

EPA ORGANIZATION

Internal deliberative pre-decisional - FOR USE BY 2024 PRESIDENT-ELECT TRANSITION TEAM MEMBERS ONLY

ISSUE SUMMARY:

The Metro-East Region is an area in southern Illinois, near St. Louis, Missouri that includes the cities of East St. Louis, Cahokia Heights, and Village of Sauget among others. The area faces numerous environmental challenges, including chronic sanitary sewer overflows, flooding, threats to drinking water, air pollution, and historical industrial contamination. EPA is committed to ensuring that environmental conditions in the area are improved and that the public is meaningfully engaged in the process.

In 2023, U.S. Representative Nikki Budzinski (IL) requested that the U.S. EPA Administrator appoint a coordinator for the area to leverage resources to help bring relief to the area, with a special emphasis on flood mitigation and sanitary and drinking water infrastructure. In October 2023, Region 5 appointed the inaugural Metro-East Coordinator as a liaison across federal, state, and local organizations. A summary of Region 5's critical work in the Metro-East area is provided below.

KEY POINTS:

Development and Release of the Metro-East Infrastructure Project Matrix

- The Metro-East Coordinator worked with more than 35 stakeholders to develop a comprehensive summary of infrastructure projects, funding needs, funding opportunities and accessed funding. This document, called the Matrix, was released for the first time in May 2024, and will be updated regularly.
- The Matrix demonstrates that over 150 different infrastructure projects are in development, ongoing or complete in the Metro East area; \$62M has been committed to these area projects as of the time of release.

Addressing Sewage Releases through Clean Water Act (CWA) Enforcement

Sewage overflows back-up into yards and homes, cause property damage, contaminate water and can cause public health threats; reducing exposure to raw sewage is a public health priority. Sanitary Sewer Overflows (SSOs) are releases of untreated sewage from a municipal sanitary sewer. Combined Sewer Overflows (CSOs) are overflows from combined sewers that carry a combination of stormwater and untreated sanitary sewage.

Many of the most visible issues in the Metro-East area are caused by flooding. EPA does not have authority to regulate flooding. The CWA does provide the agency with authority to regulate the discharge of stormwater pollutants, such as bacteria, to waterways.

- **City of East St. Louis Sewer Overflows**
 - [EPA investigation](#) found frequently occurring CSOs as well as some SSOs in the City of East St. Louis, IL.
 - Currently, East St. Louis is under two [EPA Administrative Orders on Consent \(AOCs\)](#) (entered in 2022 and 2023) to address CSOs and sewer maintenance.
- **City of Cahokia Heights Sewer Overflows**
 - [EPA investigation](#) found frequently occurring SSOs in the City of Cahokia Heights, IL.
 - Currently, Cahokia Heights is under a [2021 EPA AOC](#) to address SSOs.
 - Cahokia Heights is also under a [2022 EPA AOC](#) to address storm sewer system (MS4) violations.

Safe Drinking Water Act (SDWA) Enforcement in the Metro-East Area

- The City of Cahokia Heights and Illinois American Water (IAW) operate public water systems in the Metro-East area.

- As a result of [SWDA inspections](#), EPA issued a [SDWA Unilateral Administrative Order \(UAO\)](#) to these entities in August 2021. It was terminated for IAW in 2023, after IAW had met the UAO requirements. The UAO remains in effect for Cahokia Heights.

Critical Clean Air Act (CAA) Work at the Veolia Hazardous Waste Incinerator in Sauget, IL

- Veolia ES Technical Solutions, LLC (Veolia) operates a hazardous waste incinerator located in Sauget, Illinois. The facility is in an area with a significant minority and low-income population and has attracted significant public interest due to the facility's controversial compliance history and odor concerns.
- EPA became the permitting authority for Veolia in 2006 after Illinois failed to timely issue a Title V operating permit. EPA issued its first Title V permit to Veolia in 2008 and renewed the permit in June 2019.
- In 2019, Senator Duckworth asked the Agency for Toxic Substances and Disease Registry (ATSDR) to conduct a health consultation to determine whether pollution from the facility was affecting the community. ATSDR is currently working on the consultation.
- In September 2021, EPA issued a Finding of Violation for several CAA violation. This remains an active enforcement case.
- In November 2023, EPA received Veolia's application to renew its CAA Title V operating permit. EPA is currently evaluating the application.
- More information is available at this [website](#).

Providing Technical Assistance to the Metro-East Region

Region 5 has been working with local advocates to convene government agencies and support community engagement. Projects include:

- **Watershed Planning in the Cahokia Heights Region**
 - EPA is coordinating with several organizations including [Heartlands Conservancy](#) and the [US Army Corps of Engineers](#) to develop watershed plans that identify high priority water quality and flood management infrastructure projects within the watershed and showcase model best management practices.
- **Cultivating Skills to Address Environmental Concerns through an Environmental Justice Academy**
 - EPA, Southern Illinois University – Edwardsville and Kappa House are hosting a ten-month long capacity strengthening program for community EJ leaders called the [Environmental Justice Academy](#) (EJ Academy) in the Metro-East area.
- **Offering Free Lead Renovation, Repair and Painting (RRP) Training for Area Contractors**
 - Elevated blood lead levels in young children remain a concern; scientific evidence continues to demonstrate toxic effects of lead at low levels.
 - The Lead RRP rule requires workers renovating homes built before 1978 have lead-safe renovation training.
 - Region 5 has procured free classes for area renovators. Thus far, 3 classes have been held in Decatur and 1 in East St. Louis, certifying about 70 renovators.

Ensuring that Metro-East Area Superfund Sites are Cleaned Up

North Alcoa Site

- The [North Alcoa Site](#) is a 400-acre former aluminum refinery located in East St. Louis, IL that is being cleaned up through the Superfund Alternative Approach.

Sauget Areas 1 and 2 Superfund Sites

- The [Sauget Area 1](#) and [Sauget Area 2](#) Superfund Sites include Dead Creek and former waste treatment and disposal sites located in Sauget, Cahokia Heights and East St. Louis, IL. Some cleanup has been completed at both sites; long-term cleanup is ongoing.

Old American Zinc Plant Superfund Site

- The [Old American Zinc Plant Superfund Site](#) is in Fairmont, IL; it includes a 132-acre facility area where former zinc smelting operations were conducted, and surrounding residential, commercial, and vacant properties where slag was used as fill.
- Cleanup is ongoing through an Interagency Agreement with U.S. Army Corps of Engineers. EPA is also re-assessing the site to ensure the cleanup complies with the new residential lead guidance.

NL Industries/Taracorp Lead Smelter Superfund Site

- The [NL Industries/Taracorp Lead Smelter Superfund Site](#), located in Granite City, IL, was operated as a secondary lead smelter from around 1900 until 1983.
- The remedial action at the site is complete except for implementation of some institutional controls, and the re-assessment of the site with the new residential lead guidance.

Jennison-Wright Corporation Superfund Site

- The 20-acre [Jennison-Wright Corporation Superfund Site](#) is located in Granite City, Illinois. Various industrial operations began at the site prior to 1920 and continued until 1989. Waste piles, spills and poor storage practices led to soil and groundwater contamination.
- Illinois EPA is the lead agency for site cleanup actions; EPA is the support agency.
- Some cleanup has been completed at the site – groundwater treatment is ongoing.

Ensuring that Corrective Action Cleanups are Conducted in the Region – Solutia Inc. Facility

- Solutia is a chemical manufacturer that has been operating in Sauget, IL for 100 years.
- An interim cleanup was completed at the [Solutia Inc. Facility](#) in 2004.
- On February 26, 2008, EPA issued a [Final Decision](#) to remediate soil and groundwater contamination at the Facility. This cleanup is ongoing.
- The \$22 million remedy focuses on removing source areas of PCBs, benzene, chlorobenzenes, lead, and mercury potentially impacting workers, contaminating groundwater, and migrating to the Mississippi River.

ONGOING/UPCOMING REVIEWS FOR FY2024:

- In FY24, Five Year Reviews will be completed at the NL Industries/Taracorp Lead Smelter, Old American Zinc Plant and Jennison-Wright Corporation Superfund Sites.
- EPA is currently evaluating the Veolia Title V operating permit application, and anticipates issuing a permit decision in FY24. EPA is facilitating community engagement regarding the permit application, and is undertaking a cumulative impacts assessment to inform the decision.
- EPA anticipates updating and re-issuing the Metro-East Matrix approximately quarterly.
- The Region will continue managing the CAA, CWA, SDWA and RCRA enforcement actions cited above, to ensure that the regulated community complies with environmental regulations and the applicable orders.

KEY EXTERNAL STAKEHOLDERS:

☒ Congress
 ☐ Industry
 ☒ States
 ☐ Tribes
 ☒ Media
 ☒ Other Federal Agency
☐ NGO
 ☒ Local Governments
 ☒ Public

MOVING FORWARD:

- Region 5 will continue critical work to address sewage backups, flooding, threats to drinking water, air pollution, and historical industrial contamination issues in the Metro East area.
- The Metro East Coordinator position will remain staffed for the foreseeable future to ensure work across the area is coordinated and aligned across Regional programs, and information is shared with stakeholders. The Coordinator will also continue to connect area projects with funding opportunities and provide transparent summaries of project work to the community.