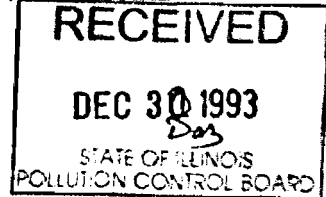


BEFORE THE ILLINOIS POLLUTION CONTROL BOARD



IN THE MATTER OF:)
REGULATION OF LANDSCAPE)
WASTE COMPOSTING FACILITIES)
)
)
)
)

R 93-29

STATEMENT OF REASONS

Now comes the Illinois Environmental Protection Agency ("IEPA") and, pursuant to 35 Ill. Adm. Code 102.121(b), submits its STATEMENT OF REASONS for the above-captioned proceeding to the Illinois Pollution Control Board ("Board").

I. FACTS IN SUPPORT, PURPOSE AND EFFECT

A. Legislation

Section 22.33 of the Environmental Protection Act (415 ILCS 5/1(1992)) ("Act"), entitled "Compost Quality Standards," requires the IEPA to submit to the Board, by January 1, 1994, proposed regulations setting forth performance standards for landscape waste composting facilities and testing procedures and standards for end-product compost derived from landscape waste and offered for sale or use in Illinois.¹ 415 ILCS 5/22.33 (1992)

Section 22.33 further requires the IEPA, in developing such regulations, to appoint, in cooperation with the Department of

¹Sections 22.34 and 22.35 of the Act address the composting of organic waste and mixed municipal waste in Illinois. IEPA intends to submit a separate regulatory proposal governing organic waste and mixed municipal waste compost facilities as soon as possible.

Energy and Natural Resources ("ENR"), a Technical Advisory Committee comprised of "members representing academia, the composting industry, the Department of Agriculture, the landscaping industry, environmental organizations, municipalities, and counties." Section 22.33(a).

In assisting in the development of regulations addressing landscape waste composting, this Technical Advisory Committee is directed to evaluate, among other things, "environmental and safety considerations, compliance costs, and regulations adopted in other states and countries." Section 22.33(a).

The performance standards governing landscape waste facilities must, pursuant to Section 22.33(a), include: " 1. The management of odor; 2. The management of surface water; 3. Contingency planning for handling end-product compost material that does not meet requirements of subsection (b) [of Section 22.33]; 4. Plans for intended purposes of end-use product; and 5. A financial assurance plan necessary to restore the site as specified in Agency permit."

Section 22.33(c) expressly exempts "[o]n-site composting that is used solely for the purpose of composting landscape waste generated on-site and that will not be offered for off-site sale or use..." from any standards addressing landscape waste composting. "End-product compost used as daily cover or vegetative amendment in the final layer..." of a landfill is exempt from any testing procedures and standards. Section 22.33(c).

Finally, Section 22.33(b) requires the Board to adopt, by

December 1, 1994, " 1. Performance standards for landscape waste compost facilities; and 2. Testing standards and procedures for the end-product compost produced by landscape waste compost facilities."

Section 39(m) of the Act is also relevant to this proceeding, in that it prescribes certain location, design and operational limitations applying to permitted landscape waste composting facilities. Specifically, Section 39(m), in pertinent part, requires documentation in a facility permit application that:

1. The facility includes a setback of at least 200 feet from the nearest potable water supply well;
 2. The facility is located outside the boundary of the 10-year floodplain or the site shall be floodproofed;
 3. The facility is located so as to minimize incompatibility with the character of the surrounding area, including at least a 200 foot setback from any residence, and in the case of a facility that is developed or expanded after November 17, 1991, the composting area is located at least 1/8 mile from the nearest residence (other than a residence located on the same property as the facility);
 4. The design of the facility will prevent any compost material from being placed within five feet of the water table, will adequately control runoff from the site, and will collect and manage any leachate that is generated on the site;
 5. The operation of the facility will include appropriate dust and odor control measures, limitations on operating hours, appropriate noise control measures for shredding, chipping and similar equipment, containment and disposal of non-compostable wastes, procedures to be used for terminating operations at the site, and recordkeeping sufficient to document the amount of materials received, composted and otherwise disposed of;
 6. The operation will be conducted in accordance with any applicable rules adopted by the Board.
- 415 ILCS 5/39(m) (1992).

These statutory provisions provide the framework within which the IEPA has developed the proposed regulations - governing landscape waste composting, the end-product compost derived therefrom and the permitting of landscape waste compost facilities - which accompany this Statement of Reasons.

2. Regulatory Development

In accordance with Section 22.33(a), the IEPA, in cooperation with ENR, appointed a Technical Advisory Committee ("Committee"), comprised of representatives from the composting industry, the landscaping industry, academia, the Departments of Agriculture and Public Health, municipalities, counties and environmental organizations, to assist in developing regulations addressing composting. (See Attachment 1 Committee Members)

After composing an initial draft of proposed rules, the IEPA convened the Committee, inviting other interested parties to attend as well. Between July and November, 1993, the Committee met seven times to review, discuss and, point by point, comment on IEPA's initial and subsequent revised drafts. The Committee evaluated environmental and safety concerns, compliance costs and regulations adopted in other states and countries, as required in Section 22.33. Between meetings, the IEPA received written comments from various Committee members suggesting changes. Several of the changes suggested have been incorporated in the regulatory proposal now before the Board.

The regulatory proposal now before the Board consists of three new Parts - 830, 831 and 832. Part 830 sets forth performance

standards governing landscape waste compost facilities and testing procedures and quality standards governing end-product compost. Part 831 sets forth the information required by the IEPA to be included in facility permit applications. Part 832 provides the procedures to be followed by the IEPA and facilities in processing permit applications.

Part 830 is the product of the IEPA's efforts to balance the interests of the Committee members. Its purposes are to provide economically reasonable operating constraints on composters, to safeguard the environment in furtherance of the Act, and to enhance public confidence in composting as a means of recycling landscape waste.

The Committee reached apparent consensus on most points addressed in developing Part 830; the proposed regulations thus may be fairly characterized as a consensus proposal. Outstanding points of contention are indicated in the statements herein supporting the proposed regulations, and will be discussed in greater detail in the IEPA's forthcoming testimony.

Parts 831 and 832 are the IEPA's independent effort to codify compost facility permitting procedures and requirements largely already in operation pursuant to IEPA authority under the Act. Since permitting procedures and requirements are not part of Section 22.33's mandate, the IEPA, while distributing copies of the final version of proposed Parts 831 and 832 to Committee members prior to this filing, neither sought nor received Committee participation in the development of that portion of the regulatory

proposal.

II. THE PROPOSED REGULATIONS

The proposed regulations, while entirely new¹, in many respects mirror already-promulgated regulations governing landfills, set forth in 35 Ill. Adm Code 810 through 815. The IEPA has incorporated all relevant provisions from the landfill regulations and supplemented them with provisions specific to composting, in part codifying Section 39(m) of the Act and in part culling from other states' regulations, model regulations published by the National Composting Council and suggestions of Committee members.

The format of the proposed regulations is drawn from the landfill regulations.

A. Part 830

Part 830, as proposed, is comprised of the following five Subparts²:

- A. General Provisions
- B. Standards for Owners and Operators of Landscape Waste Compost Facilities
- C. Standards for Owners and Operators of Organic Waste Compost Facilities
- D. Standards for Owners and Operators of Mixed Municipal Waste Compost Facilities
- E. Quality of Finished Product

¹With the exception of one amendment to 35 Ill. Adm. Code 807, cross-referencing Part 830.

²Note that Subparts C and D have been reserved for provisions addressing organic waste and mixed municipal waste composting operations, to be submitted at a later date.

F. Financial Assurance

In addition, the following three tables and two appendices accompany Part 830:

Table A	Inorganic Concentration Limits for General Use Compost
Table B	Sampling and Handling Requirements
Table C	Seed Germination Results
Appendix A	Early Detection and Groundwater Monitoring Program
Appendix B	Performance Test Methods

1. Subpart A

Subpart A of proposed Part 830 contains six sections, each addressing an aspect of the regulations germane to the entire realm of regulated composters.

Section 830.102 contains definitions applicable for purposes of Parts 830, 831 and 832. This set of definitions reflects significant Committee input and IEPA refining. In particular, additive, aerobic composting, bulking agent, closure, composting area, maturity, open composting process, processing into windrows or other piles, windrow and woody landscape waste were substantially revised in an effort to address Committee concerns.

Some Committee members objected to the inclusion of the term "landscape waste leachate" in these regulations, maintaining that such leachate poses no threat to the environment and therefore need not be regulated; the IEPA, bound, pursuant to Section 39(m) of the Act, to address the collection and management of leachate at permitted landscape waste compost facilities, concluded that the

term is appropriately included.

The IEPA points out that the definition of landscape waste compost facility was narrowed to exclude landscape waste composting operations which are both small in size and noncommercial; the rationale for doing so will be addressed fully in testimony, as will the specifics regarding all other definitions.

Section 830.103 contains the incorporations by reference for Part 830.

Section 830.104 sets forth exemptions from the applicability of Part 830. Included are both statutory exemptions taken directly from Sections 22.33 and 22.34 (Organic Waste Compost Quality Standards) and reference to the aforementioned exemption by definition for small, noncommercial landscape waste composting operations.

Section 830.105, addressing the date for coming into compliance with Part 830, carves out a transitional period for existing permitted facilities. The intent of this provision is to establish a reasonable timeframe within which existing facilities can comply with any new and different requirements imposed pursuant to Part 830. Existing facilities are given one year to certify compliance with the operating plan, personnel training, recordkeeping, testing and financial assurance requirements of Part 830. They are required to demonstrate compliance with all provisions of Part 830 upon application either for permit renewal or for certain specified modifications.

Section 830.106 is a severability provision paralleling that

in the landfill rules.

2. Subpart B

Subpart B contains thirteen sections, setting forth standards for owners and operators of landscape waste compost facilities.

Section 830.201, self-explanatory, addresses the scope and applicability of the provisions of Subpart B.

Section 830.202 contains minimum performance standards and reporting requirements applicable to all landscape waste compost facilities not expressly exempt pursuant to Section 830.104. Included as performance standards, pursuant to Section 22.33(a) of the Act, are provisions addressing:

1. The management of odor;
2. The management of surface water;
3. Contingency planning for handling end-product compost material that does not meet requirements of [Section 22.33(b)];
- (and) 4. Plans for intended purposes of end-use product.... 415 ILCS 5/22.33(a)

Also included are provisions prohibiting the use of sewage sludge, requiring that general use compost, if offered for sale or use, meet certain performance standards, and prescribing closure requirements. Reporting requirements include the statutorily-mandated annual report for permitted facilities (Section 39(m) of the Act), a similar annual report for large permit-exempt facilities, and registration and certification reports for farm composting operations meeting certain criteria set forth in Section 21(q) of the Act and repeated in Section 830.202(h)(3).

Sections 830.203 through 830.213 provide further standards

applying to permitted landscape waste compost facilities ("LWCFs").

Section 830.203 contains location standards applying to permitted LWCFs. The standards proposed are, with minor noncontroversial modifications, from the Act and the landfill regulations. Included are minimum setback distances from water supply wells and residences, a design standard requiring that composting material be prevented from being placed within five feet of the water table, flood-related restrictions and prohibitions against locating in any area posing a threat to a historically significant site, a natural landmark, a nature preserve or an endangered species. Also, certain conditions are specified pursuant to which one additional operating standard, set forth in Section 830.205, applies.

Section 830.204 contains stormwater and landscape waste leachate control requirements applicable to permitted LWCFs. These requirements supplement the leachate control requirement in subsection (e) of Section 830.202. Included are provisions: deeming water which comes into contact with landscape waste leachate as landscape waste leachate, to be collected and 1) reused, 2) treated prior to discharge or 3) properly disposed of off-site; prohibiting ponding of landscape waste leachate unless approved in the facility permit; and requiring that soil surfaces be allowed to dry periodically. As already mentioned, some Committee members objected to having to control landscape waste leachate, asserting that it poses no threat to the environment. This issue will be fully addressed in the LEPA's testimony in

support of its regulatory proposal.

Section 830.205 provides operating standards applicable to permitted LWCFs, supplementing those set forth in Sections 830.202 and 830.204. Subsection (a) provides standards with respect to the composting process itself, including: time constraints on initial processing of landscape waste received; requirements that the operator adjust the oxygen and moisture levels of composting material; provisions addressing sufficiency of staging area size, equipment, personnel and facility capacity; a prohibition against mixing landscape waste or composting material with end-product compost; and a restriction on the use of additives. Additional provisions address specific types of processes, i.e. open, contained and involving the use of an additive containing pathogens.

Subsection (b) of Section 830.205 prescribes constraints regarding the surface upon which composting is to be done. In order to prevent migration of pollutants contained in leachate into the groundwater, the surface must meet a set hydraulic conductivity standard, an equivalent base must be constructed, or an early detection and groundwater monitoring program must be implemented. The composition and slope of the composting surface are also addressed.

Subsections (c) through (l) of Section 830.205 address availability of utilities, proper maintenance of the site, open burning, dust control, noise control, vector control, fire protection, litter control, management of noncompostable wastes and

mud tracking. These provisions are self-explanatory.

Subsection (m) of Section 830.205 addresses monitoring of the temperature, moisture level and oxygen level of composting material. Monitoring of each parameter is required at a prescribed frequency; the frequencies prescribed for batch, windrow and pile systems differ from those prescribed for in-vessel continuous feed systems. The Agency is given discretion to require additional monitoring to demonstrate compliance with the Act or the standards set forth in Subpart B of Part 830. Appendix A to Part 830 is established as the protocol to be followed in developing an early detection and groundwater monitoring program.

Section 830.206 requires permitted LWCFs to have an operating plan and sets forth the requisite information to be contained therein, including: designation of personnel responsible for the operation of the facility; the anticipated quantity and variation of waste to be received; methods to measure incoming waste, to control the types of waste received, to deal with noncompostables and to control traffic; management procedures to be used in composting; methods to minimize odors; methods to control stormwater and landscape waste leachate; methods to control noise, vectors and litter; methods to control dust emissions; methods for monitoring and adjusting temperature, oxygen level and moisture level of composting material; recordkeeping and reporting procedures; methods to obtain a composite sample and test end-product compost; and plans for intended purposes of end-product compost.

Section 830.207 addresses salvaging at permitted LWCFs, paralleling the salvaging provision contained in the landfill regulations. The salvageable material anticipated by the IEPA to be found at permitted LWCFs is firewood.

Section 830.208 covers access control for permitted LWCFs, requiring that each permitted LWCF implement controls to prevent unauthorized access and post a permanent sign with certain specified information.

Section 830.209, a load checking provision applicable to permitted LWCFs, requires inspection of each incoming load and rejection of those deemed unacceptable.

Personnel training requirements for permitted LWCFs are set forth in Section 830.210, including initial and subsequent annual training for all employees, additional training relevant to an employee's position, provision and explanation of the facility operating plan to all employees, and signed acknowledgement by personnel that requisite training was provided.

Section 830.211 contains recordkeeping requirements applicable to permitted LWCFs. The operator is required to record certain specified information relating to the operation of the facility, to keep such records for three years and to have such information available for inspection by the IEPA. In addition, copies of the facility permit, design plans, any required reports and end-product compost analyses are required to be kept.

Section 830.212 requires that permitted LWCFs develop and keep on-site a contingency plan addressing specified contingencies,

including, for example, equipment breakdown, odors, groundwater contamination and fires.

Section 830.213 outlines the closure requirements applicable to permitted LWCFs. A written closure plan must be developed and kept available for inspection. Posting of signs, notice of closure, certification of completion of closure and financial assurance are required.

3. Subpart C

Subpart C is reserved for standards applicable to operators of organic waste compost facilities. Such standards will be proposed separately to the Board, as earlier mentioned, in the near future.

4. Subpart D

Subpart D is reserved for standards applicable to operators of mixed municipal waste compost facilities. Such standards will be proposed separately to the Board, as earlier mentioned, in the near future.

5. Subpart E

Subpart E contains eight sections, referencing three tables and one appendix. The quality of end-product compost is the focus of this Subpart.

Section 830.501 sets forth the scope and applicability of Subpart E, restating the statutory exemption applying to end-product compost used as daily cover or in the final layer of a landfill and specifying which provisions in the Subpart apply to end-product compost from whatever source derived and which apply only to end-product compost derived from landscape waste.

Section 830.502 contains the classification scheme governing end-product compost from whatever source derived. Two classifications are provided, general use compost and designated use compost. Meeting the performance standards set forth in Section 830.503 qualifies end-product compost to be classified as general use compost; all other end-product compost is designated use compost.

The performance standards contained in Section 830.503, applicable to general use compost, address the presence of physical hazards, man-made materials, pathogens and inorganics in and the pH and stability of end-product compost. Inorganics concentration limits are provided in Section 830. Table A. The Committee did not reach consensus regarding appropriate inorganics concentration limits; the IEPA will support its position on this point fully in testimony.

Section 830.504 provides testing requirements applicable to general use compost produced by LWCFs. Testing to demonstrate compliance with the Section 830.503 man-made materials, pH and stability standards is required once every 5,000 cubic yards or annually, if less than 5,000 cubic yards is transported off-site per year. Section 830. Appendix B provides the protocol to be followed in conducting requisite tests. No further testing is mandated, unless the IEPA requires additional testing to demonstrate compliance with Subpart E.

Sections 830.505 and 830.506 are reserved for testing requirements applicable to organic waste compost facilities and

mixed municipal waste compost facilities, respectively.

Section 830.507 sets forth two acceptable methods for preparing a composite sample of end-product compost to be used in testing. Section 830. Table B contains sample holding times, sample container types and minimum collection volumes to be used by those following the first method provided.

Section 830.508 requires that off-specification compost derived from landscape waste be further managed as landscape waste or as designated use compost.

6. Subpart F

Subpart F contains six sections, addressing financial assurance requirements. These requirements are intended to effectuate statutory language in Section 22.33 pertaining to financial assurance.

Section 830.601 is a scope and applicability section conveying that the financial assurance requirements set forth in Subpart F are applicable to permitted LWCFs.

Section 830.602 requires permitted LWCFs to have a financial assurance plan containing a written cost estimate and the selection of a financial mechanism to be used in complying with Subpart F.

Section 830.603 requires that the written cost estimate be based on the steps necessary to complete closure, be itemized and be revised as necessary.

Section 830.604 requires the maintenance of a financial assurance fund to cover the costs of closure.

Section 830.605 addresses the financial assurance mechanism to

be used in complying with Subpart F. Two alternatives are given, a cash reserve fund and self-insurance. Qualification by each of these means is outlined.

Section 830.606 requires the submittal to the IEPA of an annual certification of compliance with the provisions contained in Subpart F.

B. Part 831

Part 831, as proposed, addressing information to be submitted in a permit application, is comprised of the following three Subparts:

- A. General Information Required for All Compost Facilities
- B. Additional Information Required for Organic Waste Compost Facilities
- C. Additional Information Required for Mixed Municipal Waste Compost Facilities

The provisions comprising Part 831 in large measure parallel the permitting requirements set forth in 35 Ill. Adm. Code 812.

1. Subpart A

Subpart A of Part 831, addressing information to be submitted in an application for a LWCF permit, contains 16 sections.

Section 831.101, a scope and applicability provision, conveys that the applicability of Part 831 is triggered by Section 21(d) of the Act.

Section 831.102, a severability provision, is self-explanatory.

Section 831.103 requires certification of designs presented in the application by a professional engineer.

Section 831.104 requires the filing of any statutorily-

mandated filing fee with the permit application.

Section 831.105 addresses the signing of the permit application, requiring certain parties to sign and provide further identifying information.

Section 831.106 sets forth site identification requirements, including facility name, latitude and longitude, legal description and physical location.

Section 831.107 requires the submittal of a site location map showing certain specified information, including the permit area boundaries and information related to the location standards provided in Section 830.203.

Section 831.108 requires the submittal of a site plan map, containing maps or plan sheets showing the location of the facility, drawn to express specifications, and other specified information relating to boundaries and location.

Section 831.109 requires the submittal of a narrative description of the facility, including an estimate of maximum annual and peak daily landscape waste processing capacity, proof of compliance with Section 39(m) location standards, and all documents required pursuant to Part 830.

Section 831.110 requires the submittal of a legal description of the facility boundary.

Section 831.111 requires certification of ownership of the land on which the facility is located or a copy of the lease stating its duration.

Section 831.112 requires the submittal of a written closure

plan stating methods for complying with the closure requirements set forth in Part 830.

Section 831.113 requires the submittal of methods to ensure financial assurance.

Section 831.114 addresses operator-initiated modification of an approved permit. Certain specified permit modification requests require the submittal of a complete permit application; others are initiated by filing, on a form provided by the IEPA, a request for the desired modification.

Section 831.115 requires the obtaining of an operating authorization, unless otherwise authorized in the facility permit, prior to use of any structure constructed at a facility.

Section 831.116 provides that, in applying for a permit renewal, an operator must submit information that has changed since the last permit review, an updated groundwater impact assessment, if required, and a new closure cost estimate.

2. Subpart B

Subpart B is reserved for provisions addressing additional information to be submitted in applying for an organic waste compost facility permit. Such provisions will be submitted separately, at a later date.

3. Subpart C

Subpart C is reserved for provisions addressing additional information to be submitted in applying for a mixed municipal waste compost facility permit.

C. Part 832

Part 832, as proposed, addressing procedural requirements for permitting compost facilities, is comprised of the following three Subparts:

- A. General Provisions
- B. Additional Procedures for Modification of Permits
- C. Additional Procedures for the Renewal of Permits

The provisions comprising Part 832 in large measure parallel the procedural requirements set forth in 35 Ill. Adm. Code 813.

L. Subpart A

Subpart A of Part 832, providing general procedural provisions, contains 11 sections.

Sections 832.101 and 832.102, addressing scope and applicability and severability, respectively, are self-explanatory.

Section 832.103 sets forth requirements pertaining to the form and delivery of permit applications.

Section 832.104 contains statutorily-prescribed notice requirements from Section 22.26 of the Act and Section 3 of the Illinois Notice by Publication Act, and prescribed contents of and timeframe for publishing a newspaper notification.

Section 832.105 addresses IEPA decision deadlines, drawn from Section 39 of the Act. Filing, completeness and modification of a permit application, decision waiver and notice of final action are also addressed.

Section 832.106, taken directly from Section 39 of the Act, sets forth standards governing the issuance of a permit.

Section 832.107, also quoted directly from Section 39 of the

Act, sets forth standards governing the denial of a permit.

Section 832.108 provides procedural requirements pertaining to permit appeals. Section 40(a)(1) of the Act, authorizing appeal to the Board within 35 days of the IEPA's decision, is quoted.

Section 832.109 states that issuance and possession of a permit is no defense to a violation of the Act or Board regulations.

Section 832.110 limits permit terms to 10 years. This limitation is taken from Section 39(m) of the Act.

Section 832.111 establishes that a permit transfer constitutes, procedurally, a permit modification, requiring compliance with permit modification requirements.

2. Subpart B

Subpart B of Part 832, addressing additional procedures governing modification of a permit, contains two sections.

Section 832.201 sets forth the circumstances and procedural constraints pursuant to which the IEPA may modify a permit.

Section 832.202 extends the scope of all Part 832 procedural requirements and time schedules to applications for permit modification.

3. Subpart C

Subpart C of Part 832, addressing additional procedures governing permit renewal, contains three sections.

Section 832.301 establishes that the time for filing an application for permit renewal be at least 90 days prior to the expiration date of the existing permit.

Section 832.302 preserves the effectiveness of an existing permit pending final decision on a timely-filed application for permit renewal.

Section 832.303 extends the scope of the procedural requirements and time schedules set forth in Subpart A of Part 832 to applications for permit renewal.

III. IEPA WITNESSES AND SYNOPSIS OF TESTIMONY

The IEPA will provide six witnesses: Shirley Baer, Ed Bakowski, Gary Cima, Larry Eastep, John Taylor and Heather Young.

Shirley Baer will testify in support of Subparts A (General Provisions) and E (Quality of End-product Compost) of Part 830, as well as Tables A, B and C and Appendix B. Her testimony will address in detail each of the points summarized in pertinent portions of this Statement of Reasons, except that Ed Bakowski will address Section 830.105 (Compliance Timeframe for Existing Facilities) in his testimony. Exhibits will be included with the testimony.

Testimony in support of Subpart B of Part 830 (Operating Standards for Landscape Waste Compost Facilities) will be provided by Gary Cima. Each point summarized in the pertinent portion of this Statement of Reasons will be addressed in detail. Exhibits will be included with the testimony.

John Taylor will testify in support of Subpart F of Part 830 (Financial Assurance Requirements). His testimony will address in detail each point summarized in the pertinent portion of this Statement of Reasons, and will be accompanied by exhibits.

Heather Young will testify in support of Part 830. Appendix B, which contains early detection and groundwater monitoring program provisions. Her testimony will address such provisions in detail, and will be accompanied by exhibits.

Testimony in support of Parts 831 and 832 will be provided by Ed Bakowski and Larry Eastep. Their testimony will address in full each provision contained in Parts 831 and 832.

IV. TECHNICAL FEASIBILITY AND ECONOMIC REASONABLENESS

The IEPA asserts, and IEPA witnesses are prepared to demonstrate at hearing, that the proposed regulations are both technically feasible and economically reasonable. In working with the Committee, the IEPA sought and duly considered input regarding economic reasonableness. Technical feasibility was never in issue.

Respectfully submitted,
ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY



Judith S. Dyer
Assistant Counsel

DATED: December 29, 1993

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**COMPOST QUALITY STANDARDS
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(December 22, 1993)**

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Notice List and/or Service List

Notice List for R93-29
(This case is assigned to Marili McFawn)

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