

**SITE VISIT REPORT
GREATER CHICAGO INITIATIVE AREA
ILLEGAL DUMPING ASSESSMENT PROJECT**

INTRODUCTION

A site visit was conducted in the Greater Chicago geographic initiative area (GIA) in April and May of 1997 as part of the U.S. Environmental Protection Agency's (EPA) illegal dumping assessment project (IDAP). EPA met with involved parties to discuss illegal dumping issues and programs in the GIA and visited representative illegal dumping sites. This report identifies key contacts involved with illegal dumping within the Greater Chicago GIA. It also discusses the nature of the problem; county, local municipal government, and community group efforts to address the problem and additional resources needed and potential best practices.

KEY CONTACTS

Key Contact, Title, and Organization	Address and Telephone No.	Jurisdiction	Illegal Dumping Program Summary
Ms. Alexandra Holt, Assistant Commissioner City of Chicago Department of Environment	30 North LaSalle Street 25th Floor Chicago, IL 60602 (312) 744-3172	City of Chicago	Enforces Chicago environmental ordinances; coordinates Chicago illegal dumping program involving education, community outreach, inspection, and tracking
Mr. Ed O'Banner, Supervising Environmental Inspector City of Chicago Department of Environment	30 North LaSalle Street 25th Floor Chicago, IL 60602 (312) 744-7235	City of Chicago	Enforces Chicago environmental ordinances; supervises illegal dumping inspectors for Chicago
Ms. Anne Kent, Director of Code Enforcement City of Chicago Department of Streets & Sanitation	(312) 744-0311	City of Chicago	Directs the Code Enforcement section of the Bureau of Sanitation. Supervises inspectors who issue tickets for illegal dumping and other sanitation violations.
Mr. Vito Pisoli City of Chicago Department of Streets & Sanitation	(312) 747-5026	City of Chicago	Administers "Lot Cleanup Group" program to clean up and secure illegal dumping sites, issue citations, and perform other enforcement activities
Mr. Cliff Gould Maywood Office Illinois Environmental Protection Agency (IEPA)	1701 S. 1 st Avenue Suite 600 Maywood, IL 60153 (708) 338-7900	Cook County (outside City of Chicago limits)	Enforces Illinois solid waste laws and regulations through IEPA's Springfield office
Ms. Stacy Meyers, Assistant Attorney General Environmental Crimes Bureau, Illinois Attorney General	100 W. Randolph St. Chicago, IL 60601 (312) 814-3918	Northern IL including Chicago	Handles illegal dumping cases; coordinates Illinois Env. Crimes Investigators Network; maintains hotline for illegal dumping and other env. complaints
Mr. Charles F. Lagges, Director Dr. William Franek Cook County Department of Environmental Control	Maybrook Civic Center 1500 Maybrook Drive Maywood, IL 60153 (708) 865-6165	Cook County (outside City of Chicago limits)	Support IEPA solid waste efforts with inspections and coordination of cleanup activities

Key Contact, Title, and Organization	Address and Telephone No.	Jurisdiction	Illegal Dumping Program Summary
Mr. Keith McDonald, President Mr. Orrin Williams, Secretary West-side Alliance for a Safe and Toxic-free Environment	5437 W. Division Chicago, IL 60651 (773) 378-2783	West side of Chicago communities	Community outreach
Mr. Nelson Soza Association of Community Organizations for Reform Now	117 W. Harrison Chicago, IL 60605 (773) 939-7488	West side of Chicago communities (Little Village and Lawndale)	Assists low-income communities in addressing illegal dumping and other environmental issues
Mr. Rick Bryant Illinois 2nd Congressional District	17926 S. Halsted Homewood, IL 60430 (708) 798-6000	Illinois 2nd Congressional District	Serves as point of contact in 2nd Congressional District for Ford Heights illegal dumping issues

NATURE OF THE PROBLEM

State, county, local municipal government, and community group representatives were interviewed and urban residential and industrial areas were visited to evaluate the nature of the illegal dumping problem in the Greater Chicago GIA. This GIA is primarily urban; therefore, rural areas were not evaluated during GIA site visit activities. The Greater Chicago GIA consists of Cook County, Illinois, with emphasis on the area bounded by Lake Michigan on the east, 156th Street on the south, Western Avenue on the west, and 87th Street on the north. Based on various interviews and on observations made during the GIA site visit, areas on the south and west sides of Chicago have the highest incidence of illegal dumping activity.

Within Chicago, illegal dumping primarily occurs on unsecured vacant lots, including properties containing abandoned buildings, and industrial sites (see Photographs No. 1, 2, and 3). Unsecured, temporary construction and demolition (C&D) waste storage areas and bermed waste used to secure sites also serve as magnets for illegally dumped wastes (see Photograph No. 2). In addition, property owned by railroads is often targeted by illegal dumpers because it is often unsecured, easily accessible, and generally unmonitored (see Photograph No. 4). The City of Chicago Department of Streets & Sanitation (Streets & San) provides waste pickup services to city residents. Therefore, the waste that is dumped illegally is not typically residential garbage from within city limits; it primarily consists of C&D waste that local C&D contractors do not want to pay disposal fees for. Tires also create a significant problem (see Photograph No. 5). Illegally dumped waste from the suburbs may be either residential garbage or C&D waste.

One specific type of C&D waste that creates a particular problem in Chicago is debris from garage demolition. It is difficult to track garage demolition activities or determine whether waste generated from these activities is properly disposed because garages typically do not have sewer service or running water; consequently, a permit is not required for their demolition. As a result, it is assumed that the waste from garage demolition is often illegally dumped.

Although it primarily occurs at night, illegal dumping occurs at all times of the day. Illegal dumpers often purchase rundown pickup trucks at a very low price, use them for illegal dumping activities until they are no longer operable, and then abandon them while they still contain waste (see Photograph No. 6). Illegal dumpers may haul waste to or operate in conjunction with an illegally operated waste transfer station which offers a lower tipping fee than would a legal transfer station (see Photograph No. 7).

Representatives of the community group called West-side Alliance for a Safe and Toxic-free Environment (WASTE) provided the perspective that illegal dumping results from internal and external disrespect of the community—internal in the sense that individuals think it is acceptable to dump waste

within their local community and external in the sense that some people outside the community view these communities as dumping grounds. According to WASTE representatives, a significant factor contributing to the problem in west- and south-side communities of Chicago is a sense of helplessness brought on by the “Silver Shovel” corruption investigation and waste disposal activities at associated sites. In these instances, residents often responded as they should have—by reporting illegal dumping activities to the authorities—but saw no action. Therefore, they feel that there is no course of action they can take to solve the problem and have come to accept illegal dumping as part of their environment.

The factors contributing to illegal dumping activities outside Chicago may differ from those within city limits. For example, the south-suburban village of Ford Heights has a huge illegal dumping problem because of several unique factors. According to Richard Bryant, deputy district administrator for the 2nd Congressional District, of which the village is a part, Ford Heights is one of the poorest communities in the nation. The village currently obtains water from wells, while surrounding communities obtain their water from Lake Michigan. However, the poor quality of the well water makes it unsuitable for drinking, so village residents must buy bottled water. According to Mr. Bryant, the poor economic conditions in Ford Heights and the added financial burden of purchasing bottled water contributed to the inability of residents to consistently pay for municipal trash pickup service provided by SkyLine Hauling of Chicago Heights, Illinois. Currently, 15 to 20 percent of residents do not have trash pickup service on a regular basis. Some of these residents have sporadic trash pick-up service from village dump trucks; however, Ford Heights has no landfill, no contractual agreement with a landfill, and insufficient funds to pay tipping fees. As a result, village trucks are allegedly disposing of trash in one of several illegal dumps. The factors discussed above have also contributed to residents disposing of their residential garbage at several illegal dumps (see Photographs No. 8, 9, and 10). These dumps serve as magnets for other illegally dumped wastes that are more typical of the Greater Chicago GIA, such as C&D waste (see Photograph No. 11).

The illegal dumping problem in Ford Heights is compounded by the flooding of Deer Creek, which runs along one of the village’s more notorious dump sites (see Photograph No. 12). Deer Creek floods several times per year, dispersing illegally dumped waste throughout the village and destroying homes and property, which creates more waste (such as water-damaged furniture and carpeting) that is also illegally dumped. Signs reading “No Dumping—\$500.00 Fine” have been put up around the area but apparently do not discourage illegal dumping. The recent indictment of law enforcement officers in Ford Heights has further complicated matters; the village is currently policed by the Cook County Sheriff and Illinois State Police.

STATE EFFORTS

The Illinois Attorney General’s (AG) Office, located in Chicago, primarily handles cases from the northern part of Illinois, including Chicago. Stacy Meyers, Assistant Attorney General in the Environmental Crimes Bureau, is active in addressing environmental crimes, including illegal dumping. The AG’s office coordinates the Illinois Environmental Crimes Investigators Network which was established to connect law enforcement officials from around the State and provide participants with resources which help to identify, investigate, and prosecute environmental crimes. The Network provides training to participants and keeps its members informed through a quarterly newsletter. The AG’s office maintains a toll-free “hotline” for environmental complaints. A significant number of the complaints received through the hotline relate to illegal dumping activities. Furthermore, the AG’s office handles environmental, including illegal dumping, court cases.

Cliff Gould of the Illinois Environmental Protection Agency’s (IEPA) Maywood Region office was interviewed. The Region includes the Greater Chicago GIA, the rest of Cook County and the counties of

Lake, McHenry, Kane, DuPage, Kendall, Grundy, Will and Kankakee. Among its other responsibilities, IEPA's Bureau Of Land (BOL) is charged with enforcing the provisions of the Illinois Environmental Protection Act (Act) related to illegal dumping. However, as indicated in the IEPA "Open Dumps" brochure (see Attachment A), the IEPA encourages local governments and citizens to address this problem. The IEPA has a delegation agreement with several of the counties in the Maywood Region (Lake, McHenry, DuPage, Will and Kankakee) and the City of Chicago giving them the authority to enforce the provisions of the Act and the Illinois Pollution Control Board (Board) rules and regulations applicable to solid waste management, including illegal dumping. At the current time, the City of Chicago may also choose to enforce its own ordinances relating to illegal dumping. In some cases, these ordinances may be more strict than the corresponding provisions of the Act.

At this time the staff of the Maywood Region includes seven inspectors whose duties include the evaluation of sites for conformance to the provisions of the Act and Board regulations related to solid waste management, both hazardous and non-hazardous, including illegal dumping. The regional office receives upward of 300 complaints per year alleging violations of the Act. These complaints are received from citizens and through other governmental entities such as the Cook County Department of Environmental Control, the Metropolitan Water Reclamation District, police departments, the Illinois Attorney General and the County States Attorneys. Many of the complaints, up to two thirds, initially allege violations of provisions related to hazardous waste management. These must be investigated by the IEPA. In many instances, these complaints turn out to be non-hazardous upon investigation.

In addition to staffing constraints, the IEPA is limited in its authority to directly address illegal dumping and other solid waste cases because of the constraints on enforcement action imposed by the provisions of the Act. The IEPA cannot directly file complaints before the Board or in Circuit Court. It must refer its cases to the Illinois Attorney General or to a County States Attorney for filing. In addition, the Regional Office cannot independently work with these prosecuting authorities. Every enforcement case must be referred to IEPA Headquarters for internal review and approval prior to referral. This includes the issuance of Administrative Citations (AC), which are like "tickets," for open dumping related violations that carry a penalty of \$500 for each violation cited. They are the only type of enforcement action the IEPA can take directly. This process causes significant delays and, as a result, reduces the effectiveness of Mr. Gould's office in dealing with illegal dumping issues because violators do not take the State's enforcement activities seriously.

While ACs may be issued by the IEPA, there are problems in that in many cases they are issued against a property owner and not the individual or individuals that actually did the dumping. Another problem is they do not contain any provision for actually cleaning up the property. The alternative to the AC is enforcement of the provisions of the Act and the Board regulations relating to open dumping and the operation of a landfill without a permit. While this would substantially increase the amount of any statutory penalty and would address the clean up of the site, its drawback is the time it takes to bring the process to conclusion, due to the factors discussed above.

COUNTY EFFORTS

Interviews were conducted with Charles Lagges and Bill Franek of the Cook County Department of Environmental Control (DEC), which is primarily an "air agency" according to Mr. Lagges and Dr. Franek. DEC's jurisdiction within the GIA includes Cook County outside Chicago limits. Although the county has developed a solid waste plan to reduce the amount of waste being landfilled in its jurisdiction, it has no solid waste laws of its own, and DEC has no authority to issue citations or conduct other enforcement activities related to illegal dumping. As mentioned above, IEPA is responsible for enforcement of solid waste rules. Municipalities within the county are responsible for their own solid

waste disposal. Also, the county does not have the financial resources to clean up sites. Cook County is pursuing enactment of its own solid waste laws that would address illegal dumping, but no such laws have been enacted to date. County officials anticipate that such laws will not be enacted for at least 5 years.

DEC has inspectors, but they currently focus on annual inspections related to DEC's air pollution initiatives. Illegal dumping activities identified by inspectors or through citizen complaints are referred to IEPA. The Cook County Sheriff's Department has the authority to issue citations for illegal dumping, but to do so it must catch the illegal dumper in the act. In addition, the sheriff's department does not have the manpower to monitor known illegal dumping sites.

For some illegal dumping cases that have received political attention, the county has been involved in cooperative cleanup efforts, particularly for illegal dumping sites on highway and forest preserve properties. For example, at an illegal dumping site in Markham, Illinois, DEC was involved in a cooperative cleanup effort in which the Cook County Sheriff's Department provided labor through its work assistance program to clean up waste and the county highway department provided trucks and equipment for transporting waste. DEC has video footage showing the cleanup effort.

LOCAL MUNICIPAL GOVERNMENT EFFORTS

Meetings were held with representatives of the City of Chicago Department of Environment (DOE). Through a 1994 delegation agreement with IEPA (see Attachment B), the city is authorized to enforce State laws related to nonhazardous solid waste. In addition, DOE enforces its own municipal laws which are contained within the Municipal Code pursuant to the City's "Home Rule" authority. DOE does some joint enforcement with IEPA and may refer matters to the IEPA if enforcement resources are available within the IEPA's jurisdiction. For example, IEPA may get involved in enforcement activities regarding illegal tire dumping because such dumping often involves falsification of state records required for disposal of tires. The City typically prosecutes illegal dumping cases by issuing municipal citations for violation of municipal ordinances (see Attachment B). These cases usually result in the impoundment of vehicles used for illegal dumping activities and in fines ranging from \$500 to \$6,000. For large cases, additional civil or criminal charges may also be involved.

DOE has a staff of 12 inspectors who enforce the city's solid waste ordinances. Of these 12 inspectors, 4 focus primarily on illegal dumping activities and have had surveillance training. DOE inspectors are not armed and rely on the Chicago Police Department (CPD) to make necessary arrests. In addition to an unmarked vehicle, DOE inspectors are equipped with a radio, a cellular telephone, a citation book, a flashlight, pepper spray (for dogs), bullet-proof vests, and Polaroid and 35-millimeter cameras. Sources of funding for DOE inspectors include corporate revenue funds, a surcharge on tipping fees charged by landfill operators, and a state enforcement grant. Streets & San has over 200 inspectors who can write citations, have vehicles impounded, and have people arrested with the assistance of the Police Department. Streets & San relies heavily on the use of Polaroid photographs as evidence in bringing cases to court.

The city has established a telephone number for citizens to report illegal dumping activities and other environmental complaints. If a citizen witnesses illegal dumping in progress and the police could arrive in a reasonable time or if the material appears to be hazardous, the citizen is instructed to call "911." For other complaints, citizens are encouraged to call a hotline number being distributed on bilingual wallet cards (see Attachment B). The city offers a \$100 reward for information that leads to prosecution of illegal dumpers.

Also, in September 1996, EPA awarded DOE a \$350,000 grant to assist in development of DOE's illegal dumping program. DOE's efforts under this grant are divided into the following four tasks:

- **Task 1--Providing DOE and CPD Training.** This task involves developing a pocket card for officers that outlines procedures regarding illegal dumping enforcement, a series of one-page training bulletins for all officers, and a training seminar and manual for the 75 watch commanders of the CPD and DOE inspection and enforcement staff. Efforts on this task are being coordinated with the EPA Criminal Investigations Division.
- **Task 2--Performing Targeted Surveillance and Enforcement.** This task involves setting up surveillance at known illegal dumping sites. The city initially planned to purchase surveillance cameras but instead hired a surveillance company that provides cameras and has the expertise to install and maintain them. This approach will save DOE both training and maintenance costs.
- **Task 3--Developing a Multilingual Public Outreach and Education Campaign.** This task involves preparing a multilingual brochure that defines illegal dumping; a multilingual, wallet-size card for citizens that presents important telephone numbers for notifying the authorities of illegal dumping activities; an Internet web site with information on illegal dumping and an electronic complaint form; a short video illustrating the problems associated with illegal dumping for use at community meetings; and a series of advertisements for community newspapers. In addition, DOE is attending community alternative policing strategy (CAPS) meetings to give a presentation regarding illegal dumping and citizen involvement, answer questions, and take complaints.
- **Task 4--Implementing an Illegal Dumping Activity Tracking System Using a Geographic Information System (GIS).** This task involves using a contractor to develop an illegal dumping activity tracking system that includes the following overlays: vehicle impoundment records, DOE enforcement cases, permitted facilities such as transfer stations and recyclers, complaints, inspection and surveillance locations, police districts, community groups, and demographics. The city's "911" emergency map is being used as the base map for the system. In addition to tracking enforcement activities, the demographic information overlay will allow DOE to look at illegal dumping as it may relate to environmental justice issues.

Twice per year, the city sponsors "Tire Bounty Days" on which the city pays \$0.50 for each tire brought to designated collection points. This program is run by DOE at Streets & San yards in the city. The tires collected are shredded before disposal.

Streets & San also sponsors "Clean and Green" neighborhood cleanup days on which its 50 yard facilities are opened to civic groups who can use tools, paint, garbage bags, and other materials to clean up vacant lots in their neighborhoods. Streets & San also provides trucks and disposal services for the waste cleaned up. These events are sponsored twice per year in the spring and fall. About 1,500 civic groups participated in the May 3, 1997, event and cleaned up about 246 tons of waste. Throughout the year, Streets & San sponsors similar "Clean and Green" programs that specifically target schools.

In addition, Streets & San has a "Lot Cleanup Group" that consists of 10 crews responsible for cleaning up and securing illegal dumping sites, primarily on city property. Streets & San spends about \$11 million

per year on this program to cleanup between 1,000 and 1,300 sites per month, depending on the time of year. Sites are prioritized according to citizen complaints or by Streets & San ward superintendents or refuse collection coordinators (RCC) submitting request forms that identify site locations, approximate amount of waste, and types of waste.

Streets & San also issues administrative adjudication (AA) tickets for illegal dumping in the city. Ordinances typically cited in the tickets involve creating a public nuisance, harborage for rats, and failure to secure property. All of these violations can result in fines. Streets & San cleans up city-owned and privately-owned sites, with the possibility of recouping costs from the privately-owned sites. To recover the costs from a privately owned site, Streets & San often attempts to recoup its costs by putting a lien on the property after a title search is completed. In the past, Streets & San waited to clean up such a site until the title search was completed. However, the illegally dumped material acted as a magnet for additional dumping. Therefore, the site cleanup and title search are now conducted simultaneously.

Streets & San also conducts a program in which vacant lots that are frequent targets for illegal dumping are secured with physical barriers to prevent additional dumping. Vertical, steel I-beams protruding a few feet above the ground have proven to be the most effective barrier (see Photograph No. 13). About 500 locations are secured in this way each year.

COMMUNITY GROUP EFFORTS

An interview was conducted with Nelson Soza of the Association of Community Organizations for Reform Now (ACORN), which is located on the west side of Chicago. Cirila Diaz, a resident of the Little Village community on the west side of Chicago, hosted and was present at the meeting. ACORN is a grass-roots organization established in 1970 to assist welfare recipients in Arkansas; it now works on several low-income community problems nationally.

Mr. Soza's particular concern was the former Celotex site, an abandoned industrial facility in Little Village located at 2800 South Albany across from Ms. Diaz's home. According to Mr. Soza, Little Village has fewer vacant lots than surrounding communities; therefore, illegal dumping is not a major problem in this community. The Celotex site property is fenced and is undergoing remedial investigation; however, some illegal dumping has occurred on site and along the fence.

On the west side of Chicago, ACORN's mission is to bring the attention of community residents and authorities to local environmental problems, including illegal dumping. ACORN has no formal program for addressing illegal dumping, but it performs community outreach through door-to-door contact with the residents and acts as an organizational and networking tool for the community to solve its own problems.

A meeting was held with Keith McDonald, Orrin Williams, and Fred Friedman of WASTE, a coalition of about 35 community and environmental groups on the west side of Chicago. WASTE was originally established to stop government-subsidized incinerators from being built in low-income communities in the GIA. When the retail rate law that provided the government subsidies for the building of these incinerators was repealed, the organization's focus shifted to other environmental issues, particularly illegal dumping.

WASTE focuses its illegal dumping prevention efforts on community education and empowerment. According to WASTE representatives, community residents need to know who they can turn to if they witness illegal dumping activities, but they must first understand that illegal dumping is a problem that they can get help in solving. WASTE claims that it is crucial that residents receive this information from

community-based organizations and not through a “top-down” approach from local authorities. WASTE explained that residents are more receptive to information that comes to them from the community level. Better communication between the city and individual community groups is needed to coordinate illegal dumping prevention efforts and that any messages from the city need to be delivered by community groups in order to get buy-in from local residents.. WASTE also claims that the CPD needs to be trained to give illegal dumping higher priority than it currently does.

In addition, WASTE has established a program called SCRUB (Saving, Cleaning, and Reusing Unused Land and Brownfields), which will use community input to choose five specific sites for redevelopment. Many of the sites are vacant lots where illegal dumping activities are a problem. SCRUB’s overall goals are to educate the community about environmental problems, create a sense of pride within the community that will lead residents to view their community as an asset and help empower the community, give them the tools they need to solve environmental problems, and help them begin to redevelop their community.

Finally, during its site visit, bilingual signs were observed reading “no dumping” and “dumping is illegal” along railroad tracks in the city (see Photographs No. 14 and 15). These signs appeared to have been put in place by the local community and to be somewhat effective, as no illegal dumping was observed in their immediate vicinity.

ADDITIONAL RESOURCES NEEDED

State

The Illinois Attorney General’s Office indicated that it needs additional manpower to assist with the office’s heavy case load, maintain the Environmental Crimes Hotline, assist in developing training programs for local law enforcement officers, coordinating newsletter logistics, and acting as a liaison between agencies in the Network.

The IEPA Maywood District office indicated that it needs additional manpower to handle the heavy load of complaints. The district needs to regain the authority to pursue its own enforcement cases without going through the IEPA Springfield office. In addition, legislative clarification of the C&D debris definition is needed, as the definition is currently subject to interpretation.

County

Cook County is pursuing enactment of its own solid waste laws that would address illegal dumping, but no such laws have been enacted to date. If such laws were to be enacted, DEC has enough inspectors in its air group to transfer some inspectors to a new land pollution unit, but DEC would need an additional person to supervise this unit. In addition, to implement a solid waste inspection and enforcement program, DEC anticipates needing at least one 4-wheel-drive vehicle and laboratory equipment for any sample analysis that may be required.

Local Municipal Governments

According to DOE, additional inspectors would be beneficial, but more importantly, the judicial system needs to be made aware of the severe nature of the problem because until offenders are appropriately punished, additional enforcement has limited effectiveness. In fact, the city judicial system may not be able to handle the case load that additional inspectors would create. Additional financial resources would also be used to expand ongoing efforts, particularly those involving community outreach. In Ford Heights, for example, resources are required to clean up illegal dump sites and provide residents with the opportunity to properly dispose of their waste.

Community Groups

Community groups interviewed indicated that additional resources are needed to fund multimedia community outreach programs currently being planned. Resources are needed to sponsor community-based site cleanups, landscaping, and restoration. Community groups emphasized that efforts to deal with illegal dumping should be conducted with the larger goal of urban revitalization. In addition, the efforts of local municipal governments need to be coordinated with community groups, which can provide channels of communication to the community.

POTENTIAL BEST PRACTICES

- Physical barriers, particularly steel I-beams, to control access to vacant lots
- Multilingual signs that indicate “No Dumping”
- Multimedia community outreach (flyers, radio, television, billboards, and meetings)
- Landscaping of vacant lots to establish parks
- Providing inspectors with necessary tools and authority
- Educating law enforcement officials in illegal dumping issues, including community perspectives
- Tracking illegal dumping activity using GIS
- Government-sponsored community cleanup events
- Establishing a communication network between community groups and local officials
- Licensing of waste haulers
- Permitting of demolition activities
- Cooperative government cleanup efforts involving police, highway, and sanitation departments and forest preserve districts
- Site surveillance using cameras or inspectors
- Enforcement of laws and ordinances by authorities with clearly defined responsibilities



Photograph No. 1

Date: May 8, 1997

Location: Chicago, Illinois

Description: Demolition debris in a vacant residential lot at 2700 West Lake Street



Photograph No. 2

Date: May 9, 1997

Location: Chicago, Illinois

Description: Demolition debris and tires on a vacant industrial site at 350 West 59th Street; note bermed debris unsuccessfully used to control site access



Photograph No. 3

Date: May 9, 1997

Location: Chicago, Illinois

Description: Close-up view of tires and demolition debris on a vacant industrial site at 350 West 59th Street; note railroad tracks in background



Photograph No. 4

Date: May 8, 1997

Location: Chicago, Illinois

Description: Scrap pay telephones and landscaping wastes along railroad property at 5800 South Hoyne



Photograph No. 5

Date: May 8, 1997

Location: Chicago, Illinois

Description: Tires along railroad property at 4600 West 5th Street



Photograph No. 6

Date: May 13, 1997

Location: Chicago, Illinois

Description: Typical pickup truck used for illegal dumping activities; note condition of vehicle and lack of license plates



Photograph No. 7

Date: May 8, 1997

Location: Chicago, Illinois

Description: Illegal waste transfer station at 3139 West Lake Street



Photograph No. 8

Date: May 13, 1997

Location: Ford Heights, Illinois

Description: Illegal municipal dump along Deer Creek; note "No Dumping" sign



Photograph No. 9

Date: May 13, 1997

Location: Ford Heights, Illinois

Description: Illegal municipal dump along Deer Creek; note damaged furniture



Photograph No. 10

Date: May 13, 1997

Location: Ford Heights, Illinois

Description: Illegally dumped wastes along 10th Street near illegal municipal dump



Photograph No. 11

Date: May 13, 1997

Location: Ford Heights, Illinois

Description: Construction and demolition waste dumped near local community center



Photograph No. 12

Date: May 13, 1997

Location: Ford Heights, Illinois

Description: Illegally dumped wastes in Deer Creek



Photograph No. 13

Date: May 8, 1997

Location: Chicago, Illinois

Description: Steel I-beam barrier used to secure a vacant lot; note tire dumping outside of barrier



Photograph No. 14

Date: May 9, 1997

Location: Chicago, Illinois

Description: Sign painted by community to discourage dumping along railroad tracks



Photograph No. 15

Date: May 9, 1997

Location: Chicago, Illinois

Description: Sign painted by community to discourage dumping along railroad tracks