US ERA ARCHIVE DOCUMENT

Sustich, Richard

From: DAVE INMAN [dinman@norbic.org]
Sent: Thursday, April 20, 2000 4:12 PM
To: 'richard.sustich@mwrdgc.dst.il.us'
Subject: Comments on Project XL Submittal

Rich:

I found the submittal to be pretty comprehensive, so my comments will be brief:

- 1. First, to make it official, NORBIC, through its Environmental Assistance Center, is pleased to be invited and accepts the invitation to be a member of this Project's stakeholders group. While we would love to be considered a spokesman for the small business community on the north and nortwest sides of Chicago, we realize that positions we may take may not be representative of all, nor in some cases even a majority, of that community. Therefore, we will simply make our best effort to balance environmental, economic development, and policy issues in respect to the Project, and represent that diverse community within the stakeholders group.
- Upon review, we believe that the 14 Program elements detailed in the submittal is a thorough and pragmatic set of goals, with great potential for benefit to the environment and public health and welfare, cost containment, community informational needs, inter-Agency and public-private partnership relations, regulatory compliance requirements, and long term liability.
- 3. Furthermore, we are pleased with this Project's incorporation and synergy with the GoalsChicago Program for metal finishers, and believe that these programs will be mutually beneficial to goals attainment.
- 4. As a reminder, the U.S.EPA's guidance on Project XL stakeholder involvement recommends that the Final Project Agreement will define the stakeholders involvement throughout the lifetime of the project. As a stakeholder in a prior, aborted Project XL group, I cannot overemphasize the need to clarify this process. So many of the stakeholders come into Project XL with varying levels of capabilities, expectations, and resource commitments, that I believe it necessary to define both the group's role in the process and the procedures for fulfilling that role. This need not be done in a vacuum, of course, and it is entirely reasonable (but also probably more time consuming) to have the group make a recommendation to you on this matter. However, I think it is imperative to address this item with as much accurate direction as possible.

I hope that this has been helpful. I am forwarding these comments to you only at this time. Should you wish to disburse them to a larger audience, including U.S.EPA, IL EPA, other stakeholders, etc., please feel free to do so, or simply reply to this message and I will forward it.

Respectfully,

David R. Inman - Director
NORBIC Environmental Assistace Center

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4/20/00