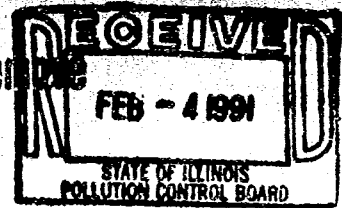


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BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

SOLID WASTE) R90-26
RULES FOR THE)
ILLINOIS FOUNDRY AND)
STEEL INDUSTRIES)

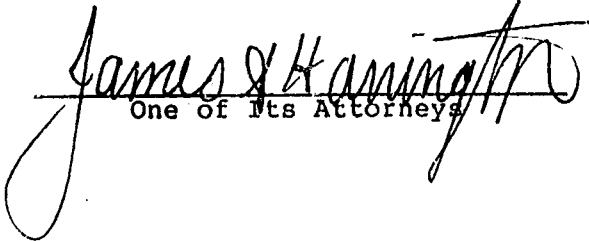
NOTICE OF FILING

To: Ms. Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 W. Randolph
Chicago, Illinois 60601

Persons on Attached List

PLEASE TAKE NOTICE that I have today filed with the Clerk of the Illinois Pollution Control Board an original and nine copies of the Illinois Steel Group/Illinois Cast Metals Association's REVIEW OF ECONOMIC IMPACT IMPLICATIONS OF PROPOSED RULEMAKING and the AFFIDAVIT of Charles Wesselhoft regarding service of the original proposal in this matter on the Department of Natural Resources, copies of which are herewith served upon you.

ILLINOIS STEEL GROUP
ILLINOIS CAST METALS ASSOCIATION

By: 
One of Its Attorneys

Dated: February 4, 1991

James T. Harrington, Esq.
Charles W. Wesselhoft, Esq.
ROSS & HARDIES
150 N. Michigan Avenue
Chicago, Illinois 60601
(312) 558-1000

CERTIFICATE OF SERVICE

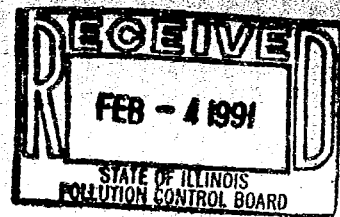
The undersigned certifies that on the 4th day of February, 1991, copies of the Illinois Steel Group/Illinois Cast Metals Association's REVIEW OF ECONOMIC IMPACT IMPLICATIONS OF PROPOSED RULEMAKING and the AFFIDAVIT of Charles Wesselhoft were served upon those listed below by depositing said documents in the U.S. Mail, first class, postage paid, at 150 N. Michigan Avenue on or before 5:00 PM.

Larry Eastep
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Bonnie Eynon-Meyer
Illinois Department of Natural Resources
325 W. Adams, Room 300
Springfield, Illinois 62704



James T. Harrington, Esq.
Charles W. Wesselhoft, Esq.
ROSS & HARDIES
150 N. Michigan Avenue
Chicago, Illinois 60601
(312) 558-1000



BEFORE THE
ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

SOLID WASTE) R90-26
RULES FOR THE)
ILLINOIS FOUNDRY AND)
STEEL INDUSTRIES)

REVIEW OF ECONOMIC IMPACT
IMPLICATIONS OF PROPOSED RULEMAKING

The following is a brief, section-by-section discussion of the economic impact implications of the Illinois Steel Group/Illinois Cast Metals Association solid waste rulemaking proposal. While many of the section discussions indicate only small or no economic impact, the proposal, taken as a whole, will produce significant cost savings for the affected industry without any appreciable increase in regulatory oversight or expense. The ISG/ICMA proposal will also significantly decrease the amount of solid waste going to the State's chemical waste landfills, thereby conserving a rapidly dwindling resource.

Following the discussion portion of this document is a table which summarizes the economic impact of each section and provides references to the R88-7 Economic Impact Statement for those sections with changes in impact. Also provided is a list of affected facilities and an estimate of the number of persons employed by these companies. Finally, a full-text copy of the rule proposal is attached which has been "red-lined" to indicate where Board language has been used or modified in the ISG/ICMA proposal.

I. Discussion

811.801 Scope and Applicability.

The language in the section is entirely new. The R88-7 EcIS discussed increases in disposal costs for the primary metals category in broad terms in Chapter 7 at section 7.2. The information presented there, however, does not provide sufficient detail to estimate costs. The proposed language

will have a major positive economic impact on affected industry and is not expected to have any negative impact on the environment.

811.802 Determination of Waste Status.

This section is identical in substance to 811.202 with the exception of the addition of a specific leaching procedure. The modification will have no effect on economic impact.

811.803 Sampling Frequency.

This section is entirely new. It will have minimal economic impact upon the affected industry or society as a whole.

811.804 Waste Classification.

The existing rule includes a limited classification system at 811.202 in conjunction with the "definition" section, 810.103. The proposed language presents a much expanded classification system. The classification process itself will have no economic impact on affected industry. However, the results of the classification process will have a major positive economic impact on the affected industry and should have no negative impacts on society as a whole.

811.805 Waste Classification Table.

This section is entirely new. It will have no direct economic impact on affected industry or society.

811.901 Scope and Applicability.

This section is entirely new. It will have no economic impact upon affected industry or society.

811.902 Limitations on Use.

This section is entirely new. The ability to place wastes of this class in settings other than land-

fills will have a major positive economic impact on affected industry and is also expected to have a positive economic impact on society.

811.903 Certification.

This section is entirely new. Compliance with the certification requirements will have a limited economic impact upon affected industry.

811.904 Notification of Use.

This section is entirely new. Compliance with the notification requirements will have a limited economic impact upon affected industry.

811.1001 Scope and Applicability

This section is identical in substance to 811.201. There is no change in economic impact. Design period was discussed at 4.2.6 of the EcIS.

811.1002 Design Period

This section is identical in substance to 811.203. There is no change in economic impact.

811.1003 Final Cover

This section is identical in substance to 811.204 except the final cover thickness requirement has been reduced from three feet to 1.5 feet.

Final cover requirements are discussed in the EcIS at section 4.2.5. This change will have a major positive economic impact on affected industry.

811.1004 Final Slope & Stabilization.

No change from 811.205. No change in economic impact. The economic impact of this section was not discussed in the EcIS.

811.1005 Leachate Sampling.

No change in sampling frequency or reporting requirement. No change in economic impact. Leachate collection is discussed at 4.2.2 of the EcIS.

811.1006

Load Checking.

No change from 811.207 except 811.1006(b)(3) requires sample analysis on annual basis. 811.207(b)(3) provided no clear frequency for this analysis. No change in economic impact. Load checking costs are discussed at 4.2.12 of the EcIS.

811.1101

Scope and Applicability.

No substantive change from 811.301. No change in economic impact. This section was not discussed in the EcIS.

811.1102

Facility Location.

No change from 811.302. No change in economic impact. Permitting requirement costs were discussed at 4.2.10 of the EcIS.

811.1103

Design Period.

Design period reduced from 30 to 20 years beyond the estimated operating life. Economic impact of 30 year period discussed in §4.2.6 of EcIS. Reduction in period will have major impact on industry.

811.1104

Foundation and Mass Stability Analysis.

No substantive change from 811.304. No change in economic impact. The economic impact of this section was discussed at 4.2.8 of the EcIS.

811.1105

Foundation Construction.

No substantive change from 811.305. No change in economic impact. Foundation construction costs were not discussed in the EcIS.

811.1106

Liner Systems.

This section is based upon section 811.306. However, the leachate collection and treatment requirement has been deleted (including the language of sections 811.307 through 811.309), as has been the language allowing alternate liner technologies (811.306(d)(5) and 811.306(e)). Also, the minimum compacted earth liner thickness has been reduced from five to three feet.

The three foot clay liner is discussed at 4.2.1 and tables 4.1 & 4.2 of the EcIS. The economic impact of a five foot liner was not discussed. Leachate collection was discussed at section 4.2.2 of the EcIS.

The deletion of the leachate collection requirement and the reduction of the clay liner thickness will result in a major reduction in the current rule's economic impact on industry. The deletion of the alternate liner technology language will have little economic impact.

(811.309)

Landfill Gas Collection/Monitoring.

As steel and foundry industry facilities will not be disposing of putrescible wastes in landfills qualifying for this subpart, all sections concerning gas collection and monitoring were deleted. The deletion will have no economic impact. Gas management systems were discussed at 4.2.3 of the EcIS.

(811.313)

Intermediate Cover.

The language of this section was not included in the requirements for low risk landfills. There was no discussion of daily cover costs in the EcIS because, apparently, the 811.313 requirements do not significantly vary from the previously existing 807.305(b) requirement. The deletion of daily cover requirements will significantly reduce the economic impact on the affected industry. These costs were not discussed in the EcIS.

811.1107

Final Cover.

Final cover design requirements are identical to the 811.314 requirements except that minimum allowable thicknesses of both the low permeability and final protective layers have been reduced from three to one-and-a-half feet.

Final cover cost impacts are discussed at section 4.2.5 of the EcIS. The reduction in the two liner thicknesses will result in a major cost savings to the affected industry.

The language of 811.314(b)(1) was also modified to change the timing of low permeability layer construction. This change should not have an economic impact.

811.1108

Hydrogeologic Site Investigations.

This section is identical to section 811.315. There is no change in economic impact. Investigation costs were discussed at 4.2.7 of the EcIS.

811.1109

Plugging and Sealing of Drill Holes.

This section is identical to section 811.316. There is no change in economic impact. These costs were not discussed in the EcIS.

811.1110

Groundwater Impact Assessment.

Groundwater impact assessment requirements remain the same as those of 811.317 except that the contaminant transport model requirement has been deleted.

Modeling costs are discussed at section F3, Appendix D of the EcIS. The deletion of the modeling requirement will result in a major cost savings to the affected industry.

811.1111 Design, Construction and Operation of Groundwater Monitoring Systems.

The language of this section is identical in substance to 811.318. There is no change in economic impact. Groundwater monitoring program costs were discussed at 4.2.4 of the EcIS.

811.1112 Groundwater Monitoring Programs.

The language of this section is identical in substance to 811.319 with the exception of 811.319(a)(3) concerning organic chemicals monitoring. That language has been deleted.

The cost of the organic chemical monitoring is discussed at F2, Appendix D of the EcIS. The deletion of the organic chemical monitoring requirement will have a small economic impact on the affected industry.

811.1113 Groundwater Quality Standards.

This section is identical in substance to 811.320. There is no change in economic impact. The economic impact of this section was not discussed in the EcIS.

811.1114 Waste Placement.

The language of this section is identical in substance to 811.321 except that allowances have made for the redirection of waste placement if it necessary to protect placement equipment or if that equipment is temporarily unavailable.

Also, language concerning the placement of waste over the leachate collection system was deleted as leachate collection systems are not included in the subpart K requirements.

Finally, the timing requirement for the placement of the base layer of waste in the landfill has been changed from "immediate" to "as soon as practicable."

Section 811.321 was not identified in the EcIS as having a significant economic impact. That analysis remains unchanged.

811.1115 Final Slope and Stabilization.

The language in this section is identical in substance to that of 811.322 except that language referring to gas venting has been deleted. This was done because of the lack of putrescible waste in affected facilities.

This deletion will have no effect on economic impact. These costs were not discussed in the EcIS.

811.1116 Load Checking.

This section is identical to 811.323. There is no change in economic impact. Load checking costs were discussed at 4.2.12 of the EcIS.

814.601 Scope and Availability.

This section is identical in substance to 814.301. There is no change in economic impact. This section's economic impact was not discussed in the EcIS.

814.602 Applicable Standards.

Much of this section is identical in substance to 814.302. However, the language concerning leachate drainage and collection of 814.302(a)(4) was deleted as the referenced leachate collection requirements had been deleted from Part 811. Language was also added to that found at 814.302(b)(2) to allow a facility to forego leachate drainage and collection if federal MCL's are not being exceeded in the leachate.

The deletion of the 814.302(a)(4) requirement will produce no change in economic impact. The ability of facilities to prove that their leachate is un-

contaminated and thereby gain an exemption from leachate management requirements will produce a major reduction in economic impact. The costs of compliance with leachate management requirements are discussed at section 5.2.1 of the EcIS.

Finally, the design period calculation language of 814.302(b)(3) was modified to reflect the 20 year design period limit of 811.1103. Language prohibiting a reduction of the design period was deleted.

Design period length affects post closure care costs which are discussed at section 5.2.5 of the EcIS. Reductions in design period will produce a major reduction in economic impact on affected industry.

814.701 Scope and Applicability.

This section is identical in substance to 814.401. There will be no change in economic impact. This section's economic impact was not discussed in the EcIS.

814.702 Applicable Standards.

This section is largely identical in substance to 814.402. However, the references to leachate collection were deleted to be consistent with prior deletions. This should have no change in economic impact.

The prohibition against additional waste stream authorizations in 814.402(b)(2) has been modified to allow the grant of authorization if the waste stream is compatible with previously authorized waste streams. The economic impact of the waste stream prohibition was not discussed in the EcIS. However, the potential exists that it could have a major impact on affected facilities. The proposed language would eliminate that potential.

The language of 814.402(b)(3) was revised to provide for the use of federal MCL's as the concentra-

tion limits at the facility boundary. That section had required use of Illinois Public and Food Processing Water Supply Standards. The economic impact of this change is difficult to determine.

Finally, this section does not include the prohibition against reductions in minimum design period found at 814.402(b)(4)(C). As noted above, reductions in design period will produce major reductions in economic impact.

814.801 Scope and Applicability.

This section is identical in substance to 814.501. There is no change in economic impact. The economic impact of this section was not discussed in the EcIS.

814.802 Standards for Operation and Closure.

This section is identical in substance to 814.502. There is no change in economic impact. Closure costs were discussed at 5.2.4 of the EcIS.

**SUMMARY OF ECONOMIC IMPACT
OF PROPOSED RULEMAKING**

PROPOSED SECTION NUMBER	CHANGE IN ECONOMIC IMPACT	CHANGE IN FILING REQUIREMENT?	R88-7 ECIS DISCUSSION SECTION NO.
811.801	MAJOR	NO	Not Discussed
811.802	NONE	NO	Not Discussed
811.803	SMALL	NO	Not Discussed
811.804	NONE	NO	Not Discussed
811.805	NONE	NO	Not Discussed
811.901	NONE	NO	Not Discussed
811.902	MAJOR	NO	Not Discussed
811.903	SMALL	NO	Not Discussed
811.904	SMALL	YES	Not Discussed
811.1001	NONE	NO	Not Discussed
811.1002	NONE	NO	4.2.6
811.1003	MAJOR	NO	4.2.5
811.1004	NONE	NO	Not Discussed
811.1005	NONE	NO	4.2.2
811.1006	NONE	NO	4.2.12
811.1101	NONE	NO	Not Discussed
811.1102	NONE	NO	4.2.10
811.1103	MAJOR	NO	4.2.6
811.1104	NONE	NO	4.2.8
811.1105	NONE	NO	Not Discussed
811.1106	MAJOR	NO	4.2.1, 4.2.2, Tables 4.1 & 4.2
(811.309)	NONE	NO	4.2.3
(811.313)	MAJOR	NO	Not Discussed
811.1107	MAJOR	NO	4.2.5
811.1108	NONE	NO	4.2.7
811.1109	NONE	NO	Not Discussed
811.1110	MAJOR	NO	Appendix D: F3
811.1111	NONE	NO	4.2.4
811.1112	SMALL	NO	Appendix D: F2
811.1113	NONE	NO	Not Discussed
811.1114	NONE	NO	Not Discussed
811.1115	NONE	NO	Not Discussed
811.1116	NONE	NO	4.2.12
814.601	NONE	NO	Not Discussed
814.602	MAJOR	NO	5.2.1, 5.2.5
814.701	NONE	NO	Not Discussed
814.702	MAJOR	NO	Not Discussed
814.801	NONE	NO	Not Discussed
814.802	NONE	NO	5.2.4

LIST OF AFFECTED FACILITIES

I. ILLINOIS STEEL GROUP

Acme Steel Company - Chicago, IL

A. Finkl & Sons - Chicago, IL

Granite City Division, National Steel Company

Granite City, IL

Keystone Steel & Wire Company - Peoria, IL

Laclede Steel Company - Alton, IL

LTV Steel Company, Chicago, IL

Northwestern Steel & Wire Company, Sterling, IL

Republic Steel Company, Chicago, IL

Thomas Steel Company - Lemont, IL

USS, Division of USX - Chicago, IL

Estimated total number of employees employed by the Illinois operations of the above companies is 15,200

II. ILLINOIS CASE METALS ASSOCIATION

Alloy Engineering & Casting Co. - Champaign, IL

American Precision Castings, Inc. - Chicago, IL

American Steel Foundries - Chicago, IL

Arrow Pattern & Foundry - Bridgeview, IL

Arzt Foundry Co. - Niles, IL

Aurora Industries, Inc. - Montgomery, IL

Batavia Foundry & Machine Co. - Batavia, IL

Beloit Corp. - Castings Division - Beloit, WI

Brass Foundry Company - Peoria, IL

Brumund Foundry, Inc. - Chicago, IL
Caterpillar Inc.- Mapleton, IL
Century Brass Works, Inc. - Belleville, IL
Chicago Aluminum Castings - Chicago, IL
Chicago Dubuque Foundry Corp. - East Dubuque, IL
Chicago Magnesium - Blue Island, IL
Christensen & Olsen Foundry Co. - Chicago, IL
Decatur Foundry Co. - Decatur, IL
Deere & Co. - East Moline Foundry - East Moline, IL
Dix-Superior Aluminum Foundry - Chicago, IL
Elizabeth Street Foundry Co. - Chicago, IL
Excelsior Foundry Co. - Belleville, IL
Faunt Foundry Co. - Chicago, IL
Francis & Nygren Foundry Co. - Chicago, IL
GMC - Central Foundry Division - Danville, IL
Gunit Corporation - Rockford, IL
Illini Foundry Co. - Peoria, IL
Lemfco Inc. - Leadmine Foundry - Galena, IL
Manufacturers Brass & Aluminum Foundry - Blue Island, IL
Modern Foundry & Manufacturing Co. - Mascoutah, IL
National Castings Inc. - Melrose Park, IL
National Castings Inc. - Cicero, IL
O&H Foundry, Jnc. - Rockford, IL
Rowe Foundry, E. - Martinsville, IL
Sall-Eclipse - Rockford, IL
Shumway & Sons - Batavia, IL

Sperry & Company, D. R. - North Aurora, IL

St. Anne Foundry Co. - St. Anne, IL

Sterling Steel Foundry, Inc. - St. Louis, MO

Universal Electric Foundry Co. - Chicago, IL

Vermont Foundry Company - Vermont, IL

Wagner Castings Co. - Decatur, IL

Wells Manufacturing Co. - Skokie, IL

In addition to the above listed foundries, there are over 60 other known foundries operating in Illinois. Estimated employment in the ICMA member companies is 17,000. The employment figure for non-member companies is unknown.