

BEFORE THE ADMINISTRATOR
OF THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

SIERRA CLUB, AMERICAN LUNG ASSOCIATION)
OF METROPOLITAN CHICAGO, ILLINOIS)
ENVIRONMENTAL COUNCIL, LAKE COUNTY)
CONSERVATION ALLIANCE, ILLINOIS PUBLIC)
INTEREST RESEARCH GROUP & LITTLE VILLAGE)
ENVIRONMENTAL JUSTICE ORGANIZATION)
)
Petitioners,)
)
V.)
)
ADMINISTRATOR CHRISTINE TODD)
WHITMAN & REGIONAL ADMINISTRATOR)
THOMAS V. SKINNER, U.S. ENVIRONMENTAL)
PROTECTION AGENCY,)
)
Respondents.)

**PETITION SEEKING THE U.S. EPA TO PROTECT ILLINOIS
FAMILIES FROM AIR POLLUTION BY ISSUING THE STATE A
NOTICE OF DEFICIENCY FOR FAILING TO ADEQUATELY
ADMINISTER AND ENFORCE ITS TITLE V PERMIT PROGRAM**

I. SUMMARY

Dangerous levels of air pollution, including smog, soot and cancer-causing air pollutants threaten millions of Illinois residents, thirty-three years after Congress enacted the 1970 Clean Air Act to eliminate this public health risk. A significant portion of Illinois' air pollution is from the state's 733 "major sources" of air pollution, including its fleet of aging coal-fired power plants, each of which annually emit hundreds of thousands, even millions, of pounds of air pollution.

Smog, one of the most common air pollution problems plaguing Illinois' urban areas, causes shortness of breath, chest pains, and has been linked to new cases of childhood asthma. Even healthy adults who exercise or engage in manual labor outdoors are vulnerable to adverse health effects from smog. See generally, National Ambient Air Quality Standard for Ozone, 62 Fed. Reg. 38,855 (July 18, 1997).

In 1990 Congress targeted the nation's largest sources of air pollution by adding Title V to the Clean Air Act [hereinafter "CAA"]. Title V directed states to develop operating permit programs for all major sources of air pollution. 42 U.S.C. §§7661a-7661f (2002). Illinois' deadline to issue operating permits to existing major sources of air pollution was March 7, 1998. Id. §7661b(c).

Thirteen years after Congress adopted Title V, 272 (or 37%) of Illinois' major sources of air pollution are still releasing pollutants without operating permits. E-mail from Chris Higgins, Illinois Environmental Protection Agency to Bruce Nilles, Sierra Club (Feb. 4, 2003) [hereinafter "IEPA Spreadsheet"]. Ex. 1.¹ Not one of Illinois' 23 coal-fired power plants has been issued an operating permit, despite being the state's largest polluters. Two hundred and forty-nine additional major sources, including chemical plants, hazardous waste incinerators, and iron and steel foundries, also lack operating permits.

This citizen petition seeks EPA intervention to compel Illinois to fix its operating permit program, to issue timely permits, and protect its residents and communities. Specifically, this petition targets the failure of the State of Illinois to administer and to enforce its operating permit program for the state's largest sources of air pollution consistent with the minimum requirements

¹ The Excel chart has been manipulated to remove irrelevant columns and sort by County and Facility Name.

established by Title V, 42 U.S.C. §§7661a-7661f, and EPA's implementing regulations, 40 C.F.R. §70 (2002). Illinois' operating permit program fails to comply with federal requirements as follows:

1. Illinois has failed to take action on 272 permit applications within the proscribed deadlines. Id. §§70.4(b)(11), 70.7(a)(2). One hundred and seventy-three of the applications have languished for more than seven years.
2. Illinois has failed to take action on at least 53 permit renewal applications within 18 months of receiving the applications as required by 40 C.F.R. §70.7(a)(2).²
3. Illinois has stated that 53 permit modification applications received more than 18 months ago still await agency action. Clean Air Act Permit Program (CAAPP) Illinois Environmental Protection Agency Report to the Illinois General Assembly, Draft, (Mar. 3, 2003) [hereinafter "Fee Report"]. Ex. 2 at 28. Federal law requires Illinois to act on each permit modification application within 18 months of receiving the application. 40 C.F.R. §70.7(a)(2).
4. Illinois' fee schedule has failed to cover the reasonable costs of its permit program as required by 40 C.F.R. §70.9(a). Illinois' fee schedule generates less than sixty-five percent of the revenue the state estimates is needed to administer and enforce the program.
5. Illinois has failed to at all times adequately enforce its permit program as required by 40 C.F.R. §70.10(b). Illinois is neither inspecting major sources on a regular basis, nor reviewing compliance data and stack testing results. Illinois is also violating the inspection and enforcement commitments it made to EPA.
6. Illinois never apprised EPA in writing before (or after) it reduced funding for its operating permit program by \$900,000 in 1996 in violation of 40 C.F.R. §70.4(i)(2).
7. Illinois reduced the permit fees it charged major sources of air pollution by \$900,000 annually without "the approval of the Administrator" in violation of 40 C.F.R. §70.4(i)(2)(iv).

² This number is a conservative estimate of overdue renewal applications based on the number of permit renewals due before March 2001 with a deadline for Illinois to act on the application before September 2002. Illinois did not provide Petitioners with the exact date on which renewal applications were received by the state and so we are unable to determine the precise number of overdue renewals.

For each of these serious program failings, and pursuant to the Clean Air Act (42 U.S.C. §§7401-7671q) and the review provisions of the Administrative Procedure Act (5 U.S.C. §§701-707), the under-signed organizations respectfully petition EPA to issue the State of Illinois a Notice of Deficiency [hereinafter “NOD”].

If within 90 days of EPA’s issuance of an NOD Illinois fails to take “significant action” to remedy these deficiencies, Petitioners further request that EPA immediately apply each of the sanctions listed in 40 C.F.R. §70.10(b)(2), including commencing to withdraw program approval and withholding federal transportation funding. The deficiencies documented in this petition are grounds for program withdrawal. Such grounds include: “failure to issue permits” (Id. §70.10(c)(1)(ii)(A)), “[f]ailure in a timely way to act on any applications for permits including renewals and revisions” (Id. §70.10(c)(1)(ii)(E)), “[f]ailure to collect fee ... revenue consistent with §70.9 (Id. §70.10(c)(1)(ii)(D)), and “[f]ailure to inspect and monitor activities subject to regulation.” Id. §70.10(c)(iii)(C).

A short timetable for imposing sanctions is appropriate because the human health and environmental effects of air pollution are often irreversible and Illinois deliberately underfunded its operating permit program for more than seven years.

EPA has been aware of the serious deficiencies with Illinois’ operating permit program for more than twelve months. If EPA unreasonably delays addressing these deficiencies, it will deny Petitioners relief at the agency level. As such, Petitioners are committed to pursue other avenues, including judicial review, in order to assure that the agency responds to the issues raised in this Petition.

Furthermore, Petitioners remind EPA that excessive and unreasonable delay in addressing matters brought to its attention by the public saps the confidence in an agency's ability to discharge its responsibilities.

Petitioners request the agency to respond to this Petition no later than September 4, 2003.

In the absence of an affirmative response within 180 days of receipt of this petition, Petitioners will be compelled to pursue all other legal options in order to achieve the full and complete action required to address the violations of federal law detailed in this Petition.

II. PETITIONERS HAVE WORKED FOR MANY YEARS TO ENSURE CLEAN AIR FOR ILLINOIS RESIDENTS

The Sierra Club is a national conservation organization with over 600,000 members nationwide. Illinois is home to more than 23,000 Sierra Club members and their families. For over three decades, the Sierra Club has worked to enact, strengthen, and enforce the CAA and its regulations to reduce air pollution in the United States.

The American Lung Association of Metropolitan Chicago [hereinafter "ALA"] prevents lung disease and promotes lung health through research, advocacy and education. ALA worked to pass the 1970 Clean Air Act and subsequent amendments, and has pressed for vigilant CAA enforcement for over thirty years. ALA's advocacy with federal, state and local officials and against polluters has helped to control environmental pollutants that affect asthma in children and adults, and cause respiratory problems in healthy individuals.

The Illinois Environmental Council [hereinafter "IEC"] is a 28 year-old statewide environmental organization which promotes sound environmental laws and policies. It is a coalition of 55 organizations representing 80,000 individuals. The IEC supports federal, state and local actions that reduce pollution from fossil-fueled power plants and other significant sources of pollution in order to minimize harm to the environment and public health.

The Lake County Conservation Alliance [hereinafter “LCCA”] consists of 300 individual members and over 20 grassroots environmental organizations. LCCA is a resource to help groups navigate through Illinois' policies, rules, and regulations on various environmental topics, including clean air protections. For the last four years, LCCA has actively participated and submitted written comments, in the Illinois Environmental Protection Agency's air permitting process for both construction and operating permits.

The Illinois Public Interest Research Group [hereinafter “Illinois PIRG”] is a statewide public interest advocacy organization. Illinois PIRG advocates on behalf of the public interest to protect the environment and consumers and ensure an ethical and accountable government. Illinois PIRG combines research, grassroots organizing and direct advocacy at the local, state and federal levels to protect the public's interest in clean air.

The Little Village Environmental Justice Organization [hereinafter “LVEJO”] is a grassroots, community-based organization established in 1998 in Chicago's largest Latino community. Its predecessor, the Gary School Environmental Justice Project [hereinafter “GSEJP”], was born in 1995 during the successful struggle of parents, students, teachers and community members to protect children from polluted air by moving the site of a new public elementary school to a safer location. Two years of organizing resulted in the Dominguez School being built two blocks away from the pollution sources. Over two years the GSEJP created an environmental justice club of students, parents and teachers that trained its members to clean-up and prevent lead contamination, implemented a school and home toxic inventory and use of safer alternatives, and prevent exposure to high levels of toxins in the roof reconstruction project. LVEJO’s mission is to work with families, friends, and neighbors to improve life, including the air quality, in Little Village and Chicago through participatory democracy in action.

III. THE CLEAN AIR ACT'S TITLE V PROGRAM REQUIREMENTS

Congress' primary goal in establishing the operating permit program was to provide a broad-based tool to aid effective implementation of the CAA and to enhance enforcement. Specifically, Title V requires operating permits for every major source of a regulated air pollutant and any other source covered by a current permit program. 42 U.S.C. §7611a(a). Prior to 1990 there was no federal requirement that existing sources of air pollution have an operating permit. Congress also required that each state's Title V program be self-sufficient and included provisions authorizing states to collect fees for the permitting program. Id. §7661a(b)(3)(A).

The central requirements of Title V include:

- Recording in one document all the air pollution control requirements that apply to a source. Id. §7661c(a).
- Requiring the source to make regular reports on how it is tracking its emissions and the controls it is using to limit emissions. Id.
- Requiring monitoring, testing, and record keeping, to ensure that the source complies with its emission limits or other air pollution control requirements. Id. §7661c(c).
- Requiring the source to certify each year whether or not it had met the air pollution control requirements in its Title V permit. Id. §7661b(b)(2).
- Making terms of a Title V permit federally enforceable by EPA, states, and individuals. Id. §7661a(a); Id. §7613 (federal enforcement); Id. §7604 (citizen enforcement).

These improvements were important because before Title V it was oftentimes unclear which substantive requirements applied to a given major source. Title V applies to all "major sources"

of air pollution. Id. §7661a(b).³ Title V also established the right of citizens to participate during the review process for each Title V permit. Id. §7661a(b)(6).

EPA has promulgated regulations establishing the minimum elements of a state's Title V permit program and the process for reviewing, approving, and overseeing states' permit programs. 40 C.F.R. Part 70. For states that are unwilling to administer an operating permits program in accordance with federal standards, EPA has established a stepped sanctions process. 40 C.F.R. §70.10(b). First, EPA must notify the state of its determination that the state is not adequately administering and enforcing its program and publish a notice of deficiency in the Federal Register. Id. §70.10(b)(1). Second, if 90 days after issuing the notice the state fails to take "significant action" to assure adequate administration and enforcement, EPA may impose one or all of the following sanctions: 1) withdraw approval of the program; 2) withhold federal transportation funds and/or increase the offset requirement for major sources in nonattainment areas; and 3) promulgate, administer and enforce a federal operating permits program. Id. §70.10(b)(2)(i-iii). Third, if eighteen months after giving notice the state still has not remedied the deficiency, EPA shall impose such sanctions. Id. §70.10(b)(3). Fourth, if the problems persist two years after giving notice of the deficiency, the EPA shall promulgate, administer and enforce a federal operating permits program in that state. Id. §70.10(b)(4). EPA is also authorized to charge additional permit fees to cover its program costs, even if the major sources have already paid the state permit fees. Id. §70.10(d).

³ A source of air pollution is defined as a "major source" depending on the type of pollutant emitted and the air quality designation of the area where the source is located. 40 C.F.R. §70.2.

EPA's final interim approval of Illinois' Title V program became effective on March 7, 1995. 60 Fed. Reg. 12,478 (Mar. 7, 1995) (codified at 40 C.F.R. pt. 70). EPA's full approval of Illinois' program became effective on November 30, 2001. 66 Fed. Reg. 62946 (Dec. 4, 2001).

IV. **ILLINOIS' TITLE V OPERATING PERMIT PROGRAM DOES NOT MEET THE MINIMUM FEDERAL REQUIREMENTS**

Illinois' operating permit program violates federal requirements in at least the following seven ways:

1. **Illinois Has Violated the Deadline for Acting on Permit Applications.**

Illinois was required to take final action on (i.e. issue or deny) operating permit applications for all existing major sources within three years of EPA's approval of the state's Title V program. 40 C.F.R. §70.7(a)(2). Because Illinois' Title V program received EPA approval on March 7, 1995, Illinois should have acted on applications for existing sources by March 7, 1998. Id. For a permit application received after the first year of the program, e.g. after March 7, 1996, Illinois is required to take final action no later than 18 months after receipt of the application. Id.

Illinois failed to meet both of these deadlines. As of February 4, 2003, Illinois has not acted on 173 permit applications received during the first year of the program, i.e. more than seven years ago. Ex. 1. Consequently, for at least 173 permit applications Illinois has violated the March 7, 1998 deadline for taking action on the applications. 40 C.F.R. §70.7(a)(2). For another ninety-nine permit applications received after March 7, 1996, (Ex. 1), Illinois is violating the requirement to act on each application within 18 months. 40 C.F.R. §70.7(a)(2).

2. **Illinois Is Violating the Deadline for Acting on Permit Renewal Applications.**

Illinois is required to take final action on an operating permit renewal application within 18 months of receiving the application. Id. An operating permit is issued for a maximum of five

years, and a renewal application must be submitted nine months before the date on which the permit expires. Id. §70.5(a)(1)(iii). Failure to submit a timely permit renewal application terminates the source’s right to operate. Id. §70.7(c)(1)(ii).

Illinois states that “[r]equests for renewal of the original permits issued in 1995 through 1997 are coming in and are awaiting processing.” Fee Report, Ex. 2 at 28. Illinois has not provided Petitioners with the date it received each renewal application. However, at least 53 permit renewal applications should have been received by the state before March 2001 with a deadline for state action of September 2002. E-mail from Chris Higgins, Illinois Environmental Protection Agency to Bruce Nilles, Sierra Club (Feb. 4, 2003). Ex. 3.⁴ In addition, as long as the state is refusing to act on permit renewal applications, there is a mounting number of applications for which Illinois has not acted on within the mandatory 18-month deadline.⁵ Id. §70.7(a)(2).

3. Illinois Is Violating the Deadline for Acting on Permit Modification Applications.

Illinois is required to take final action on an operating permit modification application within 18 months of receiving the application. Id. Illinois reported last week that it has a mounting backlog of 170 permit modification applications awaiting processing and 53 of these applications “were received more than 18 months ago.” Fee Report, Ex. 2 at 28. For each of the 53 permit modification applications received more than 18 months ago Illinois is in violation of 40 C.F.R. §70.7(a)(2).

⁴ The Excel chart received from IEPA has been manipulated to remove all extraneous information and sorted by City.

⁵ Exhibit 3 shows that 53 permits expired before December 31, 2001. If each of these sources applied nine months before the expiration date (i.e. before March 31, 2001), then the 18 month deadline for Illinois to act on these 53 permit renewal applications is no later than September 31, 2002. Ex. 3.

4. **Illinois Has Failed To Establish and Maintain A Fee Schedule That Raises Sufficient Revenue to Administer Its Title V Program.**

Congress required that each state's operating permit program be self sufficient, and included provisions in the CAA authorizing a state to assess and collect fees to fund its operating permit program. *Id.* §7661a(b)(3)(B); 40 C.F.R. §§70.4(b)(7), 70.9. In this way Congress put the cost of administering the program on the pollution sources.

Each state must submit to EPA a detailed permit fee proposal which demonstrates that permit fees will generate sufficient funds to cover “the reasonable costs of the permit program.” 42 U.S.C. §7661a(b)(3)(B)(i); 40 C.F.R. §70.4(b)(7). EPA must review and approve or disapprove each state's fee demonstration. *Id.* §70.4(e).

In 1995, as part of Illinois' submission to EPA seeking approval for its operating permit program, the state included a fee demonstration that it estimated would be adequate to administer and enforce the program. 60 Fed. Reg. 12,478 (Mar. 7, 1995). Illinois projected that its fee schedule would raise \$17.8 million and fund 228 full-time positions. Fee Report, Ex. 2 at 9. On March 7, 1995 EPA approved Illinois' fee demonstration as part of its interim approval of the state's operating permit program. 60 Fed. Reg. 12,478.

Illinois' fee schedule has never generated the level of funding EPA approved as being necessary to adequately administer and enforce the state's operating permit program. Rather than collecting \$17.8 million in annual revenue, in FY 2003 the state anticipates collecting \$11 million. Fee Report, Ex. 2 at 13. Instead of 228 positions to administer and enforce the program, permit fees support just 99 positions. Fee Report, Ex. 2 at 12. In 1996 the State

Legislature exacerbated the already severe funding shortfall by cutting permit fees by an additional \$900,000. Fee Report, Ex. 2 at 11-12.

In the Fee Report IEPA describes how the lack of staff and resources renders the state unable to perform the most basic functions required of a state's operating permit program:

- Unable to issue permits by deadline negotiated with EPA: “While the [IEPA] has met the first two milestones in the schedule, it will be very difficult to ultimately meet this commitment due to the further decline in headcount and the complexity of the remaining projects.” Fee Report, Ex. 2 at 27.
- Unable to process permit modification applications: “Because [IEPA] has concentrated all of the available resources on issuing [Title V] permits, no time has been devoted to processing amendments. ... Over 170 amendments (45 administrative, 95 minor and 20 significant) are awaiting processing of [sic] these, approximately 30% in each category (26, 21, and 6, respectively) were received more than 18 months ago. As time passes, the number of modifications awaiting processing will increase.” Fee Report, Ex. 2 at 28.
- Unable to process permit renewal applications: “Requests for renewals of the original permits issued in 1995 through 1997 are coming in and are awaiting processing. ... While a permit does remain in place [awaiting renewal] it will not contain [the new] standards for toxic pollutants.” Fee Report, Ex. 2 at 28.
- Unable to conduct regular inspections: “Inspection and compliance follow-up are two major areas that are understaffed and cannot meet minimally mandated commitment. USEPA guidance recommends [Title V] sources be inspected biannually. With our current staff, we attempt to get to the two hundred largest sources once every two years and the remainder of the sources once every three to four years.” Fee Report, Ex. 2 at 28. See also, Fee Report, Ex. 2 at 19 (“[IEPA] does not have the staff to begin to meet the requirements of the [Compliance Assurance Monitoring] Strategy, which would require ... a full compliance evaluation of all Title V sources biannually.”).
- Unable to review compliance data submitted by companies: “Because the current staff does not have enough time to assure that all necessary reports are being submitted, meaningful review of the submitted data cannot be completed at this time.” Fee Report, Ex. 2 at 28.
- Unable to review testing plans and observe stack tests: “We are currently unable to review all of the pre-test protocols, are unable to observe most of the actual stack testing, except to review for obvious noncompliance in a limited number of cases.” Fee Report, Ex. 2 at 28-29.

- Unable to release public information: Illinois is not scrutinizing information companies assert is a trade secret “due to a lack of personnel. ... This, in effect, denies the public access to information that might otherwise be available to them under [the Freedom of Information Act].” Fee Report, Ex. 2 at 29.
- Unable to maintain personnel: “[M]anagement believes that lack of adequate funding has led to declining morale and a loss of key personnel.” Fee Report, Ex. 2 at 30.

The lack of resources, IEPA concludes “results in less, and perhaps, inadequate protection of human health and the environment.” Fee Report, Ex. 2 at 30. Illinois’ failure to provide adequate resources to administer and to enforce its operating permit program is also a violation of the Clean Air Act. 42 U.S.C. § 7661a(b)(3)(B)(i); 40 C.F.R. §70.9.

5. Illinois Is Not Enforcing Its Operating Permit Program.

As described above, Illinois candidly admits it is not performing any of its oversight and vital watchdog functions to ensure companies are complying with the Clean Air Act. Fee Report, Ex. 2 at 28-29. This failure to investigate and prosecute scofflaws denies Illinois residents and communities the benefits that Title V was intended to provide: clean air and full disclosure about a company’s compliance record. Moreover, failure to enforce clean air laws results in a financial distortion in the marketplace that rewards companies that break the law and refuse to invest in pollution controls at the expense of responsible companies. Illinois’ failure to conduct regular inspections, review compliance data and stack tests violates the obligation to adequately enforce its operating permit program. 40 C.F.R. §70.10(b).

Moreover, Illinois candidly admits it will not meet the inspection and enforcement commitments for FY 2003 that it made to EPA. Fee Report, Ex. 2 at 19-21, 28-29. The failure to enforce a Title V program “in accordance with [an] agreement between the state and [EPA]” also violates 40 C.F.R. §70.10(b).

6. Illinois Failed To Notify EPA That It Reducing Its Permit Fees by \$900,000.

EPA's regulations require that each state "shall keep EPA apprised of any proposed modifications to its basic statutory or regulatory authority or procedures." *Id.* §70.4(i). Whenever a state does revise its operating permit program, the regulations further require that the "State shall submit a modified program description, Attorney General's statement, or such other documents as EPA determines to be necessary." *Id.* §70.4(i)(2). In 1996 the Illinois General Assembly modified the state's fee schedule by reducing the minimum permit fee from \$1,000 to \$100. This reduced the annual program revenue by \$900,000. Fee Report, Ex. 2 at 11-12.

Illinois has never submitted to EPA the proposed legislative change, an Attorney General statement, or in any other way apprise EPA in writing of this change. IEPA Response to Sierra Club Freedom of Information Act Request, Feb. 21, 2003 ("The Illinois EPA was unable to locate any written records relating to notification to the USEPA regarding any changes to the States [sic] Title V fee schedule."). Ex. 4. Illinois' failure to notify EPA in writing and submit the proposed fee schedule changes to EPA violates 40 C.F.R. §70.4(i).

7. Illinois Modified Its Operating Permit Program By Reducing Funding By \$900,000 Without EPA Approval.

Illinois is prohibited from implementing modifications to its EPA-approved operating permit program without EPA approval. *Id.* §70.4(i)(2)(iii). Specifically, before a state may modify its operating permit program it must submit the proposal to EP and EPA must publish the proposal in the Federal Register for public review. EPA must then determine that the modification conforms with federal law and publish its final approval of the modification in the Federal Register. *Id.* §70.4(i)(2)(i-iii). As described above, in 1996 the Illinois General Assembly cut operating permit fees by \$900,000. Petitioners are unaware of any evidence that

EPA has published a notice in the Federal Register either soliciting comments or granting approval for such a reduction in Illinois' fee schedule. Consequently, there is strong evidence that Illinois since 1996 has been implementing a modified fee schedule without EPA approval in violation of 40 C.F.R. §70.4(i)(2)(iii).

V. CONCLUSION

Based upon the reasons set forth in the Petition, Petitioners respectfully request that the EPA grant the relief sought above. Without such relief, Illinois' communities are at greater risk from air pollution that contributes to, among other things, increased cancer rates, premature death, and more asthma attacks.

Respectfully submitted on this _____ day of March, 2003

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