

Electronic Filing: Received, Clerk's Office 12/13/2023

To: Illinois Pollution Control Board

60 E. Van Buren St. Chicago, IL 60605

Case # PCB 2024-033

I'd like to respectfully request that the City of LaSalle hold a public hearing to address the violations by the attorney general and pollution board and are also requesting that this court allow *any* concerned citizens ample time (at the time of this hearing) to voice their concerns regarding the "permitted" levels of contaminants being discharged into the surrounding waters and environment.

We find these violations by the City of LaSalle to be extremely reckless. The mayor has a history of keeping the citizens of this town in the dark on important matters such as this and cannot be allowed to continue to operate in this manner. He has been able to keep important city business and violations such as the ones in question today. Examples of this are meeting with members of the city at a local restaurant and meeting with them individually or one person short of the rules requiring him to record the meeting. He avoided letting the residents know about these violations by bypassing it being announced on the city's agenda for the council meeting and sneaking it into a meeting where he called for the council to vote on it on the fly by using what he calls a straw vote. This is a way for him to force the council to vote on the matter without giving the council time for them to do their due diligence. Due to the examples given and the severity of these violations, we are requesting an immediate and complete review and investigation of, not only their permits, but also the Permits issued to other major pollution contributors in our town, Illinois Cement and Carus Corp. How can the City of LaSalle be left in charge of issuing discharge permits and keep these companies from violating them when they themselves have been carelessly violating their own permits and not reporting their waste into the river?

We respectfully request that this review and investigations begin with the discharge permits issued to the Carus Chemical Company, due to their extensive history of chemical contamination violations and the fact that the Carus Company designs and manufactures hazardous chemicals being injected *directly INTO* this and other water systems world-wide -- claimed to "clean" drinking water.

We believe this review of their discharge permits and unethical practices is valid and necessary to identify and prioritize their discharge, including identifying ALL substances being discharged from this plant into the air water and soil surrounding this plant. This request is more than justified, especially following the hazardous chemical explosion that occurred at the Carus Chemical plant on 1-11-23 (Ironically, the day after the 1-10-23 Chicago Sun Times article reporting that COVID is being tracked in wastewater).

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we've recently took water samples directly coming out of their discharge pipe, and sediment samples directly underneath the pipe where the water lands (before it enters the Vermillion river. They were taken using lab approved test tubes, documented using official chain of custody paperwork and procedures, and video recorded it to show that the results are in fact from the Carus Chemical plant. The test results were done by an independent testing laboratory recommended by the Sierra club. The results are attached to this letter. The results show very high levels of zinc, barium, mercury, manganese, and phosphorus. So, it should be clear from the examples given on the test results (attached) that the City of LaSalle is negligent and unqualified to oversee or issue these permits and both the City of LaSalle and Carus Chemical should be investigated for their pollution into the Vermillion River and Illinois River and for their illegal practices. When comparing the test results that were taken from the City of LaSalle's water treatment plant to the results from the Carus discharge pipe, it is our belief that not only is Carus exceeding their daily discharge limits, they are allowed to dump even more of their waste into the city sewer. The city is not monitoring their discharge, they are actually helping them dispose of their waste by allowing Carus to dump their waste into the city's sewer system and the city is discharging it into the river.

The City of LaSalle has failed to report their waste discharge and the levels of phosphorus discharged into the river from 2019-2022. These are very serious violations that need and should be addressed at a public hearing.

We are hope you will reconsider the penalty consisting of a fine of \$5,700.00. fining the city will only hurt the tax payers, it does nothing to hold the city responsible for their actions. There are 3 very serious violations and they should be handled individually, and the penalties more severe than a small fine. The city has downplayed the violations as being a single violation and a one-time occurrence that was caused by a storm. This has gone on for 3 years and there is no telling how much damage it has done to the environment we live in. Footage from a drone flyover of the town resembles a war zone. The land and water are contaminated and the cancer and dementia rates are near the highest in the country.

The mayor has recently approved the expansion of Illinois cement and Carus Chemical and has allowed them to operate 24hr a day. It's come to our attention that these companies are polluting the air and water in the middle of the night. Clouds of dust and smoke can be seen for miles while the town sleeps and nobody notices. We are asking you to look into this and the city for allowing it to take place.



Report ID: S55978.01(02)
Generated on 12/04/2023
Replaces report S55978.01(01) generated on 11/30/2023

Report to

Attention: Denise Trabbic-Pointer
Sierra Club
2553 Springborn Road
East China, MI 48054

Phone: 810-941-8460 FAX:
Email: dtrabbicpointer@gmail.com

Report produced by

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Contacts for report questions:
John Lavery (johnlavery@meritlabs.com)
Barbara Ball (bball@meritlabs.com)

Report Summary

Lab Sample ID(s): S55978.01-S55978.02
Project: Monitoring
Collected Date(s): 11/20/2023
Submitted Date/Time: 11/21/2023 09:40
Sampled by: Unknown
P.O. #:

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Maya Murshak
Technical Director



General Report Notes

Analytical results relate only to the samples tested, in the condition received by the laboratory.

Methods may be modified for improved performance.

Results reported on a dry weight basis where applicable.

'Not detected' indicates that parameter was not found at a level equal to or greater than the reporting limit (RL).

When MDL results are provided, then 'Not detected' indicates that parameter was not found at a level equal to or greater than the MDL.

40 CFR Part 136 Table II Required Containers, Preservation Techniques and Holding Times for the Clean Water Act specify that samples for acrolein and acrylonitrile, and 2-chloroethylvinyl ether need to be preserved at a pH in the range of 4 to 5 or if not preserved, analyzed within 3 days of sampling.

QA/QC corresponding to this analytical report is a separate document with the same Merit ID reference and is available upon request.

Starred (*) analytes are not NY NELAP accredited.

Samples are held by the lab for 30 days from the final report date unless a written request to hold longer is provided by the client.

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Limits for drinking water samples, are listed as the MCL Limits (Maximum Contaminant Level Concentrations)

PFAS requirement: Section 9.3.8 of U.S. EPA Method 537.1 states "If the method analyte(s) found in the Field Sample is present in the

FRB at a concentration greater than 1/3 the MRL, then all samples collected with that FRB are invalid and must be recollected and reanalyzed."

Samples submitted without an accompanying FRB may not be acceptable for compliance purposes.

Wisconsin PFAs analysis: MDL = LOD; RL = LOQ. LOD and LOQ are adjusted for dilution.

All accreditations/certifications held by this laboratory are listed on page 3. Not all accreditations/certifications are applicable to this report.

For a specific list of accredited analytes, please feel free to contact the laboratory or visit <https://www.meritlabs.com/certifications>.

Report Narrative

Cadmium added on sample .02 per client request



Laboratory Accreditations (For Reference Only)

Authority	Accreditation ID
Michigan DEQ	#9956
DOD ELAP & ISO/IEC 17025:2017	#69699 PJLA Testing
WBENC	#2005110032
Ohio VAP	#CL0002
Indiana DOH	#C-MI-07
New York NELAC	#11814
North Carolina DENR	#680
North Carolina DOH	#26702
Pennsylvania DEP	#68-05884
Wisconsin DNR	FID# 399147320

Qualifier Descriptions

Qualifier	Description
!	Result is outside of stated limit criteria
B	Compound also found in associated method blank
E	Concentration exceeds calibration range
F	Analysis run outside of holding time
G	Estimated result due to extraction run outside of holding time
H	Sample submitted and run outside of holding time
I	Matrix interference with internal standard
J	Estimated value less than reporting limit, but greater than MDL
L	Elevated reporting limit due to low sample amount
M	Result reported to MDL not RDL
O	Analysis performed by outside laboratory. See attached report.
R	Preliminary result
S	Surrogate recovery outside of control limits
T	No correction for total solids
X	Elevated reporting limit due to matrix interference
Y	Elevated reporting limit due to high target concentration
b	Value detected less than reporting limit, but greater than MDL
e	Reported value estimated due to interference
j	Analyte also found in associated method blank
p	Benzo(b)Fluoranthene and Benzo(k)Fluoranthene integrated as one peak.
x	Preserved from bulk sample

Glossary of Abbreviations

Abbreviation	Description
RL/RDL	Reporting Limit
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
SW	EPA SW 846 (Soil and Wastewater) Methods
E	EPA Methods
SM	Standard Methods
LN	Linear
BR	Branched



Method Summary

Method	Version
E200.8	EPA Method 200.8 Revision 5.4
E245.1	EPA Method 245.1 Revision 3.0
SM2540B	Standard Method 2540 B 2015
SM4500-PE	Standard Method 4500 P E 2011 / 4500 P B(5) 2011
SW3015A	SW 846 Method 3015A Revision 1 February 2007
SW3050B	SW 846 Method 3050B Revision 2 December 1996
SW6020A	SW 846 Method 6020A Revision 1 February 2007
SW7471B	SW 846 Method 7471B Revision 2 February 2007



Sample Summary (2 samples)

Sample ID	Sample Tag	Matrix	Collected Date/Time
S55978.01	Discharge to River	Wastewater	11/20/23 16:20
S55978.02	Vermillion Sediment	Solid	11/20/23 16:20



Analytical Laboratory Report

Supplemental Report

Lab Sample ID: S55978.01

Sample Tag: Discharge to River

Collected Date/Time: 11/20/2023 16:20

Matrix: Wastewater

COC Reference: 86354

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	125mL Plastic	HNO3	Yes	5.4	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Mercury Digestion	Completed	E245.1	11/28/23 10:35	CTV	
Metal Digestion	Completed	SW3015A	11/22/23 10:10	CCM	

Metals

Method: E200.8, Run Date: 11/22/23 14:15, Analyst: CCM

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Potassium	9.34	0.50		mg/L	5	7440-09-7	

Method: E200.8, Run Date: 11/22/23 13:10, Analyst: CCM

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Barium	0.110	0.005		mg/L	5	7440-39-3	
Chromium	Not detected	0.005		mg/L	5	7440-47-3	
Copper	Not detected	0.005		mg/L	5	7440-50-8	
Lead	Not detected	0.003		mg/L	5	7439-92-1	
Manganese	0.209	0.005		mg/L	5	7439-96-5	
Zinc	0.010	0.005		mg/L	5	7440-66-6	

Method: E245.1, Run Date: 11/28/23 14:16, Analyst: CTV

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Mercury	Not detected	0.0002		mg/L	1	7439-97-6	



Analytical Laboratory Report

Supplemental Report

Lab Sample ID: S55978.02

Sample Tag: Vermillion Sediment

Collected Date/Time: 11/20/2023 16:20

Matrix: Solid

COC Reference: 86354

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	Yes	5.4	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	11/28/23 09:00	JRH	
Mercury Digestion	Completed	SW7471B	11/22/23 11:01	CTV	

Inorganics

Method: SM2540B, Run Date: 11/21/23 13:36, Analyst: MAM

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Total Solids*	42	1		%	1		

Method: SM4500-PE, Run Date: 11/28/23 17:22, Analyst: MJC

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Total Phosphorus*	377	1		mg/kg	1	7723-14-0	

Metals

Method: SW6020A, Run Date: 11/28/23 10:42, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Manganese	4,600	2.5		mg/kg	2530	7439-96-5	

Method: SW6020A, Run Date: 11/28/23 14:08, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Potassium	218	25		mg/kg	506	7440-09-7	

Method: SW6020A, Run Date: 11/28/23 10:44, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Barium	265	1.0		mg/kg	506	7440-39-3	
Cadmium	1.57	0.20		mg/kg	506	7440-43-9	
Chromium	2.62	0.50		mg/kg	506	7440-47-3	
Copper	16.9	0.50		mg/kg	506	7440-50-8	
Lead	13.7	0.30		mg/kg	506	7439-92-1	
Zinc	257	0.50		mg/kg	506	7440-66-6	

Method: SW7471B, Run Date: 11/22/23 16:02, Analyst: CTV

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Mercury	0.077	0.050		mg/kg	132	7439-97-6	

Merit Laboratories Login Checklist

Lab Set ID:S55978

Client:SIERRACLUB (Sierra Club)

Project: Monitoring

Submitted: 11/21/2023 09:40 Login User: MMC

Attention: Denise Trabbic-Pointer

Address: Sierra Club
2553 Springborn Road
East China, MI 48054

Phone: 810-941-8460 FAX:

Email: dtrabbicpointer@gmail.com

Selection	Description	Note
Sample Receiving		
01.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples are received at 4C +/- 2C Thermometer # IR 5.4
02.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Received on ice/ cooling process begun
03.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples shipped FedEx
04.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples left in 24 hr. drop box
05.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Are there custody seals/tape or is the drop box locked
Chain of Custody		
06.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC adequately filled out
07.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC signed and relinquished to the lab
08.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sample tag on bottles match COC
09.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Subcontracting needed? Subcontracted to:
Preservation		
10.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Do sample have correct chemical preservation
11.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Completed pH checks on preserved samples? (no VOAs)
12.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Did any samples need to be preserved in the lab?
Bottle Conditions		
13.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	All bottles intact
14.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Appropriate analytical bottles are used
15.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Merit bottles used
16.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sufficient sample volume received
17.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples require laboratory filtration
18.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples submitted within holding time
19.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Do water VOC or TOX bottles contain headspace

Corrective action for all exceptions is to call the client and to notify the project manager.

Client Review By: _____ Date: _____

Merit Laboratories Bottle Preservation Check

Lab Set ID: S55978 Submitted: 11/21/2023 09:40

Client: SIERRACLUB (Sierra Club)

Project: Monitoring

Initial Preservation Check: 11/21/2023 10:47 MMC

Preservation Recheck (E200.8): N/A

Attention: Denise Trabbic-Pointer

Address: Sierra Club
2553 Springborn Road
East China, MI 48054

Phone: 810-941-8460 FAX:

Email: dtrabbicpointer@gmail.com

Sample ID	Bottle / Preservation	pH (Orig)	Add ml	pH (New)	Notes
S55978.01	125mL Plastic HNO3	<2			



2680 East Lansing Dr., East Lansing, MI 48823
 Phone (517) 332-0167 Fax (517) 332-4034
 www.meritlabs.com

C.O.C. PAGE # _____ OF _____

86354

REPORT TO

CHAIN OF CUSTODY RECORD

INVOICE TO

CONTACT NAME: Denise Trabbic-Pointer
 COMPANY: Sierra Club
 ADDRESS: 2553 Springbarn Rd.
 CITY: East China STATE: MI ZIP CODE: 48054
 PHONE NO.: 810 204 0064 FAX NO.: P.O. NO.:
 E-MAIL ADDRESS: dtrabbicpointer@gmail.com QUOTE NO.:

CONTACT NAME: Same SAME
 COMPANY:
 ADDRESS:
 CITY: STATE: ZIP CODE:
 PHONE NO.: E-MAIL ADDRESS:

ANALYSIS (ATTACH LIST IF MORE SPACE IS REQUIRED)

PROJECT NO./NAME: SAMPLER(S) - PLEASE PRINT/SIGN NAME:
 TURNAROUND TIME REQUIRED 1 DAY 2 DAYS 3 DAYS STANDARD OTHER
 DELIVERABLES REQUIRED STD LEVEL II LEVEL III LEVEL IV EDD OTHER

MATRIX CODE: GW=GROUNDWATER WW=WASTEWATER S=SOIL L=LIQUID SD=SOLID
 SL=SLUDGE DW=DRINKING WATER O=OIL WP=WIPE A=AIR W=WASTE

Containers & Preservatives

SW 6020/6020A
 SW 7471A (mercury)
 EPA 200.8
 EPA 245.1

Certifications
 OHIO VAP Drinking Water
 DoD NPDES
 Project Locations
 Detroit New York
 Other
 Special Instructions

MERIT LAB NO. <small>FOR LAB USE ONLY</small>	YEAR		SAMPLE TAG IDENTIFICATION-DESCRIPTION	MATRIX	# OF BOTTLES	NONE	HCl	HNO ₃	H ₂ SO ₄	NaOH	MeOH	OTHER								
	DATE	TIME																		
55978.01	11-20-23	4:20pm	Discharge to River	WW	1		X													
.02	11-20-23	4:20pm	Vermillion sediment																	

manganese, lead, zinc
 barium, copper,
 mercury, potassium
 Chromium

RELINQUISHED BY: Martin Schneider Sampler
 SIGNATURE/ORGANIZATION: DATE: 11-20-23 TIME: 4:20pm
 RECEIVED BY: Martin Schneider
 SIGNATURE/ORGANIZATION: DATE: 11-20-23 TIME: 4:20pm

RELINQUISHED BY: FedEx
 SIGNATURE/ORGANIZATION: DATE: 11/21/23 TIME: 0940
 RECEIVED BY: M Chilcote
 SIGNATURE/ORGANIZATION: DATE: 11/21/23 TIME: 0940

SEAL NO. SEAL INTACT YES NO INITIALS
 NOTES: TEMP. ON ARRIVAL: 5.4

PLEASE NOTE: SIGNING ACKNOWLEDGES ADHERENCE TO MERIT'S SAMPLE ACCEPTANCE POLICY ON REVERSE SIDE