NEICVP1411E02

NEIC CIVIL INVESTIGATION REPORT
East St. Louis SDWA
Belleville, Illinois 62223

Investigation Dates:
April 26-30, 2021

David Parker
Digitally signed by
David Parker
Date: 2021.07.01 14:40:44 -06'00'

David Parker, Project Manager, NEIC

Authorized for Release by:
Digitally signed by LINDA TEBRONY
DNE=US, o=U.S. Government,
o=Environmental Protection Agency,
cn=LINDA TEBRONY,
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Date: 2021.07.01 14:58:59 -06'00'

Rebecca Connell, Field Branch Chief, NEIC

Report Prepared for:
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INVESTIGATION OVERVIEW

PROJECT OBJECTIVE

At the request of U.S. Environmental Protection Agency (EPA) Region 5, EPA's National Enforcement Investigations Center (NEIC) conducted a Safe Drinking Water Act (SDWA) compliance investigation at the Illinois American Water Company - East St. Louis, Illinois, public water system (IAWC - East St. Louis PWS), located at 300 N. Waterworks Drive, Belleville, Illinois 62223, and two consecutive systems that purchase water from the East St. Louis PWS. The consecutive systems were the Commonfields of Cahokia public water district (PWD) and the Village of Cahokia PWS. The investigation assessed the three systems' compliance with SDWA regulations found in 40 Code of Federal Regulations (CFR) Part 141, with a focus on system operation and maintenance. The investigation was conducted in support of the SDWA National Compliance Initiative (NCI) to Reduce Noncompliance with Drinking Water Standards at Community Water Systems. This report is a replacement of the East St. Louis SDWA NEIC civil investigation report, dated June 23, 2021, project No. VP1411, work product No. NEICVP1411E01, in order to address comments from EPA Region 5 and the EPA Office of Enforcement and Compliance Assurance.

Table 1 lists the project team members.

<table>
<thead>
<tr>
<th>Team Member</th>
<th>Organization</th>
<th>Project Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>David Parker</td>
<td>NEIC</td>
<td>Project manager (PM)</td>
</tr>
<tr>
<td>Trent Rainey</td>
<td>NEIC</td>
<td>Field team member</td>
</tr>
<tr>
<td>Daren Vanlerberghe</td>
<td>NEIC</td>
<td>Field team member</td>
</tr>
<tr>
<td>James Adamiec</td>
<td>EPA Region 5/Enforcement and Compliance Assurance Division (ECAD)/Water Enforcement and Compliance Assurance Branch (WECAB)</td>
<td>EPA Region 5 SDWA inspector</td>
</tr>
<tr>
<td>Victoria Anderson</td>
<td>EPA Region 5/ECAD/WECAB</td>
<td>EPA Region 5 SDWA inspector</td>
</tr>
<tr>
<td>Taylor Girouard</td>
<td>EPA Region 5/ECAD/WECAB</td>
<td>EPA Region 5 SDWA inspector</td>
</tr>
</tbody>
</table>

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

<table>
<thead>
<tr>
<th>Name, Title</th>
<th>Phone No.</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rachel Bretz, Operator, IAWC - East St. Louis PWS</td>
<td>618-874-2404</td>
<td><a href="mailto:rachel.bretz@amwater.com">rachel.bretz@amwater.com</a></td>
</tr>
<tr>
<td>Dennis Traiteur, Operator, Commonfields of Cahokia PWD</td>
<td>618-337-3302</td>
<td><a href="mailto:commonfields@sbcglobal.net">commonfields@sbcglobal.net</a></td>
</tr>
<tr>
<td>Rory Morgan, Operator, Village of Cahokia PWS</td>
<td>618-301-2160</td>
<td><a href="mailto:rmorgan@cahokiaillinois.org">rmorgan@cahokiaillinois.org</a></td>
</tr>
</tbody>
</table>
FACILITY OVERVIEW

According to a December 2018 engineering evaluation conducted by the Illinois Environmental Protection Agency (IEPA), the IAWC - East St. Louis PWS, located in St. Clair County, Illinois, serves 51,452 direct metered connections, with a calculated service population of 259,037 people. The IAWC - East St. Louis PWS is a privately owned company that owns and operates the water system. A surface water source, the Mississippi River, is utilized, and treated drinking water is provided to local customers and sold to a total of 10 consecutive systems. The IAWC - East St. Louis PWS operates under PWS identification No. IL 1635040. The facility obtains water from a surface water source and is subject to regulation under 40 CFR Part 141 – National Primary Drinking Water Regulations. According to EPA’s Enforcement and Compliance History Online (ECHO), the IAWC - East St. Louis PWS was last inspected for SOWA requirements in November 2018 (listed as a state-conducted sanitary survey), and the only violation reported in the past 5 years was of the Consumer Confidence Rule in 2016.

The Commonfields of Cahokia PWD is a consecutive system located in St. Clair County, Illinois, that directly purchases water treated by the IAWC - East St. Louis PWS. It serves 4,078 direct metered connections and 1,570 satellite connections, with a calculated service population of 14,289 people, according to a November 2018 evaluation conducted by IEPA. The Commonfields of Cahokia PWD operates under PWS identification No. IL1635030. The facility purchases water from the IAWC - East St. Louis PWS and is subject to regulation under 40 CFR Part 141 – National Primary Drinking Water Regulations. According to ECHO, the Commonfields of Cahokia PWD was last inspected for SDWA requirements in November 2018 (listed as a state-conducted sanitary survey), and no violations have been reported in the past 5 years. However, in the last sanitary survey report, IEPA noted a number of issues, including finished water storage and asset deterioration, which have yet to be corrected.

The Village of Cahokia PWS is a consecutive system located in St. Clair County, Illinois, that purchases water treated by the IAWC - East St. Louis PWS after it passes through the Commonfields of Cahokia PWD. It serves 1,400 direct metered connections, with a calculated service population of 3,640 people, according to a December 2020 evaluation by IEPA. The Village of Cahokia PWS operates under PWS Identification No. IL1630200 and is subject to regulation under 40 CFR Part 141 – National Primary Drinking Water Regulations. According to ECHO, the Village of Cahokia PWS was last inspected for SDWA requirements in October 2018 (listed as a state-conducted sanitary survey), and the following violations have been reported in the past 5 years: Consumer Confidence Rule (2016-2017), Revised Total Coliform Rule (2016), Stage 1 Disinfectants and Disinfection By-Products Rule (two instances in 2016), and Total Coliform Rule (2016).
On April 21, 2021, residents voted to dissolve the Commonfields of Cahokia PWD. It became part of a new city called “Cahokia Heights” on May 6, 2021. Cahokia Heights is comprised of the former towns of Cahokia, Alorton, and Centreville, Illinois. Inspectors also learned that the Village of Cahokia PWS will also be part of the new Cahokia Heights water system.

FACILITY OPERATIONS SUMMARY

The IAWC - East St. Louis PWS uses two surface water intakes to obtain raw water. The East St. Louis River House intake is located on the east side of the Mississippi River at mile marker 

This intake location has been utilized since 1885 and draws raw water from the Mississippi River through two 48-inch pipes. Five raw water pumps (total capacity of 101.4 million gallons per day [MGD]) transfer water from the East St. Louis River House intake and the low service pump station through two 36-inch concrete mains and one 30-inch cast iron main to a grit removal unit at the IAWC - East St. Louis PWS drinking water treatment plant. Water from this intake feeds the conventional side of the treatment plant. On average, 20 MGD of raw water is pumped from the East St. Louis River House intake to the IAWC - East St. Louis PWS drinking water treatment plant.

The second intake is located upstream at, on the east side of the Mississippi River at mile marker . It has been used since 1926 and draws water between two concrete wing walls on the riverbank. Raw water is pumped through a bar rack, into two suction wells, and through one of two traveling screens. Three raw water pumps (total capacity of 64.2 MGD) send the water to two 55-foot high tanks, where grit removal is accomplished. Cationic polymer is sometimes applied to the raw water during the winter months as a coagulant aid. Water then flows by gravity from the grit removal tanks through a 54-inch concrete main to the Granite City (Illinois) drinking water treatment plant; from there, it travels through a 48-inch main to the IAWC - East St. Louis PWS drinking water treatment plant. Water from this intake feeds the Aldrich side of the treatment plant (“Aldrich plant”) and the conventional side of the treatment plant in sedimentation basins 4 and 5. On average, 30 MGD of raw water is pumped from this intake to the two drinking water treatment plants that it serves.

The IAWC - East St. Louis PWS drinking water treatment plant is located at 800 Front Street near the River House intake. The plant has two separate treatment trains, with all finished water routed into two interconnected clearwells. The plant has a combined capacity of 56.6 MGD.

The Aldrich plant, which consists of eight upflow clarifier basins with filters on the periphery of each basin, receives raw water exclusively from the intake. Powder activated carbon (PAC) is fed into the raw water main for taste and odor control at the Granite City drinking water treatment plant before the water flows to the Aldrich plant. Pre-chlorine
disinfectant, pre-ammonia disinfectant, and aluminum sulfate coagulant are added to the raw water before it enters the Aldrich basins. Aldrich basins 1 through 4 were built in 1956, each with a capacity of 10.2 MGD. Aldrich basins 5 through 8 were built in 1961, each with a capacity of 11.2 MGD. Finished water from the Aldrich plant is routed to clearwell 2, which was constructed in 1918 (and is interconnected with clearwell 1). The Aldrich plant has a treatment capacity of 21.4 MGD.

The conventional train of the IAWC - East St. Louis PWS drinking water treatment plant receives water from both intakes. Raw water from the East St. Louis River House intake undergoes grit removal at the treatment plant, followed by chemical addition (aluminum sulfate coagulant, polymer as a coagulant aid, pre-chlorine disinfectant, and pre-ammonia disinfectant) before being routed to the four settling basins. Settling basins 1 and 2 were built in 1906, with a total capacity of 13.4 MGD, and receive raw water exclusively from the East St. Louis River House intake. Settling basins 4 and 5 were built in 1887 (concreted in 1970), with a total capacity of 21.8 MGD, and receive raw water from both intakes. Filtration is accomplished with 20 dual-media filters (sand with a granular activated carbon cap) that were built between 1917 and 1967. Finished water from the conventional train flows to clearwell 1, which was constructed in 1900 (and is interconnected with clearwell 2). The conventional train has a treatment capacity of 35.2 MGD.

Fluoridation is accomplished at the clearwells using hydrofluorosilicic acid with a targeted dose of 0.7 milligrams per liter (mg/L). Post-chlorine and post-ammonia are added for disinfection at the clearwells, along with phosphoric acid and sodium hydroxide for pH adjustment, and corrosion control. Finished water is pumped from the two clearwells to the distribution system using six pumps. Average discharge pressure leaving the treatment plant was reported to range from 58 to 62 pounds per square inch (psi).

At the time of the inspection, construction was underway at the IAWC - East St. Louis PWS drinking water treatment plant to install a new ultra-violet light disinfection system with new clearwells, a new high-service pump station, and a new chemical building. These improvements are scheduled for completion in late 2021.

The IAWC - East St. Louis PWS distribution system serves a portion of the East St. Louis area. The Edgemont booster station uses pumps to raise the pressure to approximately 150 psi in parts of the distribution system. The distribution system is composed of many types of pipe materials; galvanized pipe installed in the 1920s and 1930s reportedly has the most line break issues. The water system conducts an annual free-chlorine burn in the April to August time frame, which is accompanied by a systematic flushing program. Systems that purchase water from the IAWC - East St. Louis PWS are notified so they can coordinate flushing in their distribution systems during the free-chlorine burn. The IAWC - East St. Louis PWS has installed
auto-flushers on some hydrants located in Centreville. However, due to resident complaints of flooding, IAWC has temporarily stopped using the auto-flushers and is working on public outreach.

Distribution system components of the IAWC - East St. Louis PWS include:

1. Edgemont - 14.4-MGD booster station and two 2.5-million-gallon (MG) above-ground storage tanks
2. French Village - 32.4-MGD booster station and two 2.5-MG above-ground storage tanks
3. Deep Well - 18.1-MGD booster station and two 2.0-MG above-ground storage tanks
4. Waterloo - 3.0-MG booster station and one 1.0-MG standpipe
5. Dutch Hollow - 17.3-MGD booster station
6. Frank Scott Parkway - 10.3-MGD booster station
7. Shiloh - 1.73-MG booster station and one 0.5-MG elevated storage tank
8. Brooklyn - 14.1-MG booster station
9. Shiloh Elevated Storage Tank - one 0.25-MG elevated storage tank

The Commonfields of Cahokia PWD purchases water from the IAWC - East St. Louis PWS. Metered connections exist at (12-inch main) and at the intersection of (8-inch main). A 1.5-MG ground-level storage tank is located at the Falling Springs booster station, but it has been out of service since 1993 and has not been repaired. Chlorine is added at the Falling Springs booster station starting in mid-May each year for approximately 3 months, but no ammonia is added along with the chlorine. The operator reported that two 0.5-MG elevated storage tanks are located in the distribution system, one at the intersection of (8-inch main), and the second at (8-inch main). The (8-inch main) tank can only be filled to 150,000 gallons due to ongoing pump issues that began in 2000. The distribution system is composed of many types of pipe materials, including galvanized metal, cast iron, asbestos cement, and polyvinyl chloride (PVC). The cast iron pipe was reported to be the oldest in the system and is being replaced with PVC pipe as needed. Line breaks were reported to be infrequent, with most occurring during dry spells and months with colder temperatures. The Commonfields of Cahokia PWD flushes the system as needed, but staff reported that they did not flush in 2020 during the IAWC - East St. Louis PWS’s free-chlorine burn.

The Commonfields of Cahokia PWD only has one certified distribution system operator. Staffing for drinking water and wastewater maintenance has decreased from 12 to 5 in recent years. Funding for capital improvement projects was last requested in 2009 and rejected by the board.
of directors. No subsequent requests for capital improvement funding have been brought before the board.

The Village of Cahokia PWS purchases water from the Commonfields of Cahokia PWD. Metered connections exist at Ex 7f (Water Infra) (4-inch main) and Ex 7f (Water Infra) (6-inch main). There is no storage or additional treatment in this PWS. The distribution system is composed of many types of pipe materials, including galvanized metal, cast iron, and PVC pipe. A 150-foot length of cast iron pipe was recently replaced due to a leak.

The Village of Cahokia PWS only has one certified distribution system operator. Staffing for drinking water and wastewater maintenance has decreased from 5 to 2 in recent years.

Appendix A includes the most recent IEPA inspection reports for the IAWC - East St. Louis PWS, the Commonfields of Cahokia PWD, and the Village of Cahokia PWS. The inspection reports contain information on source water, treatment, distribution systems, finished water storage, pumping facilities, and system monitoring data, as well as system deficiencies identified during the inspections.

FIELD ACTIVITIES SUMMARY

David Parker, Trent Rainey, and Daren Vanlerberghe from NEIC conducted an SDWA on-site inspection of the IAWC - East St. Louis PWS from April 26-27, and on April 30, 2021; the Commonfields of Cahokia PWD on April 28, 2021; and the Village of Cahokia PWS on April 29, 2021. They presented their credentials during each inspection to the primary facility contact, and a closeout meeting was conducted with each of the three water systems following the inspection. James Adamiec, Victoria Anderson, and Taylor Girouard from EPA Region 5 and James Blessman from IEPA also participated in the inspections. Appendix B contains closing meeting attendance lists for each water system.

NEIC inspected the IAWC - East St. Louis PWS intakes and drinking water treatment plant along with various distribution system features at all three of the water systems, including storage tanks and pump stations. NEIC inspectors observed water system personnel collect pressure readings and disinfectant residual concentrations in the distribution systems for all three water systems. NEIC inspection photographs are included in Appendix C. Information related to the Revised Total Coliform Rule sample sites in each of the three water systems is included in Appendix D.

EPA inspectors also went to areas where facility representatives indicated there had been sanitary sewer overflows and standing surface water. This included the area around North 84th Street, in Centreville. EPA inspectors noted that there seemed to be buried drinking water pipes in close proximity to reported areas of sanitary sewer overflows and standing surface water.
Disinfectant residual (mg/L of total chlorine) and pressure readings (psi) were taken at these locations, and others, by system representatives at the inspectors’ request during the inspection. That information is summarized in Tables 3 and 4. During the inspection, all pressure monitoring results were above the minimum IEPA standard of 20 psi. The current approved sample sites for disinfectants and coliform bacteria are not located in areas where EPA inspectors learned that sanitary sewer overflows repeatedly occur.

### Table 3. DISTRIBUTION SYSTEM DISINFECTANT RESIDUAL READINGS

<table>
<thead>
<tr>
<th>Water System</th>
<th>Location</th>
<th>Date/Time</th>
<th>Total Chlorine residual (mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>IAWC - East St. Louis PWS</td>
<td>Ex 71 (Water Infra) Ex 71</td>
<td>April 27, 2021, 1:12 p.m.</td>
<td>1.8</td>
</tr>
<tr>
<td>IAWC - East St. Louis PWS</td>
<td>Ex 71</td>
<td>April 27, 2021, 2:27 p.m.</td>
<td>2.9</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Falling Springs Booster Station</td>
<td>April 28, 2021, 11:15 a.m.</td>
<td>3.16</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Intersection of Ex 71 and Ex 71 (500,000-gallon elevated storage tank location)</td>
<td>April 28, 2021, 11:54 a.m.</td>
<td>2.5</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Hydrant near Ex 71 Ex 71</td>
<td>April 28, 2021, 12:42 p.m.</td>
<td>2.6</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Intersection of Ex 71 and Ex 71</td>
<td>April 28, 2021, 12:54 p.m.</td>
<td>3.0</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Intersection of Ex 71 and Ex 71</td>
<td>April 28, 2021, 2:22 p.m.</td>
<td>2.4</td>
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<tr>
<td>Village of Cahokia PWS</td>
<td>Sample tap near Ex 71 Ex 71</td>
<td>April 29, 2021, 10:56 a.m.</td>
<td>2.6</td>
</tr>
</tbody>
</table>

### Table 4. DISTRIBUTION SYSTEM PRESSURE READINGS

<table>
<thead>
<tr>
<th>Water System</th>
<th>Location</th>
<th>Date/Time</th>
<th>Pressure (psi)</th>
</tr>
</thead>
<tbody>
<tr>
<td>IAWC - East St. Louis PWS</td>
<td>Intersection of Ex 71 and Ex 71</td>
<td>April 27, 2021, 1:08 p.m.</td>
<td>42</td>
</tr>
<tr>
<td>IAWC - East St. Louis PWS</td>
<td>Intersection of Ex 71 and Ex 71</td>
<td>April 27, 2021, 2:19 p.m.</td>
<td>149</td>
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<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Hydrant near Ex 71 Ex 71</td>
<td>April 28, 2021, 12:37 p.m.</td>
<td>40</td>
</tr>
<tr>
<td>Commonfields of Cahokia PWD</td>
<td>Intersection of Ex 71 and Ex 71</td>
<td>April 28, 2021, 2:22 p.m.</td>
<td>42</td>
</tr>
<tr>
<td>Village of Cahokia PWS</td>
<td>Hydrant at Ex 71 Ex 71</td>
<td>April 29, 2021, 11:04 a.m.</td>
<td>42</td>
</tr>
<tr>
<td>Village of Cahokia PWS</td>
<td>Near Ex 71 Ex 71</td>
<td>April 29, 2021, 11:25 a.m.</td>
<td>45</td>
</tr>
<tr>
<td>Village of Cahokia PWS</td>
<td>Hydrant at Ex 71 Ex 71</td>
<td>April 29, 2021, 11:49 a.m.</td>
<td>39</td>
</tr>
</tbody>
</table>
NEIC identified the following observations during the SDWA compliance inspection. NEIC field team members discussed all observations with facility representatives during the closeout meetings unless otherwise noted in the observation description.

These observations are not final compliance determinations. EPA Region 5 will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

<table>
<thead>
<tr>
<th>Observation: 1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Observation Summary:</strong> Critical maintenance issues are unresolved at the Commonfields of Cahokia PWD. These issues present safety hazards with open excavations, allow for the potential exposure to sewage, and could adversely impact the quantity of water that the utility can provide.</td>
</tr>
<tr>
<td><strong>Citation:</strong> none</td>
</tr>
<tr>
<td><strong>Evidence:</strong></td>
</tr>
<tr>
<td>NEIC inspector interview with Dennis Traiteur, responsible operator in charge</td>
</tr>
<tr>
<td>NEIC inspector observations</td>
</tr>
</tbody>
</table>

### Appendix C – NEIC Inspection Photographs

#### Description of Observation:

1. A 1.5-MG ground-level storage tank at the Falling Springs booster station was found to be out of service and in a state of disrepair (Appendix C, photographs P4280014.JPG and P4280015.JPG). It has been out of service since at least 1993, and there are no plans for repair or rehabilitation. Trees and vegetation were found to be growing alongside and through the fence, with several sections of the fencing no longer intact (Appendix C, photograph P4280016.JPG).

2. Storage in a 0.5-MG elevated storage tank at Ex 7f (Water Infra) has been limited to 150,000 gallons due to pumping issues that have existed since 2000 (Appendix C, photograph P4280023.JPG). The tank has extensive rust (Appendix C, photograph P4280024.JPG), which should be evaluated for potential structural impacts, lack of cathodic protection, and need for painting. Mature trees and vegetation were found to be growing alongside and through the fence.

3. A 0.5-MG elevated storage tank located at Ex 7f (Water Infra) had no screen on the overflow outlet (Appendix C, photograph P4280019.JPG); the overflow pipe support weld was broken (Appendix C, photograph P4280022.JPG); trees were growing under the foundation for the inlet/outlet pipe; the structure has rust patches and is in need of painting (Appendix C, photograph P4280020.JPG); there is a pile of debris under the tank (Appendix C, photograph P4280021.JPG); and the grass was overgrown. Mature trees and vegetation were found to be growing alongside and through the fence, with several sections of the fencing no longer intact (Appendix C, photograph P4280018.JPG).
Observation: 1

4. While the PWD flushes the distribution system as needed, it was reported that it did not flush the entire distribution system in conjunction with the IAWC - East St. Louis PWS free-chlorine burn in 2020.

5. Two 150-pound chlorine gas cylinders were found unsecured in a storage building at the Falling Springs booster station (Appendix C, photographs P4280012.JPG and P4280013.JPG). It was reported they have been there since 1993 or earlier.

6. A water main repair had been completed in front of Cahokia High School, but the dirt had not been filled in for an extended period of time following the pipe repair, leaving a potentially hazardous situation for passing motorists and pedestrians (Appendix C, photographs P4290028.JPG and P4290029.JPG).

7. An open pit across from  was found to contain water that smelled of sewage. (This area of the drinking water distribution system is served by the IAWC - East St. Louis PWS, but the wastewater collection system is operated by the Commonfields of Cahokia PWD; Appendix C, photograph P4270010.JPG). The operator stated that a sewage pipe repair had been done at some time in the past at this location and the dirt had not been replaced. The operator also stated that the maintenance crew must take portable pumps to a nearby sewage lift station that serves this area multiple times each week because the lift station pump is broken.

8. When asked how maintenance assignments are tasked to the maintenance staff, the operator stated that there is no documentation for routing maintenance tasks (lawn care, preventative pump tune-ups, etc.) and stated that the maintenance staff “do as they want.”

Observation: 2

Observation Summary: The Commonfields of Cahokia PWD lacks a capital improvement plan.

Citation: none

Evidence:

NEIC inspector interview with Dennis Traiteur, responsible operator in charge

Description of Observation:

In April 2009, a water system improvement plan was brought before the board of directors and rejected. No further proposals have been brought before the board of directors since that time.

Observation: 3

Observation Summary: The Commonfields of Cahokia PWD adds booster chlorine without ammonia during the warmest months, potentially impacting the effectiveness of the chloramine disinfectant that has already been applied.

Citation: none

Evidence:

NEIC inspector interview with Dennis Traiteur, responsible operator in charge
Observation: 3
NEIC inspector observations

Description of Observation:

The Commonfields of Cahokia PWD adds free chlorine to the chloroaminated water during warm months at the Falling Springs booster station. However, the PWS does not add ammonia when it adds free chlorine. This practice has the potential to adversely impact the effectiveness of the chloramine disinfectant that has already been applied, as the chlorine to ammonia ratio is carefully adjusted to produce the optimal chloramine compounds for disinfection. This practice also has the potential to impact disinfectant effectiveness in the Village of Cahokia PWS since they purchase water from the Commonfields of Cahokia PWD.

Observation: 4
Observation Summary: Staffing concerns exist at the Commonfields of Cahokia PWD.
Citation: none

Evidence:

NEIC inspector interview with Dennis Traiteur, responsible operator in charge

NEIC inspector observations

Description of Observation:

Only 5 maintenance personnel are on staff, down from 12 in recent years. Many maintenance items have languished uncompleted for years. It was reported that much of the maintenance staff time is spent on wastewater issues. It was reported that there were extraneous staff within the PWD who work infrequently and have unclear responsibilities. None of the maintenance staff have a commercial driver's license, which limits their ability to conduct repairs. All water sample collection is conducted by Dennis Traiteur, with no backup personnel trained for this task.

Observation: 5
Observation Summary: Staffing concerns exist at the Village of Cahokia PWS.
Citation: none

Evidence:

NEIC inspector interview with Rory Morgan, responsible operator in charge

NEIC inspector observations

Description of Observation:

Only two maintenance personnel are on staff, down from five in recent years. It was reported that much of the maintenance staff time is spent on wastewater issues. It was also reported that there were extraneous staff within the PWS who work infrequently and have unclear responsibilities.

Observation: 6
Observation Summary: Maintenance issues were found at the IAWC - East St. Louis PWS.
Citation: none
Observation: 6

Evidence:

NEIC inspector observations

Appendix C – NEIC Inspection Photographs

Description of Observation:

1. Flaking paint was found in the lower portion of the [Ex 7f] intake building (Appendix C, photograph P4260001.JPG).
2. The monitoring equipment, which is used for non-regulatory raw water characterization purposes at the [Ex 7f] intake, was found to be inoperative.
Appendix A
IEPA Inspection Reports for All Systems
(100 pages)
December 20, 2018

Bruce Hauk, President
Illinois American Water Co.
300 N. Water Works Drive
Belleville, IL 62223

Re: Facility Number: 1635040
St. Clair County - Illinois American Water Co. - E. St. Louis
Evaluation Report - Noncompliance Advisory

Dear Mr. Hauk:

An engineering evaluation of the Illinois American Water Co. - E. St. Louis public water supply has been completed by our engineer, James Blessman. Mr. Blessman observed the operation and maintenance of the water supply facilities on November 14 and 15, 2018, at which time he was accompanied by Rachel Bretz, Ian Rischmiller, and Kenny Bast.

The Environmental Protection Agency periodically conducts these evaluations to determine if your community water supply meets the requirements of the Illinois Pollution Control Board’s public water supply rules, regulations, and related standards. A list of deficiencies is outlined in Attachment A. Attachment B includes reminders and recommended improvements.

A written reply addressing all comments in Attachment A and Attachment B is required within thirty (30) days. A specific date, no later than March 18, 2019, must be included when each deficiency in Attachment A will be corrected.

This letter is a Noncompliance Advisory and is not a Violation Notice as specified in Section 31(a)(1) of the Act. If you do not adequately respond to the Noncompliance Advisory, the Illinois EPA may issue a formal violation notice according to Section 31(a)(1) of the Act.
We appreciate the cooperation and courtesy extended to us during this survey. If you have any questions regarding the evaluation, please contact the Collinsville Regional Office located at 2009 Mall Street, Collinsville, Illinois 62234, phone (618) 346-5120.

Sincerely,

[Signature]

Gayle Renth
Collinsville Region Manager
Field Operations Section
Division of Public Water Supplies

cc: Ian Rischmiller
    Rachel Bretz
    St. Clair Co. Health Department
    DPWS/Division File
SUMMARY OF DEFICIENCIES

The current evaluation of your community water supply indicates that the following conditions appear to violate Title IV of the Illinois Environmental Protection Act 415 ILCS 5/1-58.17 (2018) (The Act), 35 Illinois Administrative Code (35 IAC), the Recommended Standards for Water Works (2012) (Standards) and related standards.

TECHNICAL

1. Relocate the controls for the mechanical forced-air ventilation system used in the gas chlorination room of the Waterloo booster station. At the time of the inspection, it was not possible to turn on the ventilation without physically entering the room to manually activate them. Chlorine feed rooms are to have switches located on the exterior of the room to allow staff to turn on the ventilation system prior to entering the space. [Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 602.115 and the Recommended Standards for Water Works, 2012 Edition, Part 5.4.1.8]

2. Screen the discharges on the vent line for the air release valves on the high service pumps at the French Hollow booster station. The exhaust piping for the air relief valves shall terminate in a down turned position at least 18 inches above the floor and shall be covered with 24 mesh corrosion resistant screen. On the date of the inspection, they were not screened. [Section 18 of the Act, (415 ILCS 5/18), 35 Ill. Adm. Code 607.104 and the Recommended Standards for Water Works, 2012 Edition, Part 8.5.2. (a)]
ATTACHMENT B

REMINDERS AND/OR RECOMMENDED IMPROVEMENTS

The following recommended improvements are intended to increase the Technical, Managerial and/or Financial Capacity of your water system:

MANAGERIAL

3. Inform this office of the Agency on the status of the following construction permits: "Fieldstone Apartments – Phase 1 Carlyle Ave." 0897-FY2017 and "Ex 7f (Water Infra) Ex 7f (Water Infra) 1255 – FY 2015. The system must obtain an operating permit prior to putting any project into service as required by Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 602.102, 602.115.

4. When water main repair or replacement is planned, notification of potentially affected residents must be conducted to provide information regarding potential sediment, possibly containing lead, that may result from the repair or replacement project. Notification should include recommendations that may reduce the potential lead exposure, including flushing of services lines for at least three minutes prior to use, cleaning of faucet aerator screens, and/or replacement of the lead service line.

5. It is recommended that maintenance and routine updating of the materials inventory is conducted. The materials inventory must be submitted annually. The materials inventory should include locations of lead service lines, along with maps designating the size and types of all distribution mains. The information can be used in revising the lead and copper sample site plan subsequent to lead service line removal projects and to comply with monitoring requirements included in the Lead and Copper Rule.

TECHNICAL

6. Inspect the overflows on the ground storage tanks to ensure they are screened with 24 mesh above the duckbills. At the time of the inspection, they were fitted with duckbills and it was not possible to determine whether or not screens were present or in good condition.

7. Take action to have the storage tanks inspected on a five year basis.

8. The Agency recommends that every water system have water storage equal to at least one day water usage.
FY 2019
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
PUBLIC WATER SUPPLY DATA SHEET
Facility Number: 1635040
County and Supply: St. Clair Co. - Ill. American - E. St. Louis
Date Inspected: November 14 and 15, 2018
Office Phone: 618/874-2404
Operator: Rachel Bretz *A* ROINC Plant & Dist. Phone (Cell)
Other Officials (Title): Mark Barton, Superintendent Phone (Cell)
Ian Rischmiller, Water Quality Supervisor Phone (Cell)
Stanley Scott *A* Superintendent of Field Operations Phone (Cell)
Rachel Bretz (Cell)
Emergency Contact: Fred Campbell Phone (Cell)
Send mail to: Ill. American Wtr. Co., Bruce Hauk, 300 N. Water Works Drive, Belleville, IL 62223

Brief description of supply: **Ex 71 (Water infra)** INTAKE: This station is located on the east bank of the Mississippi River, at mile marker approximately 7 miles north of the intake in East St. Louis. It was erected in 1926 and is of brick and concrete construction. The intake is a reinforced concrete structure with projecting wing walls forming an intake basin 68' long. The intake is upstream of **Ex 71 (Water infra)**. The supply passes through an inclined trash rack and enters screened wells through either of four 5' x 3' openings set in pairs. Each opening is equipped with a sluice gate. Traveling screens are provided in each well, from which the low service pumps take suction, delivering to two steel grit removal tanks, 30' in diameter by 55' high. River elevations vary from 388' to 431' and the overflow on the grit tanks is at 473'. The supply is delivered by gravity from the grit removal tanks through a 54" prestressed concrete transmission main, 21,920' long, to Granite City where it reduces to 48' and continues 35,019' to the main purification plant at East St. Louis (elevation 424.5'). (Continued on next page)

No. of Services: Direct 51,452 - 100 % metered
Satellite 10 - 100 % metered (Cahokia, Caseyville, Columbia, Common Fields of Cahokia, Millstadt, O'Fallon, Scott AFB, Waterloo, Prairie Du Pont, Concordia Water Co.)

Adequacy of Supply DATES: From: 3/31/17 To: 2/1/18
Plant Capacity: 56.6 MGD
Annual Pumpage (MG): RAW: EX 4 (CBI) FINISHED: EX 4 (CBI)
Average Daily (MG): RAW: FINISHED: 
MAX 7 Day Average (MG): RAW: FINISHED: 
Historical MAX 7 Day Average (MG): RAW: FINISHED: 
Dates of Max 7 Day Avg.: From: 7/21/2018 To: 7/27/2018
Dates of Historical Max 7 Day Avg.: From: Per July 2013 inspection report
Population *259,037* Avg. Daily Per Capita Usage: 117
How Population determined: Number of connections multiplied by county avg. household size (2.4)
Time to Produce Avg. daily Raw/Max 7 day Avg. in Hrs.: EX 4 (CBI)
Emergency Water and Power Sources:
  Water: East St. Louis is interconnected with the Granite City Plant.
  Power: Plant receives power from two different grids. Diesel generator provided that is capable of running the entire water plant minus HSP’s. Separate diesel generator provided to run HSP’s.
  * Includes 139,879 served directly and 119,158 indirectly.

East St. Louis Intake:

Conventional Plant

Ex 7f (Water Infra)

Aldrich Plant

Ex 7f (Water Infra)
CHANGES IN WATERWORKS

Changes made since the previous inspection, July 23 and July 24, 2016, include the following.

1. Complied with Recommendations 1 - 4 of the September 22, 2016 engineering evaluation letter by the following actions:
   a. Cancelled or obtained operating permits for the listed construction permits.
   b. Had the tanks at Deep Well inspected.
   c. Took action to reduce the unaccounted for water loss.
   d. Verified the plant capacity as requested.

2. Installed a new 1.25 Million gallon elevated storage tank to receive finished water from the high service pumps in general accordance with permit 0246-FY2017. See Inventory.

3. Installed a new grit separator to receive water from the river house at the East St. Louis water treatment plant in general accordance with permit 0621-FY2016. See inventory.

4. Illinois American replaces the filter media in 5 filters per year. The filter media replaced since the last inspection are filters 1, 2, 3, 4, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, and 18.

5. New baffling was installed in settling basins 4 and 5 in general accordance with permit 0116-FY2018.

6. A new 2500 KW generator and associated switching gear was installed at the water treatment plant in general accordance with permit 0518-FY2017. This generator replaces both the 1000 and 175 Kw generators previously installed. See Inventory.

7. New Water Rates. See Inventory.

COMMENTS

On the day of the visit, the chlorine residual was tested at the Ex 7f (Water Infra) Ex 7f, Belleville. The residual was 2.3 mg/l total.

Lamellar Separators were removed from the Inventory as they have been scrapped and the new grit separators constructed on their previous site.

Diesel Generator 2 has been removed from the Inventory and is no longer on site.

jb

cc: CRO
cc: USDA/RD

NEICVP1411E01
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF PUBLIC WATER SUPPLIES  
Inventory Index  

Supply: Facility Number: 1635040  
St. Clair County – Illinois American Water Co. – E. St. Louis  

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DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Date inventoried: June 23, 2016
Sheet 1 of 42

Item: Locational Map
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Date inventoried: June 23, 2016
Sheet 2 of 42
Item: Locational Map (Page 2)

Water Treatment Plant – Ex 7f (Water Infra) East St. Louis- 56.6 MGD plant

Edgemont- Ex 7f East St. Louis-14.4 MGD Booster Station and 2-2.6MG Above Ground Storage Tanks

French Village – Ex 7f Fairview Heights- 32.4MGD Booster Station and 2-2.5 MG Above Ground Storage Tanks

Deep Well- Ex 7f Belleville – 18.1 MGD Booster Station and 2-2.0 MG Above Ground Storage Tanks

Waterloo- Ex 7f Columbia – 3.0 MG Booster Station and 1.0 MG Standpipe

Dutch Hollow- Ex 7f Belleville- 17.3 MG Booster Station

Frank Scott Parkway- Ex 7f Belleville – 10.3 MG Booster Station

Shiloh- Ex 7f Shiloh – 1.73 MG Booster Station and 0.5 MG Elevated Storage Tank

Brooklyn- Ex 7f (Water Infra) East St. Louis- 14.1 MG Booster Station

Shiloh Elevated Storage Tank- Ex 7f (Water Infra) O'Fallon
EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 6 of 42

Item: Low Service Pumps

EX 4 (CBI)
EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

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| EX 4 (CBI) |
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet
Supply: Facility Number: 1635040 Date inventoried: November 15, 2018
St. Clair County – Ill. American – E. St. Louis Sheet 9 of 42

Item: Grit Separator Building

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 10 of 42

Item: Coagulation and Sedimentation (Conventional Plant)

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DIVISION OF PUBLIC WATER SUPPLIES  

Inventory Sheet

Supply: Facility Number: 1635040  
St. Clair County – Ill. American – E. St. Louis  

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Sheet 11 of 42

Item: Hydrotreaters

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<th>Filter Surface Area- Sq. ft.</th>
<th>Settling Zone Area- Sq. ft.</th>
<th>Surface loading -- g/d/sq.ft.</th>
<th>Weir rate -- g/d/ft.</th>
<th>Rise rate -- ft./hr.</th>
<th>Pre-filter detention -- hrs.</th>
<th>Drive Speed Range -- Rpm</th>
<th>Peripheral Arm Speed -- FPM</th>
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Volumes

- above S.Z. weir gals/ft. gals. *
- within S.Z. gals/ft. gals. *
- within filter gals/ft. gals. **

Dimensions

- Outer shell diameter
- Inner shell diameter
- Filter shell diameter

- Overall depth @ outer shell
- Overall depth @ inner shell
- Distance –W.W. weir to bottom
- Depth- S.Z. weir to W.W. weir

* Normal Water Level  
** Between S.Z. and W.W. weir
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 12 of 42

Item: Aldrich Tanks

Tanks 1-4

EX 4 (CBI)

Tanks 5-8

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
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Item: High Service Station Sewer Pumps

EX 4 (CBI)
### Inventory Sheet

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St. Clair County – Ill. American – E. St. Louis  
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St. Clair County – Ill. American – E. St. Louis  
Date inventoried: November 15, 2018  
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Item: Finished water Storage

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<thead>
<tr>
<th>Year</th>
<th>Location</th>
<th>Dimension in ft.</th>
<th>Capacity in MG</th>
<th>Overflow Elevation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>EX 4 (CBI)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Date inventoried: July 24, 2013
Sheet 16 of 42

Item: High Service Pumps

Pump #11

Motor

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 17 of 42

Item: High Service Pumps (Cont.)

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 18 of 42

Item: Plant Service Auxiliary Pump

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County -- Ill. American -- E. St. Louis

Date inventoried: Nov. 15, 2018
Sheet 19 of 42

Item: High Service Standby Power

EX 4 (CBI)
LLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040  Date inventoried: June 10, 2004
St. Clair County – Ill. American – E. St. Louis  Sheet 20 of 42

Item: Aldrich Clearwater Transfer

EX 4 (CBI)
<table>
<thead>
<tr>
<th>Name</th>
<th>Form</th>
<th>Chemical Building</th>
<th>Treatment Process</th>
<th>Manufacturer - Pump/Motor</th>
<th>Model #</th>
<th>Serial #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EX 4 (CBI)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Inventory Sheet

Item: Chemical Feed Pumps (cont.)

<table>
<thead>
<tr>
<th>Name</th>
<th>Form</th>
<th>Chemical Building</th>
<th>Treatment Process</th>
<th>Manufacturer- Pump/Motor</th>
<th>Model #</th>
<th>Serial #</th>
<th>McCray</th>
</tr>
</thead>
</table>

**EX 4 (CBI)**
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: May 26, July 24, 2013
Sheet 24 of 42

Item: Chemical Feed Pumps (cont.)

<table>
<thead>
<tr>
<th>Name</th>
<th>Form</th>
<th>Chemical Building</th>
<th>Treatment Process</th>
<th>Manufacturer- Pump/Motor</th>
<th>Model #</th>
<th>Serial #</th>
<th>Location</th>
</tr>
</thead>
</table>

**EX 4 (CBI)**
<table>
<thead>
<tr>
<th>Year</th>
<th>Location</th>
<th>Dimension in ft.</th>
<th>Capacity in MG</th>
<th>Overflow Elevation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>EX 4</td>
<td>(CBI)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040  
St. Clair County – Ill. American – E. St. Louis  
Date inventoried: July 24, 2013  
Sheet 26 of 42

Item: Edgemont Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Date inventoried: June 10, 2004
Sheet 27 of 42

Item: Edgemont Standby Power
EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County - Ill. American - E. St. Louis

Date inventoried: July 24, 2013
Sheet 28 of 42

Item: French Village Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: July 24, 2013
Sheet 29 of 42

Item: French Village Booster Station (Cont.)

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: July 24, 2013
Sheet 30 of 42

Item: French Village Standby Power

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040  Date inventoried: June 10, 2004
St. Clair County – Ill. American – E. St. Louis  Sheet 31 of 42

Item: Dutch Hollow Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 33 of 42

Item: Deepwell Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Date inventoried: June 10, 2004
Sheet 34 of 42

Item: Millstadt Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 35 of 42

Item: Waterloo Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County - Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 37 of 42

Item: Frank Scott Parkway Standby Power

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: November 15, 2018
Sheet 38 of 42

Item: Frank Scott Parkway Chlorine Feed

EX 4 (CBI)
Item: Shiloh Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County - Ill. American - E. St. Louis

Date inventoried: July 24, 2013
Sheet 40 of 42

Item: SWIC Chlorine Feed

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1835040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: November 15, 2018
Sheet 41 of 42

Item: Brooklyn Booster Station

EX 4 (CBI)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: November 15, 2018
Sheet 42 of 42

Item: Water Rates

In accordance with existing ordinances, the following rates apply:

Minimum monthly bill is determined by the size of the meter. Rates are as follows:

<table>
<thead>
<tr>
<th>Size</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/8&quot;</td>
<td>$20.00</td>
</tr>
<tr>
<td>¾&quot;</td>
<td>32.48</td>
</tr>
<tr>
<td>1&quot;</td>
<td>47.39</td>
</tr>
<tr>
<td>1 ½&quot;</td>
<td>105.33</td>
</tr>
<tr>
<td>2&quot;</td>
<td>162.55</td>
</tr>
<tr>
<td>3&quot;</td>
<td>312.97</td>
</tr>
<tr>
<td>4&quot;</td>
<td>522.18</td>
</tr>
<tr>
<td>6&quot;</td>
<td>1,030.67</td>
</tr>
<tr>
<td>8&quot;</td>
<td>1,664.61</td>
</tr>
<tr>
<td>10&quot;</td>
<td>2,637.13</td>
</tr>
</tbody>
</table>

Meter Rates for monthly bills are as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Gallons</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>First</td>
<td>22,400</td>
<td>@ $5.851/1,000 gallons</td>
</tr>
<tr>
<td>Next</td>
<td>426,400</td>
<td>@ 4.729/1,000 gallons</td>
</tr>
<tr>
<td>Next</td>
<td>9,275,200</td>
<td>@ 3.840/1,000 gallons</td>
</tr>
<tr>
<td>All over</td>
<td>9,724,000</td>
<td>@ 3.180/1,000 gallons</td>
</tr>
</tbody>
</table>
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 23, 2016
Sheet 6 of 39

Item: Lamella Separators

Note: At the time of the inspections, the lamella separators were out of service. The water company has begun construction of new separators. The current ones will remain out of service until their demolition.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
Sheet 20 of 43

Item: High Service Standby Power

EX 4 (CBI)
### TECHNICAL CAPACITY ASSESSMENT

| Record your system’s total annual pumpage for the past year: | 11.700.0 | MG □ | gal □ |
| Record your system’s peak day pumpage: | 46.6 | MG □ | gal □ |
| List amount of water billed or sold to customers last year: | 9,143.0 | MG □ | gal □ |
| List plant capacity: | 56.6 | MG □ | gal □ |
| List total well capacity: | 0 | MG □ | gal □ |
| List plant capacity with largest well or treatment unit out of service: | 53.9 | MG □ | gal □ |

- Is standby emergency power equipment exercised? [X]
  - Check frequency equipment exercised: [X] Weekly □ Monthly □ Quarterly □ Annual □ Other
- Can your water system provide uninterrupted service for 24 hours without electrical power? [X]
- Are hydrants routinely flushed and maintained? [X]
  - Flushing frequency: □ Annual □ Spring/Fall □ As Needed
- Are the locations of all valves in the distribution precisely known? [X]
- Are all valves periodically exercised and maintained? [X]
  - List exercising frequency: □ Key Valves Yearly □ Non Key Valves 4yrs
- Are locations, size and type of mains and valves detailed on records or maps kept in a secure area? [X]
- Are meter pits and curb stops located, unobstructed and accessible? [X]
- Is the unaccounted-for water less than 15% of the total water delivered to the mains? [X]
  - List amount of water unaccounted for: 14.8 % □ Check if information is not available
- Are all customers, water sources and treatment plants metered? [X]
  - List frequency of meters changed/calibrated: See Attachment
- Is your treatment equipment adequate to provide drinking water that meets all standards? [X]

### MANAGERIAL CAPACITY ASSESSMENT

- Is there a clear plan of organization and control among the people responsible for management and operation of the water system? [X]
- Are contingency plans in place for the unanticipated loss of key personnel? [X]
- Is a written emergency response plan in place and up to date? [X]
- Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology? [X]
- Does the utility perform inspections of work performed on the system by outside contractors? [X]
- Are construction permits obtained prior to starting water supply projects that require a permit, and operating permits obtained before placing those improvements into service? [X]
- Do you maintain copies of all water sample results, operating reports and inspection reports? [X]
- Do you have a cross connection control program? [X]
- Where are cross connection survey results and records kept? SAP System

### FINANCIAL CAPACITY ASSESSMENT

- Does your organization have an annual budget for operating and maintaining the water system? [X]
- Are water rates regularly reviewed? [X] Date of last rate increase: January 1, 2017
- Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years? [X]
- Are adequate reserve funds in place to provide for emergency repairs? [X]
- Can your organization cover the costs of an emergency or failure of its most vulnerable system component? (source/storage/treatment etc.)? [X]
- Does your organization have a written 5-year Capital Improvement Plan for major water system improvements? [X]
- Are rates sufficient to meet the costs of the 5-year Capital Improvement Plan? [X]
- Does your organization have adopted procedures for selecting outside contractors and suppliers? [X]

Public Water Supply Name: IL American Water - ESL
ID #: IL1635040

Date: 11-14-18
Prepared By: Rachel Bretz

East St. Louis SDWA
Belleville, Illinois
February 1, 2019

Mr. Bruce Hauk, President
Illinois-American Water Company
300 N. Waterworks Drive
Belleville, Illinois 62223

RE: Noncompliance Advisory Response Acceptance
Facility Number: 1635040
ST. CLAIR COUNTY - Illinois-American Water Company (East St. Louis)

Dear Mr. Hauk:

This Agency is in receipt of a letter dated January 15, 2019, from Rachel Bretz, Production Supervisor, and Ian Rischmiller, Water Quality Supervisor, which responds to this Agency’s December 20, 2018, Noncompliance Advisory letter concerning the Illinois-American Water Company (East St. Louis) public water supply. We wish to acknowledge the prompt action taken to assure compliance with the recommendations contained in the Agency’s letter.

When time permits, a reinspection of your public water supply will be made so that our records may be brought up to date. If you should have any questions regarding this letter or any other public water supply problems, please feel free to contact this office at 2009 Mall, Collinsville, Illinois 62234 or at 618/346-5120.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY

Gayle Renth
Collinsville Region Manager
Field Operations Section
Division of Public Water Supplies

cc: Rachel Bretz, Production Supervisor
cc: Ian Rischmiller, Water Quality Supervisor
ec: DPWS/FOS
bc: CRO
January 15, 2019

Mrs. Gayle Renth, Regional Manager
2009 Mall Street
Collinsville, Illinois 62234

RE: Noncompliance Advisory
Facility 1635040
St. Clair County- Illinois American Water co. – E. St. Louis
Evaluation Report – Noncompliance Advisory

Dear Gayle Renth,

We received your report of James Blessman’s sanitary survey that was conducted on November 14th and 15th, 2018 and paragraphs below are our response to the comments and deficiencies noted in your letter.

Facility Number: 1635040
St. Clair County- Illinois American Water co. – E. St. Louis

SUMMARY OF DEFICIENCIES

The current evaluation of your community water supply indicates that the following conditions appear to violate Title IV of the Illinois Environmental Protection Act 415 ILCS 5/1-58.17 (2018) (The Act), 35 Illinois Administrative Code (35 IAC), the Recommended Standards for Water Works (2012) (Standards) and related standards.

TECHNICAL

Technical 1. Relocate the controls for the mechanical forced-air ventilation system used in the gas chlorination room of the Waterloo booster station. At the time of the inspection, it was not possible to turn on the ventilation without physically entering the room to manually activate them. Chlorine feed rooms are to have switches located on the exterior of the room to allow staff to turn on the ventilation system prior to entering the space. [Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 602.115 and the Recommended Standards for Water Works, 2012 Edition, Part 5.4.1.8]
Response to Technical 1: Controls were added to the outside of the Waterloo Booster Station Chlorine Feed Room.

Ex 7f (Water Infra)

Technical 2. Screen the discharges on the vent line for the air release valves on the high service pumps at the French Hollow booster station. The exhaust piping for the air relief valves shall terminate in a downturned position at least 18 inches above the floor and shall be covered with 24 mesh corrosion resistant screen. On the date of the inspection, they were not screened. [Section 18 of the Act, (415 ILCS 5/18), 35 Ill. Adm. Code 607.104 and the Recommended Standards for Water Works, 2012 Edition, Part 8.5.2. (a)]

Response to Technical 2: 24 mesh corrosion resistant screens have been added to all vent lines on the air release valves and all the piping is oriented in the correct position.
REMINDERS AND/OR RECOMMENDED IMPROVEMENTS

The following recommended improvements are intended to increase the Technical, Managerial and/or Financial Capacity of your water system:

MANAGERIAL

Managerial 3. Inform this office of the Agency on the status of the following construction permits: "Fieldstone Apartments - Phase 1 Carlyle Ave." 0891-FY2017 and "Ex 7f at Railroad Tracks (Ex 7f) 6" Water Main Lining" 1255 - FY 2015. The system must obtain an operating permit prior to putting any project into service as required by Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 602.102, 602.115.

Response to Managerial 3: Railroad Tracks (Ex 7f) 6" Water Main Lining" 1255 - FY 2015 permit got verbal approval from Kent Cook on 1/15/2019 and the signed operating permit hard copies were mailed on the same day. Attached is the email confirming the verbal authorization. "Fieldstone Apartments - Phase 1 Carlyle Ave." 0891-FY2017
permit was for a developer who has not completed the project. The permit will not be extended and has expired. Illinois American Water's Engineering Department will send a request to the IEPA to cancel the permit.

**Managerial 4.** When water main repair or replacement is planned, notification of potentially affected residents must be conducted to provide information regarding potential sediment, possibly containing lead, that may result from the repair or replacement project. Notification should include recommendations that may reduce the potential lead exposure, including flushing of services lines for at least three minutes prior to use, cleaning of faucet aerator screens, and/or replacement of the lead service line.

**Response to Managerial 4:** Prior to any planned water main replacement, a notification letter is sent to all affected customers describing the work being done in their area along with a main replacement brochure that discusses service line transfers and distinguishes the two service line components; utility-owned and customer-owned. A second brochure is also sent, which provides information regarding lead and answers to frequently asked questions. This brochure is required by the IEPA for obtaining an operating permit and included with all projects.

**Managerial 5.** It is recommended that maintenance and routine updating of the materials inventory is conducted. The materials inventory must be submitted annually. The materials inventory should include locations of lead service lines, along with maps designating the size and types of all distribution mains. The information can be used in revising the lead and copper sample site plan subsequent to lead service line removal projects and to comply with monitoring requirements included in the Lead and Copper Rule.

**Response to Managerial 5:** ILAW utilizes GIS for mapping, which includes water main size and material. Additionally, a service line inventory has been created to track service line material by premise. This inventory was submitted to the IEPA on April 15, 2018 based on internal research and service tap record review. As better information is made available, the map/inventory will be updated on a yearly basis.
TECHNICAL

Technical 6. Inspect the overflows on the ground storage tanks to ensure they are screened with 24 mesh above the duckbills. At the time of the inspection, they were fitted with duckbills and it was not possible to determine whether or not screens were present or in good condition.

Response to Technical 6: Duckbills have been inspected and if the screens were not present they were added on the overflows at all locations that have them installed except for the two Deepwell Storage Tanks. The Deepwell Storage Tank’s duckbills will be inspected and if screens are not present they will be added by March 1, 2019.

Technical 7. Take action to have the storage tanks inspected on a five year basis.

Response to Technical 7: All storage tanks have been inspected in the last five years as of 1/15/2019. Tank inspections will continue to be conducted on a five year basis.

Technical 8. The Agency recommends that every water system have water storage equal to at least one day water usage.

Response to Technical 8: There is a total of 28 MG of storage that the East St. Louis treatment plant serves. There is an additional 16.2 MG within the distribution systems of our wholesale customers. Combined there is a total of 44.2 MG of storage within the service area of the East St. Louis WTP. In addition, ILAWC performs a Comprehensive Planning Study for each of its operating areas. A 10 MG clearwell is planned at the E. St. Louis plant as part of this study. A new 1.25MG elevated storage tank was put into service at the East St. Louis WTP in 2018.
Sincerely,

Illinois American Water Company

Rachel Bretz
Production Supervisor (ROINC)

Ian Rischmiller
Water Quality Supervisor
FYI. Shelly is putting the original in the mail today.

From: Cook, Kent J. <Kent.J.Cook@illinois.gov>
Sent: Tuesday, January 15, 2019 1:18 PM
To: Joseph P Ahlvin <Joseph.Ahlvin@amwater.com>
Cc: Elizabeth Matthews <Elizabeth.Matthews@amwater.com>; Cook, David <DAVID.COOK@illinois.gov>
Subject: Re: Final IEPA Operating Permit Application 1255-FY2015

EXTERNAL EMAIL - "Think before you click!"

Joseph,

Please consider this e-mail as confirmation that we are giving you verbal approval for Operating Permit No. 1255-FY2015, Final.

Please mail in the original signed operating permit application hard copies.

Thank you.

Kent Cook
Permit Section
Division of Public Water Supplies
Phone 217-524-0559
E-Mail Kent.J.Cook@illinois.gov

Mr. Cook,

Beth Matthews and David Cook had a phone call this morning regarding IEPA Construction Permit 1255-FY2015. Based on their conversation, we are submitting a completed Application for Final Operating Permit including a copy of our lab results, which yield satisfactory results.
This permit is for the lining of 6-inch main along Ridge Avenue in East St. Louis. I would like to request a verbal approval and will overnight to your attention the signed application and sample results. Please contact me if you have any questions.

Thanks,
Joe

Joseph P. Ahlvin, P.E.
Engineering Manager - Project Delivery
Illinois American Water
Desk 618-239-3272
Cell 618-381-3257
Email Joseph.Ahlvin@amwater.com

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December 5, 2018

Board of Trustees
Commonfields of Cahokia PWD
2525 Mousette Lane
Cahokia, Illinois 62206

RE: Noncompliance Advisory - Evaluation Report
Facility Number: 1635030
ST. CLAIR COUNTY - Commonfields of Cahokia PWD

Gentlemen:

An evaluation of the Commonfields of Cahokia PWD public water supply has been completed. A field inspection was made on November 28, 2018, by James Blessman of the Collinsville regional office. The Water District was represented by Dennis Traiteur, ROINC.

The Environmental Protection Agency periodically conducts these evaluations to determine if your community water supply meets the requirements of the Illinois Pollution Control Board's public water supply rules, regulations, and related standards. A list of deficiencies is outlined in Attachment A. Attachment B includes reminders and recommended improvements.

A written reply addressing all comments in Attachment A and Attachment B is required within thirty (30) days. A specific date, no later than January 28, 2019, must be included when each deficiency in Attachment A will be corrected.

This letter is a Noncompliance Advisory and is not a Violation Notice as specified in Section 31(e)(1) of the Act. If you do not adequately respond to the Noncompliance Advisory, the Illinois EPA may issue a formal violation notice according to Section 31(a)(1) of the Act.
We wish to acknowledge the courtesy extended to our representative by Mr. Traiteur. If you should have any questions concerning the above recommendations or any other water supply problems, please feel free to contact this office at 2009 Mall Street, Collinsville, Illinois 62234 or at 618/346-5145.

Sincerely,

[Signature]

Gayle Renth
Collinsville Regional Office Manager
Division of Public Water Supplies

GR:jb

cc: Dennis Traiteur

ec: St. Clair Co. Health Dept.
   IDPH - Springfield
   ISWS
   East Side Health Dept
ATTACHMENT A

SUMMARY OF DEFICIENCIES

The current evaluation of your community water supply indicates that the following conditions appear to violate Title IV of the Illinois Environmental Protection Act 415 ILCS 5/1-58.17 (2018) (The Act), 35 Illinois Administrative Code (35 IAC), the Recommended Standards for Water Works (2012) (Standards) and related standards.

TECHNICAL

1. The Elevated Storage Tank on [Ex 71] street is in an advanced state of deterioration. Reportedly the ladder inside the tank is in unserviceable condition which prevented the tower from being inspected. The paint remaining on the tower was failing and large amounts of rust are visible. Repair or replace the ladder to ensure the tank can be inspected and cleaned. An inspection of the tank is necessary to ensure that the finished water is protected from outside contamination. Inspect and repaint the interior and exterior of the storage tank as necessary. [Section 19 of the Illinois Environmental Protection Act, 415 ILCS 5/19, 35 Ill. Adm. Code 601.101, 601.115, AWWA G200-15, and the Recommended Standards for Water Works, 2012 Edition, Part 7.0.8]
ATTACHMENT B

REMINDERS AND/OR RECOMMENDED IMPROVEMENTS

The following recommended improvements are intended to increase the Technical, Managerial and/or Financial Capacity of your water system:

FINANCIAL

2. Take action to assure that there are adequate reserve funds in place to provide for emergency repairs.

3. Conduct a water rate study. It was reported that rates are insufficient to meet your 5 year capital improvement plan.

TECHNICAL

4. It was stated during the evaluation that the pressure provided by Illinois American East St. Louis is only able to fill the [Ex 7f] Street tower (elevated storage tank #2) to 15'. The capacity of the church street tower is based on 35' of water. As such, this reduces the capacity of the tower by over 70%, which leaves your 500,000 gallon tower with a net capacity closer to 150,000 gallons. Consider options to fully fill the [Ex 7f] Street tower.

5. Take action to assure that the unaccounted-for water in the system is less than 15% of the total water delivered to the mains.

FINISHED WATER STORAGE

6. Consider providing additional finished water storage for your distribution system. The finished water storage is necessary to maintain a minimum water pressure of 20 pounds per square inch (psi) in all parts of the distribution system at all times. The minimum storage capacity for systems not providing fire protection shall be equal to the average daily consumption. Additional storage may be needed to meet fire flow demands. The volume of the storage tank must be based on anticipated water demands of the system. [Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 653.108(c) and 602.115 and the Recommended Standards for Water Works, 2012 Edition, Part 7.0.1(a).]
MANAGEMENT AND OPERATIONS

7. Notify this office and the Agency’s Public Water Supply Permit Section on the status of the following construction permits;
   # 0992-FY2014 titled “Sodium Hypochlorite Injection System”
   # 1374-FY2008 titled “Water System Improvements”

   During the evaluation, it was noted that these projects had not been constructed. These permits will need to be canceled if there will be no construction.

8. Provide appropriate testing equipment and reagents that allow for process control testing of the following levels;
   a. Free Ammonia
   b. Total Chlorine
   c. Monochloramine
   d. Free Chlorine (using a reagent capable of avoiding interference with ammonia)

9. Consider implementing a written mutual aid agreement with another public water supply directly or through a mutual aid program such as ILWARN. This agreement should include provisions for assistance in the event of natural disaster or major equipment/system failure.

10. It is recommended that maintenance and routine updating of the materials inventory is conducted. The materials inventory must be submitted annually. The materials inventory should include locations of lead service lines, along with maps designating the size and types of all distribution mains. The information can be used in revising the lead and copper sample site plan subsequent to lead service line removal projects and to comply with monitoring requirements included in the Lead and Copper Rule.

11. When water main repair or replacement is planned, notification of potentially affected residents must be conducted to provide information regarding potential sediment, possibly containing lead, that may result from the repair or replacement project. Notification should include recommendations that may reduce the potential lead exposure, including flushing of services lines for at least three minutes prior to use, cleaning of faucet aerator screens, and/or replacement of the lead service line.
FY 2019
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
PUBLIC WATER SUPPLY DATA SHEET

Facility Number: 1635030
County and Supply: ST. CLAIR COUNTY - Commonfields of Cahokia PWD
Date Inspected: November 28, 2018
Office Phone: 618/332-6620
618/337-3302 (Bus.)
Operator: Dennis Traiteur *C*
Phone: 618/337-3302 (Cell)
Other Officials (Title): Curtis McCall, Board Chairman
Phone: 618/874-1034 (Bus.)
618/337-3302 (Bus.)
Emergency Contact: Dennis Traiteur, Manager
Phone: 618/874-1034 (Cell)
Send mail to: Board of Trustees, Commonfields of Cahokia PWD, 2525 Mousette Lane,
Cahokia, IL 62206
Interviewed: Dennis Traiteur, Manager

Brief description of supply: Water obtained from IL-American Water Co. (EstL) at 2 metered
locations, may be boosted in pressure & may be re-chlorinated. At the Falling Springs Station, water
may be chlorinated and re-pumped by 2-1400 gpm booster pumps. The distribution system includes
2-0.5 MG elevated storage tanks. A 1.5 MG above ground storage tank at the Falling Springs
Station has been valved off from the system since the Fall of 1978.

No. of Services: Direct 4078 - 100% metered
Satellite 1570 - 100% metered (Village of Cahokia)

Adequacy of Supply
Annual Pumpage 586,789,000 Gal.
Ave. Daily Pumpage 1,604,901* Gal.
Est. Population 14,286*
Ave. Daily per Capita Consumption 112 Gal.
Time Required to Produce Ave. Daily Consumption NA Hrs.
Time Required to Produce Max. Ave. Daily Consumption NA Hrs.
Large Consumers
Cahokia - 290,000 gpd; Centreville Twp. Hosp. - 6,800 gpd;
Holten Meat Packing - 50,500 gpd

Emergency Water and Power Sources:
None, except water is obtained from Illinois-American Water Co. (E St. Louis) at two locations.

*Includes population served directly (4078 x 2.53 Avg. household size St. Clair Co. = 10,317) and
indirectly (1570 x 2.53 = 3972).
CHANGES IN WATERWORKS

Changes made since the previous inspection, September 14, 2016, include the following:

1. Complied with Recommendation 7, of the September 22, 2016 inspection report letter by cancelling the listed construction permits.

COMMENTS

On the day of the visit, the chlorine residual was tested at 2.3 mg/l total.

James Blessman
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Index

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD

<table>
<thead>
<tr>
<th>Item</th>
<th>Sheet No.</th>
<th>Date</th>
<th>Replaces</th>
<th>Sheet No.</th>
<th>Date</th>
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<tbody>
<tr>
<td>Location Map</td>
<td>1</td>
<td>09-14-16</td>
<td></td>
<td></td>
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<tr>
<td>Judith Lane Metering Station</td>
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<td>10-18-06</td>
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<td>Converse Avenue Metering Station</td>
<td>3</td>
<td>10-18-06</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Chlorination</td>
<td>4</td>
<td>10-18-11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Above Ground Storage Tank</td>
<td>5</td>
<td>10-18-06</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elevated Storage Tanks</td>
<td>6</td>
<td>10-18-11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Falling Springs Booster Station</td>
<td>7</td>
<td>10-28-03</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emergency Interconnection</td>
<td>8</td>
<td>10-28-03</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Rates</td>
<td>9</td>
<td>03-06-14</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Item: Location Map

Ex 7f (Water Infra)

Converse Avenue Metering Station

Ex 7f (Water Infra)

Booster Station

Falling Springs Metering Station

Falling Springs Rd, Cahokia, IL 62206

Chlorination

Central Corridor, Downtown Parks Airport

0.5 MG D
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD

Date inventoried: Oct. 18, 2006
Sheet 2 of 9

Item: Judith Lane Metering Station

Located in a pit on the NE corner of the intersection of [EX 7T and EX 7T (Water Main)] are 2 parallel meters as follows:

1. Neptune 8" meter (SN 070001887) which measures flow in cubic feet and records it as 100's of cubic feet.

2. Neptune 4" meter (SN 70103021) which measures flow in cubic feet and records it as 100's of cubic feet.
Item: Converse Avenue Metering Station

Located in a pit on the SW corner of the intersection of in Alorton, are 2 parallel meters as follows:

1. Neptune 4" meter (SN 70099978) which measures flow in cubic feet and records it as 100's of cubic feet.

2. Neptune 4" meter (SN 70099979) which measures flow in cubic feet and records it as 100's of cubic feet.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF PUBLIC WATER SUPPLIES  
Inventory Sheet

Supply: Facility Number: 1635030  
Commonfields of Cahokia PWD  
Date inventoried: Oct. 18, 2011  
Sheet 4 of 9

Item: Chlorination

Location: Located in the Falling Springs Booster Station  
Chemical: 12% Sodium Hypochlorite  
Type: Positive Displacement  
Manufacturer: ProMinent Sigma  
Model No.: SICAH12017PVT0070UD1010C  
Capacity: 5 gph @ 174 psi

Pump #1  
Serial No.: 20033013022

Pump #2  
Serial No.: 2003013021  
Fed From: A 90 gallon polyethylene tank.

A 200 gallon polyethylene sodium hypochlorite bulk tank is provided. ProMinent Cl2 meter provided. Monitors Cl2 residual leaving the booster pumps and adjusts feed rates for pumps according to a predetermined goal value. Serial No.: 2003013024, Model No.: 7740953.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD

Date inventoried: Oct. 18, 2006
Sheet 5 of 9

Item: Above Ground Storage Tank

Located on the W side of Ex 7f (Water Infra) 1.5 MG above ground storage tank constructed in 1974 of welded steel by Chicago Bridge & Iron; 87' in diameter X 34' high. Outside access ladder terminates 10' above the ground surface; mushroom type roof vent is 3.5' in diameter; 2 roof manholes (each 2.5' in diameter) and 2 manholes in the side of the tank (each 3' in diameter) all have hinged covers which are bolted in place. The 8" overflow terminates into an 8" drain line near the ground surface and discharges freefall to the ground surface to a below ground weep well. Altitude control valve located in a pit between the ground storage tank and the building which houses the booster pumps. Fire hydrant provided for draining tank.

At this time, the tank is not in service and is valved off from the system due to problems experienced maintaining adequate chlorine residuals in the distribution when the tank was in service. The tank is also currently empty.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD

Date inventoried: Oct. 18, 2011
Sheet 6 of 9

Item: Elevated Storage Tanks

**Tank #1**

Location: At the intersection of Streets
Capacity: 500,000 gallon
Construction: Welded steel, ellipsoidal with eight column supports by Pittsburgh – Des Moines Steel Co. in 1959
Height to upper capacity level: 115' 1"
Height to lower capacity level: 76'0"
Overflow: Terminates approx. 18" above ground level, discharges down one of the legs over the concrete footing
Vent: Reportedly properly screened.
Manhole: Hatch is reportedly locked.
Remarks: Cathodic protection provided.

**Tank #2**

Location: At the intersection of Streets
Capacity: 500,000 gallons
Construction: Welded steel, ellipsoidal with eight column supports by Pittsburgh – Des Moines Steel Co. in 1959
Height to Overflow: 130'
Head Range: 35'
Bottom Height: 95'
Overflow: Terminates approx. 18" above ground level, discharges down one of the legs over the concrete footing
Vent: Reportedly properly screened.
Manhole: Hatch is reportedly locked.
Remarks: Cathodic protection provided.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD
Date inventoried: Oct. 28, 2003
Sheet 7 of 9

Item: Falling Springs Booster Station

Located on the W side of [Redacted], is a 24' x 16' x 12' high prefabricated steel building which is equipped with heat and air-conditioning. Three floor drains reportedly discharge to the outside ground surface. The entire station, including the adjacent ground storage tank, is surrounded by a locked, chain-link fence. The pumps are as follows:

North Pump - Crane Deming horizontal centrifugal pump rated at 1400 gpm @ 100' TDH (Model 5063 61420999, SN DC 506482, Size 8" x 6", 11-7/8" diameter), directly driven by a 40 hp, 1755 rpm, 460/230 volt, 60 cycle, 3 phase General Electric motor (Model 5K 324AK205, SN AH204417, Frame 324 T, Type T), with a service factor of 1.15.

South Pump - Crane Deming horizontal centrifugal pump rated at 1400 gpm @ 100' TDH (Model 5063 61420999, SN DC 506483, Size 8" x 6", 11-7/8" diameter), directly driven by a 40 hp, 1765 rpm, 460/230 volt, 96/48 amp, 60 cycle, 3 phase U.S. Electric Uniclosed Motor (SN R-4918-01-414 E, Frame 324 T, Type R, Code G, Design B), with a service factor of 1.15.
Item: Emergency Interconnection

Located at the intersection of Ex 7f (Water Infra) in a 6' x 12' x 7' deep concrete pit, is a metered one-way emergency interconnection to provide water to the City of Columbia public water supply. The meter is a 3" Schlumberger turbine meter (SN Unknown) which reads and records flow in 1000's of gallons. A Golden Anderson flow control valve with a stop check is provided to allow flow to Columbia based on a 15 psi pressure differential. Flow is limited to 350 gpm.
Item: Water Rates

In accordance with existing ordinances, the following rates apply.

Minimum monthly bill of $17.25 allows the use of 2000 gallons of water

First 2,000 gallons @ $0.00/1000 gallons
Next 3,000 gallons @ $3.21/1000 gallons
Next 95,000 gallons @ $3.14/1000 gallons
All over 100,000 gallons @ $2.59/1000 gallons
TECHNICAL CAPACITY

**TECHNICAL CAPACITY ASSESSMENT**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>Does Not Apply</th>
</tr>
</thead>
<tbody>
<tr>
<td>Record your system’s total annual pumpage for the past year:</td>
<td>500</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>Record your system’s peak day pumpage:</td>
<td>2.0</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>List amount of water billed or sold to customers last year:</td>
<td>455</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>List plant capacity:</td>
<td>4.0</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>List total well capacity:</td>
<td>□</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>List plant capacity with largest well or treatment unit out of service:</td>
<td>□</td>
<td>□ MG □ gal</td>
</tr>
<tr>
<td>Is standby emergency power equipment exercised?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Check frequency equipment exercised:</td>
<td>□ Weekly □ Monthly □ Quarterly □ Annual □ Other</td>
<td>X</td>
</tr>
<tr>
<td>Can your water system provide uninterrupted service for 24 hours without electrical power?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are hydrants routinely flushed and maintained?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Flushing frequency:</td>
<td>□ Annual □ Spring/Fall □ As Needed</td>
<td>X</td>
</tr>
<tr>
<td>Are the locations of all valves in the distribution precisely known?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are all valves periodically exercised and maintained?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>List exercising frequency:</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are locations, size and type of mains and valves detailed on records or maps kept in a secure area?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are meter pits and curb stops located, unobstructed and accessible?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Is the unaccounted-for water less than 15% of the total water delivered to the mains?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>List amount of water unaccounted for:</td>
<td>21.5 %</td>
<td>□ gal</td>
</tr>
<tr>
<td>List frequency of meters changed/calibrated:</td>
<td>In process of meter change out</td>
<td>X</td>
</tr>
<tr>
<td>Is your treatment equipment adequate to provide drinking water that meets all standards?</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

Managerial CAPACITY

**MANAGERIAL CAPACITY ASSESSMENT**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is there a clear plan of organization and control among the people responsible for management and operation of the water system?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are contingency plans in place for the unanticipated loss of key personnel?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Is a written emergency response plan in place and up to date?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Does the utility perform inspections of work performed on the system by outside contractors?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are construction permits obtained prior to starting water supply projects that require a permit, and operating permits obtained before placing those improvements into service?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Do you maintain copies of all water sample results, operating reports and inspection reports?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Do you have a cross connection control program?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Where are cross connection survey results and records kept?</td>
<td>Customer Files and on computer</td>
<td></td>
</tr>
</tbody>
</table>

FINANCIAL CAPACITY

**FINANCIAL CAPACITY ASSESSMENT**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
<th>NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does your organization have an annual budget for operating and maintaining the water system?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are water rates regularly reviewed?</td>
<td>Date of last rate increase: 10/2013 Increase forthcoming</td>
<td>X</td>
</tr>
<tr>
<td>Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are adequate reserve funds in place to provide for emergency repairs?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Can your organization cover the costs of an emergency or failure of its most vulnerable system component? (source/storage/treatment etc.)?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Does your organization have a written 5-year Capital Improvement Plan for major water system improvements?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Are rates sufficient to meet the costs of the 5-year Capital Improvement Plan?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Does your organization have adopted procedures for selecting outside contractors and suppliers?</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

Public Water Supply Name: Compton Hills or Cataokia Public Water District ID #: 1635030 Date: 11/27/18 Prepared By:
January 9, 2019

Board of Trustees
Commonfields of Cahokia PWD
2525 Mousette Lane
Cahokia, Illinois 62206

Re: Noncompliance Advisory Response Acceptance
Facility Number: 1635030
ST. CLAIR COUNTY - Commonfields of Cahokia PWD

Dear Sirs:

This Agency is in receipt of a letter dated January 3, 2019, from Dennis Traiteur, Manager, which respond to this Agency’s December 5, 2018, Noncompliance Advisory Response (Evaluation Report) letter concerning the Commonfields of Cahokia PWD public water supply. We wish to acknowledge the prompt action taken to assure compliance with all of the recommendations contained in the Agency’s letter.

When time permits, a reinspection of your public water supply will be made so that our records may be brought up to date. If you should have any questions regarding this letter or any other public water supply problems, please feel free to contact this office at 2009 Mall Street, Collinsville, Illinois 62234 or at 618/346-5120.

Sincerely,

ENVIRONMENTAL PROTECTION AGENCY

Gayle Renth
Collinsville Region Manager
Field Operations Section
Division of Public Water Supplies

cc: Dennis Traiteur
January 3, 2019

Ms. Gayle Renth
Regional Manager
Division of Public Water Supplies
Collinsville Regional Office
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, IL 62234

RE: Evaluation Report
Facility Number -1635030
St. Clair County – Commonfields of Cahokia Public Water District

Dear Ms. Renth:

In response to your Evaluation Report dated December 5, 2018:

Attachment A

Technical

1. Repair or replacement to the inside ladder of the Elevated Storage Tank at the Road Location repair date will be provided on or before January 28, 2019. A tank inspection will follow, and a copy of the report will be provided to the agency.

Attachment B

Financial

2. At the January 2018 meeting, the board of Director’s instructed Management to transfer ten thousand dollars per month to the Depreciation account for unforeseen expenses.

3. A water rate study is currently being prepared by the District’s Engineers, new rates will be adequate for the 5 year Improvement Plan.

Technical

4. Included in the Water System Improvement Project is a new Booster Station which will fill the Church Road Elevated Tank.
Facility Number 1635030
Commonfields of Cahokia PWD- St. Clair County
Page Two

Finished Water Storage

5. The District has noted a decline in unaccounted for water due to the meter change out program. The District anticipates a further reduction as meters are replaced with electronic meters.

<table>
<thead>
<tr>
<th>Year</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>34.5%</td>
</tr>
<tr>
<td>2016</td>
<td>24.6%</td>
</tr>
<tr>
<td>2017</td>
<td>21.5%</td>
</tr>
</tbody>
</table>

6. The Water System Improvement Project consists of the Interior & Exterior rehab of the EX 71 Road Water Tower and a new Booster Station at EX 71 (Water infra) Ave. The completion of this project will greatly increase the system capacity.

7. Due to the age of these permits the District will request them to be cancelled. The District will reapply for these permits with the Board of Directors approval.

8. The District will purchase the proper testing equipment & reagents for the tests listed.

9. Commonfields of Cahokia has contacted the Village of Cahokia and will request other neighboring communities to participate in a mutual aid program.

10. The District will begin a materials inventory program. The District will keep a record of all types of materials being used, types of service lines and types of water mains.

11. When the District repairs or replaces a water main, the affected residents can be notified through the District's automated phone service (One Call Now) the information recommend will be added to the notification.

If you need additional information, please do not hesitate to contact me.

Cordially,

Dennis Traiteur
Manager
January 7, 2021

Gentlemen:

An evaluation of the Cahokia public water supply was completed by our engineer, James Blessman on December 16, 2020. The Environmental Protection Agency periodically conducts these evaluations to determine if your community water supply meets the requirements of the Illinois Pollution Control Board's public water supply rules, regulations, and related standards. A list of deficiencies is outlined in Attachment A. Attachment B includes reminders and recommended improvements.

A written reply addressing all comments in Attachment A and Attachment B is required within thirty (30) days. A specific date, no later than April 7, 2021, must be included when each deficiency in Attachment A will be corrected. This response should also include any corrections to the enclosed “Public Water Supply Data Sheet”.

This letter is a Noncompliance Advisory and is not a Violation Notice as specified in Section 31(a)(1) of the Act. If you do not adequately respond to the Noncompliance Advisory, the Illinois EPA may issue a formal violation notice according to Section 31(a)(1) of the Act.
We appreciate the cooperation and courtesy extended to us during this survey. If you have any questions regarding the evaluation, please contact the Collinsville Regional Office located at 1101 Eastport Plaza Dr., Suite 100, Collinsville, Illinois 62234, phone (618) 346-5120.

Sincerely,

[Signature]
Gayle Renth
Southern Regional Manager
Field Operations Section
Division of Public Water Supplies

cc: Rory Morgan
Village Clerk

ec: IDPH-Springfield
ISWS
St. Clair Co. Health Department
ATTACHMENT A

SUMMARY OF DEFICIENCIES

The current evaluation of your community water supply indicates that the following conditions appear to violate Title IV of the Illinois Environmental Protection Act 415 ILCS 5/1-58.17 (2018) (The Act), 35 Illinois Administration Code (35 IAC), the Recommended Standards for Water Works (2012) (Standards) and related standards.

MANAGERIAL

1. Any community water supply distributing water without a free chlorine residual must create a Nitrification Action Plan (NAP). The NAP must:
   a. contain a plan for monitoring total ammonia-N, free ammonia-N, Nitrite-N, Nitrate-N, monochloramine residual, dichloramine residual, and total chlorine residual;
   b. contain system specific levels of the chemicals in subsection (a) when actions must be taken;
   c. contain specific corrective actions to be taken if the levels in subsection (b) are exceeded; and
   d. be maintained on site and made available to the Agency, upon request.

In order to comply with item a. above, provide appropriate testing equipment and reagents that allow for process control and optimization of the chloramination process. Parameters that should be monitored include free ammonia-N, total ammonia, nitrite, nitrate, total chlorine, mono-chloramine, and free chlorine (using a reagent capable of avoiding interference with ammonia.) Guidance in establishing a Nitrification Action Plan can be found in Chapter 18 of the IEPA Sample Collectors Handbook.

SUMMARY OF DEFICIENCIES

The current evaluation of your community water supply indicates that the following conditions appear to violate Title IV of the Illinois Environmental Protection Act 415 ILCS 5/1-58.17 (2018) (The Act), 35 Illinois Administration Code (35 IAC), the Recommended Standards for Water Works (2012) (Standards) and related standards.

MANAGERIAL (Cont.)

2. Take the necessary steps to complete the action to establish an active cross-connection control program. In addition to the cross-connection control ordinance, which the Village has adopted, the cross-connection control program must also include:

   a. Provisions to conduct cross-connection control surveys of the distribution system at least once every three years.

   b. A record system to maintain data of inspections, re-inspections, repairs, alterations, and tests of any cross-connection control devices.

   c. Installation of reduced pressure principle backflow preventers, or fixed air gaps at all industrial or commercial establishments handling material which may constitute a hazard to your public water supply; such as agricultural chemical facilities, hospitals, funeral homes, and car wash facilities, etc.

ATTACHMENT B

REMINDERS AND/OR RECOMMENDED IMPROVEMENTS

The following recommended improvements are intended to increase the Technical, Managerial and/or Financial Capacity of your water system:

FINANCIAL

3. Assess the financial capacity of the water system by performing a rate study. The rate structure should be adequate so that revenues cover current expenses, reserve funds are available for emergency needs, and capital improvement needs can be completed in a timely manner. Rates should also be sufficient to fund the five-year capital improvement plan.

TECHNICAL

4. There is no program to replace older, failing water mains. Replacing water mains before they fail will minimize the amount of time customers spend without water service.

5. There is no routine leak detection and repair program. Proactive programs can help decrease water and revenue losses.

6. Consider providing finished water storage for your distribution system. The finished water storage is necessary to maintain a minimum water pressure of 20 pounds per square inch (psi) in all parts of the distribution system at all times. The minimum storage capacity for systems not providing fire protection shall be equal to the average daily consumption. Additional storage may be needed to meet fire flow demands. The volume of the storage tank must be based on anticipated water demands of the system.

MANAGERIAL

7. Consider implementing a written mutual aid agreement with another public water supply directly or through a mutual aid program such as ILWARN. This agreement should include provisions for assistance in the event of natural disaster or major equipment/system failure.

8. When water main repair or replacement is planned, notification of potentially affected residents must be conducted to provide information regarding potential sediment, possibly containing lead, that may result from the repair or replacement project. Notification should include recommendations that may reduce the potential lead exposure, including flushing of services lines for at least three minutes prior to use, cleaning of faucet aerator screens, and/or replacement of the lead service line.
ATTACHMENT B (Cont.)

REMINDERS AND/OR RECOMMENDED IMPROVEMENTS

The following recommended improvements are intended to increase the Technical, Managerial and / or Financial Capacity of your water system:

MANAGERIAL (Cont.)

9. It is recommended that maintenance and routine updating of the materials inventory is conducted. The materials inventory must be submitted annually. The materials inventory should include locations of lead service lines, along with maps designating the size and types of all distribution mains. The information can be used in revising the lead and copper sample site plan subsequent to lead service line removal projects and to comply with monitoring requirements included in the Lead and Copper Rule.
### Facility Number: 1630200

#### County and Supply
- **ST. CLAIR COUNTY - Cahokia**

#### Date Inspected
- **December 16, 2020**

#### Operator
- **Rory Morgan**
- **Phone:** 618/332-0466

#### Other Officials (Title)
- **Lynn Branson, Dept. Manager**
- **Phone:** 618/337-2149 (Bus.), 618/337-9500 (Bus.)

#### Curtis McCall Jr., Mayor
- **Phone:** 618/337-9500 (Bus.)

#### Emergency Contact
- **Rory Morgan, ROINC**
- **Phone:** 618/332-0466

#### Address
- **Vill. Garage:** 618/332-0466
- **Water Office:** 618/332-1222

#### Interviewed
- **Rory Morgan, ROINC and Lynn Branson, Department Manager**

#### Brief description of supply:
- Water obtained from Illinois-American Water Company (East St. Louis) via Commonfields of Cahokia PWD, from which system pressure is maintained.

#### No. of Services
- **Direct:** 1400
- **Satellite:** -

#### Adequacy of Supply

<table>
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<th>Description</th>
<th>Value</th>
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<tr>
<td>Annual Pumpage (GAL)</td>
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<tr>
<td>Ave. Daily Pumpage (GAL)</td>
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<tr>
<td>Est. Population</td>
<td>3,640</td>
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<td>Ave. Daily Per Capita Consumption (GAL)</td>
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<tr>
<td>Time Required to Produce Ave. Daily Consump</td>
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<tr>
<td>Time Required to Produce Max. Ave. Daily</td>
<td>N/A Hrs.</td>
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<tr>
<td>Large Consumers</td>
<td>KC Hall-1100 gpd; Huffman Grade School-1920 gpd (in session)</td>
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</table>

#### Emergency Water and Power Sources:
- None.
CHANGES IN WATERWORKS

Changes made since the previous inspection, September 27, 2018, include the following.

Complied with Recommendation 1 of the October 4, 2018, inspection letter by adopting a five year Capital Improvement Plan.

COMMENTS

On the day of the visit, the chlorine residual was tested at Ex 71 (Water Infra) by Rory Morgan. The residual was reported to be 2.8 mg/l total.

[Signature]

James Blessman

cc: CRO
cc: ISWS
cc: IDPH – Springfield
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Index

Supply: Facility Number: 1630200
CAHOKIA - St. Clair Co.

<table>
<thead>
<tr>
<th>Item</th>
<th>Sheet No.</th>
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<td>Location Map</td>
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<td>Master Meters</td>
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<td>Water Rates</td>
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1630200
CAHOKIA - St. Clair Co.
Date inventoried: April 20, 2016
Sheet 1 of 3

Item: Location Map

[Diagram of location with marked points and text annotations]

Ex 7f (Water Infra)
Master Meter #1

Ex 7f (Water Infra)
Master Meter #2
Item: Master Meters

**Master Meter 1:**

Installed in a concrete pit, approximately 4' x 6' x 4' deep, at the intersection of Streets is a 6" Amco meter (SN 17492228) that reads and records flow in thousands of gallons.

**Master Meter 2:**

Installed in a concrete vault, approximately 4' x 6' x 4' deep, at the intersection of approximately 1 block south of Route 157 is a 4" Badger compound meter (SN 00204276). The low flow side reads and records flow in hundreds of gallons; the high flow side reads and records flow thousands of gallons. The remote readout records flow in tens of thousands of gallons. Installed in March 1997.
In accordance with existing ordinances, the following rates schedule applies.

All water customers using less than 100,000 gallons of water per month:

Minimum monthly bill of $11.66 allows the use of 2,000 gallons of water.

First 2,000 gallons @ $5.83/1000 gallons
Next 3,000 gallons @ 3.40/1000 gallons
Next 5,000 gallons @ 3.26/1000 gallons
Next 10,000 gallons @ 3.10/1000 gallons
Next 20,000 gallons @ 2.77/1000 gallons
All over 60,000 gallons @ 2.40/1000 gallons

All customers using 100,000 gallons or more per month:

Minimum monthly bill of $268.40 allows the use of 100,000 gallons of water.

First 100,000 gallons @ $2.6840/1000 gallons
All over 100,000 gallons @ 2.20/1000 gallons
TECHNICAL CAPACITY

TECHNICAL CAPACITY ASSESSMENT

Record your system’s total annual pumpage for the past year:

☐ MG □ gal

Record your system’s peak day pumpage:

☐ MG □ gal

List amount of water billed or sold to customers last year:

100,069,404  ☐ MG □ gal

List plant capacity:

☐ MG □ gal

List total well capacity:

☐ MG □ gal

List plant capacity with largest well or treatment unit out of service:

☐ MG □ gal

Is standby emergency power equipment exercised?

☐ Weekly □ Monthly □ Quarterly □ Annual □ Other

Can your water system provide uninterrupted service for 24 hours without electrical power?

X

Are hydrants routinely flushed and maintained?

☐ Annual □ Spring/Fall □ As Needed

Are the locations of all valves in the distribution precisely known?

X

Are all valves periodically exercised and maintained? List exercising frequency.

Yearly in the Fall (October)

Are locations, size and type of mains and valves detailed on records or maps kept in a secure area?

X

Are meter pits and curb stops located, unobstructed and accessible?

X

Is the unaccounted-for water less than 15% of the total water delivered to the mains?

☐ Check if information is not available

Are all customers, water sources and treatment plants metered?

☐ YEARLY PER ROUTE

Is your treatment equipment adequate to provide drinking water that meets all standards?

X

Managerial CAPACITY

MANAGERIAL CAPACITY ASSESSMENT

Is there a clear plan of organization and control among the people responsible for management and operation of the water system?

X

Are contingency plans in place for the unanticipated loss of key personnel?

X

Is a written emergency response plan in place and up to date?

X

Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology?

X

Does the utility perform inspections of work performed on the system by outside contractors?

X

Are construction permits obtained prior to starting water supply projects that require a permit, and operating permits obtained before placing those improvements into service?

X

Do you maintain copies of all water sample results, operating reports and inspection reports?

X

Do you have a cross connection control program?

X

Where are cross connection survey results and records kept?

STORED IN ADDRESS LOCATIONS FILE CABINETS

FINANCIAL CAPACITY

FINANCIAL CAPACITY ASSESSMENT

Does your organization have an annual budget for operating and maintaining the water system?

X

Are water rates regularly reviewed? Date of last rate increase: APRIL 1, 1998

X

Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years?

X

Are adequate reserve funds in place to provide for emergency repairs?

X

Can your organization cover the costs of an emergency or failure of its most vulnerable system component? (source/storage/treatment etc.)

X

Does your organization have a written 5-year Capital Improvement Plan for major water system improvements?

X

Are rates sufficient to meet the costs of the 5-year Capital Improvement Plan?

X

Does your organization have adopted procedures for selecting outside contractors and suppliers?

X
Appendix B
Attendance Lists for Closing Meetings with All Systems (3 pages)
<table>
<thead>
<tr>
<th>NAME</th>
<th>ORGANIZATION</th>
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<th>PHONE NUMBER/EMAIL</th>
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<tbody>
<tr>
<td>David Parker</td>
<td>EPA-NEIC</td>
<td>PROE Mgmt. Officer</td>
<td>303-462-9021 <a href="mailto:parker.david@epa.gov">parker.david@epa.gov</a></td>
</tr>
<tr>
<td>Jim Blessman</td>
<td>EPA-NEIC</td>
<td>Env Engineer</td>
<td>618-363-4475/james.j.blessman@illinois.gov</td>
</tr>
<tr>
<td>Darren Vandenbarghe</td>
<td>EPA-NEIC</td>
<td>Env Engineer</td>
<td>303-462-9261/vandelbargh.daren@epa.gov</td>
</tr>
<tr>
<td>Trent Rainey</td>
<td>EPA-NEIC</td>
<td>Env Engineer</td>
<td>303-462-9899/rainey.trent@epa.gov</td>
</tr>
<tr>
<td>Victoria Anderson</td>
<td>EPA-R5</td>
<td>Inspector/life Scientist</td>
<td>312-353-4367/anderson.victoria@epa.gov</td>
</tr>
<tr>
<td>Taylor Girouard</td>
<td>EPA-R5</td>
<td>Physical Scientist</td>
<td>312-353-3944/girouard.taylor@epa.gov</td>
</tr>
<tr>
<td>Jim Adamiec</td>
<td>EPA-R5</td>
<td>Inspector</td>
<td>812-836-0852/adamiec.james@epa.gov</td>
</tr>
<tr>
<td>Dennis Traiteur</td>
<td>CC PWD</td>
<td>Manager</td>
<td>618-410-7808 Common fields SBC Global, IL</td>
</tr>
</tbody>
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Date: 4/28/2021
<table>
<thead>
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<th>ORGANIZATION</th>
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<tr>
<td>David Parker</td>
<td>EPA-NEIC</td>
<td>Program Mgmt. Officer</td>
<td>720-237-3913 (cell) <a href="mailto:Parker.David@EPA.gov">Parker.David@EPA.gov</a></td>
</tr>
<tr>
<td>Taylor Girouard</td>
<td>EPA-R5</td>
<td>Enforcement Officer</td>
<td>505-312-353-1394 <a href="mailto:Girouard.Taylor@EPA.gov">Girouard.Taylor@EPA.gov</a></td>
</tr>
<tr>
<td>Victoria Anderson</td>
<td>EPA-R5</td>
<td>Enforcement Officer</td>
<td>312-353-4367 <a href="mailto:Anderson.Victoria@EPA.gov">Anderson.Victoria@EPA.gov</a></td>
</tr>
<tr>
<td>Jim Adamiec</td>
<td>EPA-R5</td>
<td>Inspector -</td>
<td>312-886-0815 <a href="mailto:Adamiec.James@EPA.gov">Adamiec.James@EPA.gov</a></td>
</tr>
<tr>
<td>Steve Vance</td>
<td>IEPA</td>
<td>Plant Manager</td>
<td>217-782-0200 <a href="mailto:Vance.Steve@Illinois.gov">Vance.Steve@Illinois.gov</a></td>
</tr>
<tr>
<td>James Allen</td>
<td>Village of Cahokia</td>
<td>Operator</td>
<td>(618) 570-5270 <a href="mailto:Allen.James@Illinois.gov">Allen.James@Illinois.gov</a></td>
</tr>
<tr>
<td>Rory Morgan</td>
<td>Village of Cahokia</td>
<td>OR/IC Foreman</td>
<td>618-301-2160 <a href="mailto:Morgan.Rory@Illinois.gov">Morgan.Rory@Illinois.gov</a></td>
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<tr>
<td>Trent Rainey</td>
<td>EPA-NEIC</td>
<td>4th. Engineer</td>
<td>305-462-9308 <a href="mailto:Rainey.Trent@EPA.gov">Rainey.Trent@EPA.gov</a></td>
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<tr>
<td>Gayle Rentz</td>
<td>IEPA-Collinsville</td>
<td>Regional Manager</td>
<td>618-346-5145 <a href="mailto:Rentz.Gayle@Illinois.gov">Rentz.Gayle@Illinois.gov</a></td>
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<tr>
<td>Daren Vandenbush</td>
<td>EPA-NEIC</td>
<td>Inv. Engineer</td>
<td>303-462-9261 <a href="mailto:Vandenbush.Daren@EPA.gov">Vandenbush.Daren@EPA.gov</a></td>
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<tr>
<td>Tim Blessman</td>
<td>IEPA-Collinsville</td>
<td>Env Engineer</td>
<td>618-363-4428 <a href="mailto:Blessman.Tim@Illinois.gov">Blessman.Tim@Illinois.gov</a></td>
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<tr>
<td>Justin Ladner</td>
<td>ILAW</td>
<td>President</td>
<td><a href="mailto:Justin.Ladner@amwater.com">Justin.Ladner@amwater.com</a></td>
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<tr>
<td>Jim Adamiec</td>
<td>EPA-RS</td>
<td>Inspector</td>
<td><a href="mailto:Adamiec.James@EPA.GOV">Adamiec.James@EPA.GOV</a> (312) 995-0815</td>
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<tr>
<td>Darren Vauleheughe</td>
<td>EPA-NEIC</td>
<td>Env. Engineer</td>
<td>303-462-9261/Barbra <a href="mailto:maduras@ilaqwa.gov">maduras@ilaqwa.gov</a></td>
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<tr>
<td>Trent Rainey</td>
<td>EPA-NEIC</td>
<td>Env. Engineer</td>
<td>303-462-9208/Rainey.Trent@epa.gov</td>
</tr>
<tr>
<td>Rachel Bretz</td>
<td>IL American Water</td>
<td>Dir. WQ + Envtm Enggmt</td>
<td>618-830-1820/rachel.bretz@amwater.com</td>
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<tr>
<td>Victoria Anderson</td>
<td>EPA-RS</td>
<td>Enforcement Officer</td>
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<td>Taylor Givionard</td>
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<td>Jim Blossman</td>
<td>IEPA-Collinsville</td>
<td>Environmental Engineer</td>
<td>618-365-7408/James.T.Blossman@illinois.gov</td>
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<tr>
<td>Guyle Renth</td>
<td>IEPA-Collinsville</td>
<td>Sr. Regional Manager</td>
<td>618-346-5120/Guyle.Renth@illinois.gov</td>
</tr>
<tr>
<td>Joe Amos</td>
<td></td>
<td>Sr. Operations Manager</td>
<td>618-335-3257/Amos.Joseph@amwater.com</td>
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<tr>
<td>Brent O'Neill</td>
<td>ICAAD</td>
<td>Director of Envtm Enggmt</td>
<td>618-254-5711/Brent.O'<a href="mailto:Neill@ICAAD.com">Neill@ICAAD.com</a></td>
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<tr>
<td>Fredo Campbell</td>
<td>IL American Water</td>
<td>Sr. Production Manager</td>
<td>618-779-1555/Fredo.Campbell@amwater.com</td>
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<td>David Parker</td>
<td>EPA-NEIC</td>
<td>PROG MGMT OFFICER</td>
<td>720-237-3913/Parker.David@epa.gov</td>
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Appendix C  
NEIC Inspection Photographs  
(29 pages)
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<td>T Rainey</td>
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<tr>
<td>Description</td>
<td>Excavation pit exposing end of dead end sewer. Centerville alley across from Ex 71.</td>
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<tr>
<td>Author</td>
<td>T. Rainey</td>
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Belleville, Illinois
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Open pit for force main repair at Ex 7f (Water Infra)

Author: T Rainey
Date/Time: 4/29/2021 1:10:22 PM
File Name: P4290028.JPG
Title: NEIC Inspection Photographs
Ex 7f (Water Infra)
Appendix D
Revised Total Coliform Rule Sampling Site Information
(25 pages)
Special Exception Permit Renewal
Special Exception Permit per 35 Ill. Adm. Code Section 611.521(a) and the Revised Total Coliform Rule

March 31, 2021

Sam Saucier
Water Quality Supervisor
Illinois American Water
East St. Louis, Granite City, Livingston
Illinois American Water
300 N. Water Works Drive
Belleville, IL 62223

Re: Coliform Sampling Site Plan
Facility Number: 1635040
ST. CLAIR COUNTY - IAWC – East St. Louis

Gentlemen:

The coliform sample site plan for the Illinois American East St. Louis community water system has been updated to reflect changes required by the Revised Total Coliform Rule (RTCR). Each month, two finished water samples (TP03 and TP04) and 121 distribution (D) samples must be collected at one of the designated coliform sample sites as outlined in the attachment and analyzed by a certified laboratory.

Enclosed are the site numbers assigned to each of the sampling sites. Only these sites are approved for sample collection. These identification numbers are to be used on the monthly bacteriological analyses report forms. New requirements for the RTCR mandate that the locations for any necessary repeat samples be included in the approved plan. These locations have been included in the attached list and are identified as UPSTREAM and DOWNSTREAM. Note the definitions for each of these locations. For repeat sampling, also include the actual address on the coliform report form next to the generic identifier.

It is recommended that this letter and attachment be filed with a copy of the map on which the sample site locations have been plotted. A copy of this letter and the attachment should be readily accessible for your sample collector to refer to on a frequent basis.

If you should have any questions concerning your coliform sampling site plan, please feel free to contact this office at 1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 or at 618/346-5120.

Sincerely,

Gayle Renth
Southern Regional Manager
Field Operations Section
Division of Public Water Supplies
Attachment

cc: Rachel Bretz
    BOW/CAS
Coliform Sample Site Plan

**Date:** March 31, 2021  
**Facility Number:** 1635040  
**Facility Name:** IAWC-ESL Public Water Supply  
**Population:** 139,879  
**Minimum Coliform Distribution System Samples Required per Month:** 121

### Raw Water Coliform Sample Site Numbers:

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Ex 7f (Water Infra)
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<th>Alternate Site Location</th>
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SS – Sample Station
PSS – Proposed Sample Station

For Repeat Samples Only:

UPSTREAM – A sample collected within five service connections upstream of the original site where the total coliform positive sample was taken.
DOWNSTREAM – A sample collected within five service connections downstream of the original site where the total coliform positive sample was taken.
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

COLIFORM ANALYSIS REPORT

Community Water Supply Testing

A. Facility No.: 163-5040
B. Facility Name: Illinois-American Water Company, East St. Louis Plant

C. Sampling Period:

D. Surface Supply: Yes □ No □
E. Chlorine Exempt: Yes □ No □

Samples must be analyzed within 30 hours after collection. Items A-E & 1-6 must be completed or sample may be discarded.

1. Mail Water Supply Copy To:
   Illinois-American Water Company
   800 N. Front Street
   East St. Louis IL 62201

2. Contact for Unsatisfactory Results:
   Name: Sam Saucier
   Phone: 618-707-1913

3. Date Collected:

4. Sample Collector:

5. Sample Purpose:
   □ Routine □ Boil Order □ Replacement □ Other
   □ New Construction
   Permit No. ________ FY ________
   □ Invalid Replacement
   Original Lab Sample No. ________
   □ Repeat
   Original Lab Sample No. ________

The Illinois Environmental Protection Agency is authorized to require information under ILLINOIS REVISED STATUTES, 1987, Chapter 111 1/2, Sec. 1019.
Disclosure of this information is required. Failure to do so may result in a civil penalty up to $10,000 and an additional civil penalty up to $1,000 for each day the failure continues, a fine up to $1,000, and imprisonment up to one year. This form has been approved by the Forms Management Center.
Completed forms must be maintained for a minimum of five years.

6. Coliform Sampling ESL Boosters

<table>
<thead>
<tr>
<th>Bottle #</th>
<th>Sample Site #</th>
<th>Address</th>
<th>Sample Type</th>
<th>Time Collected</th>
<th>Residual Chlorine Free/Total</th>
<th>Col Read</th>
<th>Total Coll.</th>
<th>E. Coll</th>
<th>Opin. SI/CF</th>
<th>Lab Sample #</th>
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<td>ESL4</td>
<td>C005002A3</td>
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<td>D</td>
<td></td>
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</tbody>
</table>

Method: □ Colilert-18 □ Colilert-24

Person Notified: __________ Date: __________

Reported by: __________________ Date: __________________

Analyst: __________________ Time: __________________

No. of Bottles Sent: __________ Date: __________

Reason for Replacement:
   □ Samples more than 30 hours old
   □ No Date/Time of Collection
   □ Other: __________________

Laboratory Cert. No.: 17515 Name: Illinois-American Water Company

East St. Louis SDWA
Belleville, Illinois

NEICVP1411E01

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Community Water Supply Testing

COMMUNITY WATER SUPPLY TESTING

A. Facility No.: 163-5040
B. Facility Name: Illinois-American Water Company, East St. Louis Plant
C. Sampling Period:
D. Surface Supply: Yes
E. Chlorine Exempt: No

Samples must be analyzed within 30 hours after collection.
Items A-E & 1-6 must be completed or sample may be discarded.

Date Received:
Time Received:
Date Analyzed:
Time Analyzed:

1. Mail Water Supply Copy To:
Illinois-American Water Company
800 N. Front Street
East St. Louis, IL 62201

3. Date Collected:

4. Sample Collector:

5. Sample Purpose:
- Routine
- Boil Order
- Replacement
- Other
- New Construction
- Invalid Replacement
- Original Lab Sample No.
- Repeat
- Original Lab Sample No.

The Illinois Environmental Protection Agency is authorized to require information under IL. REVISED STATUTES, 1987, Chapter 11 1/2, Sec. 1019.
Disclosure of this information is required. Failure to do so may result in a civil penalty up to $10,000 and an additional civil penalty up to $1,000 for each day the failure continues, a fine up to $1,000, and imprisonment up to one year. This form has been approved by the Forms Management Center.
Completed form must be maintained for a minimum of five years.

6. Coliform Sampling

<table>
<thead>
<tr>
<th>Bottle #</th>
<th>Sample Site #</th>
<th>Address</th>
<th>Sample Type</th>
<th>Time Collected</th>
<th>Residual Chlorine Free/Total</th>
<th>Col Read</th>
<th>Total Coll.</th>
<th>E. Col.</th>
<th>Opin. S/U</th>
<th>Lab Sample #</th>
<th>NTU</th>
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<tbody>
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<td>ESL11</td>
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<td>8405 State St. Regions Bank</td>
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<td>ESL14</td>
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</table>

Method: Colilert-18 Colilert-24 Person Notified: Date: 

Reported by: 
Analyst: 
Date: 
Time: 

No. of Bottles Sent: Date: 
Reason for Replacement:
- Samples more than 30 hours old
- No Date/Time of Collection
- Other: 

Laboratory Cert. No.: 17515 Name: Illinois-American Water Company
NEICVP1411E01 Appendix D
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East St. Louis SDWA Belleville, Illinois
**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

**COLIFORM ANALYSIS REPORT**

**A. Facility No.:** 163-5040  
**B. Facility Name:** Illinois-American Water Company, East St. Louis Plant

---

**C. Sampling Period:**

**D. Surface Supply:**  
☑ Yes  ☐ No

**E. Chlorine Exempt:**  
☐ Yes  ☑ No

---

Samples must be analyzed within 30 hours after collection.  
Items A-E & 1-6 must be completed or sample may be discarded.

---

**1. Mail Water Supply Copy To:**

Illinois-American Water Company  
800 N. Front Street  
East St. Louis  IL  62201

**2. Contact for Unsatisfactory Results:**

Name: Sam Sauzier  
Phone: 618-707-1913

---

**3. Date Collected:**

**4. Sample Collector:**

**5. Sample Purpose:**

☑ Routine  ☐ Boil Order  ☐ Replacement  ☐ Other

☐ New Construction  ☐ Invalid Replacement

---

**6. Coliform Sampling  E S L Meters 2**

**ESL22  C002003A3**  
Private Home  
Method: ☐ Colilert-18  ☑ Colilert-24

**ESL23  C002003A4**  
3407 Mississippi Ave.  
National Rent to Own

**ESL24  C008002A3**  
Private Home

**ESL25  C009001A1**  
Private Home (Concordia)

**ESL26  C006002A6**  
Private Home

---

**ESL27  C005002A1**  
1 Executive Woods Ct.  
Dental Care, Inc.

**ESL28  C004002A5**  
1200 Royal Heights Rd.  
ZX Gas Station

**ESL29  C003002A5**  
8710 State St.  
Edgemont Pediatrics, P.C.

**ESL30  C003002A6**  
Private Home

**ESL31  C001002A4**  
1400 Kingshighway  
Chinu House

**ESL32  C001002A5**  
Private Home

---

**Method:** ☐ Coli-18  ☑ Coli-24

**Person Notified:**

---

**Laboratory Cert. No.:** 17515  
**Name:** Illinois-American Water Company

---

**NEICVP1411E01**  
**Appendix D**  
**Page 10 of 25**  
**East St. Louis SDWA**  
**Belleville, Illinois**
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
Ex 7f (Water Infra)
### Proposed Coliform Sample Site Plan

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<th>Site Number</th>
<th>Primary Location</th>
<th>Alternate Site Location</th>
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<td>1</td>
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<td>Regions Bank</td>
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<td>3</td>
<td>C002001P1</td>
<td>Afton Fabricators</td>
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<td>Holten Meats</td>
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**Monthly Chloroform Sample Schedule**

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<td>December 18</td>
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</tr>
</tbody>
</table>

Lynn Branson, Assistant Director
Ex 7f (Water Infra)

Indicates Master Meter Locations

Indicates Test Locations - Primary/Alternate

Prepared by: Rory Morgan *25439999