



United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEIC

NEICVP1411E02

NEIC CIVIL INVESTIGATION REPORT

East St. Louis SDWA
Belleville, Illinois 62223

Investigation Dates:

April 26-30, 2021

David Parker

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David Parker
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David Parker, Project Manager, NEIC

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Rebecca Connell, Field Branch Chief, NEIC

Report Prepared for:

EPA Region 5
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CONTENTS

INVESTIGATION OVERVIEW	3
PROJECT OBJECTIVE	3
FACILITY CONTACT INFORMATION.....	3
FACILITY OVERVIEW	4
FACILITY OPERATIONS SUMMARY.....	5
FIELD ACTIVITIES SUMMARY	8
INVESTIGATION OBSERVATIONS	10

TABLES

Table 1. PROJECT TEAM MEMBERS.....	3
Table 2. FACILITY CONTACT INFORMATION	3
Table 3. DISTRIBUTION SYSTEM DISINFECTANT RESIDUAL READINGS	9
Table 4. DISTRIBUTION SYSTEM PRESSURE READINGS.....	9

APPENDICES (*NEIC-created)

- A IEPA Inspection Reports for All Systems (100 pages)
- B* Attendance Lists for Closing Meetings with All Systems (3 pages)
- C* NEIC Inspection Photographs (29 pages)
- D Revised Total Coliform Rule Sampling Site Information (25 pages)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

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 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
David Parker	NEIC	Project manager (PM)
Trent Rainey	NEIC	Field team member
Daren Vanlerberghe	NEIC	Field team member
James Adamiec	EPA Region 5/Enforcement and Compliance Assurance Division (ECAD)/Water Enforcement and Compliance Assurance Branch (WECAB)	EPA Region 5 SDWA inspector
Victoria Anderson	EPA Region 5/ECAD/WECAB	EPA Region 5 SDWA inspector
Taylor Girouard	EPA Region 5/ECAD/WECAB	EPA Region 5 SDWA inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Rachel Bretz, Operator, IAWC - East St. Louis PWS	618-874-2404	rachel.bretz@amwater.com
Dennis Traiteur, Operator, Commonfields of Cahokia PWD	618-337-3302	commonfields@sbcglobal.net
Rory Morgan, Operator, Village of Cahokia PWS	618-301-2160	rmorgan@cahokiaillinois.org

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 SDWA 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 **Ex 7f**. 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 **Ex 7f (Water Infra)**, on the east side of the Mississippi River at mile marker **Ex 7f**. 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 **Ex 7f (Water Infra)** 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 – Ex 7f (Water Infra) – 14.4-MGD booster station and two 2.5-million-gallon (MG) above-ground storage tanks
2. French Village – Ex 7f (Water Infra) – 32.4-MGD booster station and two 2.5-MG above-ground storage tanks
3. Deep Well – Ex 7f (Water Infra) – 18.1-MGD booster station and two 2.0-MG above-ground storage tanks
4. Waterloo – Ex 7f (Water Infra) – 3.0-MG booster station and one 1.0-MG standpipe
5. Dutch Hollow – Ex 7f (Water Infra) – 17.3-MGD booster station
6. Frank Scott Parkway – Ex 7f (Water Infra) – 10.3-MGD booster station
7. Shiloh – Ex 7f (Water Infra) – 1.73-MG booster station and one 0.5-MG elevated storage tank
8. Brooklyn – Ex 7f (Water Infra) – 14.1-MG booster station
9. Shiloh Elevated Storage Tank – Ex 7f (Water Infra) – 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 Ex 7f (Water Infra) (12-inch main) and at the intersection of Ex 7f (Water Infra) (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 Ex 7f (Water Infra), and the second at Ex 7f (Water Infra). The Ex 7f (Water Infra) 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			
Water System	Location	Date/Time	Total Chlorine residual (mg/L)
IAWC - East St. Louis PWS	Ex 7f (Water Infra) Ex 7f	April 27, 2021, 1:12 p.m.	1.8
IAWC - East St. Louis PWS	Ex 7f (Water Infra) Ex 7f	April 27, 2021, 2:27 p.m.	2.9
Commonfields of Cahokia PWD	Falling Springs Booster Station	April 28, 2021, 11:15 a.m.	3.16
Commonfields of Cahokia PWD	Intersection of Ex 7f and Ex 7f (500,000-gallon elevated storage tank location)	April 28, 2021, 11:54 a.m.	2.5
Commonfields of Cahokia PWD	Hydrant near Ex 7f Ex 7f	April 28, 2021, 12:42 p.m.	2.6
Commonfields of Cahokia PWD	Intersection of Ex 7f and Ex 7f	April 28, 2021, 12:54 p.m.	3.0
Commonfields of Cahokia PWD	Intersection of Ex 7f and Ex 7f	April 28, 2021, 2:22 p.m.	2.4
Village of Cahokia PWS	Sample tap near Ex 7f Ex 7f	April 29, 2021, 10:56 a.m.	2.6

Table 4. DISTRIBUTION SYSTEM PRESSURE READINGS			
Water System	Location	Date/Time	Pressure (psi)
IAWC - East St. Louis PWS	Intersection of Ex 7f and Ex 7f	April 27, 2021, 1:08 p.m.	42
IAWC - East St. Louis PWS	Intersection of Ex 7f and Ex 7f	April 27, 2021, 2:19 p.m.	149
Commonfields of Cahokia PWD	Hydrant near Ex 7f	April 28, 2021, 12:37 p.m.	40
Commonfields of Cahokia PWD	Intersection of Ex 7f and Ex 7f	April 28, 2021, 2:22 p.m.	42
Village of Cahokia PWS	Hydrant at Ex 7f Ex 7f	April 29, 2021, 11:04 a.m.	42
Village of Cahokia PWS	Near Ex 7f	April 29, 2021, 11:25 a.m.	45
Village of Cahokia PWS	Hydrant at Ex 7f Ex 7f	April 29, 2021, 11:49 a.m.	39

INVESTIGATION OBSERVATIONS

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.

Observation: 1

Observation Summary: 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.

Citation: none

Evidence:

NEIC inspector interview with Dennis Traiteur, responsible operator in charge

NEIC inspector observations

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 [REDACTED] **Ex 7f** **Ex 7f** 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)



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

December 20, 2018

EVALUATION LETTER

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.

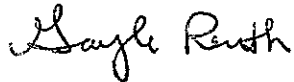
The Environmental Protection Agency periodically conducts these evaluations to determine if your community water supply meets the requirements of the Illinois Pollution Control Board's public water supply rules, regulations, and related standards. A list of deficiencies is outlined in Attachment A. Attachment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



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

GR:jb

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

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. 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) 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 Ex 6 (Personal Privacy) (Cell)

Other Officials (Title) Mark Barton, Superintendent

Phone Ex 6 (Personal Privacy) (Cell)

Ian Rischmiller, Water Quality Supervisor

Ex 6 (Personal Privacy) (Cell)

Stanley Scott *A* Superintendent of Field Operations

Phone Ex 6 (Personal Privacy) (Cell)

Rachel Bretz

(Cell)

Emergency Contact Fred Campbell

Phone (Cell)

Send mail to Il. Amreican Wtr. Co., Bruce Hauk, 300 N. Water Works Drive, Belleville, IL 62223

Interviewed Rachel Bretz, ROINC, Ian Rischmiller, Water Quality Supervisor, and Kenny Bast, Operations Supervisor

Brief description of supply: Ex 7f (Water Infra) INTAKE: This station is located on the east bank of the Mississippi River, at mile marker Ex 7f approximately Ex 7f 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 7f (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 - - % 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: (CBI) FINISHED: (CBI)

MAX 7 Day Average (MG)

RAW: (CBI) FINISHED: (CBI)

Historical MAX 7 Day Average (MG)

RAW: (CBI) FINISHED: (CBI)

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)

Adequacy of Supply (Cont.)

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:

Ex 7f (Water Infra)

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.

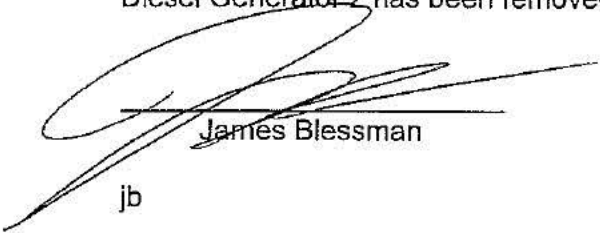
1. Complied with Recommendations 1 - 4 of the September 22, 2016 engineering evaluation letter by the following actions:
 - a. Cancelled or obtained operating permits for the listed construction permits.
 - b. Had the tanks at Deep Well inspected.
 - c. Took action to reduce the unaccounted for water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



James Blessman

jb

cc: CRO
cc: USDA/RD

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

<u>Item</u>	<u>Sheet No.</u>	<u>Date</u>	<u>Replaces</u>	<u>Sheet No.</u>	<u>Date</u>
Locational Map	1	06-23-16			
Location Map (cont.)	2	06-23-16			
Flow Diagram Aldritch	3	11-15-18	New		
Flow Diagram Conv.	4	11-15-18	New		
Flow Diagram Dist.	5	11-15-18	New		
Low Service Pumps	6	06-10-04			
LSP at Chouteau Island	7	07-24-13			
Riverhouse Pumps	8	07-24-13			
Grit Separator	9	11-15-18	New		
Coagulation and Sedimentation Conv.	10	06-10-04			
Hydrotreaters	11	06-10-04			
Aldrich Tanks	12	06-10-04			
High Service Station					
Sewer Pumps	13	06-10-04			
Filters	14	06-10-04			
Finished Water Storage	15	11-15-18	New		
High Service Pumps	16	07-24-13			
High Service Pumps (cont.)	17	06-10-04			
Plant Service					
Auxiliary Pump	18	06-10-04			
Diesel Standby Gen	19	11-15-18	Diesel Standby Gen	19	06-10-04
Aldrich Clearwell Trans.	20	06-10-04			
Aldrich Wash Water Pumps	21	06-10-04			
Chemical Feed Pump	22	07-24-13			
Chemical Feed Pump 2	23	07-24-13			
Chemical Feed Pump 3	24	07-24-13			
Distribution Storage Tanks	25	07-24-13			
Edgemont Boost Stat.	26	07-24-13			
Edgemont Standby Power	27	06-10-04			
French Village Booster Station	28	07-24-13			
French Village Booster Station(cont.)	29	07-24-13			

<u>Item</u>	<u>Sheet No.</u>	<u>Date</u>	<u>Replaces</u>	<u>Sheet No.</u>	<u>Date</u>
French Village					
Standby Power	30	07-24-13			
Dutch Hollow					
Booster Station	31	06-10-04			
Deepwell Booster					
Station	32	07-24-13			
Deepwell Standby					
Power	33	06-10-04			
Millstadt Booster Stat.	34	06-10-04			
Waterloo Booster Stat.	35	06-10-04			
Frank Scott Parkway					
Booster Station	36	06-10-04			
Frank Scott Parkway					
Standby Power	37	06-10-04			
Frank Scott Parkway			Frank Scott Parkway		
Chlorine Feed	38	11-15-18	Chlorine Feed	35	07-24-13
Shiloh Booster Station	39	06-11-07			
SWIC Chlorine Feed	40	07-24-13			
Brooklyn Booster Station	41	11-15-18	Brooklyn Booster Station	38	06-11-07
Water Rates	42	06-10-04	Water Rates	39	06-10-04

Removed

Lamella Separators	6	06-23-16
Diesel Standby Gen. 2	20	06-10-04

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

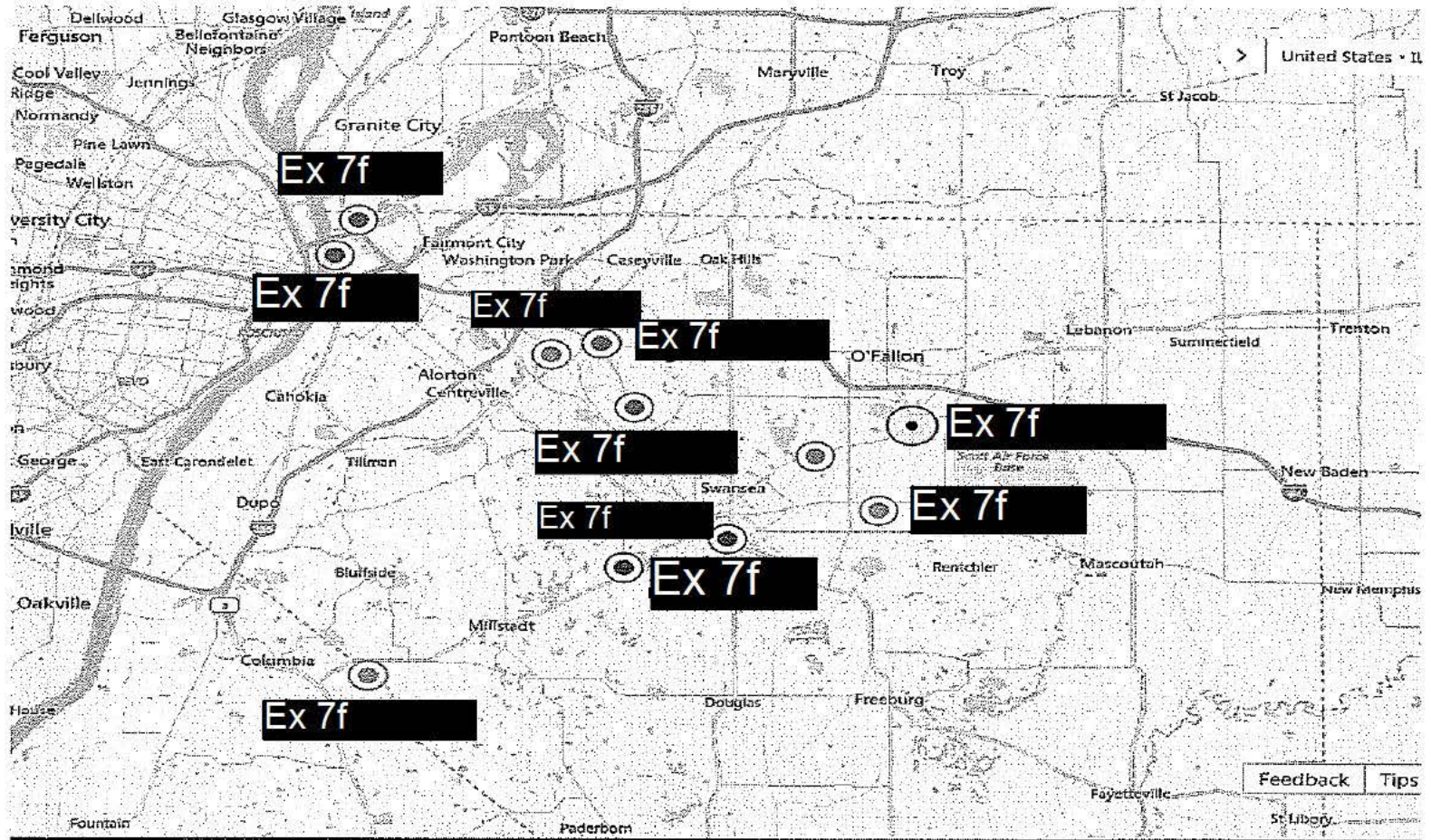
Supply: Facility Number: 1635040

St. Clair County – Ill. American – E. St. Louis

Item: Locational Map

Date inventoried: June 23, 2016

Sheet 1 of 42



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF PUBLIC WATER SUPPLIES
Inventory Sheet

Supply: Facility Number: 1635040
St. Clair County – Ill. American – E. St. Louis
Item: Locational Map (Page 2)

Date inventoried: June 23, 2016
Sheet 2 of 42

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 2-2.5MG 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

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 3 of 42

Item: Flow Diagram - Aldritch Plant

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 4 of 42

Item: Flow Diagram – Conventional Plant

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 5 of 42

Item: Flow Diagram – Clearwells and Distribution

EX 4 (CBI)

2-
GST

012

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



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 7 of 42

Item: Low Service Pumps at **Ex 7f (Water Infra)**

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 8 of 42

Item: Riverhouse Pumps

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 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)

<u>Designation</u>	<u>Year</u>	<u>Construction</u>	<u>Size</u>	<u>Capacity MG</u>
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EX 4 (CBI)				
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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 11 of 42

Item: Hydrotreators

Year Installed
Nominal Capacity MGD
Filter Surface Area- Sq. ft.
Settling Zone Area- Sq. ft.
Surface loading – g/d/sq.ft.
Weir rate – g/d/ft.
Rise rate – ft./hr.
Pre-filter detention – hrs.
Drive Speed Range – Rpm
Peripheral Arm Speed – FPM

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

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 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
Sheet 13 of 42

Item: High Service Station Sewer Pumps

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 14 of 42

Item: Filters

<u>Filters</u>	<u>Size</u>	<u>Area</u>	<u>Bottom Type</u>	<u>Capacity @ 2 gpm/ft²</u>
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			<u>Each</u>	<u>Total</u>
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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 15 of 42

Item: Finished water Storage

<u>Year</u>	<u>Location</u>	<u>Dimension in ft.</u>	<u>Capacity in MG</u>	<u>Overflow Elevation</u>
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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 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

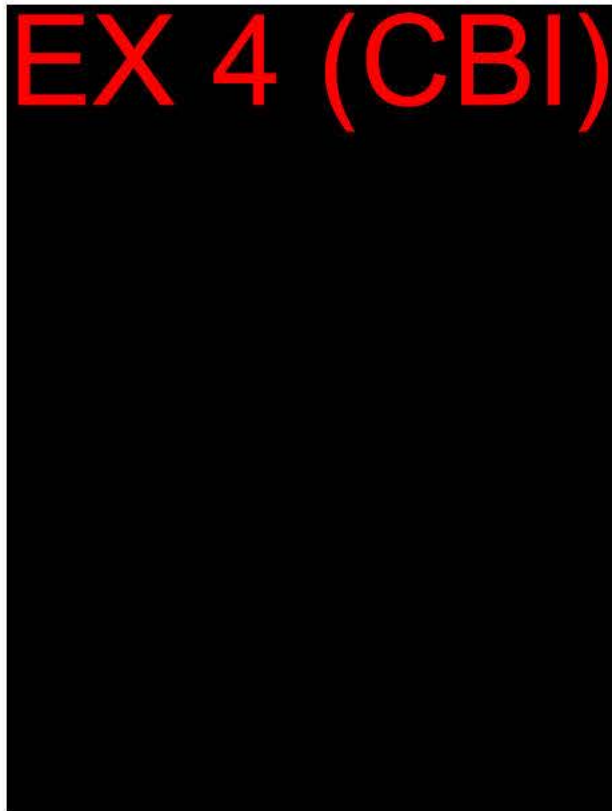
DIVISION OF PUBLIC WATER SUPPLIES

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



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 42

Item: Aldrich Clearwater Transfer

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 21 of 42

Item: Aldrich Wash Water Pumps

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 22 of 42

Item: Chemical Feed Pumps

<u>Name</u>	<u>Form</u>	<u>Chemical Building</u>	<u>Treatment Process</u>	<u>Manufacturer- Pump/Motor</u>	<u>Model #</u>	<u>Serial #</u>
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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 23 of 42

Item: Chemical Feed Pumps (cont.)

<u>Name</u>	<u>Form</u>	<u>Chemical Building</u>	<u>Treatment Process</u>	<u>Manufacturer- Pump/Motor</u>	<u>Model #</u>	<u>Serial #</u>	<u>MaxCapacity</u>
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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.)

Name	Form	Chemical Building	Treatment Process	Manufacturer- Pump/Motor	Model #	Serial #	Max Capacity
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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 25 of 42

Item: Distribution Storage Tanks

<u>Year</u>	<u>Location</u>	<u>Dimension in ft.</u>	<u>Capacity in MG</u>	<u>Overflow Elevation</u>
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EX 4 (CBI)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

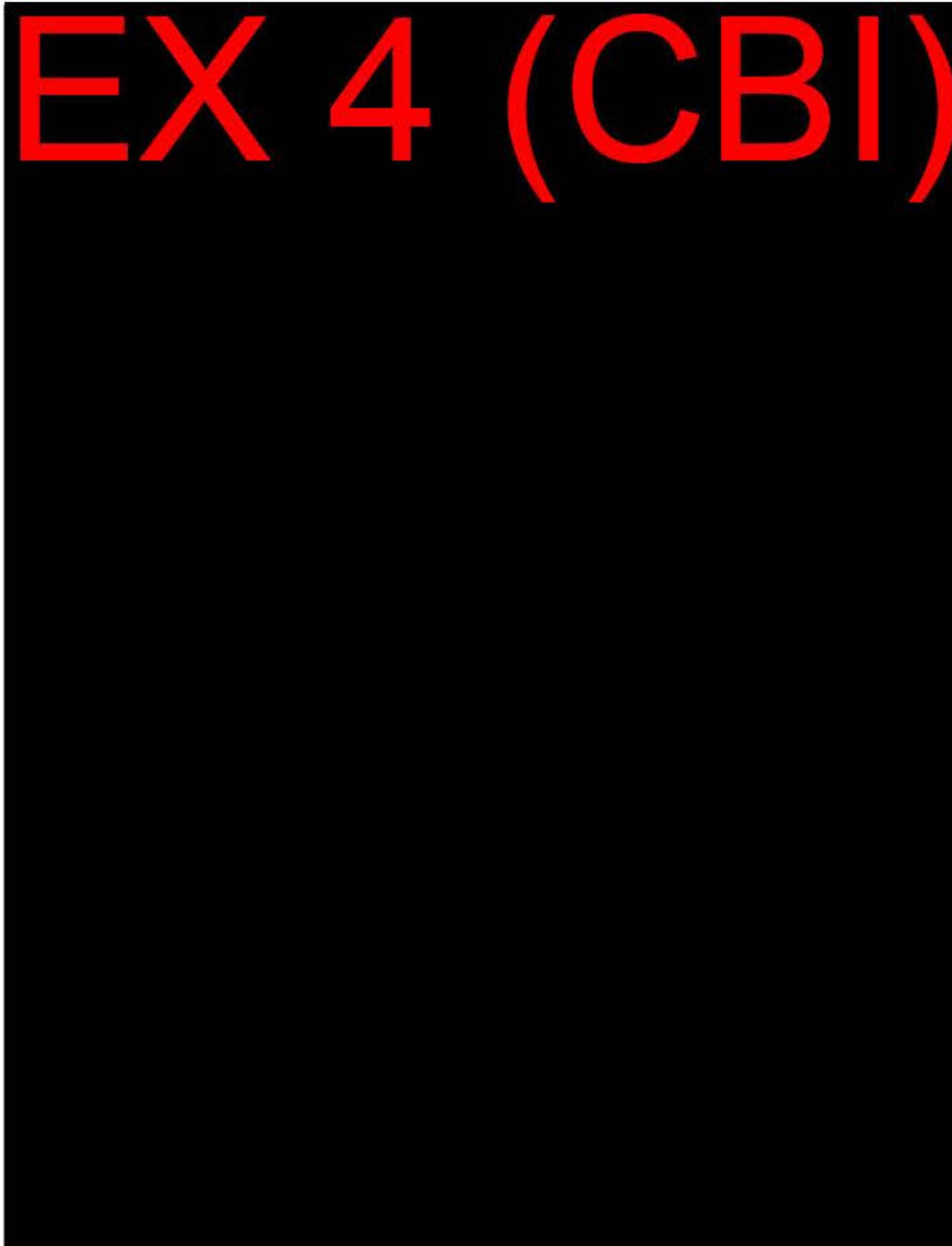
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

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

Date inventoried: July 24, 2013
Sheet 26 of 42

Item: Edgemont Booster Station



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

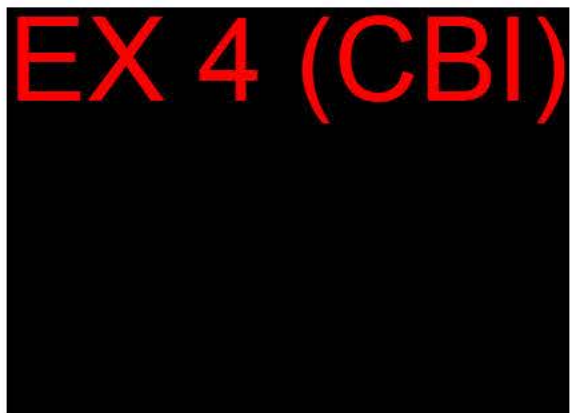
DIVISION OF PUBLIC WATER SUPPLIES

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



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

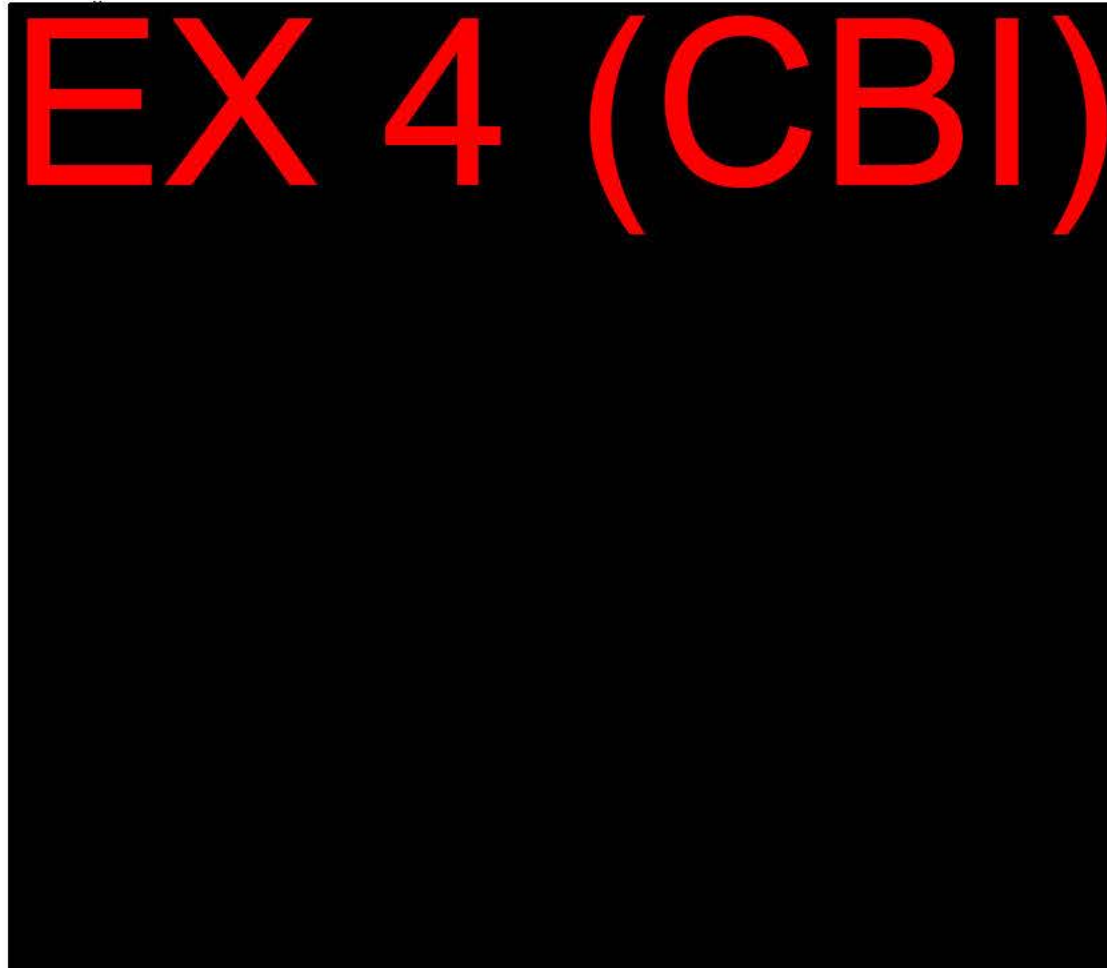
DIVISION OF PUBLIC WATER SUPPLIES

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



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

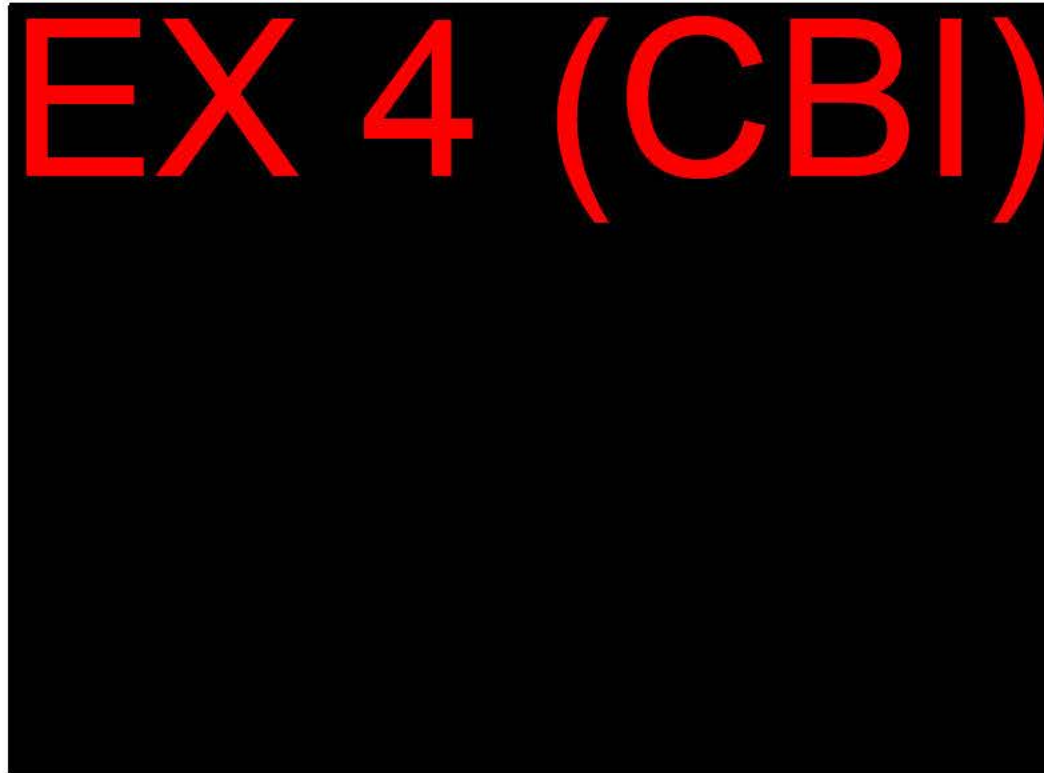
DIVISION OF PUBLIC WATER SUPPLIES

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.)



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
St. Clair County – Ill. American – E. St. Louis

Date inventoried: June 10, 2004
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: July 24, 2013
Sheet 32 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 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 36 of 42

Item: Frank Scott Parkway 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

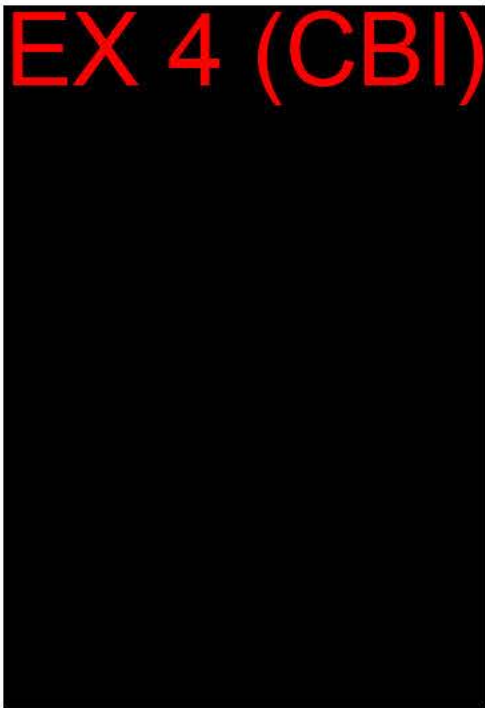
DIVISION OF PUBLIC WATER SUPPLIES

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



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 11, 2007
Sheet 39 of 42

Item: Shiloh Booster Station

EX 4 (CBI)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

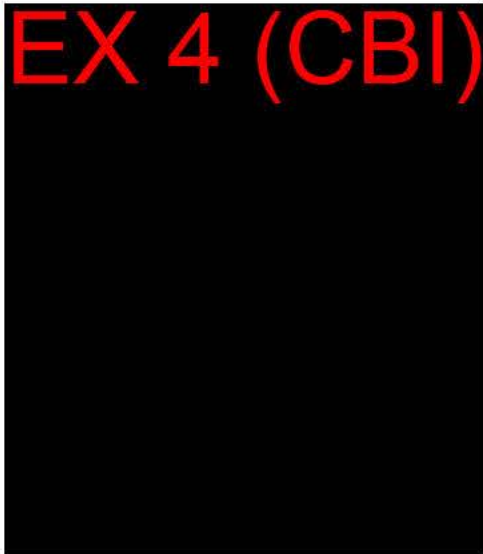
DIVISION OF PUBLIC WATER SUPPLIES

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



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 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:

5/8"	\$20.00
3/4"	32.48
1"	47.39
1 1/2"	105.33
2"	162.55
3"	312.97
4"	522.18
6"	1,030.67
8"	1,664.61
10"	2,637.13

Meter Rates for monthly bills are as follows:

First	22,400	@	\$5.851/1,000 gallons
Next	426,400	@	4.729/1,000 gallons
Next	9,275,200	@	3.840/1,000 gallons
All over	9,724,000	@	3.180/1,000 gallons

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

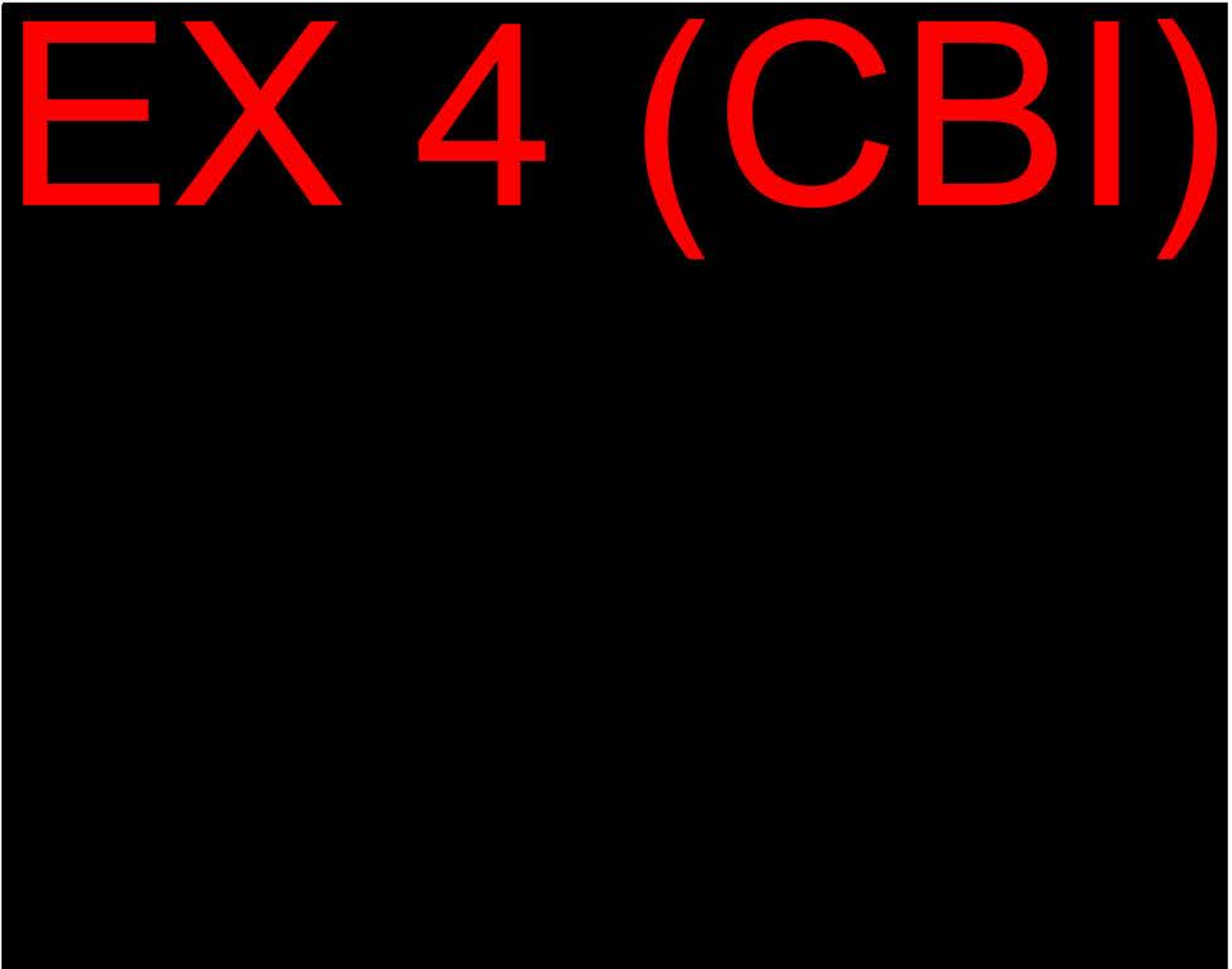
DIVISION OF PUBLIC WATER SUPPLIES

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



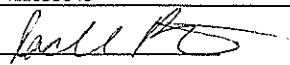
TECHNICAL CAPACITY

TECHNICAL CAPACITY ASSESSMENT	YES	NO	Does Not Apply
Record your system's total annual pumpage for the past year: <u>11,700.0</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
Record your system's peak day pumpage: <u>46.6</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List amount of water billed or sold to customers last year: <u>9,143.0</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List plant capacity: <u>56.6</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List total well capacity: <u>0</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List plant capacity with largest well or treatment unit out of service: <u>53.9</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
Is standby emergency power equipment exercised?			
Check frequency equipment exercised: <input checked="" type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input type="checkbox"/> Other	X		
Can your water system provide uninterrupted service for 24 hours without electrical power?	X		
Are hydrants routinely flushed and maintained? Flushing frequency: <input type="checkbox"/> Annual <input checked="" type="checkbox"/> Spring/Fall <input checked="" type="checkbox"/> As Needed	X		
Are the locations of all valves in the distribution precisely known?	X		
Are all valves periodically exercised and maintained? List exercising frequency: <u>Key Valves Yearly/Non Key Valves 4yrs</u>	X		
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?			
List amount of water unaccounted for: <u>14.8</u> % <input type="checkbox"/> Check if information is not available	X		
Are all customers, water sources and treatment plants metered?			
List frequency of meters changed/calibrated: <u>See Attachment</u>	X		
Is your treatment equipment adequate to provide drinking water that meets all standards?	X		

Managerial CAPACITY

MANAGERIAL CAPACITY ASSESSMENT	YES	NO	NA
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: <u>SAP System</u>			

FINANCIAL CAPACITY

FINANCIAL CAPACITY ASSESSMENT	YES	NO	NA
Does your organization have an annual budget for operating and maintaining the water system?	X		
Are water rates regularly reviewed? Yes Date of last rate increase: <u>January 1, 2017</u>	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		
Public Water Supply Name: <u>IL American Water - ESL</u> ID #: <u>IL1635040</u>			
Date: <u>11-14-18</u> Prepared By: <u>Rachel Bretz</u> 			



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JB PRITZKER, GOVERNOR

JOHN J. KIM, ACTING DIRECTOR

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



100 North Water Works Drive
Belleville, Illinois 62223

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]

RECEIVED

JAN 28 2019

Response to Technical 1: Controls were added to the outside of the Waterloo Booster Station Chlorine Feed Room. **Ex 7f (Water Infra)** the building.



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 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)]

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 [REDACTED] at Railroad Tracks (Ex 7f [REDACTED]) 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 [REDACTED]) 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 off 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.



100 North Water Works Drive
Belleville, Illinois 62223

Sincerely,

Illinois American Water Company

Rachel Bretz
Production Supervisor (ROINC)

Ian Rischmiller
Water Quality Supervisor

From: [Joseph P Ahlvin](#)
To: [Ian Rischmiller](#)
Subject: FW: Final IEPA Operating Permit Application 1255-FY2015
Date: Tuesday, January 15, 2019 3:32:37 PM

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

RECEIVED

JAN 28 2019

From: Joseph P Ahlvin <Joseph.Ahlvin@amwater.com>
Sent: Tuesday, January 15, 2019 11:24 AM
To: Cook, Kent J.
Cc: Elizabeth Matthews; Cook, David
Subject: [External] Final IEPA Operating Permit Application 1255-FY2015

IEPA
COLLINSVILLE OFFICE

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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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

December 5, 2018

EVALUATION LETTER

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(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 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,



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

Facility Number: 1635030
St. Clair County – Commonfields of Cahokia PWD

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 7f** 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]

Facility Number: 1635030
St. Clair County – Commonfields of Cahokia PWD

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).]

ATTACHMENT B

(Cont.)

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 Ex 6 (Personal Privacy) (Cell)

Other Officials (Title) Curtis McCall, Board Chairman

Phone 618/874-1034 (Bus.)

618/337-3302 (Bus.)

Emergency Contact Dennis Traiteur, Manager

Phone Ex 6 (Personal Privacy) (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 585,789,000 Gal.

Ave. Daily Pumpage 1,604,901 Gal.

Max. Ave. Daily Pumpage 2,463,286 Gal.

Est. Population 14,289*

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 (4078×2.53 Avg. household size St. Clair Co. = 10,317) and indirectly ($1570 \times 2.53 = 3972$).

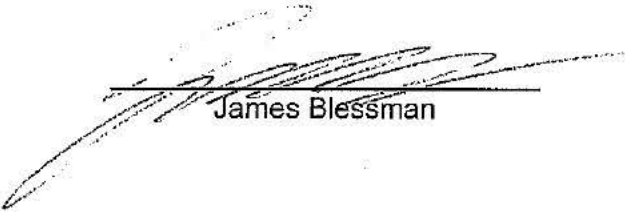
CHANGES IN WATERWORKS

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 **Ex 7f (Water Infra)**. The residual was 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

<u>Item</u>	<u>Sheet No.</u>	<u>Date</u>	<u>Replaces</u>	<u>Sheet No.</u>	<u>Date</u>
Location Map	1	09-14-16			
Judith Lane Metering Station	2	10-18-06			
Converse Avenue Metering Station	3	10-18-06			
Chlorination	4	10-18-11			
Above Ground Storage Tank	5	10-18-06			
Elevated Storage Tanks	6	10-18-11			
Falling Springs Booster Station	7	10-28-03			
Emergency Interconnection	8	10-28-03			
Water Rates	9	03-06-14			

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

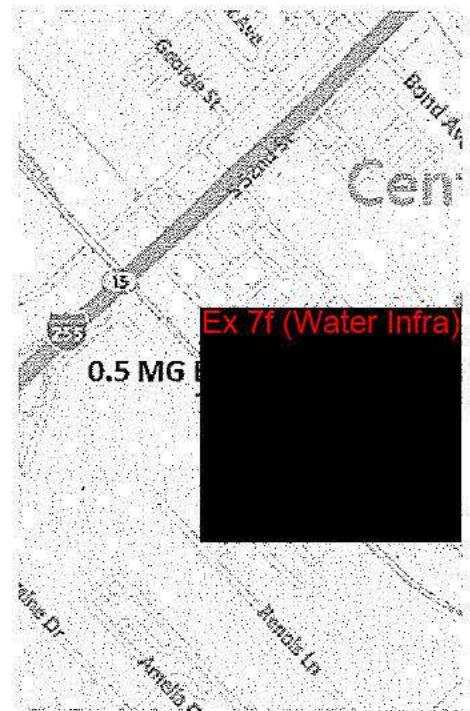
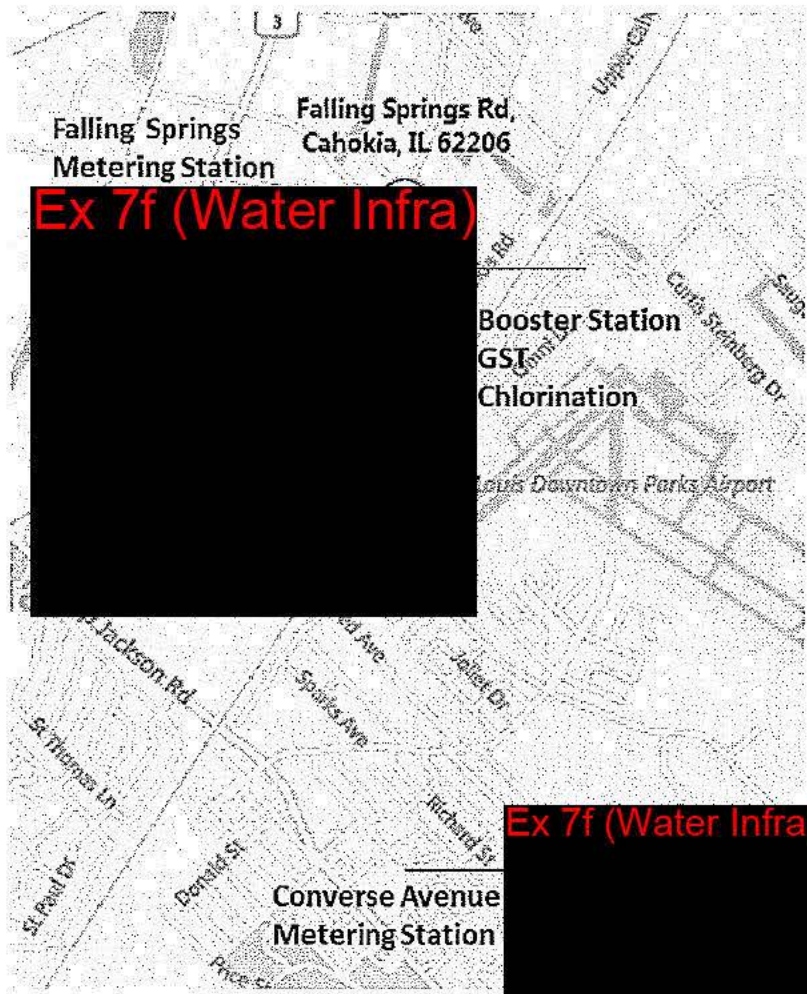
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635030
Commonfields of Cahokia PWD

Date inventoried: Sep. 14, 2016
Sheet 1 of 9

Item: Location Map



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 7f** and **Ex 7f (Water Infra)** 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.

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 3 of 9

Item: Converse Avenue Metering Station

Located in a pit on the SW corner of the intersection of **Ex 7f (Water Infra)** 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 **Ex 7f (Water Infra)** 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 **Ex 7f (Water Infra)** 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 **Ex 7f (Water Infra)** 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.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635030
St. Clair Co. - Commonfields of Cahokia PWD

Date inventoried: Oct. 28, 2003
Sheet 8 of 9

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.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

Supply: Facility Number: 1635030
St. Clair Co. - Commonfields of Cahokia PWD

Date inventoried: March 5, 2014
Sheet 9 of 9

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	YES	NO	Does Not Apply
Record your system's total annual pumpage for the past year: <u>580</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
Record your system's peak day pumpage: <u>2.0</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List amount of water billed or sold to customers last year: <u>455</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List plant capacity: <u>4.0</u> <input checked="" type="checkbox"/> MG <input type="checkbox"/> gal			
List total well capacity: <u> </u> <input type="checkbox"/> MG <input type="checkbox"/> gal			X
List plant capacity with largest well or treatment unit out of service: <u> </u> <input type="checkbox"/> MG <input type="checkbox"/> gal			X
Is standby emergency power equipment exercised?			X
Check frequency equipment exercised: <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input type="checkbox"/> Other			
Can your water system provide uninterrupted service for 24 hours without electrical power?	X		
Are hydrants routinely flushed and maintained? Flushing frequency: <input checked="" type="checkbox"/> Annual <input type="checkbox"/> Spring/Fall <input type="checkbox"/> As Needed	X		
Are the locations of all valves in the distribution precisely known?	X		
Are all valves periodically exercised and maintained? List exercising frequency: <u> </u>	±	X	
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: <u>21.5</u> % <input type="checkbox"/> Check if information is not available			
Are all customers, water sources and treatment plants metered?	X		
List frequency of meters changed/calibrated: <u>In process of meter change out</u>	X		
Is your treatment equipment adequate to provide drinking water that meets all standards?	X		

Managerial CAPACITY

MANAGERIAL CAPACITY ASSESSMENT	YES	NO	NA
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: <u>Customer Files and on computer</u>			

FINANCIAL CAPACITY

FINANCIAL CAPACITY ASSESSMENT	YES	NO	NA
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: <u>10/2013 New Increase forthcoming</u>		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		
Commonfields of Cahokia			
Public Water Supply Name: <u>Public Water District</u> ID #: <u>1635030</u>			
Date: <u>11/27/18</u> Prepared By: <u>[Signature]</u>			



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, DIRECTOR

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

A handwritten signature in cursive script, reading "Gayle Renth".

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

cc: Dennis Traiteur

ec: DPWS/FOS

bc: CRO

Commonfields of Cahokia Public Water District

2526 MOUSETTE LANE
CAHOKIA, ILLINOIS 62206

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

RECEIVED
JAN 07 2019
TUTTA
COLLINSVILLE OFFICE

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

Dear Ms. Renth:

In response to you 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. **Ex 7f**

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.

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.

2015	34.5%
2016	24.6%
2017	21.5%

6. The Water System Improvement Project consists of the Interior & Exterior rehab of the **Ex 7f** Road Water Tower and a new Booster Station at **Ex 7f (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



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

January 7, 2021

EVALUATION LETTER

Village President and
Board of Trustees
Village Hall
103 Main Street
Cahokia, Illinois 62206

Re: Facility Number: 1630200
CAHOKIA – St. Clair County
Evaluation Report – Noncompliance Advisory

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.

CAHOKIA – St. Clair County
Facility Number: 1630200
Page 2

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,



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

GR:jb

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.

[Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 604.140 and 604.130(d)(10).]

ATTACHMENT A (Cont.)

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.

[Section 18 of the Illinois Environmental Protection Act, (415 ILCS 5/18), 35 Ill. Adm. Code 604.1505, and 653.803]

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.

Facility Number: 1630800
Cahokia – St. Clair County

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.

FY 2020

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

PUBLIC WATER SUPPLY DATA SHEET

Facility Number: 1630200

County and Supply ST. CLAIR COUNTY - Cahokia

Date Inspected December 16, 2020

Vill. Garage 618/332-0466

Water Office 618/332-1222

Operator Rory Morgan *D*

Phone Ex 6 (Personal Privacy) (Cell)

Other Officials (Title) Lynn Branson, Dept. Manager

Phone 618/337-2149 (Bus.)

618/337-9500 (Bus.)

Curtis McCall Jr., Mayor

Phone Ex 6 (Personal Privacy) (Cell)

Emergency Contact Rory Morgan, ROINC

Phone Ex 6 (Personal Privacy) (Cell)

Send mail to Mayor and Board of Trustees, Village Hall, 201 West 4th St, Cahokia, IL 62206

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 - 100 % metered

Satellite - - - % metered

Adequacy of Supply

Annual Pumpage 125,205,000 Gal.

Ave. Daily Pumpage 343,027 Gal.

Max. Ave. Daily Pumpage 360,714 Gal.

Est. Population 3,640

Ave. Daily per Capita Consumption 72 Gal.

Time Required to Produce Ave. Daily Consumption

N/A Hrs.

Time Required to Produce Max. Ave. Daily Consumption

N/A Hrs.

Large Consumers KC Hall-1100 gpd; Huffman Grade School-1920 gpd (in session)

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 7f (Water Infra)** by Rory Morgan. The residual was reported to be 2.8 mg/l total.



James Blessman

jlb

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.

<u>Item</u>	<u>Sheet No.</u>	<u>Date</u>	<u>Replaces</u>	<u>Sheet No.</u>	<u>Date</u>
Location Map	1	04-20-16			
Master Meters	2	01-30-08			
Water Rates	3	11-17-98			

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

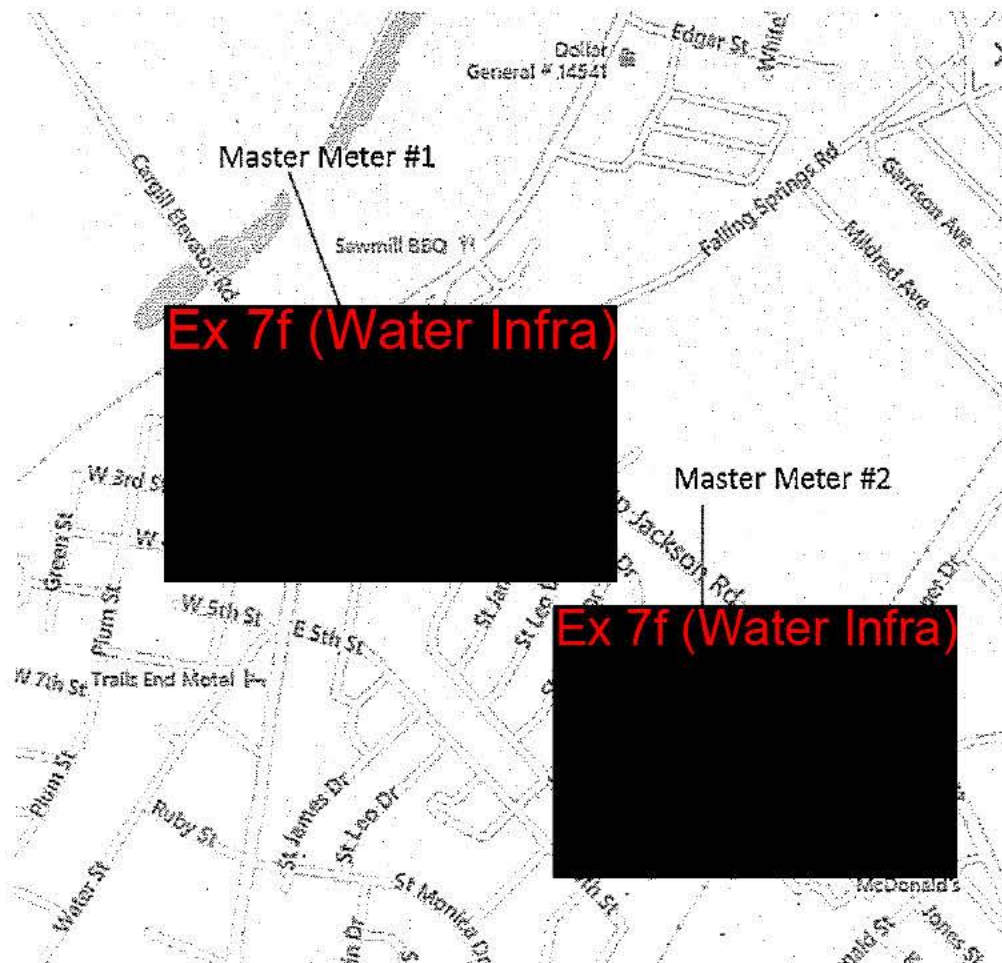
DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

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

Date inventoried: April 20, 2016
Sheet 1 of 3

Item: Location Map



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

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

Date inventoried: Jan. 30, 2008
Sheet 2 of 3

Item: Master Meters

Master Meter 1:

Installed in a concrete pit, approximately 4' x 6' x 4' deep, at the intersection of **Ex 7f (Water Infra)** 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 **Ex 7f** **Ex 7f** 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.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF PUBLIC WATER SUPPLIES

Inventory Sheet

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

Date inventoried: Nov. 17, 1998
Sheet 3 of 3

Item: Water Rates

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	YES	NO	Does Not Apply
Record your system's total annual pumpage for the past year: _____ <input type="checkbox"/> MG <input type="checkbox"/> gal			X
Record your system's peak day pumpage: _____ <input type="checkbox"/> MG <input type="checkbox"/> gal			X
List amount of water billed or sold to customers last year: <u>100,089,404</u> <input type="checkbox"/> MG <input checked="" type="checkbox"/> gal			
List plant capacity: _____ <input type="checkbox"/> MG <input type="checkbox"/> gal			X
List total well capacity: _____ <input type="checkbox"/> MG <input type="checkbox"/> gal			
List plant capacity with largest well or treatment unit out of service: _____ <input type="checkbox"/> MG <input type="checkbox"/> gal			X
Is standby emergency power equipment exercised?			X
Check frequency equipment exercised: <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Annual <input type="checkbox"/> Other			
Can your water system provide uninterrupted service for 24 hours without electrical power?			X
Are hydrants routinely flushed and maintained? Flushing frequency: <input type="checkbox"/> Annual <input checked="" type="checkbox"/> Spring/Fall <input type="checkbox"/> As Needed	X		
Are the locations of all valves in the distribution precisely known?	X		
Are all valves periodically exercised and maintained? List exercising frequency: <u>Yearly in the Fall (October)</u>	X		
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?			
List amount of water unaccounted for: <u>12</u> % <input type="checkbox"/> Check if information is not available			
Are all customers, water sources and treatment plants metered?	X		
List frequency of meters changed/calibrated: <u>YEARLY PER ROUTE</u>			
Is your treatment equipment adequate to provide drinking water that meets all standards?			X

Managerial CAPACITY

MANAGERIAL CAPACITY ASSESSMENT	YES	NO	NA
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? WHEN NEEDED			
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: <u>STORED IN ADDRESS LOCATIONS FILE CABINETS</u>			

FINANCIAL CAPACITY

FINANCIAL CAPACITY ASSESSMENT	YES	NO	NA
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: <u>APRIL 1, 1998</u>			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		
Public Water Supply Name: <u>VILLAGE OF CAHOKIA</u> ID #: <u>1630200</u>			
Date: <u>DECEMBER 16, 2020</u> Prepared By: <u>LYNN BRANSON MATCHINGTOUCH, DIRECTOR</u>			

Appendix B
Attendance Lists for Closing Meetings with All Systems
(3 pages)

Date: 4/28/2021

EPA INSPECTION

OPENING / CLOSING MEETINGS

[illegible]

Date: 4/29/21

OPENING & CLOSING MEETING EPA INSPECTION

CAHOKIA PUBLIC WATER SUPPLY
VP1411

<u>NAME</u>	<u>ORGANIZATION</u>	<u>TITLE</u>	<u>PHONE NUMBER/EMAIL</u>
DAVID PARKER	EPA-NEIC	Program Mgmt. Officer	720 237 3913 (cell) PARKER.DAVID@EPA.GOV
Taylor Girouard	EPA-RS	Enforcement Officer	(800) 312 3531 / girouard.taylor@epa.gov
Victoria Anderson	EPA-RS	Enforcement Officer	312 353 4367 / anderson.victoria@epa.gov
JIM ADAMIEC	EPA-RS	Inspector	312 886 - 0815 Adamiec.james@EPA.gov
Steve Vance	IEPA	Fos Manager	217-782-0200 Steve.Vance@illinois.gov
James Allen	Village of Cahokia	Operator	(618) 570-5270
Rory Morgan	Village of Cahokia	ORINC Foreman	618 301-2160 rmorgan@cahokiallinc.org
Trent Rainey	EPA-NEIC	Env't Engineer	303-462-9308 rainey.trent@epa.gov
Gayle Renth	IEPA-Collinsville	Regional Manager	618-346-5145 gayle.renth@Illinois.gov
Daren Vanberghe	EPA-NEIC	Inv. Engineer	303-462-9261 / vanberghe.darene@epa.gov
Tim Blossman	IEPA-Collinsville	Env Engineer	618-363-4428 James.T.Blossman@Illinois.gov

Date: 4/30/21 0830

EPA INSPECTION

ILLINOIS - AMERICAN
CLOSE-OUT MTG

[illegible]

Appendix C
NEIC Inspection Photographs
(29 pages)



Attributes	
Description	Ex 7f (Water Infra) intake pump and motor.
Author	T. Rainey
Date/Time	4/26/2021 1:46:45 PM
File Name	P4260001.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	River House intake pump motors and control.
Author	T Rainey
Date/Time	4/26/2021 3:00:40 PM
File Name	P4260002.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Aldrich Clarion chemical feed tanks.
Author	T Rainey
Date/Time	4/27/2021 8:55:34 AM
File Name	P4270003.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	GAC replacement filter No. 14.
Author	T Rainey
Date/Time	4/27/2021 9:51:18 AM
File Name	P4270004.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Blocked curb drop inlet near hydrant test 61st and Piat.
Author	T Rainey
Date/Time	4/27/2021 1:11:05 PM
File Name	P4270005.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Hydrant drainage to drop inlet.
Author	T Rainey
Date/Time	4/27/2021 1:13:05 PM
File Name	P4270006.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	48 inch concrete culvert under US 255 near Pittsburgh and 63rd. Heavy silt infiltration in area prone to flooding.
Author	T Rainey
Date/Time	4/27/2021 1:22:01 PM
File Name	P4270007.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Auto-flush test Ex 7f .
Author	T Rainey
Date/Time	4/27/2021 1:34:11 PM
File Name	P4270008.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Open manhole on side of street Ex 7f
Author	T Rainey
Date/Time	4/27/2021 1:47:37 PM
File Name	P4270009.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Excavation pit exposing end of dead end sewer. Centerville alley across from Ex 7f .
Author	T Rainey
Date/Time	4/27/2021 3:22:56 PM
File Name	P4270010.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Falling Springs Booster Station. View from control panel.
Author	T Rainey
Date/Time	4/28/2021 11:13:32 AM
File Name	P4280011.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Liquid chlorine tanks in locked chemical building.
Author	T Rainey
Date/Time	4/28/2021 11:25:20 AM
File Name	P4280012.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Out of service chemical application building. Falling Springs Booster Station.
Author	T Rainey
Date/Time	4/28/2021 11:26:19 AM
File Name	P4280013.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Base of Falling Springs storage tank.
Author	T Rainey
Date/Time	4/28/2021 11:31:20 AM
File Name	P4280014.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Overall view of Falling Springs storage tank.
Author	T Rainey
Date/Time	4/28/2021 11:31:59 AM
File Name	P4280015.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Broken fence at Falling Springs Booster Station.
Author	T Rainey
Date/Time	4/28/2021 11:32:16 AM
File Name	P4280016.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Five hundred thousand gallon storage tank, Ex 7f and Ex 7f
Author	T Rainey
Date/Time	4/28/2021 11:47:50 AM
File Name	P4280017.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Vegetation growing within enclosure. Ex 7f and Ex 7f .
Author	T Rainey
Date/Time	4/28/2021 11:48:07 AM
File Name	P4280018.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Missing overflow screen. Ex 7f .
Author	T Rainey
Date/Time	4/28/2021 11:48:21 AM
File Name	P4280019.JPG
Title	NEIC Inspection Photographs



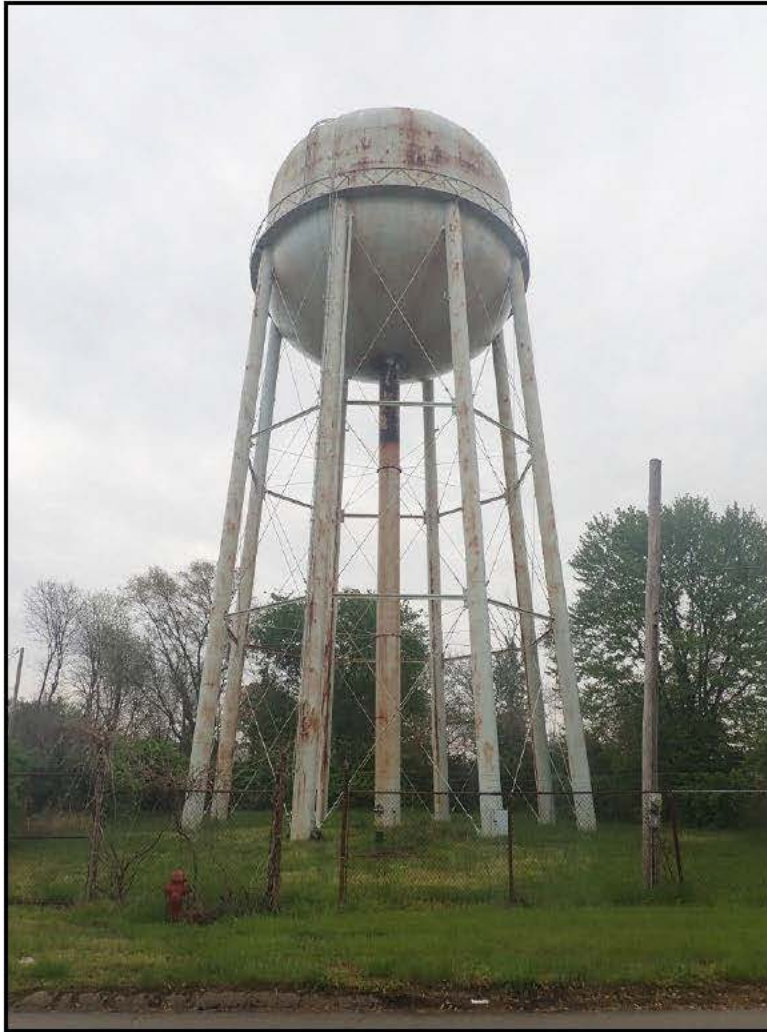
Attributes	
Description	Rust on support column Ex 7f .
Author	T Rainey
Date/Time	4/28/2021 11:48:52 AM
File Name	P4280020.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Debris pile under tower. Ex 7f .
Author	T Rainey
Date/Time	4/28/2021 11:52:18 AM
File Name	P4280021.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Broken weld for overflow pipe. Ex 7f
Author	T Rainey
Date/Time	4/28/2021 11:55:54 AM
File Name	P4280022.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Ex 7f Rd. storage tower from across the street.
Author	T Rainey
Date/Time	4/28/2021 12:12:21 PM
File Name	P4280023.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Fill/withdrawal pipe Ex 7f Rd. tower.
Author	T Rainey
Date/Time	4/28/2021 12:21:28 PM
File Name	P4280024.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Metered flow from Commonfields to Village of Cahokia.
Author	T Rainey
Date/Time	4/29/2021 10:42:02 AM
File Name	P4290025.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Bacteriological/DBP sampling station. One block from meter station.
Author	T Rainey
Date/Time	4/29/2021 10:47:45 AM
File Name	P4290026.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	Ex 7f St. meter from Commonfields.
Author	T Rainey
Date/Time	4/29/2021 11:33:58 AM
File Name	P4290027.JPG
Title	NEIC Inspection Photographs



Attributes	
Description	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)



Attributes	
Description	Force main repair at Ex 7f (Water Infra)
Author	T Rainey
Date/Time	4/29/2021 1:10:45 PM
File Name	P4290029.JPG
Title	NEIC Inspection Photographs

Appendix D
Revised Total Coliform Rule Sampling Site Information
(25 pages)



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

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

Exhibit 5

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

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346 5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608 3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671 3022
4302 N. Main Street, Rockford, IL 61103 (815) 987 7760

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:

Site Number	Raw Source Description	Former Site Number
60236	Intake Ex 7f	
60237	Intake Mississippi River	

Finished Water Coliform Sample Site Numbers (as needed):

Site Number	Finished Water Description	Former Site Number
TP 03	ESL Conventional Water Treatment Plant	
TP 04	ESL Aldrich Plant	

Distribution System Coliform Sample Site Numbers:

Area	Key No. from Map	Site Number	Primary Site Location	Alternate Site Location	Former Site Number
1		C001002P1	Ex 7f (Water Infra)		
1		C001002A1			
1		C001002P2			
1		C001002A2			

Area	Key No. from Map	Site Number	Primary Site Location	Alternate Site Location	Former Site Number
1		C001002P3	Ex 7f (Water Infra)		
1		C001002A3			
1		C001002P4			
1		C001002A4			
1		C001002A5			
1		C001002A6			
2		C002002P1			
2		C002003A1			
2		C002002P2			
2		C002002A2			
2		C002002P3			
2		C002002A3			
2		C002002P4			
2		<u>C002003A2</u>			
2		C002003A3			
2		<u>C002003A4</u>			
3		C003002P1			
3		C003002A1			
3		C003002P2			
3		C003002A2			
3		C003002P3			

Area	Key No. from Map	Site Number	Primary Site Location	Alternate Site Location	Former Site Number
3		C003002A3			
3		C003002P4	93		
3		C003002A4			
3		C003002A5			
3		C003002A6			
4		C004002A2			
4		C004002P3	13		
4		C004002A3			
4		C004002P4	1		
4		C004002A4			
4		C004002P5	4		
4		C004002A5			
4		C004003P1	4		
4		C004003A6			
4		C004002P7			
4		C004002A7			
4		C004002A8			
5		C005002P1			
5		C005002A1			
5		C005002P2			
5		C005002A2			

Ex 7f (Water Infra)

Area	Key No. from Map	Site Number	Primary Site Location	Alternate Site Location	Former Site Number
5		C005002P3	231	Ex 7f (Water Infra)	
5		C005002P4	109		
5		C005002A4			
6		C006002A1			
6		C006002P2	80		
6		C006002A2			
6		C006002P3	26		
6		C006003A1			
6		C006002P4	7		
6		C006002A4			
6		C006002A5			
6		C006002A6			
7		C007002P1	1		
7		C007002A1			
7		C007002P2			
7		C007002A2			
7		C007002P3			
7		C007002A3			
7		C007002P4			
7		C007002A4			
8		C008002P1			
8		C008002A1			

Area	Key No. from Map	Site Number	Primary Site Location	Alternate Site Location	Former Site Number
8		C008002P2	Ex 7f (Water Infra)		
8		C008002A2			
8		C008002A3			
9	1	C009001P1			
9	2	C009001A1	New		
9	3	C009001A2	New		
9	4	C009001A3	New		
9	5	C009001A4	New		
9	6	C009001A5	New		

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: _____

Date Received: _____

D. Surface Supply ☒ Yes ☐ No

Time Received: _____

E. Chlorine Exempt ☐ Yes ☒ No

Date Analyzed: _____

Time Analyzed: _____

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	3. Date Collected: 4. Sample Collector:
2. Contact for Unsatisfactory Results: Name: Sam Saucier Phone: 618-707-1913	5. Sample Purpose: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Boil Order <input type="checkbox"/> Replacement <input type="checkbox"/> Other <input type="checkbox"/> New Construction Permit No. _____ FY _____ <input type="checkbox"/> Invalid Replacement Original Lab Sample No. _____ <input type="checkbox"/> Repeat Original Lab Sample No. _____

The Illinois Environmental Protection Agency is authorized to require information under ILLINOIS 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 **ESL Boosters**

Bottle #	Sample Site #	Address	Sample Type	Time Collected	Residual Chlorine Free/Total	Col Read	Total Celi.	E. Coli	Opin. S/U	Lab Sample #	NTU	
ESL1	C003002P2	Ex 7f Edgemont Booster	D		/					-21		
ESL2	C003002P4	Ex 7f French Village Booster	D		/					-21		
ESL3	C005002P3	Ex 7f Yorktown Elevated Tank	D		/					-21		
ESL4	C005002A3	Ex 7f Shiloh Booster	D		/					-21		
ESL5	C005002P4	Ex 7f Shiloh Elevated Tank	D		/					-21		
ESL6	C006002P3	Ex 7f SWIC Booster	D		/					-21		
ESL7	C006002P4	Ex 7f Mascoutah Ave Booster	D		/					-21		
ESL8	C007002P4	Ex 7f Deepwell Pump Station	D		/					-21		
ESL9	C008002P1	Ex 7f Frank Scott Booster	D		/					-21		
ESL10	C008002P2	Ex 7f Waterloo Booster	D		/					-21		

Method: ☐ Colilert-18 ☐ Colilert-24

Person Notified: _____ Date: _____

Reported by: _____

No. of Bottles Sent: _____ Date: _____

Analyst: _____ Date: _____

Reason for Replacement:

Time: _____

☐ Samples more than 30 hours old☐ No Date/Time of Collection☐ Other: _____

Laboratory Cert. No.: 17515

Name: Illinois-American Water Company

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: _____

Date Received: _____

D. Surface Supply ☒ Yes ☐ No

Time Received: _____

E. Chlorine Exempt ☐ Yes ☒ No

Date Analyzed: _____

Time Analyzed: _____

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	3. Date Collected: <hr/> 4. Sample Collector: <hr/>
2. Contact for Unsatisfactory Results: Name: Sam Saucier Phone: 618-707-1913	5. Sample Purpose: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Boil Order <input type="checkbox"/> Replacement <input type="checkbox"/> Other <input type="checkbox"/> New Construction Permit No. _____ FY _____ <input type="checkbox"/> Invalid Replacement Original Lab Sample No. _____ <input type="checkbox"/> Repeat Original Lab Sample No. _____

The Illinois Environmental Protection Agency is authorized to require information under ILLINOIS REVISED STATUTES, 1987, Chapter 11 ½, 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 ESL Meters

Bottle #	Sample Site #	Address	Sample Type	Time Collected	Residual Chlorine Free/Total	Col Read	Total Col.	E. Coli.	Opin. S/U	Lab Sample #	NTU	
ESL11	C001002P3	2601 N. 41st St. Fairmont City Hall	D		/					-21		
ESL12	C003002A3	8405 State St. Regions Bank	D		/					-21		
ESL13	C005002P2	3600 N. Illinois St. Miller Family Denistry	D		/					-21		
ESL14	C006002A5	4 Wade Square Dollar General	D		/					-21		
ESL15	C007002A1	1500 Boul Ave. Erb Turf & Equipment	D		/					-21		
ESL16	C007002P3	400 W. Monroe St. Plumber's Supply	D		/					-21		
ESL17	C007002P2	1601 W. Main St. Main Street Cafe	D		/					-21		
ESL18	C004003A6	3610 W. Main St. Krupp Florist	D		/					-21		
ESL19	C004002P7	3519 Frank Scott Pkwy. Crescent Parts & Equip.	D		/					-21		
ESL20	C004002P3	1301 S. 74th St. BP Gas Station	D		/					-21		
ESL21	C004002P2	313 Eiler Rd. Stookey Township Office	D		/					-21		

Method: ☐ Colilert-18 ☐ Colilert-24

Person Notified: _____ Date: _____

Reported by: _____

No. of Bottles Sent: _____ Date: _____

Analyst: _____ Date: _____

Reason for Replacement:

Time: _____

☐ Samples more than 30 hours old☐ No Date/Time of Collection☐ Other: _____

Laboratory Cert. No.: 17515

Name: Illinois-American Water Company

NEICVP1411E01

Appendix D

Page 9 of 25

East St. Louis SDWA

Belleville, Illinois

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: _____

Date Received: _____

D. Surface Supply ☒ Yes ☐ No

Time Received: _____

E. Chlorine Exempt ☐ Yes ☒ No

Date Analyzed: _____

Time Analyzed: _____

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	3. Date Collected: 4. Sample Collector:
2. Contact for Unsatisfactory Results: Name: Sam Saucier Phone: 618-707-1913	5. Sample Purpose: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Boil Order <input type="checkbox"/> Replacement <input type="checkbox"/> Other <input type="checkbox"/> New Construction Permit No. _____ FY _____ <input type="checkbox"/> Invalid Replacement Original Lab Sample No. _____ <input type="checkbox"/> Repeat Original Lab Sample No. _____

The Illinois Environmental Protection Agency is authorized to require information under ILLINOIS 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 **ESL Meters 2**

Bottle #	Sample Site #	Address	Sample Type	Time Collected	Residual Chlorine Free/Total	Col Read	Total Coli.	E. Coli.	Opin. S/U	Lab Sample #	NTU	
ESL22	C002003A3	Ex 6 (Personal Privacy) Private Home	D		/					-21		
ESL23	C002003A4	3407 Mississippi Ave. National Rent to Own	D		/					-21		
ESL24	C008002A3	Ex 6 Private Home	D		/					-21		
ESL25	C009001A1	Ex 6 Private Home (Concordia)	D		/					-21		
ESL26	C006002A6	Ex 6 Private Home	D		/					-21		
ESL27	C005002A1	1 Executive Woods Ct. Dental Care, Inc.	D		/					-21		
ESL28	C004002A5	1200 Royal Heights Rd. ZX Gas Station	D		/					-21		
ESL29	C003002A5	8710 State St. Edgemont Pediatrics, P.C.	D		/					-21		
ESL30	C003002A6	Ex 6 Private Home	D		/					-21		
ESL31	C001002A4	1400 Kingshighway China House	D		/					-21		
ESL32	C001002A5	Ex 6 Private Home	D		/					-21		

Method: ☐ Colilert-18 ☐ Colilert-24

Person Notified: _____ Date: _____

Reported by:Analyst: _____ Date: _____
Time: _____

No. of Bottles Sent: _____ Date: _____

Reason for Replacement:

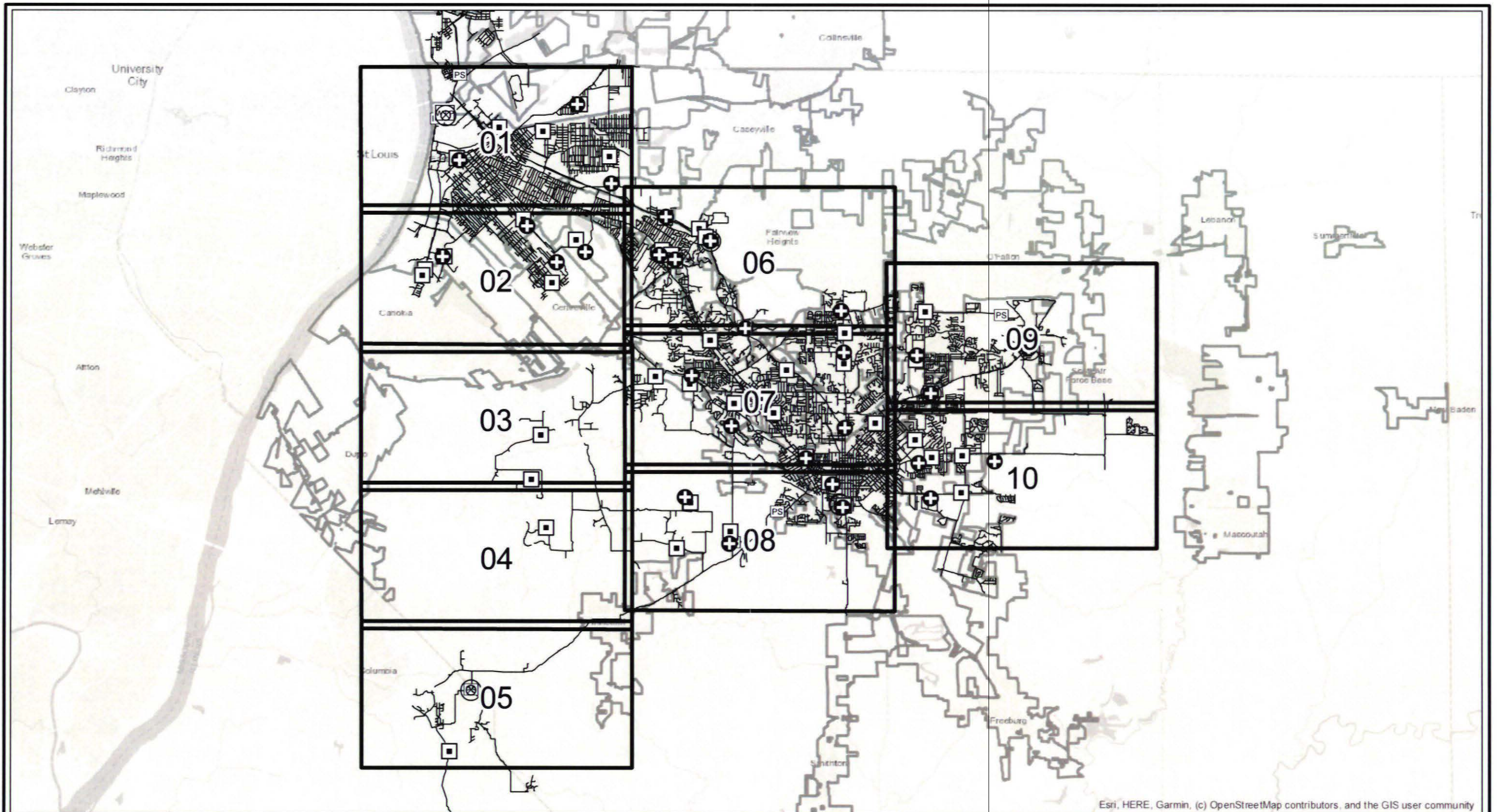
- ☐ Samples more than 30 hours old
☐ No Date/Time of Collection
☐ Other: _____

Laboratory Cert. No.: 17515

Name: Illinois-American Water Company

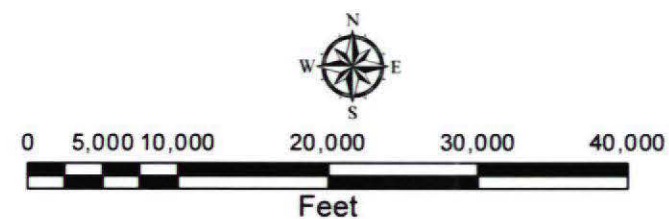
NEICVP1411E01

Appendix D
Page 10 of 25East St. Louis SDWA
Belleville, Illinois



Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

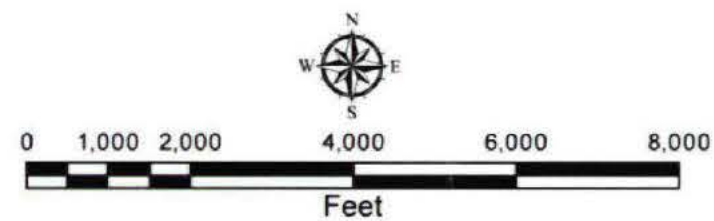
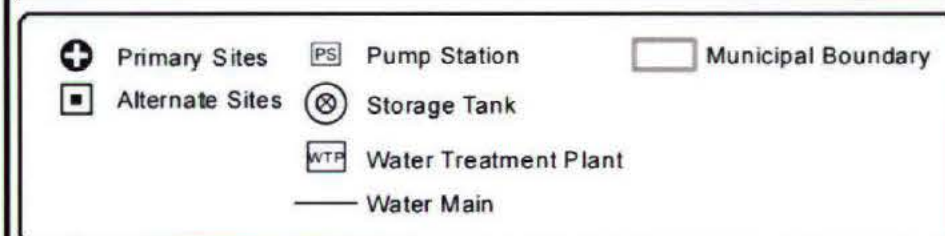
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|-------------------|---------------------------|----------------------|
| ⊕ Primary Sites | PS Pump Station | ▭ Municipal Boundary |
| ◻ Alternate Sites | ⊗ Storage Tank | |
| | WTP Water Treatment Plant | |
| | — Water Main | |



**Interurban Distribution Maps
with RTR Sample Sites**
**INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS**

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 1 of 11

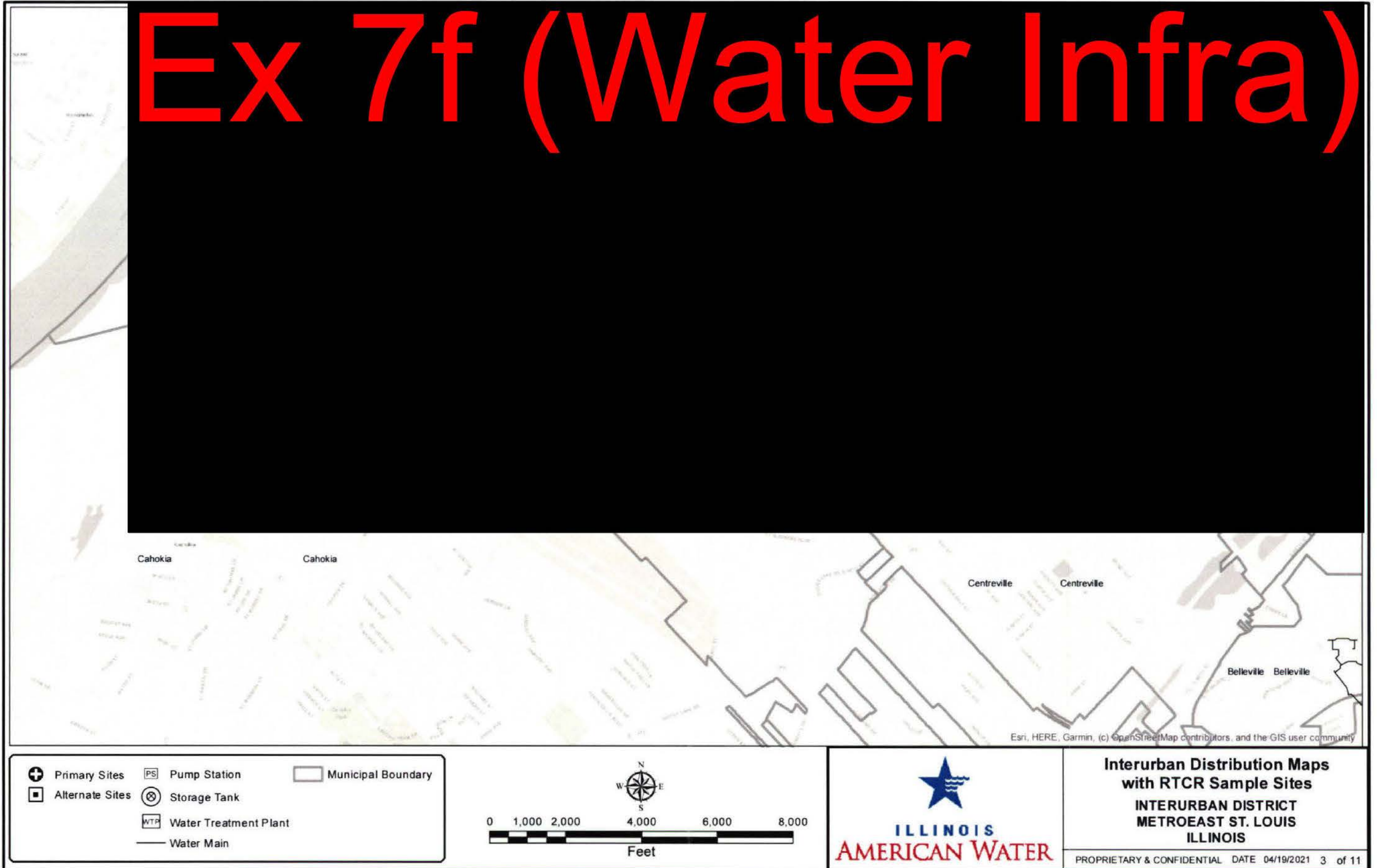
Ex 7f (Water Infra)



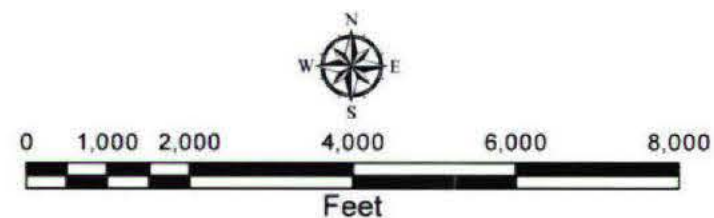
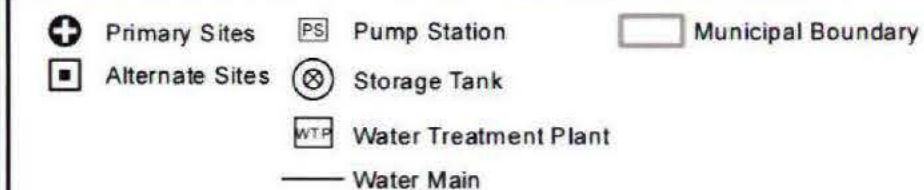
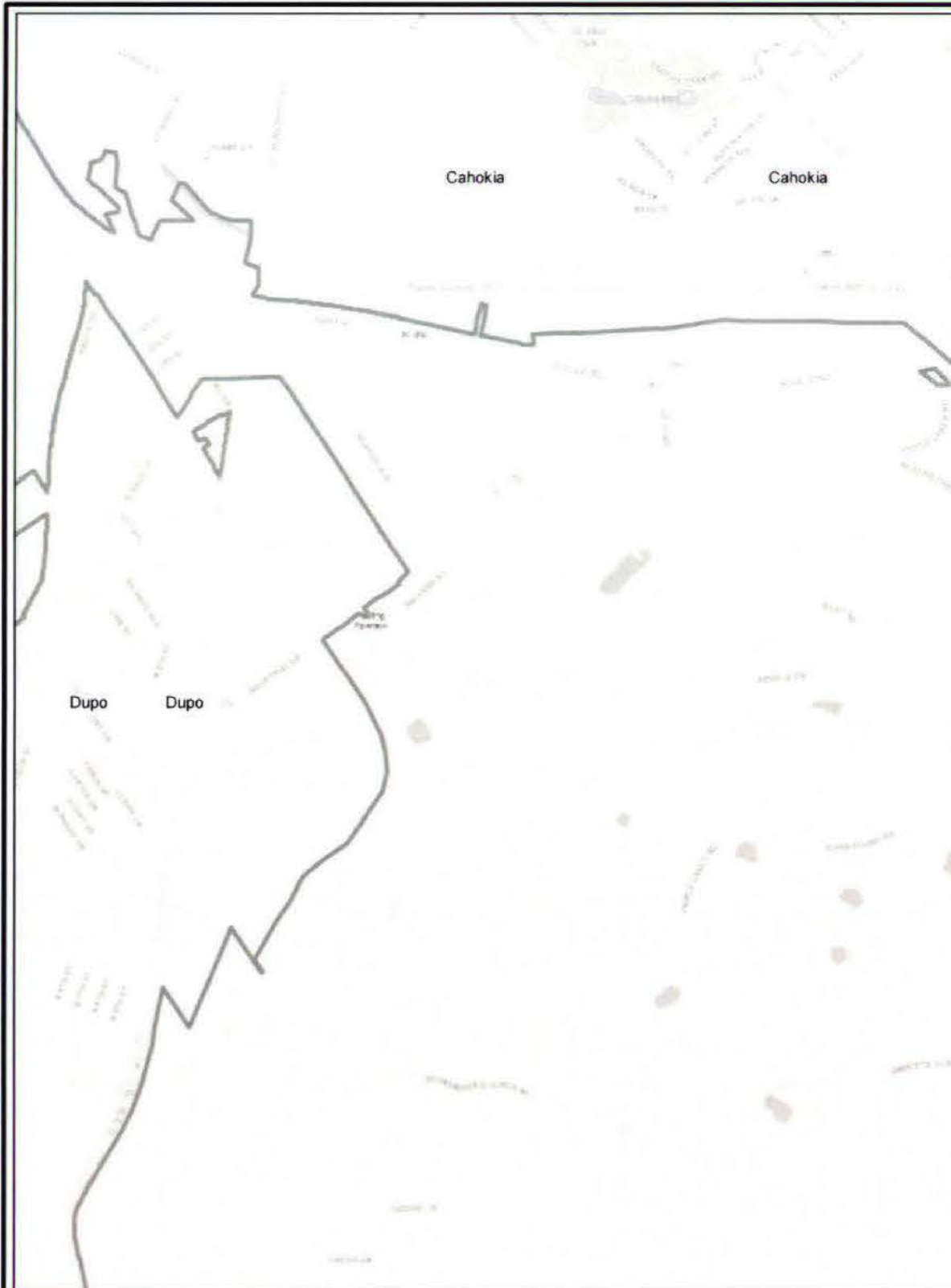
Interurban Distribution Maps
with RTCR Sample Sites
INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 2 of 11

Ex 7f (Water Infra)



Ex 7f (Water Infra)



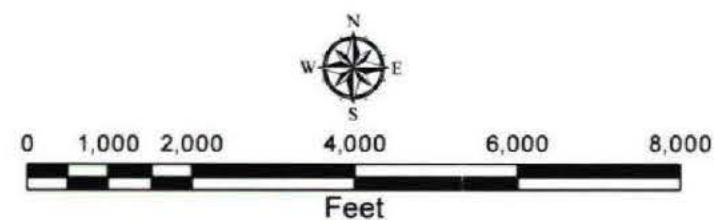
Interurban Distribution Maps
with RTCR Sample Sites
INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 4 of 11

Ex 7f (Water Infra)



- | | | |
|-------------------|---------------------------|----------------------|
| ⊕ Primary Sites | PS Pump Station | □ Municipal Boundary |
| ■ Alternate Sites | ⊗ Storage Tank | |
| | WTP Water Treatment Plant | |
| — Water Main | | |



**Interurban Distribution Maps
with RTCR Sample Sites**
**INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS**

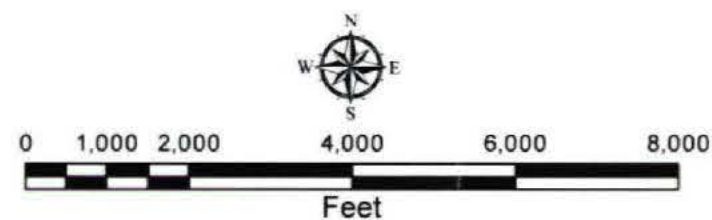
PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 5 of 11

Ex 7f (Water Infra)



GIS user community

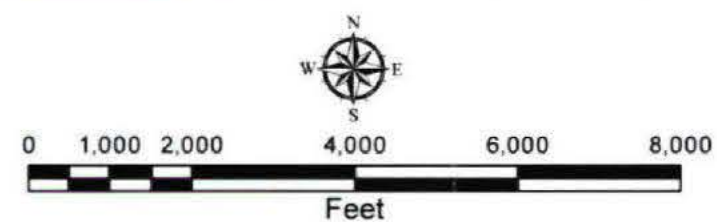
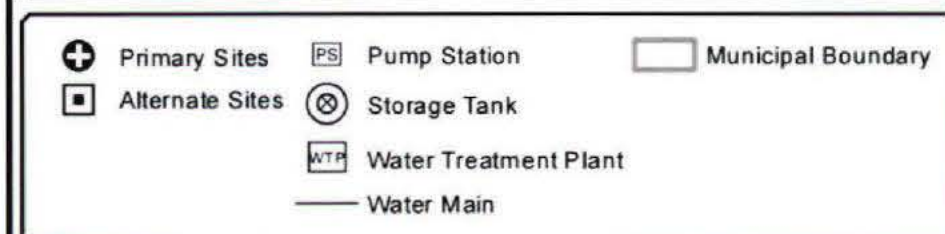
- Primary Sites
- Alternate Sites
- Pump Station
- Storage Tank
- Water Treatment Plant
- Water Main
- Municipal Boundary



**Interurban Distribution Maps
with RTRC Sample Sites**
**INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS**

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 6 of 11

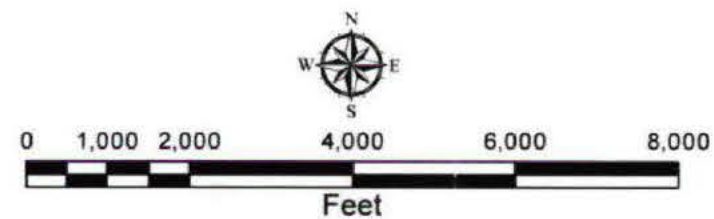
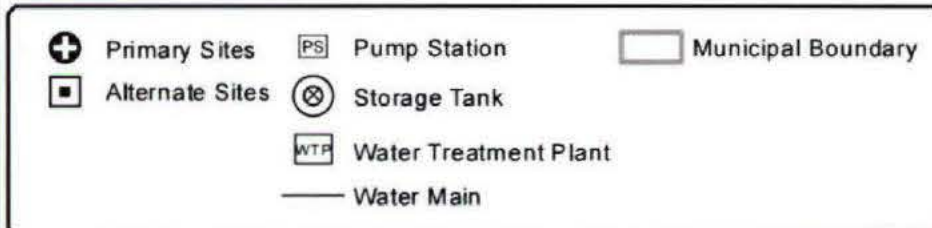
Ex 7f (Water Infra)



**Interurban Distribution Maps
with RTCR Sample Sites**
**INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS**

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 8 of 11

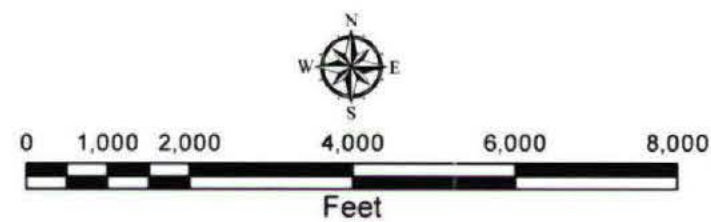
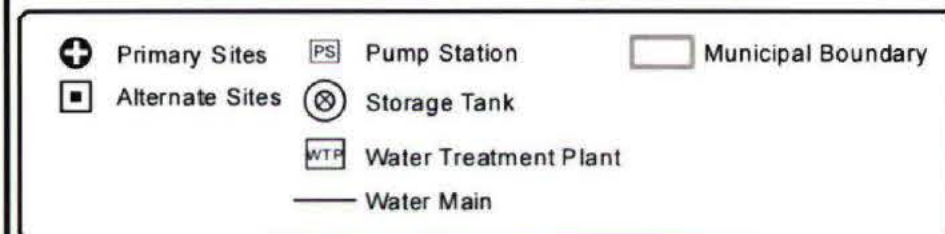
Ex 7f (Water Infra)



Interurban Distribution Maps
with RTCR Sample Sites
INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 7 of 11

Ex 7f (Water Infra)

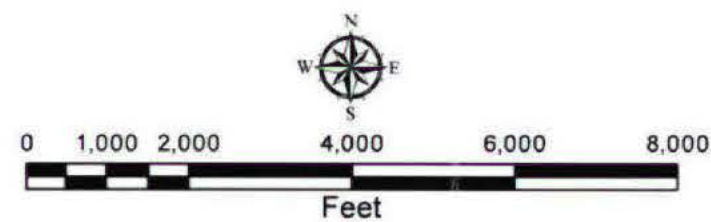


Interurban Distribution Maps
with RTCR Sample Sites
INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 9 of 11

Ex 7f (Water Infra)

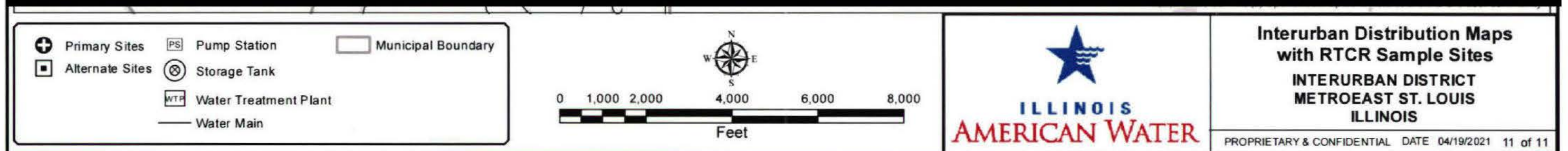
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■ Alternate Sites	⊗ Storage Tank	
	WTP Water Treatment Plant	
	— Water Main	



**Interurban Distribution Maps
with RCR Sample Sites**
**INTERURBAN DISTRICT
METROEAST ST. LOUIS
ILLINOIS**

PROPRIETARY & CONFIDENTIAL DATE 04/19/2021 10 of 11

Ex 7f (Water Infra)



Commonfields of Cahokia Public Water District

Facility Number #1635030

Proposed Coliform Sample Site Plan

	Area	Site Number	Primary Location	Alternate Site Location
1	1	C001001P1	Parks College	
2	1	C001001A1		Regions Bank
3	2	C002001P1	Afton Fabricators	
4	2	C002001A1		St Patrick & Jerome
5	3	C003001P1	Holten Meats	
6	3	C003001A1		Volvo
7	4	C004001P1	Cahokia High School	
8	4	C004001A1		Ex 7f Tank
9	5	C005001P1	Rt 157 & Hutchings	
10	5	C005001A1		Camp Jackson Shopping Center
11	6	C006001P1	Cahokia Swimming Pool	
12	6	C006001A1		Village Shopping Center
13	7	C007001P1	Water District Office	
14	7	C007001A1		Patricia Garden Apartments
15	8	C008001P1	Wirth Jr High School	
16	8	C008001A1		Centreville School
17	9	C009001P1	Ex 7f (Tank Site)	
18	9	C009001A1		5700 Bond Ave.- City Hall
19	10	C010001P1	Ex 6 (Personal Privacy)	
20	10	C010001A1		Flying J

WATER DISTRIBUTION SYSTEM MAPS

VP1411-COC-02

Ex 7f (Water Infra)

WATER & SEWER DEPT
Village of Cahokia
 900 UPPER CAHOKIA RD
 CAHOKIA, IL 62206
 PHONE: 618-332-1222
 FAX: 618-337-9519

Coliform EMAIL: WATSEW@CAHOKIAILLINOIS.ORG

Monthly Chloroform Sample Schedule

2019:

January 9	January 23
February 6	February 25
March 13	March 20
April 11	April 25
May 8	May 22
June 6	June 19
July 10	July 25
August 8	August 22
September 11	September 25
October 9	October 23
November 5	November 18
December 12	December 18

2020:

January 8	January 27
February 5	February 19
March 4	March 18
April 1	April 15
May 6	May 20
June 3	June 17
July 7	July 21
August 11	August 19
September 15	September 23
October 7	October 21
November 10	November 23
December 2	December 16

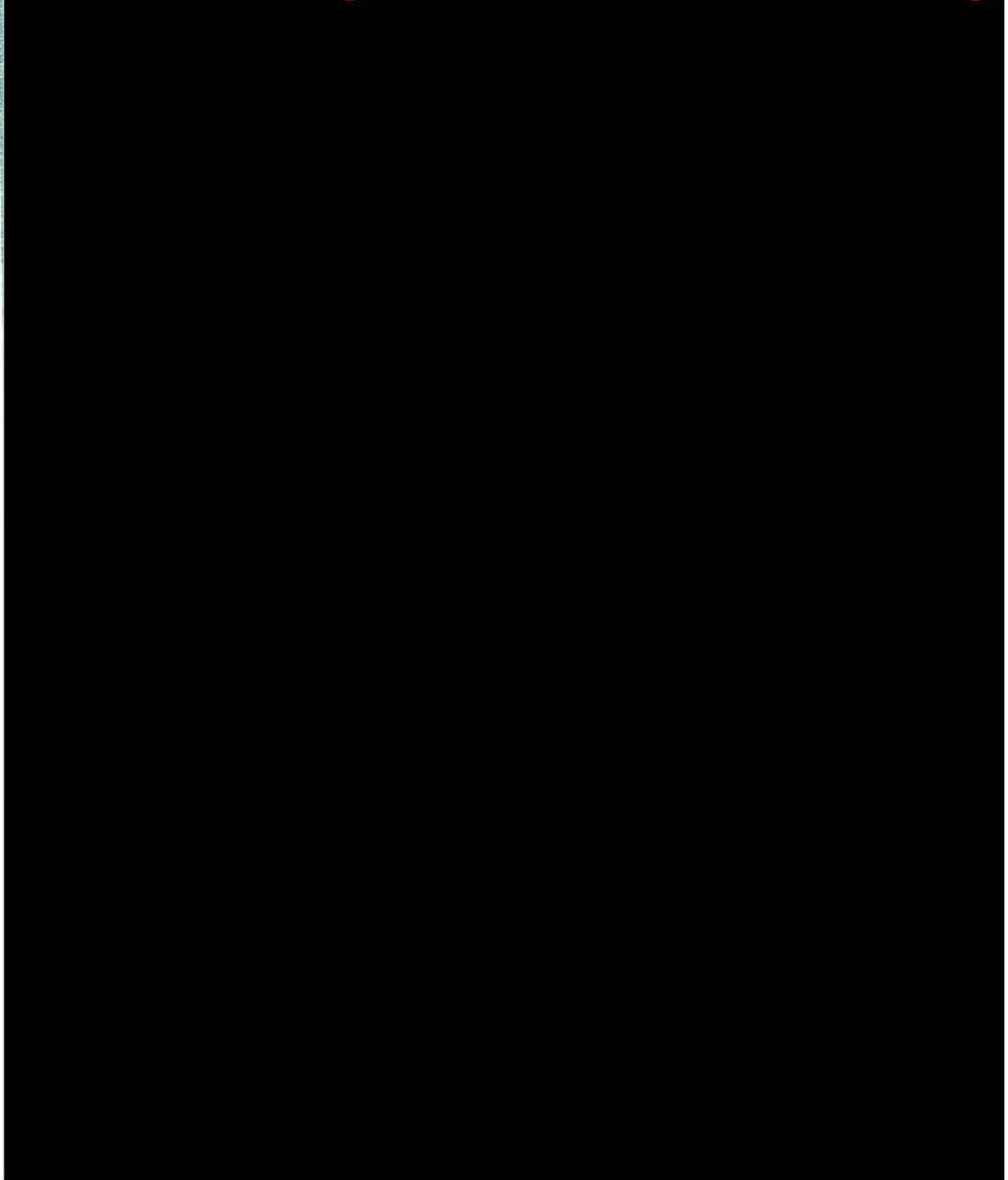
2021:

January 7	January 20
February 10	February 24
March 10	March 24
April 13	April 21

Lynn Branson, Assistant Director

Coliform Sample Site MAP LOCATIONS

Ex 7f (Water Infra)



▲ INDICATES MASTER METER LOCATIONS

NEICVP1  INDICATES TEST LOCATIONS - PRIMARY/ALTERNATE