

US EPA ARCHIVE DOCUMENT

March 2, 2000

Mr. Richard Lanyon, Director
Research and Development
Metropolitan Water Reclamation District of Greater Chicago
P.O. Box 10654
Chicago, IL 60610-0654

Subject: EPA Selection of Metropolitan Water Reclamation District of Greater Chicago
Project XL Proposal for Pretreatment Program

Dear Mr. Lanyon:

I am pleased to inform you that the U.S. Environmental Protection Agency (EPA) has considered your Project XL proposal dated June 8, 1999, and is prepared to work with you, the State of Illinois, and appropriate stakeholders to develop a Final Project Agreement (FPA). The FPA will detail the expectations of EPA, the Metropolitan Water Reclamation District of Greater Chicago (District), the Illinois Environmental Protection Agency (Illinois EPA), and other project partners. Illinois EPA anticipates sending a letter of support for the project within the next two weeks. If all partners are satisfied and sign the FPA, this agreement will constitute acceptance as an XL project. We congratulate you on this selection, and thank you and the District staff for the hard work getting the proposal approved.

Project XL tests innovative environmental management strategies for the 21st century, and seeks to foster excellence and leadership in environmental protection. We invite you to participate in the next phase of XL project development because your proposal shows potential to accomplish these goals.

Your proposal requests regulatory flexibility from some of the oversight requirements, such as inspection and sampling, of the General Pretreatment Regulations for de minimis and non-significant categorical industrial users (CIUs) meeting certain criteria related to waste water volume, waste water quality, and the facility's compliance record. You also propose revising the format of the Pretreatment Program Annual Report. Under the revised format, detailed oversight information related to significant industrial users (SIUs) will be limited to those that were in significant noncompliance at some time during the report year. The revised Annual Report will also include detailed information regarding environmental performance which is not currently required.

Using the resources saved as a result of the decreased oversight of de minimis and non-significant CIUs, and as a result of the reformatted Annual Report, you propose to achieve superior environmental performance by implementing Toxic Reduction Action Plans (TRAPs) and by piloting alternative environmental monitoring systems.

Under TRAPs, an interagency task force consisting of staff from the District, EPA, Illinois EPA, and local stakeholders will review existing data and identify non-regulated pollutants of local concern. The TRAPs task force will rank the pollutants in order of importance. The District will then attempt to reduce emissions of these pollutants through a variety of non-traditional strategies.

You also propose to develop, test, and implement alternative monitoring systems for demonstrating environmental performance. This objective will be achieved by creating Strategic Performance Partnerships (Partnerships) with metal finishing facilities who are sector leaders and who substantially achieve individual facility goals related to superior environmental performance developed as part of the Strategic Goals Program (SGP). It is anticipated that the alternative monitoring systems that are piloted will provide environmental data on a more frequent basis and will provide data that are more accurate, more precise, and/or more meaningful than traditional monitoring data. Correlation of process control data with effluent discharge data, for example, may provide participating facilities with better tools for monitoring and maintaining environmental performance. Part of this improvement may include decreased loadings of regulated pollutants and reduced water consumption. It is also anticipated that the use of alternative monitoring systems will increase worker safety.

Regulatory flexibility may be needed to implement the alternative monitoring systems. Such flexibility will be consistent with national pretreatment regulatory reinvention efforts. The District has also proposed regulatory flexibility, in the form of deferral of new or revised categorical pretreatment standards for certain Partnership participants. While EPA is not able to commit to waiving new or revised pretreatment standards that may be promulgated, we support the commitment made by our Office of Water, Engineering and Analysis Division, to incorporate provisions regarding successful participants in the Strategic Goals Program into any new or revised standards. This incorporation could affect whether or how certain facilities would be required to comply with the standards.

The District is aware of the importance of public input into the XL process. In developing the FPA, the District will need to seek input from stakeholders already involved in the Chicago Metal Finishing SGP initiative, as well as from stakeholders outside this group.

EPA has assembled a team to work with the District, Illinois EPA, and stakeholders to develop this project. The team will be led by Matt Gluckman in Region 5 (312-886-6089) and Chad Carbone at EPA Headquarters (202-260-4296). They will be contacting you shortly to commence work.

Sincerely,

Francis X. Lyons
Regional Administrator

- cc. Thomas Skinner, Illinois EPA
Roger Kanerva, Illinois EPA
Jim Park, Illinois EPA
Richard Sustich, MWRDGC
- bcc: Richard Farrell, Associate Administrator, Office of Reinvention
Diane Regas, Deputy Assistant Administrator, Office of Water
James Nelson, Associate General Counsel, Office of General Council
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rest of EPA project team