

**SITE VISIT REPORT
GATEWAY INITIATIVE AREA
ILLEGAL DUMPING ASSESSMENT PROJECT**

INTRODUCTION

A site visit was conducted in the Gateway geographic initiative area (GIA) in April 1997 as part of the U.S. Environmental Protection Agency's (EPA) illegal dumping assessment project. The Gateway GIA is made up of portions of St. Clair and Madison Counties. EPA met with involved parties to discuss illegal dumping issues and programs and visited representative illegal dumping sites. This report identifies key contacts involved with illegal dumping in the Gateway area.. It also discusses the nature of the problem; county, local municipal government, and community group efforts to address the problem, and additional resources needed.

KEY CONTACTS

Key Contact, Title, and Organization	Address and Telephone No.	Jurisdiction	Illegal Dumping Program Summary
Director New Spirit Organization	771 Vogel Place East St. Louis, IL 62201 (618) 874-0312	City of East St. Louis	Coordinates and assists community groups; maintains inventories and maps of sites
Jesse Walker Director of Public Works Myron Cason Code Enforcement Supervisor City of East St. Louis	301 River Park Drive East St. Louis, IL 62201 (618) 482-6828	City of East St. Louis	Enforce city ordinances
Tony Irwin Environmental Protection Coordinator Environmental Protection Specialist St. Clair County Health Department	19 Public Square Suite 150 Belleville, IL 62220 (618) 233-7769	St. Clair County	Enforce county environmental regulations
Curtis Caldwell Public Assistance Officer Illinois Emergency Management Agency	500 West Monroe Springfield, Illinois 62704 (217) 782-8719	State of Illinois	Review applications for federal funding to be applied to demolition and removal activities
George Andres, P.E. Southwest Illinois Planning Commission	203 West Main Collinsville, IL 62234 (618) 344-4250	Southwest Illinois counties	Carries out contracting and planning responsibilities for the "FEMA buyout areas"
Thomas Hawkins Environmental Coordinator Madison County	Administration Building 157 N. Main St. Suite 254 Edwardsville, IL 62025	Madison County	Enforce county environmental regulations
Penni Livingston State's Attorney	State's Attorney Office 10 Public Square Belleville, IL 62220 277-6600 Ext 398	St. Clair County	Prosecutes environmental crimes, including illegal dumping cases
Ken Mensing Regional Manager Doug Hayward Environmental Protection Specialist Field Operations Section - Bureau of Land Illinois Environmental Protection Agency	2009 Mall Street Collinsville, IL 62234 (618) 346-5120	Southwest Illinois, including Gateway GIA	Enforces state environmental laws; coordinates tire cleanups

Key Contact, Title, and Organization	Address and Telephone No.	Jurisdiction	Illegal Dumping Program Summary
Bonnie Robinson Pollution Prevention Manager St. Clair County Health Department	19 Public Square Suite 150 Belleville, IL 62220 (618) 233-7769	St. Clair County	Coordinates pollution prevention training and implementation
Lt. Steve Saunders Director of Training Deputy Dale Sauget Environmental Officer St. Clair County Sheriff's Department	700 North 5 th Street Belleville, IL 62220 (618) 277-3505 Ext 757	St. Clair County	Enforces county environmental regulations
Fanny Woods Neighborhoods United for Progress	19 Public Square Suite 200 Belleville, IL 62220	City of East St. Louis	Coordinates and assists neighborhood organizations

NATURE OF THE PROBLEM

East St. Louis

Low-income areas have the highest incidence of illegal dumping. In 1980, the population was about 55,000 and decreased to 40,000 by 1990. The city suffers from poor infrastructure development and maintenance capabilities. Local politics and the absence of a long-term redevelopment plan appear to be a major hindrance to efforts to prevent illegal dumping. Many local officials consider the problem to be less serious now than several years ago. There was no trash collection service for 7 years from the mid-80s to the early-90s. Household refuse and yard waste piled up in streets, alleys, and residences (occupied and abandoned). The problem still exists, partially because of habits from previous years. Many residents do not acknowledge that dumping is illegal.

Many residents cannot afford trash collection. The quarterly fee is \$30 and is lowered to \$20 for people who are reliable in making payments. The waste management company provides bins and bills residents directly. Residents submit payments to the City, which in turn pays the waste management company. A computerized billing system is administered by the Sanitation Department (Lisa Moore). The waste management company will not collect trash if the resident is delinquent in payments. As of April 1997, there was \$300,000 in delinquent bills. Residents who cannot afford service often dump trash in yards or homes, adjacent properties, in nearby alleys, or at illegal transfer facilities. Trash from such facilities (Photo 3), is likely transferred to abandoned buildings; vacant lots; alleys; roadsides; and rural areas.

Contractors and individuals may haul and dump either demolition debris (drywall, flooring, siding, wood, bricks, railroad ties, and shingles) or bulky, materials (tires, appliances, televisions, furniture) to avoid tipping fees (Photo 4). Only tires and large white goods are banned from local landfills. Offenders are difficult to catch because the dumping activities occur at random times late at night. Abandoned autos in streets and yards are also a common problem.

St. Clair County

Several nearby cities only recently established trash collection programs. Centreville residents were informed that a new city ordinance mandated that residents pay for trash collection service; otherwise, residency permits would be revoked.

Several rural areas have a high incidence of illegal dumping. Dirt roads lined by trees and bushes between farm fields are typical of such areas in southern St. Clair County (Photo 5). Other rural areas

included an abandoned racetrack and a former stable filled with construction debris and household waste (Photo 6).

Flooding

The 1993 flooding of the Mississippi River impacted many areas throughout the Gateway area. The Federal Emergency Management Agency (FEMA) purchased large sections of property (“FEMA buyout areas”) impacted by the flooding. Such areas are former residential areas where residents move out, all structures are demolished, and the area is regraded (Photo 9). However, prior to demolition of abandoned residences, these areas attract dumpers who fill the homes with debris and dump throughout the area (Photos 7-8). Contractors eventually hired to conduct the demolitions do not always properly disposed the waste. A frequent practice is to burn out the residence, compact debris into the foundation, and cover it with dirt. According to the Sheriff’s Department, one contractor hired to remove demolition debris (Dennis Fults), was a convicted environmental criminal and was able to secure contracts by changing corporate identities and submitting the low bids. Dumping of demolition debris has been verified by inspectors who have found gas meters from demolished homes at sites.

The Illinois Emergency Management Agency (IEMA) reviews applications for reimbursement under the FEMA reimbursement program. IEMA consists of the Hazard Mitigation Grant Program, which provides funding for purchasing property and structures, and the Public Assistance Program, which funds demolition and removal activities. The Southwest Illinois Planning Commission was the reimbursement applicant for the FEMA buyout areas in St. Clair County. A special contracting scheme was supposed to have been developed so that demolition debris would not be illegally dumped.

Madison County

90% of Chouteau Island (120 acres) is a FEMA buyout area, which reverted to Madison County. Open dump sites are located throughout the island (Photo 10), including a large tire dump that caught fire and burned for several weeks. Other high-incidence areas include Venice, McKinley Bridge, Route 3, the Metro East Sanitation area, and Route 111 wetland areas. Other problems and issues facing the county include: (1) burn barrels; (2) local fire departments that provide faulty advice to citizens regarding open burning; (3) local landfill capacity is expected to be reached in 6 -20 years; (4) out-of-state landlords cannot be located; (5) Corrections Program manpower cannot operate the equipment (such as bobcats) needed to conduct cleanups; and (6) coordination with other police departments is limited.

FEDERAL EFFORTS

Clean Sites, a nonprofit organization, conducted a Citizens’ Environmental Academy, a 7-week seminar series that provided residents with information about environmental legislation, the public participation process, and solutions to local environmental problems in 1996. EPA also awarded a grant to the St. Clair County Sheriff’s Department to establish an environmental crimes unit, which supports an environmental officer. In addition, EPA awarded a grant to the New Spirit Organization and to Neighborhoods United for Progress to coordinate neighborhood organization efforts. EPA supports the East St. Louis Action Research Project, which is a University of Illinois program that focuses on improving enforcement of environmental codes in neighborhoods. EPA supports Stop Pollution Illinois to produce a newsletter called *The Bottom Line*. The newsletter’s purpose is to identify environmental issues across communities and create links among different groups. Finally, EPA supports the Madison County Soil and Water Conservation District to provide a part-time environmental educator to visit schools, libraries, and scout troops to discuss environmental issues.

East St. Louis was the recipient of federal funding earmarked for community development, including demolition activities. The East St. Louis Community Enterprise Zone received about \$11.3 million. The

federal funding was transferred to Community Development Block Grants (Diane Bonner). The Department of Housing and Urban Development (HUD) oversees implementation (Percy Harris). The Department of Agriculture and the Natural Resource Conservation Service provide funding through the Urban Resource Partnership (URP). URP provided approximately \$1.4million between 1995-97 directed toward educating the community about waste reduction techniques such as composting. The Department of Justice, Americorps, Army National Guard, and Scott Air Force Base also contribute resources to cleanup and prevention efforts.

STATE EFFORTS

Illinois EPA-Collinsville is responsible for enforcing state environmental laws and regulations to in southwester Illinois. IEPA focuses on enforcement of Title 35, Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, Volume IV, Parts 745 through 849.

Complaints are evaluated directly or delegated to appropriate county or municipal government. Doug Hayward investigates tire dumping by conducting inspections and reporting relevant information on a standard inspection form. The enforcement approach is to warn first-time offenders, inform them of proper waste management or cleanup techniques, and provide them with the opportunity to correct the problem. If a first-time offender is cooperative, there is generally no penalty. If the offense is repeated, enforcement action is taken. Cases are tracked and monitored using a database, file system and open dump status sheets. Staff work closely with the Attorney General's Office and various county State's attorneys, including Penni Livingston and Nelson Metz, to prosecute environmental crimes. A Delegation Agreement for surveillance and enforcement activities has increased coordination with St. Clair and Madison County officials. IEPA staff supported a training workshop for state, county and city police officers focused on applicable laws, rules, regulations, and ordinances. Two training workshops have been sponsored to date.

The University of Illinois supports the East St. Louis Community Action Network with manpower for cleanups, technical support, needs assessments, and participation in painting projects. Other state organizations supporting the area include the Illinois Lung Association and Midwest Environmental Enforcement Association.

COUNTY EFFORTS

The St. Clair and Madison County Health Departments enforce the Environmental Protection Act. Tony DeSimone and Jared Essenpreis use county-owned vehicles to conduct inspections, often in cooperation with a county Sheriff. In St. Clair County, Deputy Sheriff Dale Sauget is an environmental officer dedicated to surveillance and enforcement of open dumping and burning regulations, attempting to catch people committing violations. He often watches for smoke from open burning from a high vantage point to guide his investigation route. Citations are written for the following violations: 415 Illinois Consolidated Statutes (ILCS) 5/21(a) for open dumping, 415 ILCS 5/(c) for open burning, 415 ILCS 5/9(a) for open burning, and 415 ILCS 5/55(a)(2) or 415 ILCS 5/9(a) and 5/55(a)(2) for open burning of tires. The Sheriff's Department is also benefitting from increased participation by other officers who are following this example and from improved public perception of the department.

Madison County has two inspectors working with the sheriff's department to conduct surveillance and enforcement. Health department inspectors apply Madison County Ordinance 69 and rules under the Illinois Environmental Protection Act to cite offenders for illegal dumping and burning. The county's program is creating an awareness of the problem through increased enforcement and prosecution of offenders. Cases are being tracked using progress reports as required by the Delegation Agreement. An enforcement decisions group was formed to evaluate and prioritize circuit court cases. The county uses

Corrections Program manpower to conduct roadside cleanups. Landfill tipping fees provide income to support surveillance and enforcement efforts.

MUNICIPAL EFFORTS

East St. Louis

City of East St. Louis code enforcement inspectors use personal vehicles to conduct surveillance and investigations. The inspectors reported a high incidence of illegal dumping on Morris Avenue and the Wyman and Lansdown neighborhoods. East St. Louis code 91-100-50, covers illegal dumping of trash and debris and unsanitary conditions. The code allows the inspectors to issue citations to offenders. Though inspectors work with the state attorney to prosecute environmental crimes, many offenses are settled before they get to court.

The Building Department (Diane Williams) and the Regulatory Affairs Department (Gene Williams) also enforce city codes. Within the Public Works Department (Jesse Walker), approximately half the personnel, 20 trucks, and 2 end-loaders are available to conduct cleanups. Waste collected is transferred to the Milan Landfill and disposed of at \$90/truckload. The City received 10,000 cubic yards of free space at the Milan Landfill which took 7-8 months to fill. Approximately 1700 structures are targeted and 200-300 have already been demolished by the City. Most public works staff and equipment are used to cut tall grass and weeds. The Sanitation Department bills residents for grass-cutting services but only collects 5-10% of the fees.

The Department of Health & Safety and Police Department support a project to address derelict cars. Abandoned automobiles are tagged; owners are given 7 days to remove them, and if not removed, it is towed to a salvage yard. The project ceased when a city council member's car was accidentally towed. The EcoCouncil works with FEMA on wetland development. The Casinos Foundation provides \$1000 Community Fund Grants for urban revitalization and development projects.

St. Louis

The "Trash Task Force" is part of the Neighborhood Stabilization Program, which was created by the city because of the city's population decrease from 1 million to 400,000. The Task Force consists of off-duty officers who use their own vehicles to conduct surveillance and enforce ordinances. Each member is carefully chosen and signs an independent contract with the city. The off-duty officers' time is compensated under the government budget, and the officers are allowed by the Police Department to spend 20 hrs/week on Task Force activities. The preferred Task Force member is trustworthy, self-motivated, experienced in investigating environmental crime, and a former detective.

The officers make arrests and contact on-duty officers to arrange transport of an offender to a police station (Photo 11). Penalties include a \$500 fine and 20 hrs community service. The Task Force responds to citizen complaints received through the Citizens Service Bureau, which acts as a clearinghouse for questions and complaints. A \$100 reward is offered for complaints that lead to prosecution (Photo 12). Cases are tracked and monitored through the court computer system.

COMMUNITY GROUP EFFORTS

New Spirit coordinates prevention and cleanup efforts in 18 neighborhoods, coordinates demolition projects, solicits corporate support, and raises awareness of the problem and potential solutions among citizens and government officials.

Specific activities and programs include "Community Cleanup Days," "Recycling Fairs," an "I Spy" hotline. As part of a supplemental environmental project pursuant to an enforcement action against a

waste management company, 550 dumpsters were used during the “Community Cleanup Days,” which resulted in removal of 166,000 tons of waste. “Recycling Fairs” are held annually on 10th and 11th Streets because no recycling programs exist in these areas. Urban mulchers were purchased and distributed in some neighborhoods to reduce yard waste and citizens were educated on composting and mulching techniques. New Spirit is helping to develop the Community Oriented Policing (COPS) program for the Alta Sita, South End, and WinStanley neighborhoods.

New Spirit participates on a City sponsored demolition task force to develop a comprehensive demolition plan, and works with neighborhood organizations to compile information regarding structures requiring demolition. Maps identifying and charting vacant homes and homes requiring demolition for each neighborhood were developed by neighborhood organizations to guide the process (Photos 13,14,15). Progress made on the demolitions has been limited. New Spirit participated in a project to demolish 11 homes using \$20,000 provided by a local corporation. Relationships have been developed with local newspapers to disseminate information, increase visibility, and exert political pressure. New Spirit organizes “phone blasts” in which several citizens call government offices within a short time frame to lobby for change, such as an increase the fine for illegal dumping. New Spirit is also funded through the Greater East St. Louis Community Fund.

Other community groups that have a positive impact on the problem include the East St. Louis Community Action Network (Carolyn Fuller), Neighborhoods United for Progress (Fanny Woods); and Make East St. Louis Beautiful (Geraldine Jenkins).

ADDITIONAL RESOURCES NEEDED

Additional resources needed include:

- (1) additional officers, inspectors, or attorneys devoted to illegal dumping (especially at night)
- (2) training in conducting surveillance, identifying and responding to environmental crimes
- (3) radios and cellular telephones for state, county, and local government inspectors
- (4) additional (youthful) manpower, equipment, and funds for cleanups
- (5) education and prevention efforts focused on citizens and neighborhood groups
- (6) Authority to regulate waste haulers
- (7) A tracking system for repeat offenders operating between states and counties.
- (8) An illegal dumping tipline and citizen rewards for offender arrests and prosecutions.
- (9) Administrative assistance for processing complaints and paperwork.
- (10) An “Open Landfill Day”
- (11) A long-term development plan in coordination with State, County and City government

POTENTIAL BEST MANAGEMENT PRACTICES

- St. Louis Trash Task Force enforcement and prevention program
- Dedicating a State’s Attorney Office attorney to prosecuting environmental crimes
- Cooperation of the St. Clair County Health Department and Sheriff’s Department to arrest environmental offenders
- Environmental law enforcement training for state, county, and city police officers
- Application of resources of local waste management companies and other local companies to illegal dumping projects as part of an EPA supplemental environmental project
- Efforts of the New Spirit community group to coordinate neighborhood efforts



Photograph No. 1

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: Household general refuse, tires, and yard waste adjacent to Interstate 70 at 8th and WinStanley



Photograph No. 2

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: Railroad ties, tires, and general household refuse next to an abandoned residence adjacent to Interstate 70 at 8th and WinStanley



Photograph No. 3

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: General household refuse and demolition debris at an illegal waste transfer facility located at 6440 Rock Spring Road



Photograph No. 4

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: Pile of debris from a demolished residence adjacent to a residence currently in use



Photograph No. 5

Date: April 24, 1997

Location: St. Clair County, Illinois

Description: Pile of roof shingles on a rural, dirt road that is lined with trees and that runs between two farm fields



Photograph No. 6

Date: April 24, 1997

Location: Alorton, Illinois

Description: General household refuse and demolition debris in the central area of a former horse stable at the abandoned Alorton racetrack; individual stables along the sides were also filled with waste



Photograph No. 7

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: FEMA buyout area located at 60th and Summit that was blocked off with a soil berm; vacant neighborhood and former residences were filled with general household refuse



Photograph No. 8

Date: April 23, 1997

Location: East St. Louis, Illinois

Description: General household refuse in abandoned neighborhood that is part of the FEMA buyout area at 60th and Summit



Photograph No. 9

Date: April 24, 1997

Location: East St. Louis, Illinois

Description: Wooded, former residential area that was cleaned up following a FEMA buyout of the property



Photograph No. 10

Date: April 25, 1997

Location: Chouteau Island, Madison County

Description: Pile of debris located in a FEMA buyout area on Chouteau Island



Photograph No. 11

Date: April 25, 1997

Location:

Description: St. Louis Trash Task Force arrest of an environmental offender



Photograph No. 12

Date: April 25, 1997

Location: St. Louis, Missouri

Description: St. Louis Trash Task Force members holding sign describing the illegal dumping reward program