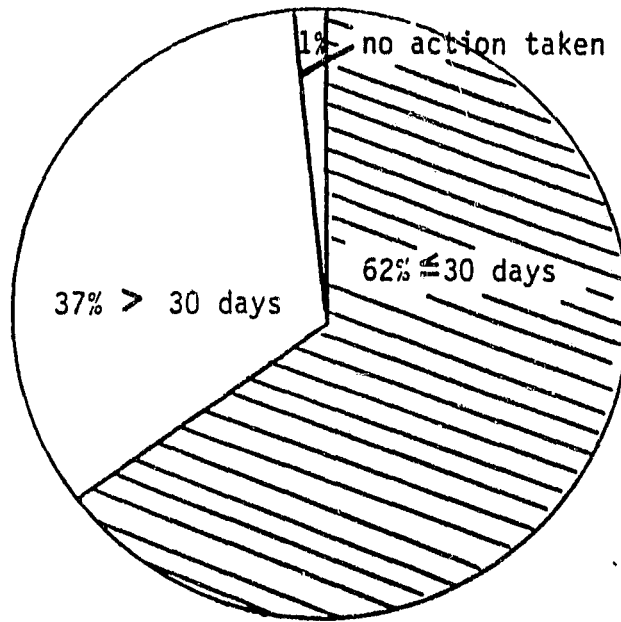


Figure 1. Timeframes for Initial Actions

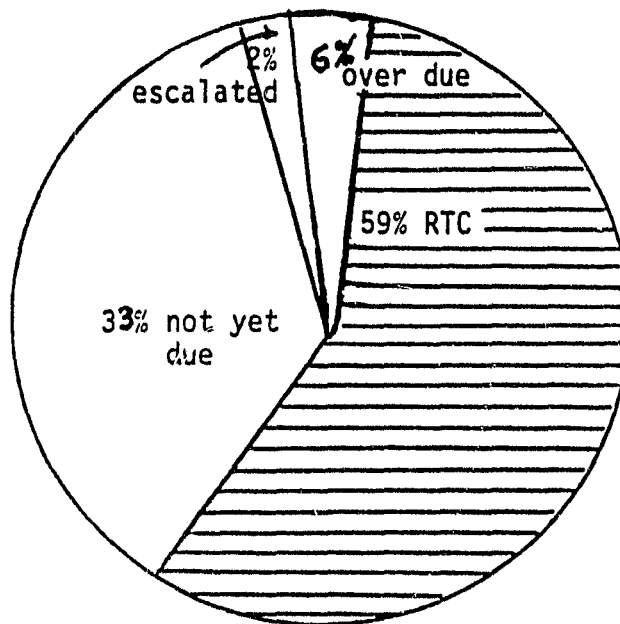


Figure 2. Status of Other Class I's

Program Element III: Permitting

Introduction

Under this Element of the work plan, IEPA committed to perform four Objectives, including the development of a Multi-Year Facility Management Strategy, preparation of facility management plans for all environmentally significant land disposal facilities, review of permit applications, and the processing of facility closures. The State concentrated its efforts and resources during FY'86 on the HSWA planning activities and on closure plan approvals. These were extremely beneficial in laying the framework for meeting the November 8, 1988 deadline for issuing all land disposal permits. The IEPA completed timely, good quality outputs, and used the Implementation Contract effectively to supplement permit resources during the facility management planning process. IEPA completed a draft land disposal permit prior to year-end, and has scheduled two major commercial landfills for permit issuance in FY'87.

Summary of State Performance

During FY'86 IEPA worked closely with Regional permitting staff to develop a Multi-Year Facility Management Strategy, and Joint Permitting Procedures. The Strategy was submitted on July 15, 1986, and was consistent with Regional guidance. Permitting roles and responsibilities to ensure parallel issuance were identified, and quarterly commitments were outlined for final determinations and interim milestones. Both outputs under this objective were timely and of good quality; the State has agreed to update its strategy in conjunction with the Region on a quarterly basis.

As a result of the HSWA of 1984, IEPA committed to screen all land disposal facilities for environmental significance, and to develop Facility Management Plans (FMPs) for those facilities with a positive determination. A total of 19 LDF screens and 56 LDF FMPs were completed in FY'86. All commitments were met within established timeframes and were of excellent quality. The State's FMPs were thorough, and closely coordinated within the areas of enforcement, permitting, and CERCLA. The extensive file searches done as a part of the FMP process are expediting RFA work, and allowing U.S. EPA staff to focus on sampling plans for those facilities with a known or suspected release. IEPA also completed 73 screens for storage/treatment facilities, although not a commitment, and is credited with 10 RFAs for land disposal facilities. Specific comments on the RFAs can be found in Attachment D.

The State committed to only limited review of Part B permit applications during FY'86, as its resources were exhausted by facility closures, screens, and FMPs. A total of 21 permit outputs were completed as scheduled; a detailed file audit summary can be found in Attachment D. IEPA did not want all permit reviews to languish during the FMP process, so the State utilized the RCRA Implementation contract to perform several technical evaluations of land disposal facilities during the latter half of the year. IEPA provided technical oversight of the contract work, and kept the work on schedule. The contract support provided the necessary "boost" to the Part B reviews at these facilities to allow them to be targeted for draft or final permits in FY'87.

IEPA was also able to draft a permit for the 3M Incinerator and the Velsicol injection well during the third quarter. During the fourth quarter the State wrote "Appendix IX letters" to land disposal facilities, to accelerate the permit process for these priority sites.

The majority of State resources under this Program Element in FY'86 were concentrated on facility closure processing. IEPA approved 151 closure plans or modifications, including 27 for land disposal facilities. The quality of the State's closure reviews was a concern during FY'85 but this deficiency has been corrected. The State and Region developed a closure review checklist to ensure consistency with the National and Regional closure performance standards.

The checklist was implemented at mid-year, and Regional audits have found the results impressive. The State's decision making process is well-documented, and administrative logging and tracking appears flawless. Plans are being processed within regulatory timeframes, and consistency among reviewers is good; the similarity in logic and technical philosophy suggests that training is being provided and guidance utilized. Individual audit results can be found in Attachment D.

Finally, IEPA has made good progress in the area of public participation. Two sites were identified in FY'86 for expanded public participation. The State requested and received training in this area during the fourth quarter.

Conclusion

IEPA is in a good position to meet the November 8, 1988 deadline. The FMP process was thorough, and has laid a good framework for the next few years. The Velsicol permit issued during the fourth quarter allowed the joint permitting procedures and public noticing to be "field-tested"; the 3M draft permit gave IEPA experience in changing Federal regulatory citations to State citations. Steps were taken to accelerate permit processing at land disposal facilities, and closure plans for the majority of remaining LDFs were approved. Coordination and communication with the Region in all areas of all Objectives is Highly Satisfactory.

While short term goals appear to be achievable, IEPA must still process 60-80 storage/treatment permit applications, received prior to November 8, 1984, by November 8, 1992. Furthermore, all other Illinois facilities seeking a permit must submit an application by November 8, 1988, or lose interim status. The number of facilities could total 200-300. IEPA does not currently have sufficient resources to review these permit applications in a timely manner. Also, as the State is authorized for HSWA clusters, additional responsibilities will be resource-intensive. The Region strongly encourages IEPA to seek authorization for additional permit positions and/or to secure the necessary contractual support to meet this challenge.

The Region is concerned that without significant additional resources, IEPA will be unable to maintain a quality hazardous waste permitting program.

Program Element IV: Management and Reporting

Introduction

During FY'85 and FY'86, IEPA made several changes to its management and reporting systems, which had a significant, positive impact on the State's program. These changes included regular meetings of all program managers to discuss progress in meeting grant commitments, and computerized tracking of grant activities, which produced functional management reports for grant monitoring. The result has been timely reporting of accomplishments, good tracking systems, and effective utilization of grant resources.

Summary of State Performance

IEPA committed under this program Element to submit the Status of Permit Actions Report (SPAR), the Compliance Monitoring and Enforcement Log (CMEL) report, updated Facility Status Sheets, and hard copies of groundwater activities/data, by the 20th of the following month. File audits performed during the fiscal year verified that reporting is generally accurate. Escalated actions, including referrals to the Region, A.G. or States Attorney, and filings by the A.G. or States Attorney, were not being reported consistently at mid-year. However, a corrective measure was developed and implemented by the State, so that escalated actions are now being reported. As discussed under Program Element II, the State and Region are currently working together to improve the utility of the State's CMEL report as a data entry document for HWDMS. IEPA is providing the Region with floppy disks on a trial basis, to determine if the Region can extract all required information.

Although the State did not develop a formal, written training plan during FY'86, training needs were assessed, and steps taken to ensure priority courses. IEPA staff completed a graduate level course in hydrogeology at Illinois State University, and attended the permit writer public participation training. A formal plan was developed and submitted with the FY'87 grant application.

Under this Program Element, the State is also responsible for monitoring and utilizing workyears as allocated in the grant work plan, providing an equipment inventory, and updating its QAPP. IEPA did not meet its original schedule for submitted of the QAPP and equipment inventory. The schedules were renegotiated as part of a corrective action, and both outputs were submitted accordingly. The update to the Illinois RCRA QAPP was approved by Region V Environmental Services on October 17, 1986. The state has done an excellent job of monitoring workyear usage. Staff timecards reflect actual work hours spent under each program element.

The State is quick to notify the Region of potential under-earning changes in the indirect rate, significant vacancies, and internal reorganizations. At this time, the State expects to under-earn the grant by approximately \$150,000 due to a change in the State's indirect rate.

Finally, the State is responsible under this Program Element for negotiating and submitting its annual grant application/work plan. IEPA was very cooperative during the negotiating sessions with the Region, and submitted a draft application on August 11, 1986, and a final on October 15, 1986. A few additional revisions have been made, and the grant awards package is currently being prepared. The work plan is consistent with National guidance and policy, is clear, concise, and contains specific milestones/objectives with timeframes. The State's commitments support Regional SPMS commitments with respect to permitting and enforcement.

Conclusion

IEPA has developed and implemented excellent management and reporting systems, which enable the state to track program commitments and workyear utilization. Financial Status Reports (FSR's) are timely and accurate; the State has an approved QAPP. Illinois has a well-defined, functional process for negotiating the grant work plan, which encourages the participation of all program managers. Performance has been satisfactory in all objectives under this Program Element.

8001 Grants

Task 1 - Industrial Material Exchange Service (IMES)

1. Pamphlet Printing and Distribution: IMES continues to publish every two months. Printing has increased to approximately 9800 copies from approximately 8500 copies. Distribution by outside agencies include:

- Kentucky Division of Waste Management
- Iowa Association of Business
- Louisville Chamber of Commerce
- Minnesota Division of Solid & Hazardous Wastes
- Oklahoma Waste Exchange
- Wisconsin Bureau of Solid Waste Management
- Missouri Environmental Improvement Authority

In addition to distribution by these above Agencies IMES also shares information with the attached list of waste exchanges.

2. Data System: A one day workshop was held in Springfield on 12/12/86 and was attended by 5 "outside" waste exchanges. The purpose was to finalize the data base for automated transmission of data among these exchanges. A user's manual will be developed to assist participating exchanges in this effort.
3. Reuse and Recycling Activities: IMES continues to review supplemental special waste stream permit applications to determine if potentially recyclable material is involved. If yes, the applicant is notified of potential markets where material can be recycled rather than landfilled. This review helps to ease the impact of the Illinois landfill ban of hazardous waste - effective January 1, 1987.

IMES has surveyed 183 American Embassies to seek innovative approaches to recycling. Information is still being received from this October 21, letter.

4. Other: IMES has worked with the Illinois Department of Energy and Natural Resources concerning sales tax credits for certain recycled materials as an incentive for recycling. This work is part of a DENR report which is due to the Illinois Legislature in April.

Task 2 - Small Quantity Generators

1. Grant dollars are being spent to assist in the tracking, handling, and printing of manifests.
2. IEPA has participated in two work sessions (May 21, and June 5, 1986) concerning regulatory requirements and small quantity generators and sponsored by the Illinois Hazardous Waste Research and Information Council. Agency staff also discussed small quantity regulatory requirements with the Graphic Arts and Paper Association in Itasca, Illinois on October 8, 1986.

NON-PROFIT WASTE EXCHANGE IN NORTH AMERICA
CURRENTLY SHARING INFORMATION

*Ms. Karen Beliveau
Alberta Waste Materials Exchange
4th Floor Terrace Plaza
4445 Calgary Trail South
Edmonton, Alberta
Canada T6H 5R7
(403) 450-5461

Mr. Robert McCormick
California Waste Exchange
Department of Health Services
Toxic Substances Control Division
714 P Street
Sacramento, CA 95814
(916) 324-1807

Dr. Robert Laughlin
Canadian Waste Materials Exchange
Ontario Research Foundation
Sheridan Park Research Community
Mississauga, Ontario
CANADA L5k 1R3
(416) 822-4111

Mr. William Stough
Great Lakes Regional Waste Exchange
470 Market St. S.W. Suite 100A
Grand Rapids, MI 49503
(616) 451-8992

*Ms. Karen Evans
Indiana Waste Exchange
Environmental Quality Control
1220 Waterway Boulevard
P.O. Box 1220
Indianapolis, IN 46206
(317) 634-2142

Ms. Margo Siekerka
Industrial Material Exchange Service
2200 Churchill Road, 024
Springfield, Illinois 62706
(217) 782-6762

*Mr. James Ferguson
Manitoba Waste Exchange
c/o Biomass Energy Institute
1329 Miakwa Road
Winnipeg, Manitoba
CANADA R2J 374
(204) 257-3891

Mr. Lewis M. Cutler
Northeast Industrial Waste Exchange
90 Presidential Plaza
Suite 122
Syracuse, New York 13202
(315) 422-6572

Ms. Mary McDaniel
Southeast Waste Exchange
Urban Institute
URCC Station
Charlotte, NC 28223
(704) 547-2307

Dr. Roy Herndoe
Southern Waste Information Exchange
P.O. Box 6487
Tallahassee, FL 32313
(904) 644-5516

Mr. Ernie Blankenship
Tennessee Manufacturers and Taxpayers
Association
226 Capitol Boulevard
Suite 800
Nashville, TN 37219
(615) 256-5141

Dr. Nicholas Rild
Western Waste Exchange
ASU Center for Environmental Studies
Krause Hall
Tempe, AZ 85287
(602) 965-1858

*Ms. Linda Varangu
Peel Regional Waste Exchange
Regional Municipality of Peel
10 Peel Center Drive
Brampton, Ontario
Canada L6T 4B9
(416) 791-9400

Mr. Doe Ingies
Montana Industrial Waste Exchange
Montana Chamber of Commerce
P.O. Box 1730
Helena, Montana 59624
(406) 442-2405

* new since July 1, 1986

Attachment A
 FY'86 STATE INSPECTION COMMITMENTS AND
 ACCOMPLISHMENTS

CATEGORY	COMMITMENT					ACTUAL				
	1st	2nd	3rd	4th	YEARLY	1st	2nd	3rd	4th	CUMM.
LAND DISPOSAL FACILITIES	20	14	20	13	67	17	23	11	16	67
CMEs (Comprehensive Ground Water Monitoring Evaluations)	10	10	10	7	37	12	7	13	8	40
CEIs (Compliance Evaluation Inspections)	20	14	20	13	67	17	23	11	16	67
OTHER STORAGE/TREATMENT FACILITIES (50% of the universe)	42	32	42	32	148	46	59	61	18	184
GENERATORS/TRANSPORTERS (2% of the universe)	20	15	20	15	70	50	61	41	45	197
ALL PERMITTED FACILITIES (not included in the above)	2	2	2	0	6	2	1	0	2	5 *
CLOSED FACILITIES (within 90 days of closure certification)	N/A	N/A	N/A	N/A	N/A	10	13	9	10	42

* One permitted facility had closed.

Attachment B - Illinois

UNIVERSE OF EVALUATIONS (CASES) IDENTIFYING ONE OR MORE OTHER CLASS I VIOLATIONS BETWEEN OCTOBER 1, 1985 AND SEPTEMBER 30, 1986.

	#	%		#	%
1. TOTAL CASES IDENTIFIED	317	100%	4. CASES WITH ESCALATED ACTION	6	X
2. INITIAL ACTIONS TAKEN	315	X	a. Cases with AO ≤ 180 days of DOD	N/A	N/A
a. Cases with initial action ≤ 30 days of DOD	197	62%	b. Cases with AO > 180 days of DOD	N/A	N/A
b. Cases with initial action > 30 days of DOD	118	37%	c. Cases referred ≤ 210 days of DOD	6	100%
c. Cases with no initial action	2	01%	d. Cases referred > 210 days of DOD	0	0%
d. Average number of days to initial action	32	X	e. Total cases escalated within the established timeframes	6	100%
e. Percent of total cases identified with an initial action $(a+b) \div 1 \times 100$	X	99%	f. Average number of days to escalated action (AO or referral)	176	X
f. Cases not due for an initial action (<30 days)	0	0%	g. Percent of total cases identified having escalated action, not RTC $\frac{a + b + c + d}{1} \times 100$	X	2%
3. CASES RETURNED-TO-COMPLIANCE (RTC)	188	X	5. CASES THAT ARE OVERDUE (> 210 days of DOD without RTC or escalated action) out of the total cases identified	18	6%
a. Cases RTC ≤ 210 days of DOD	184	98%	6. CASES NOT YET OVERDUE (< 210 days of DOD) out of the total cases identified	105	33%
b. Cases RTC > 210 days of DOD	4	2%			
c. Average number of days to RTC	105	X			
d. Percent of total cases identified that are now RTC $\frac{a + b}{1} \times 100$	X	59%			

SUMMARY:

Total cases = 3 + 4 + 5 + 6 = 317

Total percent of actions taken, not due, or overdue
 $3d + 4g + 5 + 6 = 59 + 2 + 6 + 33 = 100\%$

Total percent of initial actions = $2a + 2b + 2c + 2f$
 $= 62 + 37 + 1 = 100\%$

Cases resolved successfully = $\frac{3a + 4e}{\text{total} - 5} = \frac{190}{212} = 90\%$

ATTACHMENT C
SUMMARY OF PERMIT APPLICATIONS PROCESSED
FEDERAL FISCAL YEAR ENDED FFY-86

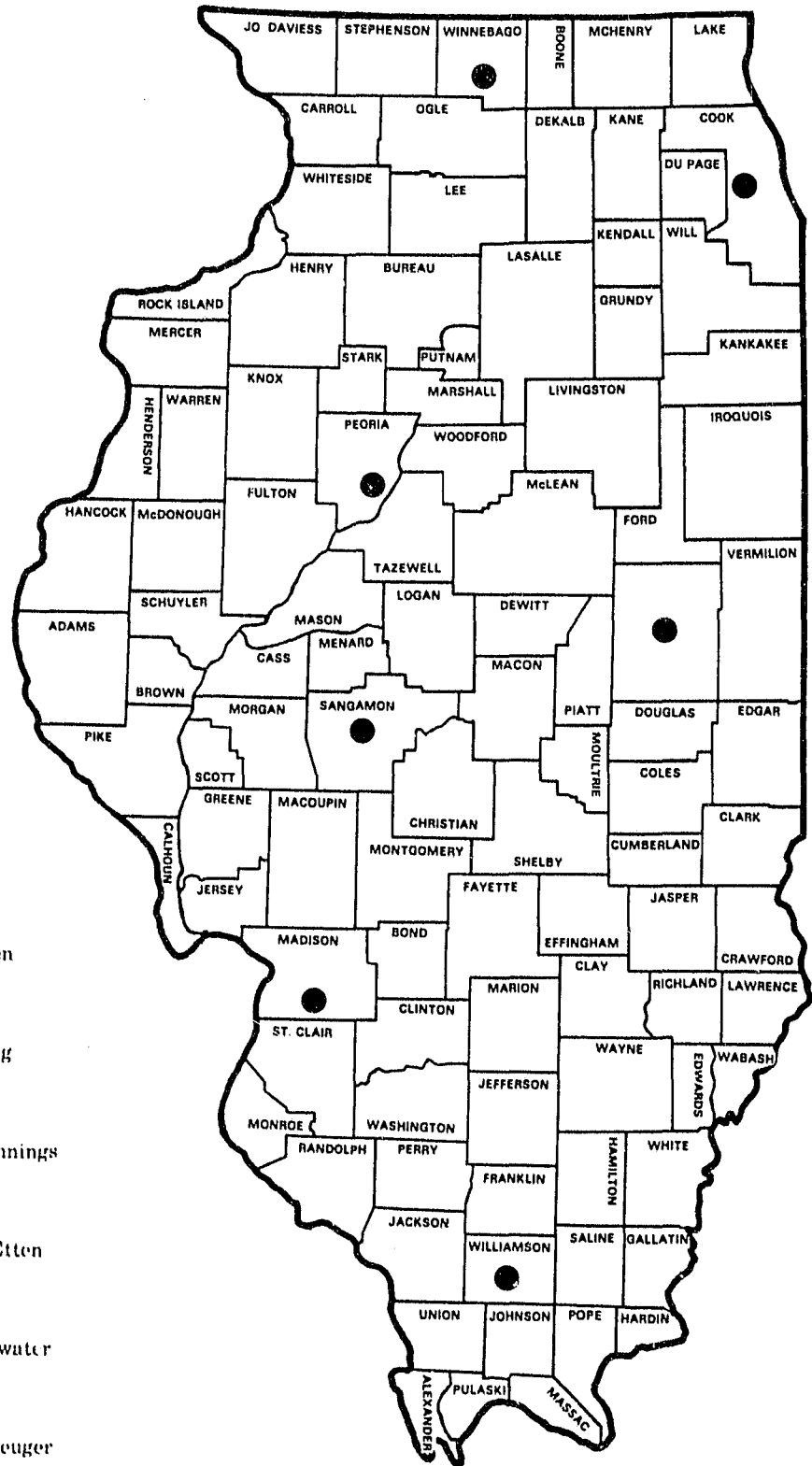
TYPE OF SITE OR FACILITY	OCT	NOV	DEC	JAN	CLOSURE PLAN ACTIVITIES							
					FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT
CLOSURE PLANS RECEIVED (1st Time)	22	19	14	6	9	11	8	11	13	18	6	15
	22	41	55	61	70	81	89	100	113	131	137	152
PLANS REJECTED	7	10	9	13	10	5	3	4	6	4	2	7
	7	17	26	39	49	54	57	61	67	71	73	80
PLANS APPROVED-STPR (S01,S02,T01,T04)	6	8	9	13	15	13	9	9	10	7	17	7
	6	14	23	36	51	64	73	82	92	99	116	123
PLANS APPROVED-INCINERATION (T03)	0	0	0	0	0	0	0	0	1	0	0	0
	0	0	0	0	0	0	0	0	1	1	1	1
PLANS APPROVED-DISPOSAL (S03,S04,T02,D80,D81,D83)	2	0	1	2	1	2	2	6	4	3	2	2
	2	2	3	5	6	8	10	16	20	23	25	27
TOTAL PLANS APPROVED	8	8	10	15	16	15	11	15	15	10	19	9
	8	16	26	41	57	72	83	98	113	123	142	151
FACILITIES CLOSED-STPR	3	2	1	2	5	2	0	6	2	6	3	2
	3	5	6	8	13	15	15	21	23	29	32	35
FACILITIES CLOSED-INCIN.	0	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0	0
FACILITIES CLOSED-DISPOSAL	1	1	0	0	0	2	1	0	0	0	0	1
	1	2	2	2	2	4	5	5	5	5	5	6
TOTAL CLOSED	4	3	1	2	5	4	1	6	2	6	3	3
	4	7	8	10	15	19	20	26	28	34	37	40

SUMMARY OF PART B PERMIT APPLICATIONS PROCESSED
FEDERAL FISCAL YEAR ENDED FFY-86

TYPE OF SITE OR FACILITY		PART B PERMIT ACTIVITIES											
		OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT
COMPLETENESS	STORAGE/TREATMENT	0	0	0	0	0	0	1	0	0	0	0	0
		0	0	0	0	0	0	1	1	1	1	1	1
	INCINERATION	0	0	0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0	0	0	0
	DISPOSAL	5	0	0	0	0	0	0	0	0	0	0	0
	5	5	5	5	5	5	5	5	5	5	5	5	
TECHNICAL REVIEW	STORAGE/TREATMENT	0	1	0	0	0	0	0	0	0	0	0	0
		0	1	1	1	1	1	1	1	1	1	1	1
	INCINERATION	0	1	0	0	0	0	0	0	0	0	0	0
		0	1	1	1	1	1	1	1	1	1	1	1
	DISPOSAL	3	2	1	0	0	0	0	0	1	0	0	1
	3	5	6	6	6	6	6	6	7	7	7	8	
DRAFT PERMIT	STORAGE/TREATMENT	0	0	0	0	0	0	0	0	0	1	0	0
		0	0	0	0	0	0	0	0	0	1	1	1
	INCINERATION	0	0	0	0	0	0	0	0	1	0	0	0
		0	0	0	0	0	0	0	0	1	1	1	1
	DISPOSAL	0	0	0	0	0	0	0	0	0	0	0	1
	0	0	0	0	0	0	0	0	0	0	0	1	
TIMELINESS	NO. EARLY	3	2	1	0	0	0	0	0	0	0	0	0
		3	5	6	6	6	6	6	6	6	6	6	6
	DAYS EARLY	14	8	1	0	0	0	0	0	0	0	0	0
		14	22	23	23	23	23	23	23	23	23	23	23
	NO. ON TIME	5	2	0	0	0	0	0	0	0	0	0	0
		5	7	7	7	7	7	7	7	7	7	7	7
NO. LATE	0	0	0	0	0	0	0	0	0	0	0	0	
	0	0	0	0	0	0	0	0	0	0	0	0	

APPENDIX IV

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGIONAL BOUNDARIES AND OFFICE HEADQUARTERS LOCATIONS



REGIONAL OFFICES

ROCKFORD

Regional Coordinator-Harris Chien
(815) 987-7755

MAYWOOD

Regional Coordinator-Ted Denning
(312) 345-9780

PEORIA

Regional Coordinator-Richard Jennings
(309) 691-2200

CHAMPAIGN

Regional Coordinator-Cecil Van Etten
(217) 333-8361

SPRINGFIELD

Regional Coordinator-Bud Bridgewater
(217) 786-6892

COLLINSVILLE

Regional Coordinator-Robert Schleuger
(217) 345-6220

MARION

Regional Coordinator-Larry Ziemba
(618) 997-4371

APPENDIX V

IV. ENFORCEMENT MANAGEMENT SYSTEM

A. SYSTEM COVERAGE

The Division of Land Pollution Control uses the following enforcement management system (EMS) to maximize the enforcement efforts of the Division. This EMS is based on the functioning of five groups within the Division. The five groups are regionally located field offices under Field Operations Section (FOS), a centrally located Enforcement Programs, a centrally located Permit Section, a centrally located Compliance Monitoring Section and a centrally located Remedial Project Management Section. Under this system each of these groups has responsibility for certain outputs and certain interactions with the other groups.

The Land Division views enforcement activity as a fundamental and necessary response to bring violators into compliance, deter other potential violations from non-compliance, encourage other violators to seek voluntary compliance, and to remove economic and other incentives for companies to be out of compliance. The Land Division, however, believes that enforcement activity should be utilized to punish non-compliance activities only when the protections offered under the criminal justice system are available. The EMS addresses procedures that pertain to "enforcement activity" before the Pollution Control Board or a court of competent jurisdiction. The EMS recognizes the need to utilize formal enforcement vigorously through administrative orders and court actions in order to obtain compliance and deter violations of hazardous waste handling and underground injection control requirements. Because of the nature of the litigation process in terms of length of time in

prosecuting violations and the very large and diverse community of hazardous waste handlers in Illinois, it must be recognized that the enforcement oriented approach represented in this EMS is part of a multi-year effort to obtain substantial, long-term compliance with hazardous waste requirements. This approach has worked effectively in other IEPA program areas and is expected to work as favorably in achieving compliance with hazardous waste handling and underground injection requirements.

The procedures contained in this EMS set forth a variety of program responses to different types of violations depending on the nature of the violation and its impact or potential impact on public health or the environment. Because of the integration of the various program responses it is not possible to set forth a simple flow chart delineating "maximum" time frames for increments within the process. To do so would create a skewed evaluation of the IEPA's performance under this EMS and an improper assessment of the IEPA's capability to escalate enforcement action as delineated in the federal Enforcement Response Policy (December 21, 1984) "ERP" (See Appendix 18). It is the Agency's intention and goal to initiate and complete enforcement activity within the constraints of the ERP. To that end the Agency has incorporated the ERP criteria as set forth in this EMS in a manner which is intended to assure performance consistent with ERP guidelines.

The procedures set forth in this CMS are intended solely for the guidance of employees of the IEPA and the U.S. Environmental Protection Agency. They are not intended to nor do they constitute rulemaking by

the IEPA, and may not be relied upon to create a right or a benefit, substantive or procedural, enforceable at law or in equity, by any person. IEPA officials may take any action that is at variance with the procedures contained in this document if determined to be appropriate in a specific case.

This EMS applies to enforcement activity concerning treatment, storage, and disposal sites, generators, transporters and Class I and IV underground injection wells (as defined under 35 Ill. Adm. Code 730).

B. PRIORITY OF ENFORCEMENT

Enforcement considerations and actions are directed to violations with priority of enforcement determined as follows:

1. High priority violators. High priority violators are defined as all treatment storage or disposal sites who:
 - a. Are Significant Noncompliers (as defined below), or
 - b. Have one or more Class I violations of Subparts G or H of 35 Ill. Adm. Code 724 or 725 and
 - 1) Pose likelihood of exposure to hazardous waste, or have caused actual exposure; or
 - 2) Have realized substantial economic benefit as a result of noncompliance;
or
 - 3) Are recalcitrant or chronic violators (including handlers who are violating schedules in orders or decrees).

A Significant Noncomplier is a land disposal facility with Class I violations of Subparts F, G or H. A land disposal facility includes any facility which had any of the following units in operation between November 19, 1980 and the present: D80, S04, T02, D83, D81, S03, D79. Included as land disposal facilities are facilities with any of the above units in operation between November 19, 1980 and the present which have partially or completely closed such units, which have had the waste in such units delisted ("temporary exclusion") or which should have notified and filed Part A application for such units, but did not. Land disposal facilities, however, do not include protective filers who did not place the units in actual operation.

2. Class I violations. A Class I violation is a violation that results in a release or serious threat of release of hazardous waste to the environment, or involves the failure to assure that groundwater will be protected, that proper closure and post-closure activities will be undertaken, or that hazardous wastes will be destined for and delivered to permitted or interim status facilities or involves a significant noncompliance at a Class I or Class IV injection well (as defined by Balton memo dated March 28, 1986). Examples of Class I violations are included in Appendix 11.

NOTE: The term "Class I" in the phrase "Class I violations" does not have the same meaning as "Class I" in the phrase "Class I injection well".

3. Class II violations. Class II violation is any violation of RCRA requirements that does not meet the criteria listed above for Class I violations. Example of Class II violators are included in Appendix 11.

C. PRE-ENFORCEMENT ACTIVITY

Field Operations Section

FOS is responsible for inspections of treatment, storage, and disposal (TSD) sites, generators and transporters and underground injection wells.

If an inspection reveals a violation of any RCRA or UIC requirement the regional FOS Manager refers the violations to the Facilities Compliance Unit (FCU) to prepare and transmit to the site owner/operator a Compliance Inquiry Letter (CIL) (See Appendix 12). For Class I violations the CIL will normally be sent within 25 to 30 days and no later than 35 days after the field inspection, unless sampling analysis results must necessarily be included with the CIL, but are not available during the 35 day time frame. If the site is owned and operated by different parties a CIL should be directed to each. Where as a result of an inspection only non-RCRA or non-UIC violations are detected, the regional FOS Manager shall use his discretion as to whether a CIL or other letter is appropriate under the circumstances, bearing in mind that a minor violation at a non-RCRA or non-UIC site may still require a CIL if the site has a continual history of minor violations.

The CIL specifies the problems at the site, the violations observed, references the date on which the inspection occurred and concludes that the problems must be rectified or legal action may result. The CIL also requests a written response within fifteen days. The CIL will be signed by the manager of the Facilities Compliance Unit. The CIL is tracked by FCU as to whether a response was received and whether such response is adequate or not. The adequacy of the response will be determined by FOS. The physical tracking of the CIL is done by FOS on the monthly Enforcement Activities Report. (Appendix 13) and by Hazardous Waste Regional Coordinator in FCU. Compliance activities are also tracked through the submission of Compliance Monitoring and Enforcement Logs (CMEL's) or their equivalent. (Appendix 2)

If the response to the CIL is satisfactory that matter will be removed from the CMEL report as satisfactorily resolved. If the CIL was based on field-observed violations, site inspections will be scheduled in order to verify that the remedial action outlined in the satisfactory CIL response is adhered to. Even if an adequate response is received to a specific CIL, all past violations may be included as alleged violations if enforcement activity becomes necessary at a future time. For Class I violations, a field inspection to determine if field observed violations have been corrected generally will be conducted 1) within 90 days after the date by which the owner or operator committed to correct the violation in the response to the CIL. Where a follow-up inspection demonstrates that the remedial action has corrected the violations, the violator will be informed of the results of the inspection.

If the CIL results in an unsatisfactory response to Class I violations or if no response is received by the Agency to Class I violations by the designated date, the matter will be discussed at the next scheduled monthly Regional Enforcement Meeting. This meeting will normally occur 20 to 25 days after the response and no later than 30 days, unless scheduling difficulties require postponement of the case discussion or the Regional Enforcement Meeting.

Permits Section

In addition to its other responsibilities with regards to review and issuance of state and RCRA permits as delineated previously in this document, the Permits Section is responsible for review and approval of closure and post closure plans to determine compliance with Subpart G and review and approval of financial assurance documents to determine compliance with Subpart H for regulated treatment, storage and disposal sites. The highest priority in this review process is given to land disposal facilities with Class I violations of Subparts G or H. The same general procedures, however, are used for other facilities as well.

If a record review reveals that Subpart G or H documents which have been received from a facility are insufficient, a formal CIL will be sent to the facility. (Appendix 12) For significant noncompliers the CIL will normally be sent with 15 to 20 days and no later than 35 days after the record review is completed. Where different facilities within Illinois are owned by the same company, a separate CIL will be transmitted for each site. The CIL specifies uncorrected violations of Subpart G or H documents and concludes with a statement that the problems must be rectified or legal action may result. The CIL also requests a written

response within fifteen days. The CIL will be signed by the Facilities Compliance Unit Manager. The CIL is tracked by the Program Development Unit and by Hazardous Waste Regional Coordinators in FCU as to whether a response was received and whether the response was adequate or not. Compliance activities are tracked through the submission of CMEL's or equivalent. (Appendix 2)

If the response to the CIL is adequate, such will be reported on a CMEL or equivalent. If the CIL results in an unsatisfactory response to Class I violations or if no response is received by the Agency to Class I violations by the designated date, the matter will be escalated as set forth under "Enforcement Procedures".

Compliance Monitoring Section

In addition to its other responsibilities with regards to issuance of special waste hauling permits, collection of fees, and operation of a drillrig, as previously described, the Compliance Monitoring Section is responsible for regulating the acquisition of data from various handlers regarding compliance with Subpart F standards, state groundwater monitoring requirements, submission of annual hazardous waste reports, and operation of the manifest system. Although the following discussion applies to the various functions of the Compliance Monitoring Section in generally regulating hazardous waste the discussion will focus on regulation of Subpart F requirements because of the priority of enforcement under this EMS. Within the Compliance Monitoring Section, the regulation of Subpart F facilities also falls within the responsibility of the Facilities Compliance Unit. The Facilities Compliance Unit is responsible for approval of assessment plans submitted

under Subpart F and the evaluation of performance data submitted under Subpart F requirements. The procedures utilized by the Facilities Compliance Unit in reviewing such documents have been previously identified in this document. The Facilities Compliance Unit is also responsible for reviewing and evaluating performance data submitted under the state groundwater monitoring program and the underground injection control program. Highest priority, however, is given to regulation of Subpart F facilities.

If documents received by the Facilities Compliance Unit demonstrate a violation of Subpart F requirements a formal CIL will be sent to the facility. (Appendix 12) The CIL will normally be sent within 25 to 30 days and no later than 35 days. The CIL specifies uncorrected violations of Subpart F and concludes with a statement that the problems must be rectified or legal action may result. The CIL also requests a written response within fifteen days. The CIL will be signed by the Facilities Compliance Unit Manager. The CIL is tracked by the Facilities Compliance Unit as to whether a response was received and whether the response was adequate or not. Compliance activities are tracked through the submission of CMEL's or equivalent. If the response to the CIL is adequate, such will be reported on a CMEL or equivalent. If the CIL results in an unsatisfactory response to Class I violations or if no response is received by the Agency to Class I violations by the designated date, the matter will be escalated as set forth under "Enforcement Procedures".

In addition, within the Facilities Compliance Unit of the Compliance Monitoring Section the Agency employs 3 persons as Hazardous Waste

Coordinators to coordinate the use of information with regards to non-compliance and enforcement activity at RCRA sites. Each hazardous waste regional coordinator will be responsible for touching bases with all groups (FOS, Permits, Compliance, Enforcement) to assure that before a CIL is sent it contains all violations identified by those groups and does not somehow undermine one group's efforts. Whenever possible the Regions should follow coordinated inspection procedures so that all violations (F, G, ISS) identified by regional personnel are contained in the paragraphs sent by the field office to FCU for inclusion in the CIL.

The Facilities Compliance Unit will initiate and track up to the point of determination by EDG all compliance/enforcement actions for all RCRA facilities within Illinois. This activity will include CILs and PECLs for violations detected as a result of ISS inspections.

D. ENFORCEMENT PROCEDURES

Enforcement/FOS Interface

Each regional staff attorney is required to confer, in person or by conference call, with the regional FOS Manager at least once a month at a Regional Enforcement Meeting. At the Regional Enforcement Meeting (REM), the parties review the current status of all cases referred to Enforcement and review new cases suggested for enforcement by FOS. At this meeting, the parties review the previous month's Enforcement Activity Report as a control mechanism so both the FOS regional manager and Enforcement regional attorney can review progress in accomplishing the goals set the month before.

The Enforcement Activity Report (Appendix 13) sets forth the tasks to be performed for the following month by both the FOS region and staff

attorney. The Report also reflects the results of previous goals and dates upon which future tasks are to be completed. Finally, the Enforcement Activity Report tracks Compliance Inquiry Letters sent out for the region during the previous month.

Whenever there is no response to a CIL with Class I violations within the required response period or if the response to the Class I violations is found unsatisfactory by FOS, the case shall be reviewed by FOS and the Regional Attorney at the next monthly regional enforcement meeting. A joint decision will be made at the monthly regional enforcement meeting to either schedule additional inspections (which generally are to be completed within 90 days), confirm the adequacy of a response, refer the matter to FCU for the issuance of a Pre-Enforcement Conference Letter (Appendix 14) or refer the matter to the Enforcement Decision Group (EDG) with a recommendation for enforcement. This decision will be made after evaluation of the factors and criteria evaluated by EDG under this EMS in determining whether formal enforcement should be initiated.

In cases where the Division reasonably believes that compliance can be achieved more effectively by meeting with the handler before referring a case to Enforcement, FOS may prepare a Pre-Enforcement Conference Letter for transmittal to the handler by FCU. The form of the letter to be used appears as Appendix 14. The purpose of such a conference is to discuss with and assess the willingness of the handler to commit to a program to resolve the identified violations. Staff attorneys and regional coordinators may or may not be present as FOS, in consultation with Enforcement and CAS, determines. At such pre-enforcement

conferences FOS will discuss with the handler the measures necessary to correct the violations and determine if the handler is willing to commit to specific measures to correct the violations in a timely manner. If FOS determines that such a willingness exists, FOS may withhold purusit of enforcement action if: 1) the handler sends a letter to the Agency within 10 working days setting forth the measures and an expeditious schedule for correction of the violations or accepting such in a letter from the Agency and 2) the handler completes the measures in a timely manner as set forth in the letter. No substantive compliance measure may take longer than 6 months to complete. If compliance cannot be achieved within a maximum of 6 months, further enforcement should not be withheld. Within 3 working days after the pre-enforcement conference FOS will prepare a memo for the file detailing the attendees, the compliance measures discussed, the compliance measures the handler agreed to undertake or further investigate, and whether the handler has offered to send a letter setting forth its program. FOS will monitor compliance with the measures set forth by the handler. If the handler fails to send letter of commitment or acceptance within 10 working days or fails to meet scheduled items, the case shall proceed to active enforcement.

If the matter is to be referred to the EDG, a memorandum and supporting documentation is prepared outlining the circumstances of the case and is sent to the Regional Attorney over the signature of the regional FOS Manager. The enforcement referral package is prepared in time to allow EDG review at its next meeting, unless delays in transmittal would require postponement until the next meeting. As a

minimum, the enforcement referral package will contain a narrative of the problem, the specific violations cited, the dates the violations were observed, a technical evaluation as to how to remedy compliance deficiencies, lab analysis results (if available) and cost assessment information (if available). The Regional Attorney will review the materials, and transmit the referral package if sufficient, to the Division Senior Attorney. The Division Senior Attorney will transmit salient portions of each referral to each EDG member.

Compliance Monitoring/Enforcement Interface

Whenever there is no response to a CIL with a Class I violation within the required response period or if the response to the Class I violations is considered unsatisfactory by the Compliance Monitoring Section, CMS will determine whether to transmit a Pre-Enforcement Conference Letter (Appendix 14), refer the matter to the Enforcement Decision Group (EDG) with a recommendation for enforcement or to further investigate the matter. This decision will be made after evaluation of the factors and criteria evaluated by EDG under this EMS in determining whether formal enforcement should be initiated.

In cases where the CMS reasonably believes that compliance can be achieved more effectively by meeting with the handler before referring a case to Enforcement, CMS may prepare a Pre-Enforcement Conference Letter for transmittal to the handler by FCU. The form of the letter to be used appears as Appendix 14. The purpose of such a conference is to discuss with and assess the willingness of the handler to commit to a program to resolve the identified violations. Staff attorneys and regional coordinators may or may not be present as CMS, in consultation with

Enforcement, determines. At such pre-enforcement conferences CMS will discuss with the handler the measures necessary to correct the violations and determine if the handler is willing to commit to specific measures to correct the violations in a timely manner. If CMS determines that such a willingness exists, CMS may withhold pursuit of enforcement action if: 1) the handler sends a letter to the Agency within 10 working days setting forth the measures and an expeditions schedule for correction of the violations or accepting such in a letter from the Agency and 2) the handler completes the measures in a timely manner as set forth in the letter. No substantive compliance measure may take longer than 6 months to complete. If compliance cannot be achieved within a maximum of 6 months, further enforcement should not be withheld. Within 3 working days after the pre-enforcement conference CMS will prepare a memo for the file detailing the attendees, the compliance measures discussed, the compliance measures the handler agreed to undertake or further investigate, and whether the discharger has offered to send a letter setting forth its program. CMS will monitor compliance with the measures set forth by the handler. If the handler fails to send letter of commitment or acceptance within 10 working days or fails to meet scheduled items, the case shall proceed to active enforcement.

If the matter is to be referred to the EDG, a memorandum and supporting documentation is prepared outlining the circumstances of the case and is sent to the Division Senior Attorney. The enforcement referral package is prepared in time to allow EDG review at its next meeting, unless delays in transmittal would require postponement until the next meeting. As a minimum, the enforcement referral package will

contain a narrative of the problem, the specific violations cited, the dates the violations were observed, a technical evaluation as to how to remedy compliance deficiencies, lab analysis results (if available) and cost assessment information (if available). The Division Senior Attorney will transmit salient portions of each referral to each EDG member.

Interaction with Remedial Project Management Section

IEPA coordinates enforcement activities at identified CERCLA and Section 22.2 sites through the interaction of the Remedial Project Management Section (RPMS) with existing programmatic functions. Assigned Agency attorneys are generally responsible for assisting RPMS efforts in contract administration for fund financed cleanups and in negotiating settlement agreements for private party cleanups. Field staff inspectors and on-scene coordinators under the direction of Regional Managers are respectively responsible for investigations and contract management at CERCLA and Section 22.2 sites. In a typical case, a field investigation will reveal the existence of hazardous substances at an abandoned site. The investigation and enforcement options available will be discussed at the next Regional Enforcement Meeting. The Regional Manager and Regional Attorney have the option of proceeding directly against responsible parties, including the site owner, through the use of CIL and/or PCL or may refer the matter to EDG to determine if the matter should be turned over to the RPMS or other enforcement action taken. The EDG, upon receipt of the referral, will review the information to determine if additional investigative work is necessary and to determine if the matter should be referred to the RPMS to perform a fund-financed cleanup or to initiate the process for an HRS scoring. EDG will also determine whether additional

enforcement action should be taken immediately or deferred in light of the RPMS activity. In some cases immediate enforcement action could be counterproductive to correcting an environmental hazard for reasons such as access problems or lack of sufficient evidence.

E. ENFORCEMENT DECISIONS

The EDG is composed of senior management officials from the Division of Land Pollution Control which include the Division Manager, FOS Section Manager, Compliance Monitoring Section Manager, Permit Section Manager, Remedial Project Management Section Manager and Division Senior Attorney. The EDG group meets on a monthly basis and will normally consider and evaluate referrals concerning Class I violations within 20 to 25 days and no later than 30 days after the transmittal to EDG, unless delays in transmittals require postponement of consideration to a subsequent meeting. USEPA Region V, is informed of the results of each EDG meeting through Enforcement Conference Calls (ECC) (discussed below) and through transmittal of EDG meeting minutes.

The EDG will make its decision with regards to the enforcement action to be taken on all enforcement proposals. When a matter is referred to the EDG requesting permission to file a formal enforcement action, the EDG considers the following factors and criteria:

1. the sufficiency of the evidence to prosecute successfully;
2. the forum in which the matter should be prosecuted; and
3. whether or not all technical aspects of the case have been considered by Agency technical personnel.

As a result of its evaluation, the EDG may decide to: (1) refer the matter back for further investigation; (2) reject or suspend enforcement action; (3) request the issuance of an Enforcement Notice Letter as necessary; or (4) request that an enforcement action be prepared and referred. Where EDG concludes that additional investigation is necessary, that investigation is to occur promptly, but in not more than 90 days. EDG meeting minutes will note the time frame for completion of the additional investigation. Enforcement actions will be coordinated to assure consistency with any adopted Facility Management Plan ("FMP").

It is not necessary to issue an ENL as a condition precedent to referring all enforcement actions. Referrals to USEPA do not require issuance of an ENL, nor does referral to the AGO when the case will be filed in state or federal court. EDG may choose issuance of an ENL in such circumstances, however, where such action has a good probability of bringing the facility into expeditious compliance. It is necessary to issue an ENL with language offering a meeting in accordance with Section 31(d) of the Act if the case will be filed with the Board and a pre-enforcement conference under Section 31(d) was not previously held or offered.

The EDG will assign a high or normal priority to each case. The EDG will assign a high priority to cases involving "high priority violators" as defined under Part IV(B) and other violators which because of the significance of the non-compliance, should be addressed more expeditiously in the preparation of enforcement referrals.

The EDG will also designate whether the case should be referred for prosecution to the Attorney General's Office (AGO), the local State's Attorney or the U.S. Environmental Protection Agency (USEPA). If the

matter will be referred to the AGO, EDG will recommend prosecution before the Board, state court or federal court. If the matter will be referred to USEPA, EDG will recommend issuance of an administrative order or referral to the U.S. Department of Justice or other coordination with pending administrative action. Although it is not possible to specify the specific types or combinations of violations that will usually result in a referral to the AGO rather than Region V or vice versa, EDG does evaluate various factors in deciding where to refer a case. EDG will generally designate the forum to which a referral is to be made by taking into account the following considerations:

- a) whether the violations at the facility also include air or water violations extending beyond the jurisdiction of RCRA or UIC;
- b) whether the facility was previously prosecuted and, if so, the effectiveness of the prosecuting authority and its knowledge of the facility;
- c) whether the complexities of the RCRA or UIC violations at issuance would result in problems in convincing a state court or the Pollution Control Board as to the existence or the severity of the violations;
- d) the allocable resources of the prosecuting authority and its intentions with regards to expeditious prosecution;
- e) whether an administrative order will result in successful correction of violations;
- f) whether there are pending cases against the violating facility and the position of the litigation in such matters;
- g) whether immediate injunctive action is necessary;
- h) whether a criminal prosecution is being sought.

If the EDG elects to file an enforcement action, an Enforcement Notice Letter (ENL) (See Appendix 15) if necessary, will be sent to the site under the signature of the LPC Division Manager. For Class I violations the ENL will be sent within 15 days after the EDG meeting. The ENL will refer to the previously noticed violations, inform the site owner/operator that legal action will be instituted and specify the name of the assigned Agency Attorney. Thereafter, the assigned IEPA attorney is required to prepare and transmit the referral within 60 days after the issuance of the ENL and any meetings required by statute for any Class I violations other than high priority violations. Part IV(G) delineates the enforcement procedures for high priority violators.

When a referral is transmitted to the AGO or States Attorney, it should contain a narrative of the nature of the case, including a section that sets forth any special or unusual factual or legal problems; all supporting documentary evidence; a negotiating strategy for obtaining a monetary penalty figure, with supporting data, should the case be settled without trial; and, a ranking of the priority assigned to the case by EDG. A copy of the transmittal to the AGO or SA will be forwarded to Region V.

The Office of the Attorney General, as chief legal officer of the State of Illinois, is responsible for representing the interests of the State of Illinois in the courts of the State, U.S. courts, and the Pollution Control Board. As chief legal officer, the AGO decides whether or not it will prosecute cases referred to it by the Agency. After receipt of the IEPA referral an assistant attorney general will be assigned to prepare a complaint for filing with a state circuit court, federal district court or the Illinois Pollution Control Board, an

administrative agency with quasi-judicial authority including the power to assess penalties. After the complaint is prepared, it will be reviewed by the assigned IEPA attorney for correctness and completeness. The Attorney General's office then decides on which cases will be filed through use of a case review committee. This committee reviews the complaint and supporting summaries prepared by the individual assistant attorney general from documentation submitted with the IEPA referral. The timely filing of cases however, is an historical difficulty which has persisted through three AGO administrations. Prospects for improvement are not likely to be forthcoming, in part due to the Attorney General's position as an elected constitutional officer within state government.

The AGO has an Environmental Control Division which is responsible for representing the IEPA, the Illinois Department of Conservation, the Illinois Department of Public Health and the Illinois Department of Nuclear Safety. This division employs 22 attorneys (16 in Chicago; 6 in Springfield). IEPA currently staffs nine attorneys within the Division of Land Pollution Control which generally interface with the AGO through discussions with individual assistants attorney general concerning IEPA-referred cases. When differences of opinion between staff attorneys occur, management level personnel are involved to achieve resolution.

Once an enforcement case has been referred to the AGO, State's Attorney or USEPA for prosecution, Enforcement Attorneys coordinate the litigation on behalf of the Agency. Support by Agency Attorneys may include assistance in preparing discovery, producing witnesses and documents, and attending settlement negotiation conferences. Agency

Attorneys will discuss the status of cases with the appropriate prosecuting authority to determine any reason for delay in the prosecution.

When a referral is transmitted to USEPA, it should contain the following:

- . All ISS or UIC inspection reports. (Which should include identification of each hazardous waste by its name and hazardous waste number, the quantity of each waste generated, stored, etc., a description of the process which generates each hazardous waste and/or the rationale for determining that a waste is hazardous.)
- . All Compliance Inquiry Letters, Enforcement Notice Letters, etc.
- . The respondent's reply to the above and any subsequent exchange of correspondence.
- . Minutes, follow-up memos, or correspondence resulting from an enforcement conference.
- . Laboratory analysis results (if available).
- . Manifests (if pertinent).
- . Strengths/Weaknesses of legal position, facts or evidence.
- . A ranking of the priority assigned to the case by EDG.

On generally a monthly basis IEPA and Region V will have an enforcement conference call (ECC). During the ECC the Agency and Region V will discuss the following:

- a) Identification of high priority violators.
- b) High priority violators which have been referred to the AGO or Region V for which a complaint has not been issued within 60 days of the date of the IEPA referral;

- c) Updates on activities with regards to specific sites;
- d) Status of hazardous waste referrals to the AGO;
- e) EDG decisions concerning potential referrals to U.S.EPA indicating the site and type of violations. Region V should indicate its capability to process such referrals;
- f) Status of IEPA referrals to Region V in proceeding to issuance of administrative orders or referral to the Department of Justice;
- g) Status of negotiations on IEPA referrals to Region V.

Because of the historical difficulty which has persisted concerning the timely filing of IEPA referred cases by the Illinois Office of Attorney General, IEPA will continue to closely monitor AGO efforts on hazardous waste cases. For IEPA referrals of high priority violators not acted upon within 60 days, IEPA will inform Region V through the monthly ECC and will initiate discussions at the ECC to determine whether a referral would receive expeditious action by Region V and whether duplicative enforcement resources would be expended. Referral to Region V of such cases will result if consensus at the ECC is achieved as to the merit of such action.

The enforcement, variance and permit appeal activity of each Regional Attorney is summarized in quarterly status reports which are sent to the Division Manager, all Section Managers, the regional FOS Manager and others. Enforcement activities are also tracked through the submission of Compliance Monitoring and Enforcement Logs (CMEL's)(Appendix 2) utilizing free field codes developed by the IEPA (Appendix 16).

F. PENALTIES

The State of Illinois is able to sue in court or before the Pollution Control Board to recover civil penalties and in certain instances to seek criminal remedies, including fines, for hazardous waste violations. The IEPA, however, does not have authority to independently assess fines or penalties through use of administrative orders against hazardous waste handlers.

This lack of authority on the part of IEPA necessitates using all enforcement authority options that are available. In particular IEPA has used and will continue to utilize the enforcement order and penalty assessment capabilities of Region V against hazardous waste handlers. With respect to civil penalties sought in state cases, the State is enabled to seek penalties in amounts equal to the provisions under RCRA. Civil penalties for violations of Section 21 of the Environmental Protection Act or any RCRA permit or regulation may be assessed up to \$25,000 per day of violation. However, with regard to fines for felony convictions, Illinois is able to seek penalties significantly higher than those imposed by federal RCRA provisions.

Any person who knowingly disposes of hazardous wastes with conscious disregard that he places another person in danger or creates a danger to the public health, commits a Class 2 felony and is subject to a fine not to exceed \$500,000 for each day of the violation. If a person knowingly disposes of hazardous waste without lawful justification, he is guilty of a Class 3 felony and is subject to a fine not to exceed \$250,000 per day for each day of the violation. Any person who treats, transports, or stores any hazardous waste without a permit or license; treats,

transports or stores hazardous waste in violation of the terms and conditions of a permit or license; or transports any hazardous waste to a facility which does not have a permit or license is guilty of a Class 4 felony and is subject to a fine not to exceed \$100,000 for each day of violation. The reckless disposal of hazardous waste, the concealment of the criminal disposal of hazardous waste, and making false statements concerning generation, disposal, treatment, storage, or transportation are also Class 4 felonies but are subject to fines not to exceed \$50,000 for each day of violation.

The maximum civil penalty or criminal fines are assessable for each instance of violation. If the violations are continuous, they are assessable up to the maximum amount for each day of the violation. In determining the amount of penalty to be sought in any particular case, IEPA takes into consideration the following factors:

- the amount appropriate to address the harm or risk to public health or the environment;
- the amount appropriate to remove the economic benefit gained or to be gained from delayed compliance;
- the amount appropriate as a penalty for the violator's degree of recalcitrance, defiance, or indifference to requirements of the law;
- the amount appropriate to recover unusual or extraordinary enforcement costs thrust upon the public;
- the appropriate adjustments to reflect any part of the noncompliance attributable to the government itself;
- the appropriate adjustments to reflect any part of the noncompliance caused by factors completely beyond the violator's control (e.g., floods, fires);

- any extraordinary costs of investigations, inspections, or monitoring surveys which lead to the establishment of violations; and
- the amount to cover expenses incurred by the State in removing, correcting, or terminating any adverse effects upon human health and the environment resulting from the violation.

G. HIGH PRIORITY VIOLATORS

If an inspection, record review or other information reveals Class I violations which may be of a high priority nature one of the following procedures shall be utilized.

Where an inspection or other information demonstrates an emergency condition exists creating an immediate danger to health, the Regional FOS Manager will immediately contact the Agency's Emergency Response Unit (ERU) by telephone. ERU will bring the matter to the attention of the Director or Deputy Director. If it is considered that sealing of the site is necessary, a brief written memorandum will be prepared by the Regional Attorney for review by and discussion with the Director or Deputy Director. In the event that the Agency determines that an emergency condition exists creating an immediate danger to health, the Agency is authorized under Section 34 of the Environmental Protection Act to seal any equipment or other facility contributing to the emergency condition. It is a criminal offense to break any seal affixed by the Agency under Section 34. Under existing Agency procedures, only the Director or Deputy Director may authorize the sealing of a site.

Where the Agency determines that the seal provisions of Section 34 do not apply, but that immediate injunctive relief or a search warrant is

necessary the procedures previously set forth in this EMS need not be met prior to initiating a referral to the Attorney General's Office. If a Regional Manager believes that immediate injunctive relief or a search warrant should be sought as a result of an inspection or attempted inspection, he should immediately contact the Regional Attorney or Senior Attorney. If concurrence is obtained on the level of Division Manager or above, the referral will proceed immediately.

If an inspection, record review or other information reveals a Class I violation which may be of a high priority nature as defined under Part IV(B)(1)(b), but insufficient to warrant utilization of seal or immediate injunction authorities, the Regional or Unit Manager shall discuss the matter with the Division Senior Attorney, by telephone or otherwise, prior to issuance of the CIL. The purpose of this discussion will be to determine if the violations discovered constitute high priority Class I violations. If the Regional or Unit Manager, the Division Senior Attorney and the Division Manager or Deputy Division Manager concur that a high priority Class I violation exists then the CIL will combine language from Appendix 14 offering the opportunity for a Section 31(d) pre-enforcement conference, unless extenuating circumstances, such as on-going prosecutions or investigations, dictate otherwise. If the CIL is insufficient to resolve the violation, the matter will be referred to EDG for evaluation at its next meeting in accordance with Part IV(E). If EDG determines that additional investigation is necessary to assure that a violation has in fact been "discovered", that investigation must proceed immediately to assure completion of an aggressive enforcement response.

If EDG determines that enforcement should proceed, a referral to appropriate prosecuting authorities will be made within 30 days.

If an inspection, record review or other information reveals a high priority, violation as defined under Part IV(B)(1)(a), the following procedures will apply. The Compliance Section will transmit a CIL to the facility within 30 days after concluding that a high priority violation has, in fact, been discovered. The CIL, as set forth in Appendix 19, will inform the facility that the high priority violations will be referred to the appropriate prosecuting authority to seek assessment of a penalty. Contemporaneously, the compliance Section will transmit a copy of the CIL and the inspection report or record review documents to the Division Senior Attorney for evaluation by EDG at its next scheduled meeting in accordance with Part IV (E)(Appendix 20). If EDG determines that additional investigation is necessary to assure that a violation has, in fact, been "discovered", that investigation must proceed immediately to assure completion of an aggressive enforcement response. If EDG determines that enforcement should proceed, a referral to Region V will be made within 30 days using the simplified referral form set forth in Appendix 21.

H. CRIMINAL PROSECUTION

The Illinois Department of Law Enforcement employs a unit of law enforcement officers within the Division of Criminal Investigation which includes evidence technicians, that work with IEPA on potential criminal prosecutions. Such criminal matters come to IEPA's attention by various means, including citizen tips and incidents viewed by IEPA field inspectors. The Division of Law Enforcement works with the Agency to

conduct criminal investigations, and in such cases, applicable criminal procedures necessary to preserve evidence and establish a clear chain of custody are utilized. Arrest authority is available through the Division of Criminal Investigation. If it appears that there is enough evidence to prosecute a criminal prosecution, such a matter is usually brought by the Office of the Illinois Attorney General but, on occasion, such action may be brought by a local State's Attorney or referred to USEPA, Region V. Agency attorneys coordinate Agency activities in the pre-trial stage to prepare cases and in negotiating pleas to include appropriate penalties and compliance measures.

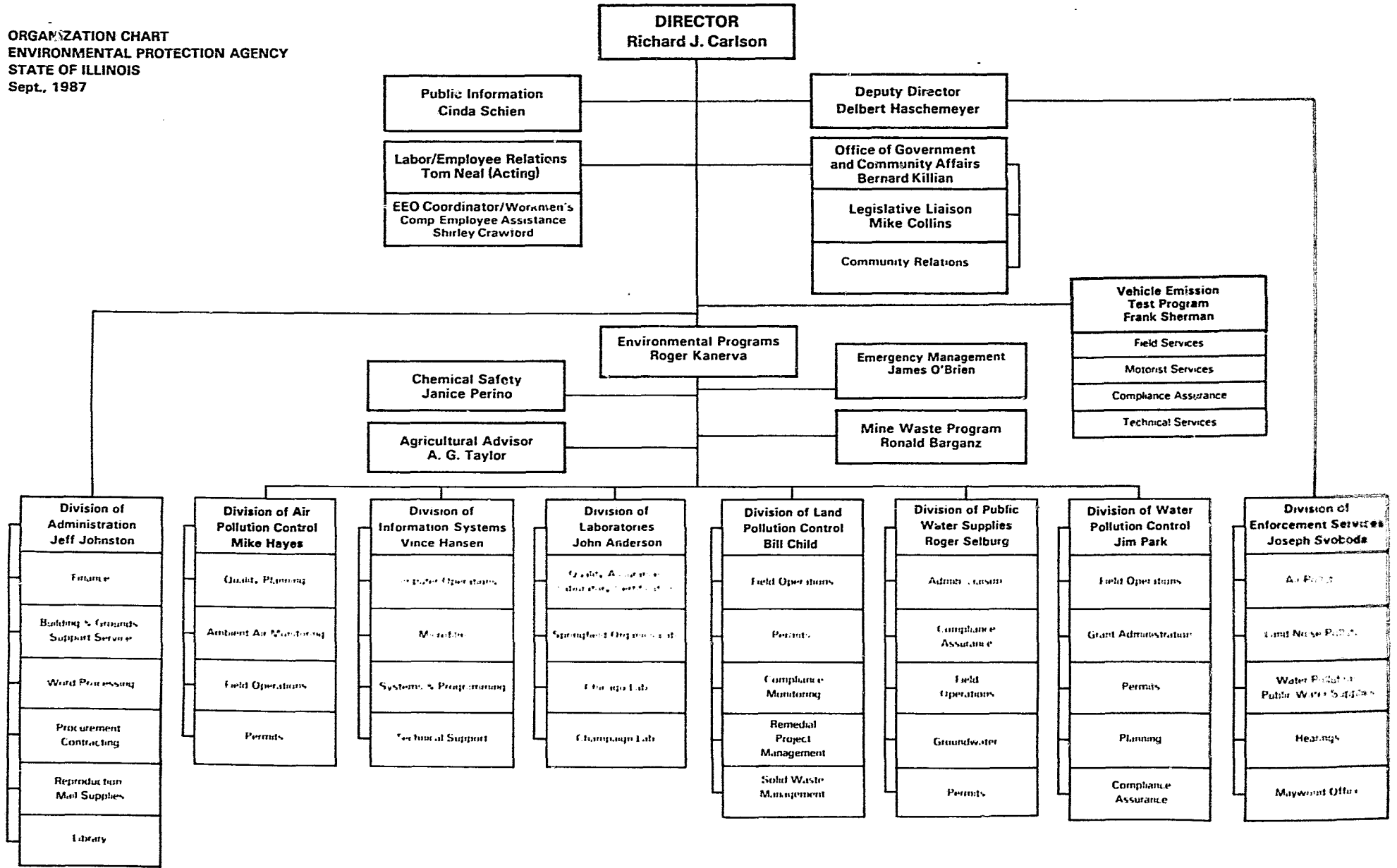
I. PUBLICATION OF ENFORCEMENT ACTIONS

When a complaint is filed against a hazardous waste handler by a States Attorney or the AGO, the prosecuting office will assume responsibility for publication of a press release of that enforcement activity. The Agency issues press releases upon the sealing of a site under Section 34 or the initiation of a site cleanup with HWF funding. IEPA also issues press releases concerning IEPA decisions involving closure plans and permit activities at hazardous waste handling sites where a significant public interest exist.

APPENDIX VI

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**ORGANIZATION CHART
ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS
Sept., 1987**



REPORT DOCUMENTATION PAGE	1. REPORT NO. IEPA/ENF/87-018	2.	3. Recipient's Accession No.
4. Title and Subtitle Hazardous Waste Enforcement in Illinois (Fiscal Year 1986)		5. Report Date November 1987	
7. Author(s) Joe Svoboda and Joan Muraro		6.	
9. Performing Organization Name and Address Illinois Environmental Protection Agency Enforcement Programs 2200 Churchill Road Springfield, Ill. 62794-9276		8. Performing Organization Rept. No.	
12. Sponsoring Organization Name and Address Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Ill. 62794-9276		10. Project/Task/Work Unit No.	
15. Supplementary Notes Second in a series of legislatively mandated annual reports covering IEPA enforcement activities involving hazardous wastes or materials.		11. Contract(C) or Grant(G) No. (C) (G)	
16. Abstract (Limit: 200 words) A brief overview of enforcement policies and procedures by the Illinois Environmental Protection Agency, particularly as they involve violations concerning hazardous wastes or materials, and the various enforcement options available to IEPA to secure compliance.		13. Type of Report & Period Covered	
17. Document Analysis a. Descriptors hazardous wastes enforcement Illinois Pollution Control Board litigation b. Identifier/Open-Ended Terms Illinois c. COSATI Field/Group		14.	
18. Availability Statement: release unlimited		19. Security Class (This Report) unclassified	21. No of Pages 96
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