



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

To: Susan Mooney, USEPA Region V
From: James Jennings, Illinois Environmental Protection Agency
Date: January 25, 2023
Re: Illinois SWIFR Draft Work Plan

On December 6, 2022, the Illinois EPA submitted its Notice of Intent to participate in the United States Environmental Protection Agency's ("USEPA") Solid Waste Infrastructure for Recycling ("SWIFR") State and Territory Grant Opportunity. This document serves as the Illinois EPA's draft Scope of Work discussed in USEPA's SWIFR Grant Program: Program Guidance for States and Territories (December 2022).

Anticipated Use of Funds. The Illinois EPA anticipates using all awarded funds to conduct a statewide waste characterization study that identifies the annualized volume of individual materials generated in Illinois and the end-of-life handling methods of those materials by geographic region of the state. The Illinois EPA believes this use is consistent with "develop[ing], strengthen[ing], and/or implement[ing] data collection efforts that demonstrate progress towards the National Recycling Goal and Food Loss and Waste Reduction Goal" eligibility criteria set forth in the Program Guidance. The Illinois EPA plans to utilize a combination of existing full time employees and outside contractors to complete this project within three years of receipt of the award.

The primary output from the use of these funds will be a report detailing the tons of municipal solid waste generated by material type in Illinois and how those materials are handled at the end of their life. The types of material will align with the taxonomy of materials included in the Illinois Materials Management Advisory Committee's July [2021 report](#). The report developed using SWIFR funds will also detail the reduction of greenhouse gases, in metric tons of carbon dioxide, from collection, recycling, and composting efforts in Illinois. These outputs will be achievable during the assistance agreement funding period.

The primary outcome from the use of these funds will be providing the Illinois EPA with contemporary, accurate data reflecting the statewide materials generation profile. These data will enable the Illinois EPA to identify specific materials streams and generation locations to target for landfill diversion efforts. Depending on the results of the waste characterization, those efforts may include regulatory amendments to afford composting facilities flexibility to accept additional food scraps or targeted uses of state funds appropriated by the General Assembly to focus on materials generated at a high rate that are otherwise recoverable given the state's existing infrastructure. Consistent with USEPA Region V's direction at the January 11, 2023 State RCRA Directors call, a more developed description of the anticipated work, budget, outputs, and outcomes will be included in the Illinois EPA's application that will be submitted in May 2023.

Allocation of Funds factors. The Program Guidance identified five factors USEPA would use to evaluate the allocation of SWIFR Funds for awards available to states and territories. The State of Illinois's information related to those five factors is detailed below.

4302 N. Main Street, Rockford, IL 61103 (815) 987-7760
595 S. State Street, Elgin, IL 60123 (847) 608-3131
2125 S. First Street, Champaign, IL 61820 (217) 278-5800
2009 Mall Street Collinsville, IL 62234 (618) 346-5120

9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph Street, Suite 4-500, Chicago, IL 60601

I. Legislation that Mandates Solid Waste Management Planning

Illinois law does not require the maintenance of a statewide solid waste management plan. Indeed, in the last three decades there have been only two legislatively driven statewide efforts that include some of the elements of a solid waste management plan set forth in 40 CFR 256. In 1990, the General Assembly amended the Illinois Solid Waste Management Act to require the Department of Commerce of Economic Opportunity to develop a report evaluating the effectiveness of existing recycling and solid waste management programs in the state. 415 ILCS 20/7. This report was published in July 1992. In 2019, the General Assembly amended the Illinois Solid Waste Management Act to require the Illinois EPA to facilitate the Illinois Statewide Materials Management Advisory Committee. 415 ILCS 20/7.1. That Committee was tasked with authoring a report to the General Assembly that evaluated the effectiveness of existing recycling and waste management infrastructure and identified achievable recommendations to enhance the performance of those systems. This report was published in July 2021 and is linked earlier in this document.

II. Depth and Breadth of State Data Collection Efforts

Illinois law does not require omnibus solid waste and materials management data collection or reporting. A patchwork of state laws requires individual industry sectors to annually report municipal solid waste disposal volumes. These reporting requirements include the volume of solid waste sent to landfills for disposal and landscape waste sent to permitted compost facilities for disposal. There is no comparable requirement to report municipal solid waste generation figures. Illinois EPA data collection efforts are managed by fulltime employees who primarily perform other materials management functions; the Illinois EPA has not received any independent funding for statewide materials management data collection efforts in recent decades.

III. Most Recent State Solid Waste Management Plan Information

The State of Illinois does not have an overarching solid waste management plan as contemplated in 40 CFR 256. The closest comparable undertaking is the Materials Management Advisory Committee's Report from July 2021. This Report did not include an updated state waste characterization study. The [most recent such study](#) took place in 2008.

IV. Available Resources for Implementing a Solid Waste Management Program

The Illinois EPA does not currently have available funds or staff to exclusively dedicate to implementing a solid waste management program similar to that outlined in 40 CFR 256. The Illinois EPA contemplates utilizing fulltime employees who currently oversee other materials management programs to perform the functions necessary to administer awarded SWIFR funds. These employees are paid from a pair of state funds derived from landfill tipping fees. These funds also support core Illinois EPA functions, such as landfill permitting, field inspections, and civil enforcement activities.

V. *Additional Programmatic Factors*

The Illinois EPA has the statutory authority to administer recycling and composting grants to a wide range of entities. Although funding has not been appropriated for these programs since 2014, the Materials Management Advisory Committee identified more than \$10 million of state funds that could be appropriated to support such grants without raising fees. The Illinois EPA anticipates utilizing these resources to augment efforts undertaken with SWIFR funds if state financing becomes available. The Illinois EPA contemplates weaving environmental justice principles and source reduction endeavors into the rubric for the report that will be produced using SWIFR funds. These elements will be examined in further detail in the Illinois EPA's May 2023 application.

Program contact: James Jennings, Manager
Materials Management and Compliance Section
(217) 524-1852
James.m.jennings@illinois.gov