

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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IN THE MATTER OF:

GROUNDWATER QUALITY
STANDARDS AMENDMENTS:
35 ILL. ADM. CODE 620

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R01-14
(Rulemaking Water)

STATE OF ILLINOIS
Pollution Control Board

P.C.#1

Testimony of Craig Curtis, J.D., Ph.D.

Craig Curtis hereby prefiles the attached TESTIMONY

DATED: March 6, 2001
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TESTIMONY OF CRAIG CURTIS, J.D., Ph.D. FOR THE PROPOSED MTBE
GROUNDWATER QUALITY STANDARDS
R01-14

INTRODUCTION

My name is Craig Curtis and I am an Associate Professor of Political Science at Bradley University. Together with my research assistant, C. J. Neu, an undergraduate student at Bradley University, I am conducting exploratory research into the rulemaking process in the state of Illinois. As a part of our research, we attended the March 1 hearing on PROPOSED MTBE GROUNDWATER QUALITY STANDARDS, R01-14, in Springfield, Illinois, at the Illinois Pollution Control Board Hearing Room at 600 S. 2nd Street.

During the course of that hearing, I had occasion to ask a question concerning the lack of findings of contamination of Community Water Supplies ("CWS") in Madison County, Illinois. I had obtained information from a World Wide Web site called "Scorecard" (<http://www.scorecard.org/>) that indicated releases of MTBE into the environment in that county were much larger than any other Illinois county. Despite these releases, the testimony of Richard P. Cobb, P.G., of the Illinois Environmental Protection Agency indicated that only two sites in Madison County had been affected by MTBE contamination. These were Bethalto CWS and E. Alton CWS.

The answers provided by Mr. Cobb made it very clear that he was not aware of these data. I was asked to file testimony containing the data, and do so here today.

BRIEF EXPLANATION OF THE DATA SOURCE

The data on releases of MTBE were obtained during a search of the World Wide Web. We began with the US Environmental Protection Agency ("US EPA") web site in Fall of 2000 (I am not sure of the exact date). That site, at that time, contained a link to the "Scorecard" site, which C. J. and I followed. The attached documents are printouts of web pages from "Scorecard."

According to the authors of "Scorecard" their charts are derived from the Toxics Release Inventory ("TRI") database collected and maintained by the US EPA. Although the "Scorecard" site is not explicit about this point, one is led to believe that the data from which the charts were compiled are the 1998 TRI reports.

I have included two charts: 1) the first lists the nine Illinois counties with reported releases of MTBE; and, 2) the second lists the 100 counties in the United States with the most reported releases of MTBE. As one can see, three Illinois counties, Madison, St. Clair and Cook, appear on the list of the 100 counties with the largest releases of MTBE.

Attachment I: Counties with Reported Total Environmental Releases of MTBE in Illinois (1 page).

**ENVIRONMENTAL
DEFENSE**

Environmental Defense
Scorecard

ABOUT THE CHEMICALS | By County

- Home
- Find Your Community
- What's New
- Setting Priorities
- Pollution Locator
- Pollution Rankings
- About the Chemicals
- Health Effects
- Regulatory Controls
- Discussion Forums
- FAQs
- Personalize Scorecard
- Glossary
- About the Scorecard
- Search Scorecard

Chemical: methyl tert-butyl ether

CAS Number: 1634-04-4

Counties with Reported Total Environmental Releases

Ranked by (select your ranking criteria)

Total environmental releases

in (explain)

Rank	County	Pounds
1.	<u>MADISON</u>	33,668
2.	<u>ST. CLAIR</u>	9,905
3.	<u>COOK</u>	6,483
4.	<u>BOONE</u>	1,386
5.	<u>DUPAGE</u>	1,000
6.	<u>LAKE</u>	500
7.	<u>MCLEAN</u>	340
8.	<u>CRAWFORD</u>	109
9.	<u>WILL</u>	5

Search Tips

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Email questions regarding the data or
how to use this information to protect the environment.

Attachment II: Counties with Reported Total Environmental Releases of MTBE, nationwide, ranked, the 100 counties with the most releases are charted (4 pages).

ENVIRONMENTAL DEFENSE



ABOUT THE CHEMICALS | By County

- Home
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Chemical: methyl tert-butyl ether
CAS Number: 1634-04-4

Counties with Reported Total Environmental Releases

Ranked by (select your ranking criteria)

Total environmental releases
 in [\(explain\)](#)

Rank	County	Pounds
1.	<u>HARRIS, TX</u>	429,462
2.	<u>CONTRA COSTA, CA</u>	311,268
3.	<u>LOS ANGELES, CA</u>	297,122
4.	<u>NUECES, TX</u>	189,300
5.	<u>BOX ELDER, UT</u>	175,000
6.	<u>UNION, NJ</u>	171,571
7.	<u>LAKE, IN</u>	152,208
8.	<u>WAYNE, MI</u>	144,624
9.	<u>MIDDLESEX, NJ</u>	136,727
10.	<u>GLOUCESTER, NJ</u>	97,204
11.	<u>EAST BATON ROUGE, LA</u>	85,495
12.	<u>PHILADELPHIA, PA</u>	69,251
13.	<u>JEFFERSON, TX</u>	68,134
14.	<u>ST. CHARLES, LA</u>	60,804
15.	<u>SUFFOLK, MA</u>	59,829
16.	<u>YORK, VA</u>	56,600
17.	<u>BALTIMORE (CITY), MD</u>	54,161
18.	<u>DELAWARE, PA</u>	48,752
19.	<u>GALVESTON, TX</u>	46,649
20.	<u>KAY, OK</u>	43,242
21.	<u>ST. CROIX, VI</u>	42,431
22.	<u>OTTAWA, MI</u>	40,578
23.	<u>NEW CASTLE, DE</u>	39,425
24.	<u>SOLANO, CA</u>	38,539

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25.	<u>BRAZORIA, TX</u>	37,980
26.	<u>ASCENSION, LA</u>	36,381
27.	<u>ST. LANDRY, LA</u>	35,558
28.	<u>CALCASIEU, LA</u>	35,191
29.	<u>PROVIDENCE, RI</u>	34,501
30.	<u>NASSAU, NY</u>	34,029
31.	<u>MADISON, IL</u>	33,668
32.	<u>NEW HAVEN, CT</u>	33,403
33.	<u>GUAYAMA, PR</u>	30,554
34.	<u>MCKINLEY, NM</u>	29,279
35.	<u>SAN DIEGO, CA</u>	28,683
36.	<u>MARICOPA, AZ</u>	27,847
37.	<u>FAIRFAX, VA</u>	27,310
38.	<u>ST. JAMES, LA</u>	26,421
39.	<u>FAIRFIELD, CT</u>	25,955
40.	<u>DALLAS, TX</u>	25,493
41.	<u>MIDDLESEX, MA</u>	23,335
42.	<u>BOYD, KY</u>	23,000
43.	<u>ST. BERNARD, LA</u>	22,663
44.	<u>SUFFOLK, NY</u>	22,345
45.	<u>TARRANT, TX</u>	22,263
46.	<u>ADAMS, CO</u>	21,995
47.	<u>CANADIAN, OK</u>	21,145
48.	<u>CUMBERLAND, ME</u>	20,574
49.	<u>LARAMIE, WY</u>	20,000
50.	<u>YOLO, CA</u>	19,504
51.	<u>NORFOLK, MA</u>	19,399
52.	<u>SANTA CLARA, CA</u>	19,096
53.	<u>ALLEGHENY, PA</u>	18,901
54.	<u>MONROE, IA</u>	18,840
55.	<u>ESSEX, MA</u>	18,163
56.	<u>ORANGE, NY</u>	16,571
57.	<u>SAN BERNARDINO, CA</u>	16,508
58.	<u>MOORE, TX</u>	16,154
59.	<u>BROWARD, FL</u>	15,474
60.	<u>NEW HANOVER, NC</u>	15,218
61.	<u>DAVIS, UT</u>	14,787
62.	<u>KERN, CA</u>	13,350
63.	<u>PETERSBURG (CITY), VA</u>	12,250
64.	<u>RICHMOND (CITY), VA</u>	11,920
65.	<u>RICHMOND, NY</u>	11,719

66.	<u>BREVARD, FL</u>	11,000
67.	<u>HAMPDEN, MA</u>	10,714
68.	<u>SAN JOAQUIN, CA</u>	10,548
69.	<u>CHESAPEAKE (CITY), VA</u>	10,423
70.	<u>ESSEX, NJ</u>	10,354
71.	<u>ST. CLAIR, IL</u>	9,905
72.	<u>CAMDEN, NJ</u>	9,796
73.	<u>JEFFERSON, KY</u>	9,665
74.	<u>EL PASO, CO</u>	9,205
75.	<u>HALE, TX</u>	9,205
76.	<u>QUAY, NM</u>	9,205
77.	<u>BEAVER, OK</u>	9,205
78.	<u>DALLAM, TX</u>	9,205
79.	<u>ERIE, NY</u>	9,018
80.	<u>MONROE, NY</u>	8,942
81.	<u>CHESTER, PA</u>	8,933
82.	<u>KINGS, NY</u>	8,774
83.	<u>NYE, NV</u>	8,450
84.	<u>SUMMIT, OH</u>	8,357
85.	<u>BERKS, PA</u>	7,553
86.	<u>FAIRFAX (CITY), VA</u>	7,391
87.	<u>MONROE, MI</u>	7,247
88.	<u>EL PASO, TX</u>	6,815
89.	<u>YELLOWSTONE, MT</u>	6,800
90.	<u>SACRAMENTO, CA</u>	6,705
91.	<u>CHEMUNG, NY</u>	6,569
92.	<u>ANNE ARUNDEL, MD</u>	6,504
93.	<u>COOK, IL</u>	6,483
94.	<u>JONES, TX</u>	6,090
95.	<u>ALLEN, OH</u>	6,006
96.	<u>LEHIGH, PA</u>	5,400
97.	<u>MERCER, NJ</u>	5,299
98.	<u>PRINCE WILLIAM, VA</u>	5,150
99.	<u>BERNALILLO, NM</u>	5,105
100.	<u>GUILFORD, NC</u>	4,736

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