



November 9, 2022

Via Electronic Mail Delivery Only

James Adamiec
Environmental Scientist
Water Enforcement and Compliance Assurance Branch
U.S. EPA Region V
Email: adamiec.james@epa.gov

Gillian Asque
Counsel
U.S. EPA Region V
Email: asque.gillian@epa.gov

Elizabeth Murphy
Chief, Section 3
Water Enforcement and Compliance Assurance Branch
U.S. EPA Region V
Email: Murphy.Elizabeth@epa.gov

Mike Brown
Division Manager
Bureau of Water – Division of Public Water
Supplies
Email: Michael.L.Brown@illinois.gov

Re: ILAW's request to be terminated from August 2, 2021 Unilateral Administrative Order

Dear Mr. Adamiec, Ms. Murphy, and Ms. Asque:

Illinois-American Water Company (ILAW) received U.S. EPA's Unilateral Administrative Order (UAO), on August 3, 2021. While denying all liability under the UAO, ILAW has complied with the directives of the UAO and communicated weekly or at a greater frequency with EPA. All ILAW's requirements under the UAO have been completed and all water quality samples taken from ILAW's drinking water system in Cahokia Heights have met or exceeded drinking water standards.

Following is a summary of the efforts that ILAW completed under the directives of the UAO. For organizational purposes, ILAW has used the headings from Paragraphs 73 and 74 of the UAO for this letter. Given fulfillment of each of these items, ILAW requests termination of the UAO as to ILAW pursuant to Paragraph 73 of the UAO.

Acknowledgement and intention to comply with UAO (Paragraph 73):

ILAW sent its intention to comply letter to the EPA on August 4, at 4:10 pm through email, pursuant to Paragraph 73 of the UAO.

**Illinois American Water was ranked
highest in customer satisfaction with
large water utilities in the Midwest
three years in a row.**

For J.D. Power 2022 award information,
visit [jdpower.com/awards](https://www.jdpower.com/awards).





Monitoring and Inspections (Paragraphs 74(a-c)):

Additional Bacterial and Residual Chlorine Monitoring:

- ILAW developed Standard Operating Procedures (SOPs) for additional bacterial and residual chlorine testing after a Sanitary Sewer Overflow (SSO) notification.
- ILAW identified and installed four (4) sampling stations, at sites located within the boundaries identified in Attachment C of the UAO. The sites were approved by EPA and IEPA and added to ILAW's RTCR (Revised Total Coliform Rule) sample site plan.
- As requested by EPA, ILAW installed one (1) bacterial sample station at Ex 71 (Water Intra) Avenue and added it to ILAW's RTCR plan dated June 8, 2022, thus bringing the total sampling stations to five (5).
- From August 2, 2021 through September 1, 2022, ILAW received eighteen (18) notifications of twenty-four (24) SSOs from Cahokia Heights. ILAW team acted as quickly as possible to collect the water quality samples, averaging about 4 hours of response time.
- ILAW has collected more than 135 routine water quality samples monitoring the drinking water quality in Cahokia Heights and following SSO events reported to ILAW by Cahokia Heights. All these samples passed current water quality regulations for total coliform, E. Coli, and chlorine residuals in the drinking water. All these sample results showed that the drinking water was meeting water quality regulations.
- ILAW continued additional bacterial and residual chlorine monitoring until September 1, 2022 as provided for in Section 74(b) of the UAO. After discussions with EPA, ILAW discontinued the monitoring effective September 2, 2022.
- ILAW received a letter with modification to the UAO from EPA signed on October 12, 2022 that amended the UAO to modify the date specified in Paragraph 74(b) to September 1, 2023. ILAW has reinitiated the bacterial and residual chlorine monitoring sampling following receipt of the modification. However, given the one-year history of samples showing no impact of SSO events on ILAW's drinking water system, ILAW does not see a benefit or need for this continued monitoring. EPA has the data it needs and continuing this sampling is a draw on ILAW resources that could be better used towards benefiting our customers.

Pressure Monitoring:

- In August 2021, ILAW procured and installed Trimble's pressure recorders with remote communication capabilities for continuous and transient pressure monitoring at four (4) locations in its Cahokia Heights service area. ILAW worked collaboratively with EPA regarding pressure recorders' technical specifications, monitoring locations and pressure data reporting format to comply with the UAO.



- ILAW began continuous pressure monitoring on September 1, 2021. Monthly pressure monitoring reports as well as a list of the dates, times, locations, and durations of main breaks, flushing, fire flow, and other emergency conditions causing expected changes in distribution system pressure were submitted on time by the 10th of the month.
- ILAW added one (1) additional pressure monitoring site during the week of April 26, 2022, in response to EPA's request for installation of additional pressure monitors.
- ILAW discontinued pressure monitoring on September 2, 2022, after twelve consecutive months, pursuant to the Attachment A, Section 2 of the UAO. All data has been submitted to EPA for their analysis and ILAW considers the tasks under the pressure monitoring section of the UAO completed.

Low Pressure/Loss of Pressure Events (Paragraphs 74(d-e)):

- Since the UAO Effective Date, ILAW issued nine (9) boil orders in its Cahokia Heights service area:
 - Four (4) were due to main breaks.
 - One (1) was because of a driver hitting a hydrant and causing another main break.
 - One (1) was due to ILAW flushing the hydrants at higher flow rates in the area after a rain event; this caused pressure drop in a part of the system.
 - Three (3) boil orders were issued because of transient events recorded in the pressure monitors, resulting from power outages at Edgemont booster station due to heavy storms. Although ILAW believed these events met the definition of a transient event pursuant to Paragraph 74 (e)(iii) of the UAO, after consultation with and direction from IEPA, ILAW issued boil orders for transient events recording below 20 psi for any amount of time.
- The number of customers affected by these boil orders varied. ILAW used Tier 1 public notices, social media updates, door hangers, sandwich boards, Code Red, phone calls, or in-person notifications to affected customers per the SOPs for boil orders/treatment change.
- ILAW collected and analyzed the required number of water quality samples pursuant to Attachment B of the UAO, for total coliform, E. Coli, and chlorine residual after main repairs were made. Following acceptable water quality results, boil orders were lifted, and customers were notified.
- ILAW experienced seven (7) leaks or small breaks in water mains in Cahokia Heights service area that were repaired under pressure; and no boil orders were needed.
- ILAW provided copies of customer communication, water quality samples results, and status updates to EPA and IEPA through emails and through weekly update letters.



Alternative Water Source Plan (AWSP) Development and Implementation (Paragraph 74(f-i)):

- The AWSP was originally submitted and approved by EPA in August 2021. The AWSP was further modified on May 31, 2022 to add another location for bulk water distribution.
- Although the UAO excluded transient events from AWSP implementation, to keep customer service consistent, ILAW implemented the AWSP for all the boil orders within its Cahokia Heights service area, resulting from any reason including main breaks or pressure monitors recording pressures below 20 psi during transient events.

Schedule for Correcting Significant Deficiencies (Paragraphs 74(j-k)):

- ILAW's proposed schedule approved by EPA on October 20, 2021 and all items completed pursuant to the approved schedule.
 - Choteau Island Intake Building Interior Painting project has been completed and inspected by EPA.
 - Inoperative monitoring equipment, which was used for non-regulatory raw water characterization purposes at the Choteau Island intake has been addressed with the sample trough, pH and conductivity probes installed and calibrated. These have also been inspected by EPA.

Sample Siting Plan (Paragraphs 74(l-p)):

- Submitted and approved by the EPA and IEPA; Sampling stations installed and sampling ongoing as described previously in the section "additional bacterial and chlorine residual monitoring" of this letter.

System Information (Paragraph 74(q)):

- Submitted to EPA on August 31, 2021.

Notification and Reporting (Paragraphs 74(r-u)):

- ILAW is submitting weekly updates to EPA and has set a weekly regular meeting time with EPA.
- ILAW has submitted weekly reports, monthly pressure monitoring reports, copies of customer communications, and any capital project status updates to EPA and IEPA.

ILAW is dedicated to serving our customers in Cahokia Heights, including our residential customers as well as our sale for resale customer, the City of Cahokia Heights. Going beyond the directives of the UAO, ILAW is making continuous efforts to stay engaged in the community by:

- Sending monthly newsletter to customers in Cahokia Heights on various topics including education and updates on engineering projects, treatment change, and hydrant flushing program.
- Multiple home visits and phone calls/text efforts to reach customers one-on-one.
- Attending Citizens for Change townhall meetings as invited.



- Organizing a customer open house on October 26, 2022 at the Kappa House located at 5101 Lake Drive, Cahokia Heights. Customers were notified by monthly newsletters as well postcards. Customers had an opportunity to talk to ILAW's President and other team members to ask questions on topics such as water quality, operations, water main replacement projects, lead service line program, and plant construction projects. This also provided them an opportunity to update their contact information in ILAW's customer database to receive customer notifications.

Coordination with City of Cahokia Heights

- ILAW makes monthly/biweekly coordination call to City of Cahokia Heights personnel to check-in on chlorine and ammonia residuals, and to provide any updates on system chlorine feed changes.
- Facilitated a tour of ILAW Edgemont Booster station for City of Cahokia Heights team.

The above summary demonstrates that ILAW has met the directives of the UAO. ILAW is continually looking to make enhancements in our system that will benefit our customers as well as improve the distribution system. ILAW wishes to focus on such efforts, and therefore requests to be terminated from the UAO pursuant to Paragraph 82. ILAW appreciates working collaboratively with U.S. EPA and IEPA to continue providing safe, reliable, and affordable service to our customers in Cahokia Heights.

Sincerely,

DocuSigned by:

E28EDA3A50294F2...

Rebecca B. Losli, P.E.
President, Illinois American Water Company

cc: (Via email)
James Blessman, IEPA
Jonathan Moody, EPA



CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A handwritten signature in blue ink, appearing to read "Rachel Bretz", is written over a horizontal line.

Rachel Bretz
Director of Water Quality