

ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

CITY OF LASALLE, an Illinois municipal
corporation,

Respondent.

PCB 24-33
(Enforcement – Water)

NOTICE OF FILING

Please take note that on March 8, 2024, I filed Submission of Additional Exhibits, a copy of which is attached and served upon you.

Respectfully submitted,

City of LaSalle, an Illinois municipal corporation

By: James A. McPhedran
James A. McPhedran of Meyers, Flowers,
Bruno, McPhedran & Herrmann, LLC, a/k/a
Meyers & Flowers, LLC, One of its Attorneys

James A. McPhedran
Illinois ARDC Number 1868977
Meyers, Flowers, Bruno, McPhedran & Herrmann, LLC
a/k/a Meyers & Flowers, LLC
1200 Maple Drive
Peru, Illinois 61354
Phone: 815-223-0230
Facsimile: 815-223-0233
jim@meyers-flowers.com

PROOF OF SERVICE

I, James A. McPhedran, an attorney, do hereby certify that on March 8, 2024, I caused to be served on the individuals listed below by electronic mail, a true and correct copy of the attached Submission of Additional Exhibits.

City of LaSalle, an Illinois municipal corporation

By: James A. McPhedran
James A. McPhedran of Meyers, Flowers,
Bruno, McPhedran & Herrmann, LLC,
a/k/a Meyers & Flowers, LLC
One of its Attorneys

Mr. Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
Brad.Halloran@illinois.gov

Mr. Don Brown
Clerk of the Pollution Control Board
Don.Brown@illinois.gov

Cara Sawyer
Assistant Attorney General
Office of the Attorney General of Illinois
cara.sawyer@ilag.gov

Christopher Grant
Senior Assistant Attorney General Environmental Bureau
Christopher.grant@ilag.gov

Ms. Brianne Hicks
Bhicks171@gmail.com

Ms. Dawn Hicks
lighted_dawn@yahoo.com

Ms. Karen (Karry) King
Kanning16@gmail.com

Mr. Martin Schneider
Martyschneider20@yahoo.com

Ms. Lindsay Jones
ljone3@ilstu.edu

ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,

Complainant,

v.

CITY OF LASALLE, an Illinois municipal
corporation,

Respondent.

PCB 2024-033
(Enforcement – Water)

Submission of Additional Exhibits

Attached find Exhibit Agreement as entered into as between the State of Illinois and the City of LaSalle through their respective counsel in regard to the attached exhibits:

Exhibit 1: Admitted as attached in its entirety.

Exhibit 2: Admitted as attached in its entirety.

Exhibit 3: None tendered.

Exhibit 4: Admitted as redacted and attached.

Exhibit 5: Admitted as attached in its entirety.

Exhibit 6: Admitted as redacted and attached.

Exhibit 7: Admitted as redacted and attached.

Additional materials may be submitted with post-hearing submissions.

Respectfully submitted,

City of LaSalle, an Illinois Municipal Corporation

By: James A. McPhedran
James A. McPhedran

Illinois ARDC Number 1868977

Meyers, Flowers, Bruno, McPhedran & Herrmann, LLC

a/k/a Meyers & Flowers, LLC

1200 Maple Drive

Peru, Illinois 61354

Phone: 815-223-0230 / Facsimile: 815-223-0233

jim@meyers-flowers.com

Exhibit 1

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 24-
)	
CITY OF LASALLE,)	
An Illinois municipal corporation,)	
)	
Respondent.)	

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and CITY OF LASALLE (“City” or “Respondent”), (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2022), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

I. STATEMENT OF FACTS

A. Parties

1. On November 13, 2023, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31



(2022), against the Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2022).

3. At all times relevant to the Complaint, Respondent has been an Illinois municipal corporation organized and operating under the laws of the State of Illinois.

4. At all times relevant to this Complaint, Respondent has owned and operated the LaSalle Wastewater Treatment Plant – South (“WWTP-South”) located at 400 River Street, LaSalle, Illinois, which collects and treats wastewater for its residents and businesses, which it discharges into the Illinois River through its Outfall 001.

5. On November 23, 2015, Illinois EPA issued Respondent NPDES permit No. IL0029424 (“NPDES Permit”) for discharges of wastewater from the LaSalle WWTP-South. The NPDES Permit was in effect at all times relevant to this Stipulation and Proposal for Settlement.

B. Allegations of Non-Compliance

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

- Count I: Failure to maintain effluent contaminant limits within the parameters of its NPDES permit in violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Illinois Pollution Control Board (“Board”) Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of its NPDES Permit.
- Count II: Failure to maintain effluent contaminant levels in such a way as to cause, threaten, or allow water pollution in violation of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022).
- Count III: Failure to comply with the reporting requirements of the NPDES Permit, in violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), and Sections 305.102(b) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and NPDES Permit Special Conditions Nos. 15, 17, and 21.

C. Non-Admission of Violations

The Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, the Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section I.B herein, and this Stipulation shall not be interpreted as including such admission.

D. Compliance Activities to Date

1. On February 23, 2022, LaSalle untimely submitted to Illinois EPA its semi-annual Combined Sewage Outfall ("CSO") Long-Term Control Planning ("LTCP") reports, which had been due as follows: (1) report due December 1, 2019; (2) report due June 1, 2020; (3) report due December 1, 2020; (4) report due June 1, 2021; and (5) report due December 1, 2021.

2. On February 23, 2022, LaSalle untimely submitted its biomonitoring reports required by Special Condition No. 17 as follows: (1) report due May 1, 2019; (2) report due August 1, 2019; (3) report due November 30, 2019; and (4) report due February 29, 2020.

3. On February 23, 2022, LaSalle untimely submitted to Illinois EPA Phosphorus Discharge Optimization Plan annual progress reports as follows: (1) the report due March 31, 2019; (2) the report due March 31, 2020; and (3) the report due March 31, 2021.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against the Respondent in any subsequent enforcement action or permit proceeding as

proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2022).

III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2022), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. The Illinois EPA's information gathering responsibilities were hindered by the Respondent's violations thereby threatening human health and the environment.
2. There is social and economic benefit to the facility.
3. Operation of the facility was and is suitable for the area in which it is located.
4. Maintaining contaminants within NPDES Permit levels, and submitting timely reports, are both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act and the Board and Illinois EPA regulations.

IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2022), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection (i) of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Respondent failed to stay within its permitted effluent limitations. The violation began in June, 2021 and was resolved by September, 2021. Respondent further failed to timely submit to Illinois EPA multiple reports required by its NPDES Permit. The violations began March

31, 2021 and were resolved on February 23, 2022.

2. Respondent was diligent in attempting to come back into compliance with the Act, Board regulations, and applicable federal regulations, once the Illinois EPA notified it of its noncompliance.

3. The civil penalty takes into account any economic benefit realized by the Respondent as a result of avoided or delayed compliance.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of Five Thousand, Seven Hundred and Forty Dollars (\$5,740.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

V. TERMS OF SETTLEMENT

A. Penalty Payment

The Respondent shall pay a civil penalty in the sum of Five Thousand, Seven Hundred and Forty Dollars (\$5,740.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Stipulated Penalties, Interest, and Default

1. If the Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, the Respondent shall be in default and the

remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by the Respondent not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

3. The stipulated penalties shall be enforceable by the Complainant and shall be in addition to, and shall not preclude the use of, any other remedies or sanctions arising from the failure to comply with this Stipulation.

C. Payment Procedures

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602

D. Future Compliance

1. Respondent shall comply with effluent permit limitations and timely file all future required reports.

2. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the Respondent's facility which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

3. This Stipulation in no way affects the responsibilities of the Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

4. The Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

E. Release from Liability

In consideration of the Respondent's payment of the \$5,740.00 penalty, its commitment to cease and desist as contained in Section V.D.4 above, completion of all activities required

hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives, and discharges the Respondent from any further liability or penalties for the violations of the Act and Board regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on November 13, 2023. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondent.

F. Correspondence, Reports and Other Documents

Any and all correspondence, reports and any other documents required under this Stipulation, except for penalty payments, shall be submitted as follows:

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

As to the Complainant

Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
cara.sawyer@ilag.gov

Gabriel H. Neibergall
Assistant Counsel
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Zane Austin
Illinois Environmental Protection Agency
Bureau of Water / Division of Water Pollution Control
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Paul Jungles
Illinois Environmental Protection Agency
Bureau of Water / Field Operations Section
Peoria Regional Office
412 SW Washington Street, Suite D
Peoria, Illinois

As to the Respondent

James A. McPhedran
City Attorney
Meyers & Flowers, LLC
1200 Maple Drive
Peru, Illinois 61354
jim@meyers-flowers.com
csg@meyers-flowers.com

G. Enforcement of Stipulation

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

H. Execution of Stipulation

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it. This Stipulation may be executed by the parties in one or more counterparts, all of which taken together shall constitute one and the same instrument.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS

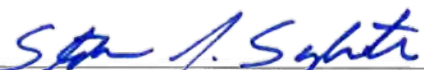
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

KWAME RAOUL
Attorney General
State of Illinois

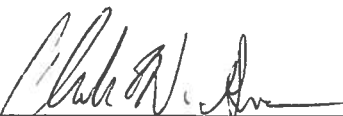
MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

JOHN J. KIM, Director
Illinois Environmental Protection Agency

BY:


STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

BY:

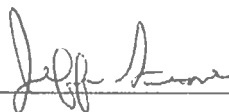

CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: 11/7/23

DATE: 11/7/23

CITY OF LASALLE

BY:



ITS:

Mayor

DATE: 10/11/23

Exhibit 2



City of LaSalle

LaSalle County, Illinois

City Offices - 745 Second Street - La Salle, Illinois 61301-2501

Bus: 815-223-3755 Fax: 815-223-9508 www.lasalle-il.gov



February 23, 2022

Attn: Zane Austin / CAS#19
Illinois Environmental Protection Agency
Division of Water Pollution Control
P. O. Box 19276
Springfield, IL 62794-9276

Re: City of LaSalle
IEPA Violation Notice No. W-2021-50194

Dear Mr. Austin:

The City is in receipt of Violation Notice No. W-2021-50194 (**Attachment A**) and is submitting this letter in compliance with the requirement of the notice to respond in writing within 21 days from our virtual meeting that was held on February 4, 2022 (Slides attached as **Attachment B**).

The Notice of Violation references that Outfall 001 had two occurrences of effluent violations on June 30, 2021, and August 31, 2021. The effluent violations were for TSS and BOD which exceeded the permitted limit of 30 mg/l for each of these parameters.

As we discussed in our virtual meeting, these exceedances were caused by unusually heavy rain and high instantaneous flow conditions experienced at the plant.

The following flood stage chart for the Illinois River shows that the entire region was experiencing extremely wet conditions at this time:

The City of La Salle is an equal opportunity provider and employer

Jeff Grove Mayor 815-223-3755 x5026	Amy Quinn City Clerk 815-223-3755 x5028	John Duncan Finance Director 815-223-3755 x5029	Brian Brown, PE City Engineer 815-223-7041	Leah Inman Economic Development Director 815-488-4442	Brent Bader Community Dev. & Public Relations Director Deputy City Clerk 815-223-3755 x5028
Andy Bacidore Building Inspector 815-228-9218	Jerry Janick Fire Chief 815-223-0834	Mike Smudzinski Police Chief 815-223-2131	Patrick Watson Supt. of Public Works 815-223-2755 x5029	Lynda Kasik Parks and Recreation Director 815-488-1205	Virginia Kochanowski City Treasurer 815-223-1101
					Jim McPhedran City Attorney Meyers & Flowers 815-223-0000



City of La Salle

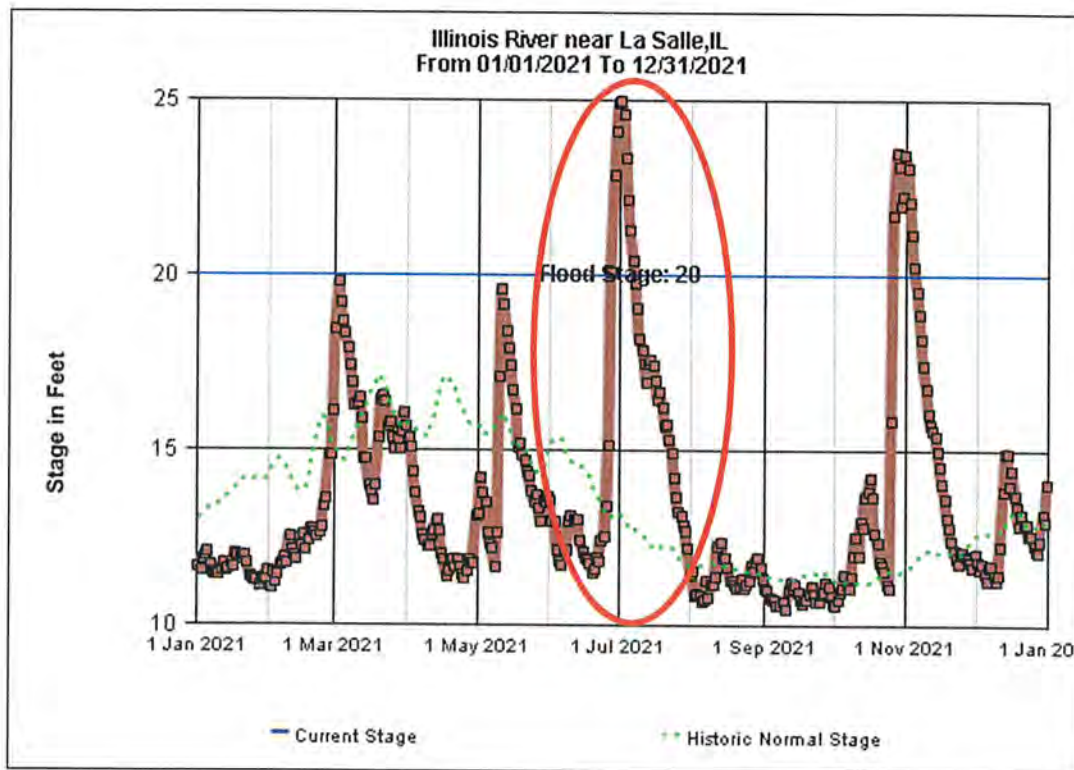
La Salle County, Illinois

City Offices - 745 Second Street - La Salle, Illinois 61301-2501

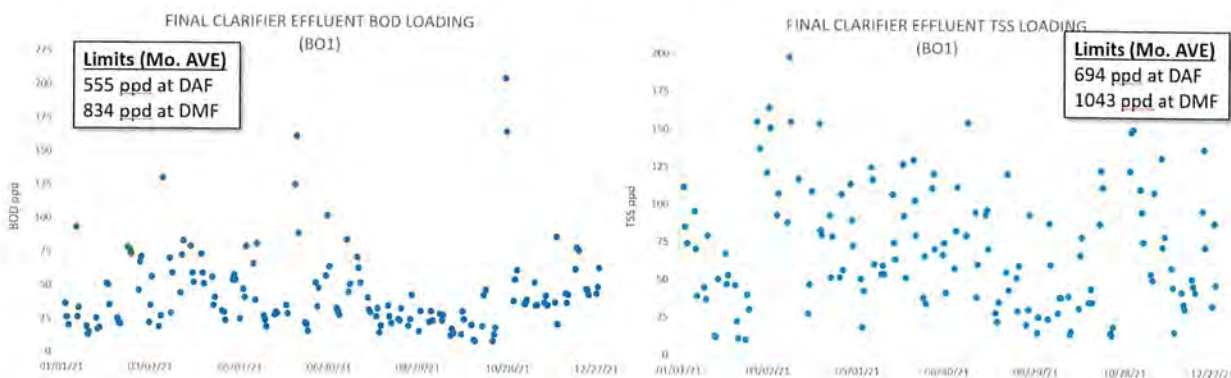
Bus: 815-223-3755

Fax: 815-223-9508

www.lasalle-il.gov



In addition, the following graphs demonstrate that on a day-to-day basis the treatment plant is achieving excellent water quality and the effluent loading of the key parameters for BOD and TSS to the Illinois River are far below the allowed loadings to the receiving stream:



The City of La Salle is an equal opportunity provider and employer

Jeff Grove
Mayor
815-223-3755 x5026

Amy Quinn
City Clerk
815-223-3755 x5028

John Duncan
Finance Director
815-223-3755 x5029

Brian Brown, PE
City Engineer
815-223-7041

Leah Inman
Economic
Development
Director
815-488-4442

Brent Bader
Community Dev. & Public
Relations Director
Deputy City Clerk
815-223-3755 x5028

Andy Bacidore
Building Inspector
815-228-9218

Jerry Janick
Fire Chief
815-223-0834

Mike Smudzinski
Police Chief
815-223-2131

Patrick Watson
Supt. of Public
Works
815-223-3755 x5030

Lynda Kasik
Parks and
Recreation Director
815-488-1205

**Virginia
Kochanowski**
City Treasurer
815-224-1101

Jim McPhedran
City Attorney
Meyers & Flowers
815-223-0220



City of LaSalle

LaSalle County, Illinois

City Offices - 745 Second Street - LaSalle, Illinois 61301-2501

Bus: 815-223-3755

Fax: 815-223-9508

www.lasalle-il.gov



These two violation events were caused by the unusually heavy rain and high instantaneous flow conditions. The treatment plant is achieving overall effluent quality that is excellent and protective of the receiving stream water quality.

Therefore, we are proposing that since these conditions were unusual for the plant, that no further action is required.

The Violation Notice also indicated that there were three reporting violations.

The first of these is the Long-Term Control Plan Update Report that is required every six months. Due to recent personnel changes and COVID related issues these reports were missed. The attached report (**Attachment C**) is the documentation required for November 30, 2019, through the present time period.

The second reporting violation was failure to submit the biomonitoring reports from July 31, 2019. The reports from 2019 have been compiled and emailed to Zane Austin at IEPA on February 22, 2022. These documents are attached as **Attachment D**.

The third reporting violation was failure to submit the status report for the Phosphorus Discharge Optimization Plan (PDOP). The original PDOP which was submitted in August of 2017 concluded that the typical improvements for the phosphorus optimization measures would have required significant capital investment. Therefore, there were no optimization measures that were recommended in the PDOP. Therefore, there would be no status updates to report. In order to comply with the permit, we are providing the PDOP status update report as **Attachment E**.

The City staff has made a plan with the new personnel to submit the future required reports to the Agency according to the timelines required in the permit.

Please don't hesitate to contact me if you have any questions or require any additional information.

Sincerely,

Patrick Watson

The City of LaSalle is an equal opportunity provider and employer

Jeff Grove Mayor 815-223-3755 x5026	Amy Quinn City Clerk 815-223-3755 x5028	John Duncan Finance Director 815-223-3755 x5029	Brian Brown, PE City Engineer 815-223-7041	Leah Inman Economic Development Director 815-488-4442	Brent Bader Community Dev. & Public Relations Director Deputy City Clerk 815-223-3755 x5028
Andy Bacidore Building Inspector 815-228-9218	Jerry Janick Fire Chief 815-223-0834	Mike Smudzinski Police Chief 815-223-2131	Patrick Watson Supt. of Public Works 815-223-3755 x5029	Lynda Kasik Parks and Recreation Director 815-223-1203	Virginia Kochanowski City Treasurer 815-223-1101
					Jim McPhedran City Attorney Meyers & Flowers 815-222-0220

Attachment A

Violation Notice No. W-2021-50194



Electronic Filing: Received, Clerk's Office 03/08/2024

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

217/558-4115

November 22, 2021

CERTIFIED MAIL # 7018 1830 0000 5283 7676
RETURN RECEIPT REQUESTED

City of LaSalle
745 Second Street
LaSalle, IL 61301

**Re: Violation Notice: LaSalle Wastewater treatment plant south-IL0029424-
W0990300007
Violation Notice No.: W-2021-50194**

Dear Facility Owner:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

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

PLEASE PRINT ON RECYCLED PAPER

Page 2 of 2

LaSalle WWTP South – IL0029424

VN W-2021-50194

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by, either agreeing to and signing the proposed CCA, or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA. When compliance is achieved, the owner of the facility must submit a completed statement of compliance form certifying that all Compliance Commitment Agreement measures/events have been successfully completed.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Water Pollution Control
Attn: **Zane Austin**/ CAS#19
P.O.BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, **W-2021-50194**.

Questions regarding this Violation Notice should be directed to **Zane Austin** at **217/558-4115** or zane.austin@illinois.gov.

Sincerely,



Cathy Siders, Manager
Compliance Assurance Section
Bureau of Water, Division of Water Pollution Control

Attachments

ATTACHMENT A

LaSalle WWTP South – IL0029424
50194

VIOLATION NOTICE NO. W-2021-

Questions regarding the violations identified in this attachment should be referred to **Zane Austin** at (217) 558-4115 or zane.austin@illinois.gov.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Effluent Violations

Review the treatment plant operations/operational procedures and evaluate the treatment equipment in order to correct the deficiencies which caused the violations. Compliance is expected to be achieved within 30 days.

<u>Violation Date</u>	<u>Violation Description</u>
06/30/2021 08/31/2021	Outfall 001 Effluent – Solids, total suspended, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2018) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0029424

<u>Violation Date</u>	<u>Violation Description</u>
06/30/2021 08/31/2021	Outfall 001 Effluent – BOD, 5-day, 20 deg. C, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2018) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0029424

Page 2 of 2

Failure to Comply with NPDES Permit

Establish and implement procedures to assure compliance with the monitoring, sampling, recording and reporting requirements set forth in the NPDES Permit. Compliance is expected immediately

<u>Violation Date</u>	<u>Violation Description</u>
11/30/2019 To Present	Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 15 Delinquent Permit Schedule: <u>Status/Progress Report CSO Long term control plan progress report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424

<u>Violation Date</u>	<u>Violation Description</u>
07/31/2019 To Present	Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 17 Delinquent Permit Schedule: <u>Biomonitoring Report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424

<u>Violation Date</u>	<u>Violation Description</u>
03/31/2020 To Present	Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 21 Delinquent Permit Schedule: <u>Status/Progress Report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424

ATTACHMENT B

LaSalle WWTP South – IL0029424

VIOLATION NOTICE NO. W-2021-50194

In order to assist your facility in attaining compliance with the apparent violations listed in Attachment A, the following recommendations are offered:

Confer with your consulting engineer and take action to assure compliance with your NPDES Permit effluent limits and to achieve maximum treatment efficiency.

1. Evaluate –
 - The treatment process
 - The process unit efficiency
 - The influent waste stream

2. Develop –
 - A Process Control Program that will identify facility trends and allow timely O & M adjustment of plant operations.

3. Explore other treatment/waste disposal options such as:
 - Regionalization
 - Land Application
 - Spray Irrigation

4. Submit the missing NPDES schedule reports as soon as possible to the Agency. These reports can be submitted to the Agency email for special condition reports for NPDES permitted facilities: EPA.PrmtSpecCondtns@Illinois.gov.

**LASALLE, CITY OF
IL0029424**

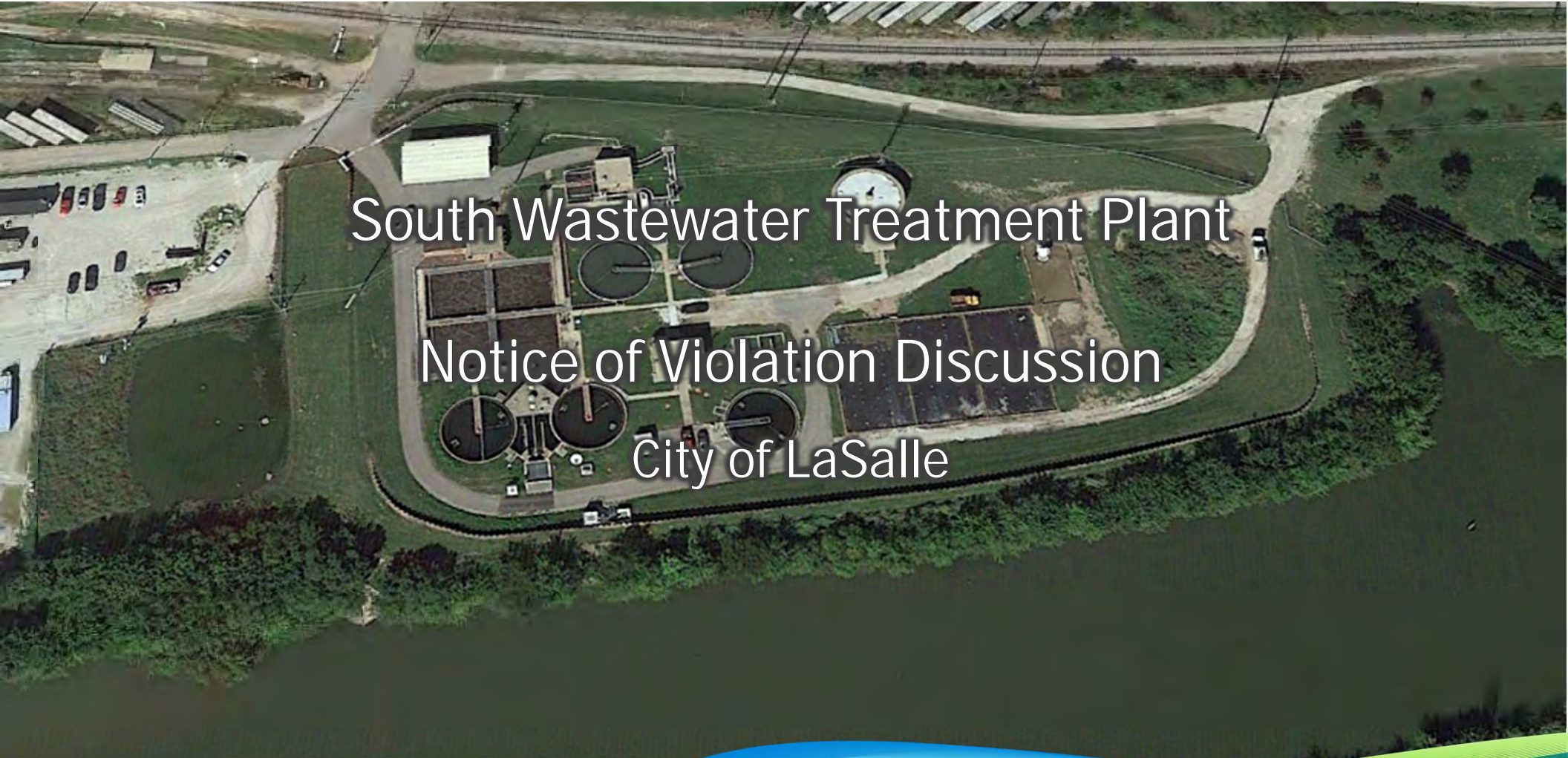
Schedule Desc	Event Comment	Event Desc	Sched Date
SPECIAL CONDITION 15	Status/Progress Report	CSO LONG TERM CONTROL PLAN PROGRESS REPORT	11/30/2020
SPECIAL CONDITION 15	Status/Progress Report	CSO LONG TERM CONTROL PLAN PROGRESS REPORT	05/31/2020
SPECIAL CONDITION 21	Status/Progress Report		03/31/2020
SPECIAL CONDITION 17	Biomonitoring Report		01/31/2020
SPECIAL CONDITION 15	Status/Progress Report	CSO LONG TERM CONTROL PLAN PROGRESS REPORT	11/30/2019
SPECIAL CONDITION 17	Biomonitoring Report		10/31/2019
SPECIAL CONDITION 17	Biomonitoring Report		07/31/2019

Page 2 of 2

5. Develop and implement procedures to ensure that all schedule events specified in the facility's NPDES permit are completed as required and reports are submitted timely to the Agency.
6. Should the financing of any infrastructure improvements be necessary, please consult the Agency's webpage below for information regarding the Water Pollution Control Loan Program and potential funding options: <https://www2.illinois.gov/epa/topics/grants-loans/state-revolving-fund/Pages/default.aspx>. You may also e-mail one of the Project Managers listed on the webpage for more information and to discuss specifics regarding the Water Pollution Control Loan Program.

Attachment B

February 4, 2022 - Virtual Meeting Slides



South Wastewater Treatment Plant
Notice of Violation Discussion
City of LaSalle

February 4, 2022





Agenda

Agenda

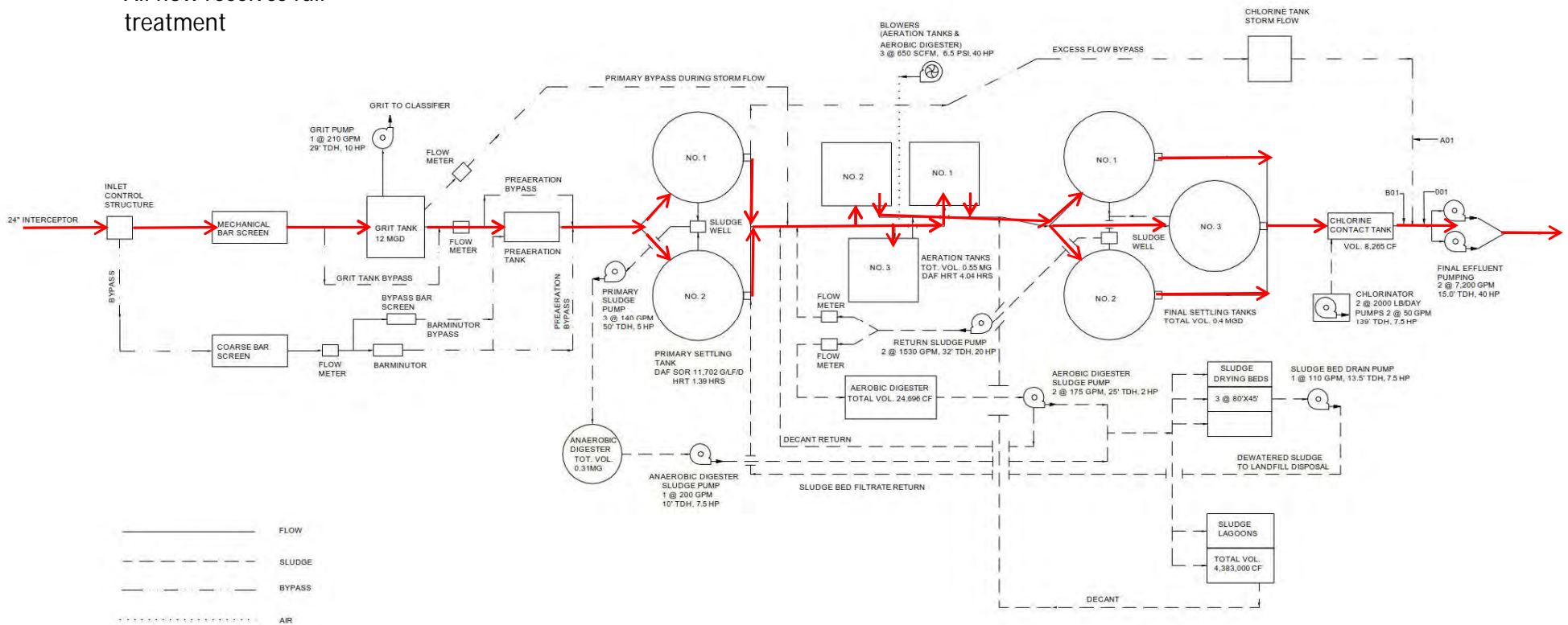
WWTP Flow Schematic
Outfall 001 Violations Discussion
Reporting Violations Discussions
Next Steps

Plant Overview



Current Flow Schematic – Dry Weather

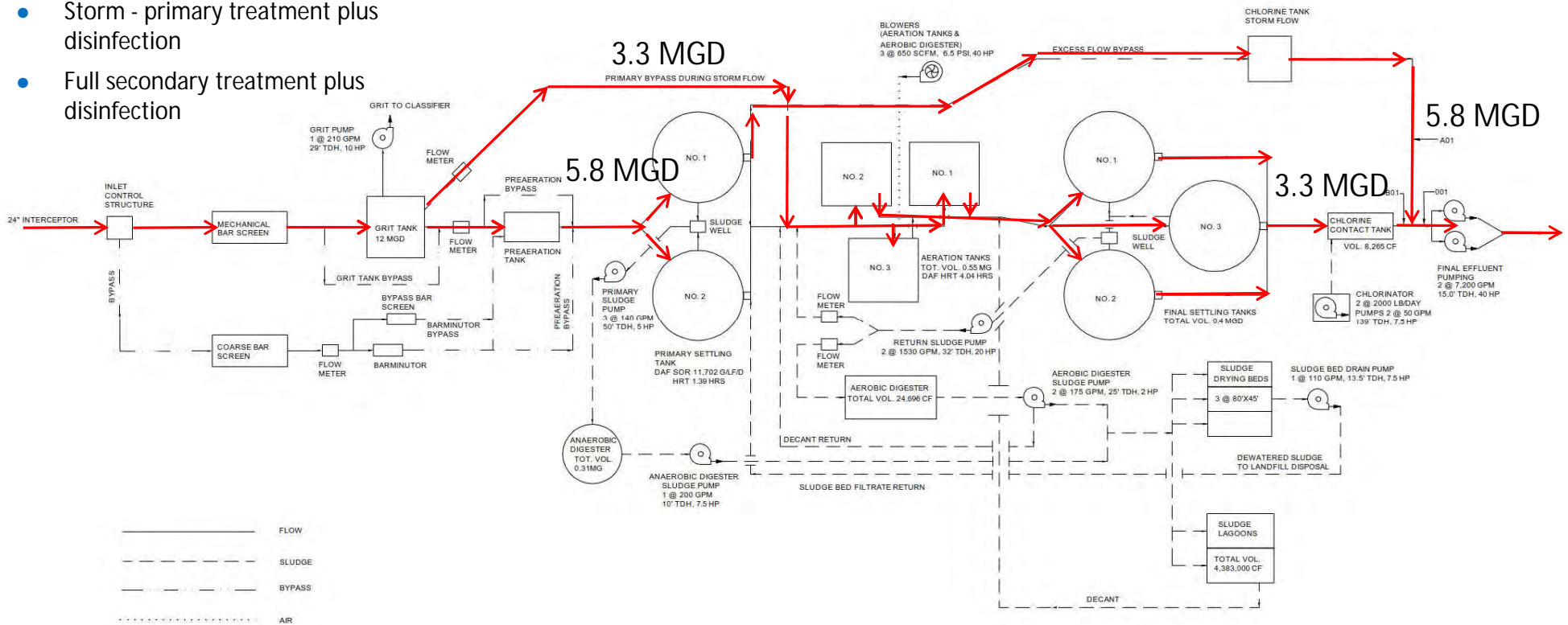
All flow receives full treatment



Current Flow Schematic – Wet Weather

Flow receives either:

- Storm - primary treatment plus disinfection
- Full secondary treatment plus disinfection



Effluent Violations

<u>Violation Date</u>	<u>Violation Description</u>
06/30/2021 08/31/2021	Outfall 001 Effluent – Solids, total suspended, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2018) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0029424

<u>Violation Date</u>	<u>Violation Description</u>
06/30/2021 08/31/2021	Outfall 001 Effluent – BOD, 5-day, 20 deg. C, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2018) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0029424

June 2021											
City of LaSalle - Wastewater Treatment Plant											
Date	Day of Week	pH	NH3 - mg/L	BOD - mg/L	BOD - Weekly Avg. mg/l	TSS - mg/L	TSS - Weekly Avg mg/L	CL2 Residual	Flow - MGD	DAY OF WEEK	DATE
1	T									T	1
2	W									W	2
3	T									T	3
4	F									F	4
5	S									S	5
6	S									S	6
7	M	7.35	0.5	64		67		0.71	3.775	M	7
8	T									T	8
9	W									W	9
10	T									T	10
11	F									F	11
12	S									S	12
13	S				64		67			S	13
14	M									M	14
15	T									T	15
16	W									W	16
17	T									T	17
18	F									F	18
19	S									S	19
20	S									S	20
21	M	7.33	0.32	24		15		0.64	2.645	M	21
22	T									T	22
23	W	7.32	2	28		19		0.74	2.762	W	23
24	T									T	24
25	F	7.17	1.89	51		27		0.34	6.069	F	25
26	S	7.25	0.41	16		8		0.54	7.85	S	26
27	S	7.21	0.25	19.5	27.7	6	15	0.32	3.651	S	27
28	M									M	28
29	T	7.36	1.41	28.5		26		0.51	6.952	T	29
30	W	7.42	0.54	34	32.3	7	15	0.7	6.163	W	30
31											31
TOTAL		58.41	7.32	265.0	124	175.0	96.80		39.867	TOTAL	
AVE.		7.30	0.92	33.1	33.1	21.9	21.9	0.56	4.983	AVE.	
MAX.		7.42	2.00	64.0	64	67.0	67.00	0.74	7.850	MAX.	
MIN.		7.17	0.25	16.0	28	6.0	14.80	0.32	2.645	MIN.	

June 2021

- BOD violation
- No TSS violation



June 2021

City of LaSalle - Wastewater Treatment Plant

Date	Day of Week	pH	NH3 - mg/L	BOD - mg/L	BOD - Weekly Avg. mg/l	TSS - mg/L	TSS - Weekly Avg mg/L	CL2 Residual	Flow - MGD	DAY OF WEEK	DATE
1	T									T	1
2	W									W	2
3	T									T	3
4	F									F	4
5	S									S	5
6	S									S	6
7	M	7.35	0.5	64		67		0.71	3.775	M	7
8	T									T	8
9	W									W	9
10	T									T	10
11	F									F	11
12	S									S	12
13	S				64		67			S	13
14	M									M	14
15	T									T	15
16	W									W	16
17	T									T	17
18	F									F	18
19	S									S	19
20	S									S	20
21	M	7.33	0.32	24		15		0.64	2.645	M	21
22	T									T	22
23	W	7.32	2	28		19		0.74	2.762	W	23
24	T									T	24
25	F	7.17	1.89	51		27		0.34	6.069	F	25
26	S	7.25	0.41	16		8		0.54	7.85	S	26
27	S	7.21	0.25	19.5	27.7	6	15	0.32	3.651	S	27
28	M									M	28
29	T	7.36	1.41	28.5		26		0.51	6.952	T	29
30	W	7.42	0.54	34	32.3	7	15	0.7	6.163	W	30
31											31
TOTAL		58.41	7.32	265.0	124	175.0	96.80		39.867	TOTAL	
AVE.		7.30	0.92	33.1	33.1	21.9	21.9	0.56	4.983	AVE.	
MAX.		7.42	2.00	64.0	64	67.0	67.00	0.74	7.850	MAX.	
MIN.		7.17	0.25	16.0	28	6.0	14.80	0.32	2.645	MIN.	

June 2021

- High rainfall resulted in very high instantaneous flow to the plant
- High flow caused temporary washout resulting in high BOD

Date	Day of Week	Weather		Flows (MGD)							
		Rainfall - Inches	Snowfall - Inches	Minimum Instantaneous 001A &	Maximum Instantaneous 001A &	Normal Influent Channel	Pretreatment Bypass Channel	Storm Channel/Primary Bypass	Total Flow - 001 A	Secondary System Bypass - 001 B	Total Facility Flow - 001 A & 001 B
1	T			1.600	2.500	2.233			2.233		2.233
2	W			1.600	2.900	2.074			2.074		2.074
3	T			1.400	3.500	1.178			1.178		1.178
4	F			1.300	1.800	1.589			1.589		1.589
5	S			1.400	2.300	1.590			1.590		1.590
6	S			1.000	1.800	1.434			1.434		1.434
7	M	1.4		1.400	9.500	1.635		1.477	3.112	0.663	3.775
8	T			1.900	3.100	2.480			2.480		2.480
9	W			2.300	2.900	2.413			2.413		2.413
10	T			2.300	3.200	2.475			2.475		2.475
11	F			1.600	2.800	2.264			2.264		2.264
12	S			1.500	2.600	2.069			2.069		2.069
13	S			1.400	2.200	1.769			1.769		1.769
14	M			1.300	2.400	1.543			1.543		1.543
15	T			1.100	2.900	1.576			1.576		1.576
16	W			1.000	1.800	1.390			1.390		1.390
17	T			1.100	1.800	1.377			1.377		1.377

August 2021											
City of LaSalle - Wastewater Treatment Plant											
Date	Day of Week	pH	NH3 - mg/L	BOD - mg/L	BOD - Weekly Avg. mg/l	TSS - mg/L	TSS - Weekly Avg mg/L	CL2 Residual	Flow - MGD		DAY OF WEEK
1	S						###				S 1
2	M										M 2
3	T										T 3
4	W										W 4
5	T										T 5
6	F										F 6
7	S										S 7
8	S										S 8
9	M										M 9
10	T	7.53	3	28.5		21.5		0.53	1.812		T 10
11	W										W 11
12	T										T 12
13	F										F 13
14	S										S 14
15	S				28.5		22				S 15
16	M										M 16
17	T										T 17
18	W	7.41	2.97	64		22		0.29	2.068		W 18
19	T										T 19
20	F										F 20
21	S										S 21
22	S				64		22				S 22
23	M										M 23
24	T	7.35	3.39	33.5		79		0.19	2.104		T 24
25	W	7.29	3	16		38.5		0.65	2.507		W 25
26	T										T 26
27	F										F 27
28	S	7.44	3	20.5		33.5		0.68	2.652		S 28
29	S				23.3		50				S 29
30	M										M 30
31	T										T 31
TOTAL		37.02	15.36	162.5	116	194.5	4.502	0.83	11.143		TOTAL
AVE.		7.40	3.07	32.5	32.5	38.9	8.9	0.47	2.229		AVE.
MAX.		7.53	3.39	64.0	64	79.0	4.409	0.68	2.652		MAX.
MIN.		7.29	2.97	16.0	23	21.5	21.50	0.19	1.812		MIN.

August 2021

- BOD violation
- TSS violation



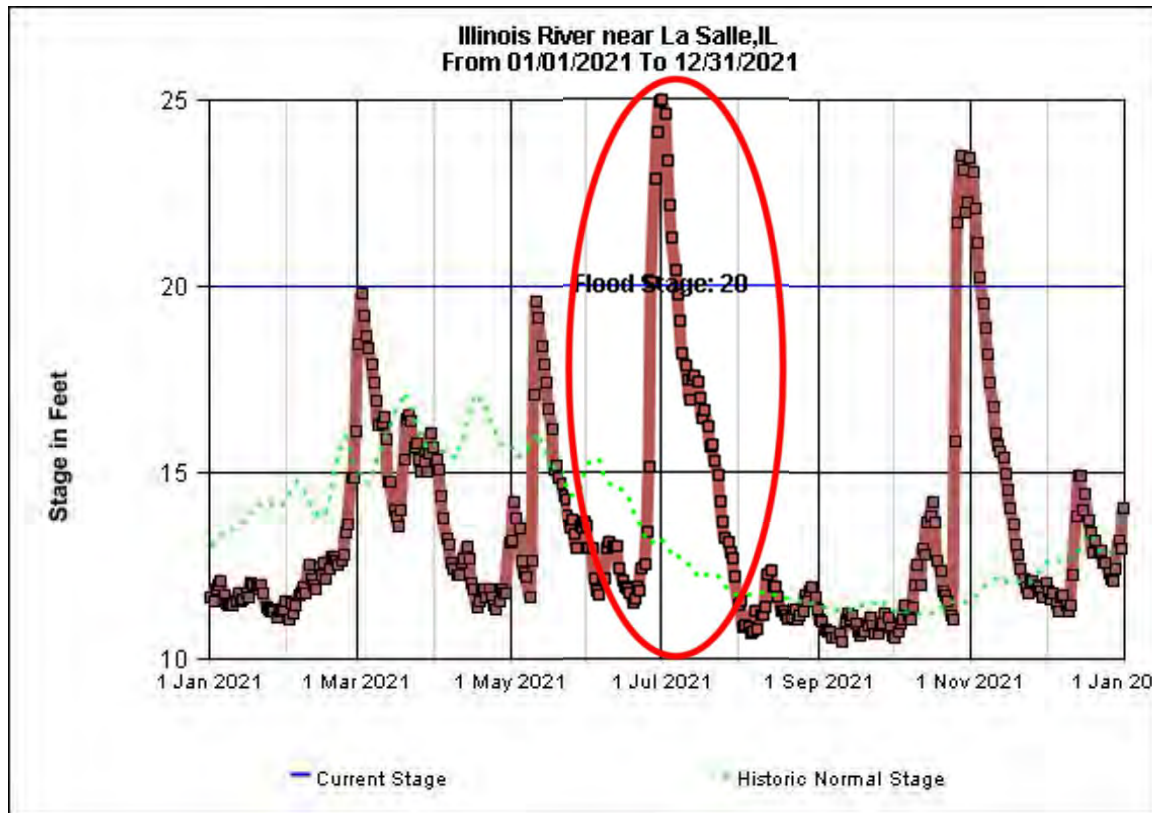
August 2021										
City of LaSalle - Wastewater Treatment Plant										
Date	Day of Week	pH	NH3 - mg/L	BOD - mg/L	BOD - Weekly Avg. mg/l	TSS - mg/L	TSS - Weekly Avg. mg/L	CL2 Residual	Flow - MGD	DAY OF WEEK
1	S					####				S
2	M									M
3	T									T
4	W									W
5	T									T
6	F									F
7	S									S
8	S									S
9	M									M
10	T	7.53	3	28.5	21.5		0.53	1.812		T
11	W									W
12	T									T
13	F									F
14	S									S
15	S				28.5	22				S
16	M									M
17	T									T
18	W	7.41	2.97	64		22	0.29	2.068		W
19	T									T
20	F									F
21	S									S
22	S				64	22				S
23	M									M
24	T	7.35	3.39	33.5	79	38.5	0.19	2.104		T
25	W	7.29	3	16			0.65	2.507		W
26	T									T
27	F									F
28	S	7.44	3	20.5		33.5	0.68	2.652		S
29	S				23.3	50				S
30	M									M
31	T									T
TOTAL		37.02	15.36	162.5	116	194.5	4.502	8.3	11.143	TOTAL
AVE.		7.40	3.07	32.5	32.5	38.9	0.89	0.47	2.229	AVE.
MAX.		7.53	3.39	64.0	64	79.0	4.409	0.68	2.652	MAX.
MIN.		7.29	2.97	16.0	23	21.5	21.50	0.19	1.812	MIN.

August 2021

- High rainfall resulted in very high instantaneous flow to the plant
- High flow caused temporary washout resulting in high BOD and TSS

Date	Day of Week	Weather		Flows (MGD)							
		Rainfall - Inches	Snowfall - Inches	Minimum Instantaneous 001A &	Maximum Instantaneous 001A &	Normal Influent Channel	Pretreatment Bypass Channel	Storm Channel/Primary Bypass	Total Flow - 001 A	Secondary System Bypass - 001 B	Total Facility Flow - 001 A & 001 B
1	S			1.100	2.400	1.204			1.204		1.204
2	M			1.100	1.800	1.413			1.413		1.413
3	T			1.100	1.700	1.367			1.367		1.367
4	W			1.100	1.900	1.424			1.424		1.424
5	T			1.100	1.800	1.356			1.356		1.356
6	F			1.100	4.500	1.574			1.574		1.574
7	S			1.000	1.600	1.284			1.284		1.284
8	S	0.2		1.000	6.200	1.672			1.672		1.672
9	M	TR.		1.300	3.200	1.501			1.501		1.501
10	T	0.2		1.200	6.100	1.477		0.224	1.701	0.111	1.812
11	W	0.1		1.300	4.200	1.755			1.755		1.755
12	T			1.300	2.200	1.675			1.675		1.675
13	F			1.200	3.200	1.593			1.593		1.593
14	S			0.990	1.500	1.283			1.283		1.283
15	S			0.900	2.300	1.328			1.328		1.328
16	M			1.100	1.800	1.244			1.244		1.244
17	T			1.000	1.600	1.202			1.202		1.202
18	W	0.1		1.000	8.300	1.466		0.322	1.788	0.280	2.068
19	T			1.100	2.500	1.518			1.518		1.518
20	F			1.100	2.200	1.421			1.421		1.421
21	S			0.900	1.600	1.274			1.274		1.274
22	S			0.900	1.600	1.228			1.228		1.228
23	M	1		1.000	1.700	1.278			1.278		1.278
24	T	0.3		1.000	9.400	1.339		0.526	1.865	0.239	2.104
25	W			1.300	8.200	1.845		0.403	2.248	0.259	2.507
26	T			1.300	2.100	1.646			1.646		1.646
27	F			1.400	2.900	1.965			1.965		1.965

Illinois River Stage Height



- River exceeded flood stage due to unusually heavy rains
- High rainfall resulted in very high instantaneous flow to the plant

Outfall 001

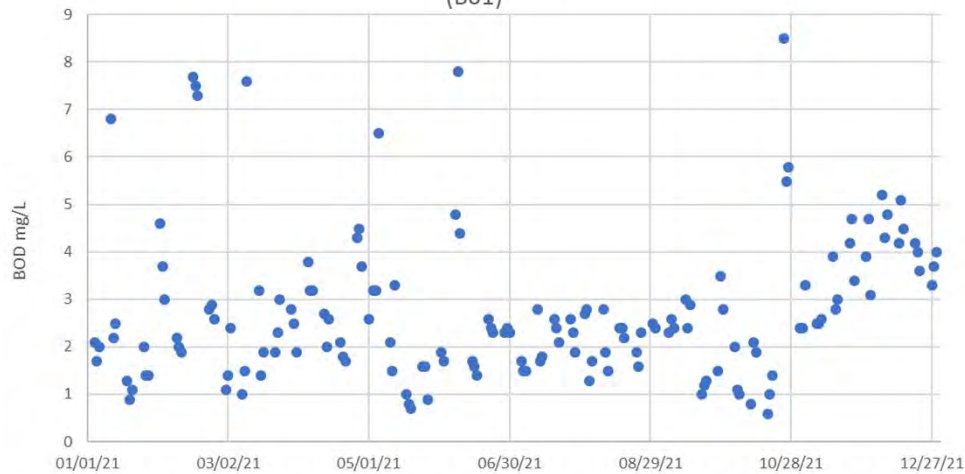
- | | <u>2021 BOD (mg/l)</u> | <u>TSS (mg/l)</u> |
|-------|------------------------|-------------------|
| ■ Jan | 22.8 | 26.0 |
| ■ Feb | 24.6 | 17.3 |
| ■ Mar | 24.1 | 17.8 |
| ■ Apr | 23.3 | 16.7 |
| ■ May | 24.8 | 23.6 |
| ■ Jun | 33.1 | 21.9 |
| ■ Jul | 21.9 | 12.7 |
| ■ Aug | 32.5 | 38.9 |
| ■ Sep | 29.0 | 23.0 |
| ■ Oct | 28.8 | 28.5 |
| ■ Nov | ----- | ----- |
| ■ Dec | ----- | ----- |

Overall Plant Performance 2021

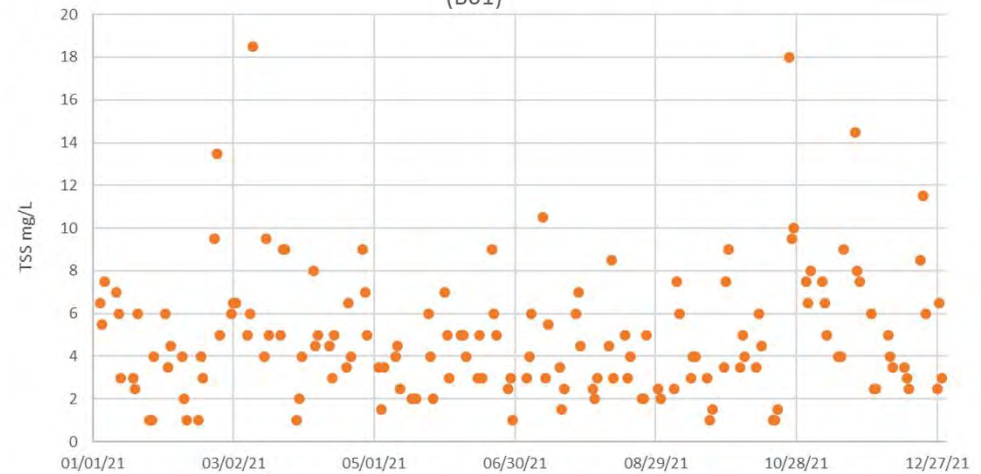
BOD Limits
20 mg/l Mo. Ave.
40 mg/l Wkly Ave.

TSS Limits
25 mg/l Mo. Ave.
45 mg/l Wkly Ave.

FINAL CLARIFIER EFFLUENT BOD CONCENTRATION
(B01)



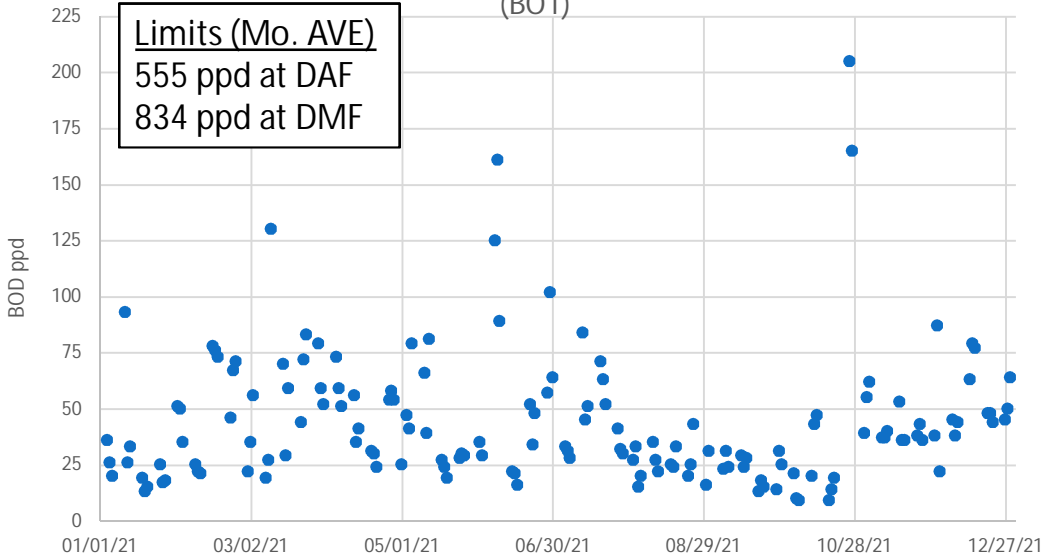
FINAL CLARIFIER EFFLUENT TSS CONCENTRATION
(B01)



Overall Plant Performance 2021

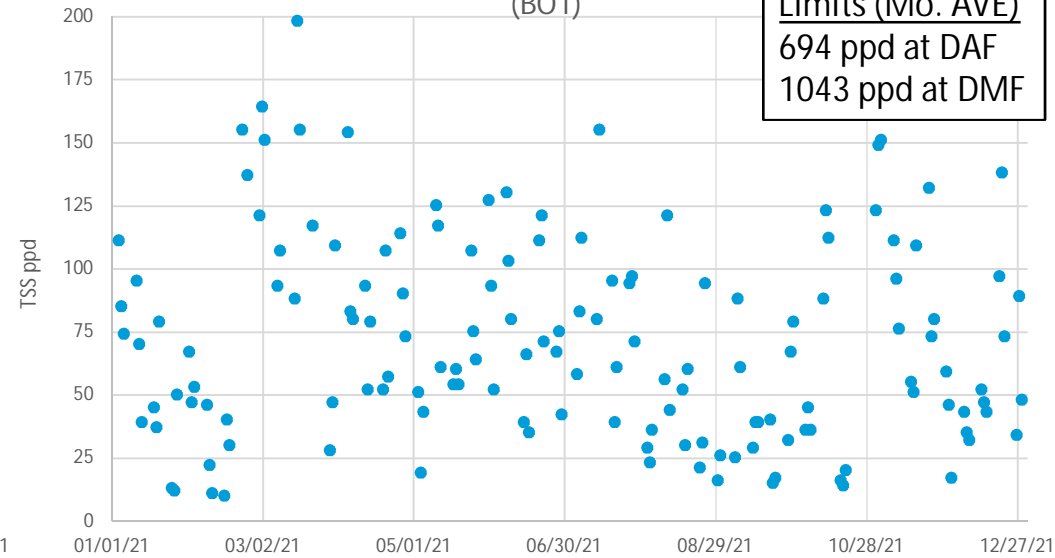
FINAL CLARIFIER EFFLUENT BOD LOADING

(BO1)



FINAL CLARIFIER EFFLUENT TSS LOADING

(BO1)



Reporting Violations

Violation Date 11/30/2019 To Present	Violation Description Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 15 Delinquent Permit Schedule: <u>Status/Progress Report CSO Long term control plan progress report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424
Violation Date 07/31/2019 To Present	Violation Description Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 17 Delinquent Permit Schedule: <u>Biomonitoring Report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424
Violation Date 03/31/2020 To Present	Violation Description Failure to comply with reporting requirement of NPDES Permit# IL0029424, Special Condition 21 Delinquent Permit Schedule: <u>Status/Progress Report</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2018); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit #IL0029424

- Report due every 6 months. Former employee responsible for this task. Will assign new staff to report progress.
- Biomonitoring reports were completed by former operator. We believe it was completed and submitted. New operator hired this week.
- Status report for PDOP measures. The PDOP concluded there were no cost effective P reduction measures.

Next Steps / Action Items

- Effluent Violations
 - Violations were due to unusually heavy rain and high instantaneous flow conditions.
 - Overall effluent quality excellent.
 - No further action required
- Reporting Violations
 - City will develop a report that covers from November 2019 through present.
 - City will work with new operator to locate submitted biomonitoring report (July 2019) and submit to Agency.
 - City will develop a progress report for the PDOP and submit.

Attachment C
Long Term Control Plan Update Report

Technical Memorandum

Long Term Control Plan Progress Report

City of LaSalle, Illinois



Date: February 22, 2022
To: IEPA
From: Terry Boyer, PE, Donohue & Associates, Inc.
Brian Brown, City of LaSalle
Patrick Watson, City of LaSalle
Re: City of LaSalle, Illinois
NPDES Permit No. IL0029424 - Long Term Control Plan Progress Report
Reporting Period: Through February 22, 2022

The NPDES permit requires the City to provide a progress report every six months.

The updated project schedule for the Long Term Control Plan is as follows:

Project	Type	Location	Completion
CSO 3 Pump Station Upgrades	Pump and Treat	CSO 3 Pump Station	December 31, 2019
Separation Project 1	Sewer Separation	Hegeler Park	December 31, 2019
Monitoring Part 1	Detailed Flow and CSO Monitoring	Hegeler Park	January 1, 2020 to December 31, 2020
Monitoring Part 2	Detailed Flow and CSO Monitoring	CSO 3 Pump Station	January 1, 2020 to December 31, 2021
Restrictor Project	In-Line Storage	8 th Street and Sterling	June 30, 2020
Separation Project 2	Sewer Separation	Tonti St, LaHarp St, Walnut and Porter	December 31, 2021
Monitoring Part 3	Detailed Flow and CSO Monitoring	Tonti St, LaHarp St, Walnut and Porter	January 1, 2022 to December 31, 2023
Final Project	To Be Determined	To Be Determined	December 31, 2025

1. CSO 3 Pump Station Upgrades Progress Update as of February 22, 2022:

- a. The pump station upgrades and force main were completed by December 31, 2019.
- b. The force main had additional air valves that had to be installed in an attempt to get the pump station and force main to meet the 23,000 gpm requirement. This installation was completed in November 2020 due to COVID related issues.
- c. Due to construction obstacles, the contractor was not able to replace approximately 180 feet of 24" force main with the required 36" force main. In addition, the outlet of the

force main was restricted down to 24" to make the connection to an existing junction structure.

- d. The City is in the process of hiring another contractor to improve the junction box connection to reduce the significant headlosses that are occurring. It is believed that this improvement will allow the station to achieve the 23,000 gpm required.
- e. The City is in the process of developing design drawings to make required changes to the junction structure, as well as install a mag meter at the station to allow for discharge flow measurements. These improvements are expected to be completed by the fall of 2022.

2. Separation Project 1 – Hegeler Park

- a. The Hegeler Park sewer separation project was completed by December 31, 2019.
- b. This project removed approximately 115 acres from the combined sewer system.

3. Monitoring Part 1 – Hegeler Park Sewer Separation

- a. The City has observed that this separation project as reduced flow in the combined sewer system.
- b. More detailed flow monitoring is planned at a future date.

4. Monitoring Part 2 – CSO 3 Pump Station

- a. The CSO 3 Pump Station and force main improvements are still ongoing.
- b. A magnetic flow meter is planned to be installed to measure flow from this station when the improvements are completed.

5. Restrictor Project

- a. Due to COVID and supply chain related issues, this project has taken longer than the planned schedule.
- b. The restrictor gate has been ordered and has been delivered to the City.
- c. The City is working with a local contractor to have the restrictor gate installed during the summer of 2022.

6. Separation Project 2 – Tonti, LaHarp, Walnut and Porter

- a. The Tonti, LaHarp, Walnut and Porter sewer separation project was completed by December 31, 2021.
- b. This project removed approximately 35 acres from the combined sewer system.

7. Monitoring Part 3 – Tonti, LaHarp, Walnut and Porter

- a. The City has observed that this separation project as reduced flow in the combined sewer system.
- b. More detailed flow monitoring is planned at a future date.

Attachment D
Biomonitoring Reports



April 24, 2019

Vincent Maggi
LaSalle WWTP
745 Second St
LaSalle, IL 61301

Dear Vincent Maggi:

Please find enclosed the analytical results for the sample(s) the laboratory received on **4/10/19 10:20 am** and logged in under work order **9042277**. All testing is performed according to our current TNI certifications unless otherwise noted. This report cannot be reproduced, except in full, without the written permission of PDC Laboratories, Inc.

If you have any questions regarding your report, please contact your project manager. Quality and timely data is of the utmost importance to us.

PDC Laboratories, Inc. appreciates the opportunity to provide you with analytical expertise. We are always trying to improve our customer service and we welcome you to contact the Director of Client Services, Lisa Grant with any feedback you have about your experience with our laboratory.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Cooper".

Chad Cooper
Laboratory Supervisor
(417) 864-8924
ccooper@pdclab.com





ANALYTICAL RESULTS

Sample: 9042277-01	Sampled: 04/09/19 06:50
Name: Effluent Composite- SOUTH (Old)	Received: 04/10/19 10:20
Alias: P. promelas LC50= >100, 0% mortality in 100% effluent. C. dubia LC50= >100, 5% morta	Matrix: Waste Water - Composite
	PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - SPMO							
Chlorine - Total Residual	< 0.10	mg/L	H, X	04/11/19 14:00	04/11/19 14:00	RRG	SM 4500-Cl G*
Conductivity	1900	umhos/cm		04/10/19 11:26	04/10/19 11:26	KMR	SM 2510B
Dissolved Oxygen	8.3	mg/L	H	04/10/19 11:26	04/10/19 11:26	KMR	SM 4500-O G*
pH	7.7	pH Units	H	04/10/19 11:26	04/10/19 11:26	KMR	SM 4500-H B - SW 9040
General Chemistry - STL							
Alkalinity - total as CaCO3	280	mg/L		04/16/19 08:27	04/16/19 17:53	SCI	SM 2320B*
Nutrients - SPMO							
Ammonia-N	< 0.10	mg/L	V	04/15/19 12:00	04/15/19 12:00	KB	EPA 350.1 - QC 10-107-06-1-I & J*
Total Metals - PIA							
Calcium	120	mg/L	Pc	04/15/19 12:36	04/23/19 16:24	TJJ	EPA 200.7
Magnesium	39	mg/L	Pc	04/15/19 12:36	04/18/19 18:15	TJJ	EPA 200.7
Total Hardness as CaCO3	470	mg/L		04/15/19 12:36	04/23/19 16:24	TJJ	SM 2340B
WETT - SPMO							
Ceriodaphnia Dubia TUa	< 1.0	units		04/10/19 12:00	04/10/19 12:00	KMR	EPA 2002.0*
Pimephales Promelas TUa	< 1.0	units		04/10/19 12:00	04/10/19 12:00	KMR	EPA 2002.0*

Sample: 9042277-02	Sampled: 04/09/19 07:10
Name: Upstream Grab- SOUTH (Old)	Received: 04/10/19 10:20
Matrix: Surface Water - Grab	PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Analyzed	Analyst	Method
General Chemistry - SPMO							
Chlorine - Total Residual	< 0.10	mg/L	H, X	04/11/19 14:00	04/11/19 14:00	RRG	SM 4500-Cl G*
Conductivity	760	umhos/cm		04/10/19 11:26	04/10/19 11:26	KMR	SM 2510B
Dissolved Oxygen	8.3	mg/L	H	04/10/19 11:26	04/10/19 11:26	KMR	SM 4500-O G*
pH	8.0	pH Units	H	04/10/19 11:26	04/10/19 11:26	KMR	SM 4500-H B - SW 9040
Nutrients - SPMO							
Ammonia-N	0.11	mg/L	V	04/15/19 12:00	04/15/19 12:00	KB	EPA 350.1 - QC 10-107-06-1-I & J*



NOTES

Specific method revisions used for analysis are available upon request.

Memos

P. promelas LC50= >100, 0% mortality in 100% effluent. C. dubia LC50= >100, 5% mortality in 100% effluent.

Report of Acute Toxicity Testing

Reference Toxicity Test:

PDC Laboratories, INC. conducts a monthly reference toxicant test to demonstrate and obtain consistent, precise results for permit compliance purposes. This demonstration is to ensure satisfactory laboratory performance. The most recent reference test results are as follows:

Date Initiated: April 9, 2019
Date Concluded: April 11, 2019

Reference Toxicant: Potassium Chloride (KCl)
Lot Number: 18A195207
Expiration: N/A
Standards ID: SPMO6-22A

Moderately Hard Synthetic Water: 3-5AC2
Prepared: April 3, 2019
Expiration: April 17, 2019
Analyst: KMR

Pimephales promelas: 48 hour Acute Test - LC50 = 812.5 mg/L
SPMO %CV = 19.49 %
National Limits (75th Percentile) = 17.9% CV
National Control Limit (90th Percentile) = 33% CV
Ceriodaphnia dubia: 48 hour Acute Test - LC50 = 500 mg/L
SPMO %CV = 20.38 %
National Limits (75th Percentile) = 29%CV
National Control Limit (90th Percentile) = 34%CV

Literature Cited:

- 1.) APHA. 1992. Standard methods for the examination of water and wastewater, 18th Ed. American Public Health Association, Washington, D.C.
- 2.) USEPA. 2002. Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms, 5th ed. EPA-821-R-02-012
- 3.) USEPA 2000. Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2). June 2000. EPA 833-R-00-003



Certifications

CHI - McHenry, IL

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100279
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17556

PIA - Peoria, IL

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553
Missouri Department of Natural Resources Certificate of Approval for Microbiological Laboratory Service No. 870
Drinking Water Certifications: Iowa (240); Kansas (E-10338); Missouri (870)
Wastewater Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)
Hazardous/Solid Waste Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPIL - Springfield, IL

NELAP/NELAC accreditation through the Illinois EPA, PAS IL 100323

SPMO - Springfield, MO

USEPA DMR-QA Program

STL - St. Louis, MO

TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS Lab No. E-10389
Accreditation of Laboratories for Wastewater, Hazardous, and Solid Waste Analysis through IL EPA No. 200080
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 171050
Drinking Water Certifications: Missouri (1050)
Missouri Department of Natural Resources

* Not a TNI accredited analyte

Qualifiers

- H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.
- Pc Chemical preservation discrepancy noted at the time of analysis
- V Verification standard recovery failed to meet the required acceptance criteria on repeat instrumental analyses.
- X Samples ran as Free Chlorine

Certified by: Chad Cooper, Laboratory Supervisor



PDC Laboratories Inc, SPMO.

EPA Test Methods: 2002.0 & 2000.0

Multiple Dilution WET Test

Sample # 904222-01
 Client OLD PLANT

Client Permit #: 1L-0029424
 PP Hatch 632819A
 CD Hatch 0410191CA

MHSF 3-5AC2
 Board/Shelf 00212

Cup	Conc.	Initial	24 hour	48 hour	72 hour	96 hour	Set Times			
P1	6.25	10	10	10	10	10	Start Date/Time:	4-10-19 @ 1200		
P2	up	10	10	10	10	10		Date	Time	Analyst
P3	12.5	10	10	10	10	10	0 Hour	4-10-19	1200	KMR
P4	25	10	10	10	10	10	24 Hour	4-11-19	1233	KMR
P5	50	10	10	10	10	10	48 Hour	4-12-19	1131	KMR
P6	50	10	10	10	10	9	72 Hour	4-13-19	1148	KMR
P7	6.25	10	10	10	10	10	96 Hour	4-14-19	1248	RJR
P8	up	10	10	10	10	10	End Date/Time:	4-14-19 @ 1248		
P9	Lab	10	10	10	10	10	Results			
P10	Lab	10	10	10	10	10	Pimephales promelas			
P11	100	10	10	10	10	10	96 Hour Result	Date	Analyst	
P12	12.5	10	10	10	10	10	LC 50	>100	4-15-19	KMR
P13*	25	10	10	10	10	10	TUa	<1	4-15-19	KMR
P14*	100	10	10	10	10	10	P-Value	-	-	-
C1	100	5	5	5			Ceriodaphnia Dubia			
C2	50	5	5	5			48 Hour Result	Date	Analyst	
C3	up	5	5	5			LC 50	>100	4-15-19	KMR
C4	12.5	5	5	5			TUa	<1	4-15-19	KMR
C5	50	5	5	5			P-Value	-	-	-
C6	Lab	5	5	5				Date	Analyst	
C7	6.25	5	5	5			Filtered (Y/N):	Y	4-11-19	KMR
C8	25	5	5	5			Light Check:	N/A	4-11-19	KMR
C9	50	5	5	5			PP Fry Age:	18 days	4-11-19	KMR
C10	100	5	5	5			CD Neonates Age:	<24hrs	4-11-19	KMR
C11	up 12.5	5	5	5			Comments: PP fry were set in 200 ml of conc. w/in a 250 ml cup .CD were set in 15 ml of conc. w/in a 30 ml cup.			
C12	up up	5	5	5						
C13	up 25	5	5	5						
C14	6.25	5	5	5						
C15	Lab	5	5	5						
C16	Lab	5	5	5						
C17	100	5	5	5						
C18	12.5	5	5	5						
C19	12.5	5	5	5						
C20	100	5	4	4						
C21	6.25	5	5	5						
C22	up	5	5	5						
C23	Lab	5	5	5						
C24	25	5	5	5						
C25*	25	5	5	5						
C26*	50	5	5	5						
C27*	25	5	5	5						
C28*	6.25	5	5	5						

* These cups only used when upstream samples are provided.

Analyst Signature: Krista Rice
 Date: 4-15-19
 Read and Understood By: [Signature]
 Date: 4-19-19

Logbook: 3

Report #: 110 17
RJR
04-19-19

PDC Laboratories Inc. SPMO

La Salle

Routine Chemistries
 Client Permit # 1L-0039424
 Client # 90422701 pp Hatch 032819A
 Client Old Plant CD Hatch 0410191A
 MHSF 3-5A-C2
 Board/Sheet 00212

EPA Test Methods: 2002.0 & 2000.0

Curve	Initial	1 Hour	24 Hour	48 Hour	72 Hour	96 Hour
10,000	98.7	10.04	10.05	98.81	10.05	98.9
700	4.01	4.01	4.14	4.01	4.01	4.01
400	4.01	4.01	4.14	4.01	4.01	4.01
Initial/Received						
Cup #	9	5	4	5	17	2
Concentration	MHSF 6.25%	12.5%	25%	50%	Effluent	FF-DUP
PH (EPA 150.1)	7.85	8.02	7.99	7.88	7.67	7.71
DO mg/L (SM 5010)	7.95	8.25	8.24	8.30	8.30	8.38
Conductivity (µMhos)	317	1851	1861	1861	1861	1861
Chlorine (mg/L)	Method 4500CLG	Effluent 0.01	Upstream* 0.09	Date 4-11-19	Time 1400	Batch R907454
Ammonia (mg/L)	EPA 350.1	0.043	0.14	Date 4-15-19	Time 1200	Batch R907324
Alkalinity (mg/L)	23208	2044	202	Date 4-16-19	Time 1758	Batch R907353
Hardness (mg/L)	200.7	500	500	Date 4-16-19	Time 1815	Batch R907353
Comments: "H" qualifier added to DO, PH and chlorine analytes due to sample hold from.						
Temperature (°C)	Fatted Minnow					
Test	MHSF	7.81	7.93	8.09	4-10-19	1300
DO (mg/L)	Fatted Minnow	23.9	23.4	23.4	4-10-19	1300
Temperature (°C)	Fatted Minnow	23.4	23.4	23.4	4-10-19	1300
Test	MHSF	7.12	6.84	6.58	4-11-19	1220
DO (mg/L)	Fatted Minnow	25.1	24.3	24.3	4-11-19	1220
Temperature (°C)	Fatted Minnow	25.1	24.3	24.3	4-11-19	1220
Test	MHSF	7.05	6.32	6.34	8.39	8.32
DO (mg/L)	Fatted Minnow	6.57	6.54	6.51	6.90	6.90
Temperature (°C)	Fatted Minnow	24.9	23.9	23.9	4-12-19	1120
Conductivity (µMhos)	MHSF	319	1748	1748	7.99	1120
Renewal Period:	151					
Test	MHSF	6.25%	12.5%	25%	50%	Effluent
DO (mg/L)	Fatted Minnow	1.95	6.59	6.57	4.52	4.54
Temperature (°C)	Fatted Minnow	25.4	25.4	25.4	25.4	25.4
Test	MHSF	7.97	8.49	8.44	8.52	8.43
DO (mg/L)	Fatted Minnow	7.25	6.88	6.82	6.89	6.83
Temperature (°C)	Fatted Minnow	24.9	24.9	24.9	24.9	24.9
Conductivity (µMhos)	MHSF	325	1585	1585	388	1249

*Upstream only performed if supplied by the client

Analyst Signature: Kayla R. Liu
 Date: 4-15-19
 Read and Understood By: [Signature]
 Date: 4-19-19

PDC LABORATORIES, INC.
1805 W. SUNSET
SPRINGFIELD, MO 65807




PHONE # 417-864-8924
FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

IL MO

State where samples collected

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT ADDRESS LASALLE - SOUTH (OLD) 400 RIVER RD LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER MONDAY 815-233-8816 SAMPLER (PLEASE PRINT) Vincent Maggi SAMPLER'S SIGNATURE 		MEANS SHIPPED WPS DATE SHIPPED 4-5-19		ANALYSIS REQUESTED 4 LOGIN # 9042277 LOGGED BY JMW LAB PROJ # PROJ VGR CHAD COOPER	
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED TIME COLLECTED 4-9-19 6:50 AM 4-9-19 7:10 AM		MATRIX TYPE WW WW		BOTTLE COUNT 3 1	
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH F.A. IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE FAX # IF DIFFERENT FROM ABOVE PHONE # IF DIFFERENT FROM ABOVE		RUSH DATE RESULTS NEEDED		WET Test X X		SHIPPING X X	
7 RELINQUISHED BY (SIGNATURE) 		RECEIVED BY (SIGNATURE) Stacy Wolf 		DATE TIME 4-9-19 1020		COMMENTS (FOR LAB USE ONLY) SAMPLE TEMPERATURE UPON RECEIPT SAMPLE PROCESS STARTED PRIOR TO RECEIPT SAMPLES RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME EXCLUDES TYPICAL FIELD PARALLEL PRES DATE AND TIME TAKEN FROM SAMPLE BOTTLE	

REMARKS
 [1-P, 1 Gal Cube
 [1-P, 250ml, HMB
 [1-P, 150ml, Vap
 [1-P, 1 Gal Cube

6 The sample temperature will be measured upon receipt at the lab. By initiating this area you request that the lab notify you before proceeding with analysis, if the sample temperature is outside of the range of 0 to 6°C. By not initiating this area you allow the lab to proceed with analytical testing regardless of the sample temperature.

SUBCONTRACT ORDER
 Electronic Filing Received, Clerk's Office 03/08/2024

PDC Laboratories, Inc.
 9042277

SPW

SENDING LABORATORY

PDC Laboratories, Inc.
 1805 West Sunset Street
 Springfield, MO 65807
 (417) 864-8924

RECEIVING LABORATORY

PDC Laboratories, Inc.
 2231 W Altorfer Dr
 Peoria, IL 61615
 (309) 692-9688

Sample: 9042277-01
Name: Effluent Composite- SOUTH (Old)

Sampled: 04/09/19 06:50
Matrix: Waste Water
Preservative: HNO₃, pH <2

Analysis	Due	Expires	Comments
Ca 200.7 WWTot	04/22/19 16:00	10/06/19 06:50	
Mg 200.7 WWTot	04/22/19 16:00	10/06/19 06:50	

Please email results to Chad Cooper at ccooper@pdclab.com

Date Shipped: 4-10-19 Total # of Containers: 1 Sample Origin (State): IL PO #: —
 Turn-Around Time Requested NORMAL RUSH Date Results Needed: —

Relinquished By	Date/Time	Received By	Date/Time	Sample Temperature Upon Receipt	<u>2</u> °C
<i>Stacey Wolf</i>	<u>1400</u> <u>4-10-19</u>			Sample(s) Received on Ice	<input checked="" type="radio"/> Y or N
				Proper Bottles Received in Good Condition	<input checked="" type="radio"/> Y or N
				Bottles Filled with Adequate Volume	<input checked="" type="radio"/> Y or N
				Samples Received Within Hold Time	<input checked="" type="radio"/> Y or N
Relinquished By	Date/Time	Received By	Date/Time	Date/Time Taken From Sample Bottle	Y or N
		<i>[Signature]</i>	<u>4/11/19 1050</u>		<input checked="" type="radio"/>

SUBCONTRACT ORDER
 Transfer: Chain of Custody

PDC Laboratories, Inc.
 9042277

SENDING LABORATORY

PDC Laboratories, Inc.
 1805 West Sunset Street
 Springfield, MO 65807
 (417) 864-8924

RECEIVING LABORATORY

PDC Laboratories, Inc. - St Louis
 3278 N Highway 67
 Florissant, MO 63033
 (314) 432-0550

Sample: 9042277-01
 Name: Effluent Composite- SOUTH (Old)

Sampled: 04/09/19 06:50
 Matrix: Waste Water
 Preservative: Cool <6

Analysis	Due	Expires	Comments
04-Alk	04/19/19 16:00	04/23/19 06:50	

Please email results to Chad Cooper at ccooper@pdclab.com

Date Shipped 4-10-19 Total # of Containers: 1 Sample Origin (State): IL PO #: -
 Turn-Around Time Requested NORMAL RUSH Date Results Needed: -

Relinquished By	Date/Time	Received By	Date/Time	Sample Temperature Upon Receipt	4.4
<i>Stacey Wolf</i>	<u>4-10-19</u> ¹⁵⁰⁰	<i>Jill Clark</i>	<u>4/11/19</u>	Sample(s) Received on Ice	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				Proper Bottles Received in Good Condition	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				Bottles Filled with Adequate Volume	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				Samples Received Within Hold Time	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				Date/Time Taken From Sample Bottle	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N

CHAIN OF CUSTODY RECORD

PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807
 PHONE # 417-864-8924
 FAX # 417-864-7081

State where samples collected IL MO Apr

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT ADDRESS		PROJECT NUMBER		P.O. NUMBER		MEANS SHIPPED		3 ANALYSIS REQUESTED		4 (FOR LAB USE ONLY)			
LASALLE - SOUTH (OLD) 400 RIVER RD LASALLE, IL 61301 VINNY MAGGI		WEDNESDAY		FAX NUMBER		DATE SHIPPED UPS 4-11-19		WET Test Shipping		LOG IN # 9042277 LOGGED BY SMW			
5 TURBIDITY REQUESTED (PLEASE CIRCLE) (RUSH IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE)		6 DATE RESULTS NEEDED		DATE COLLECTED		TIME COLLECTED		SAMPLE TYPE		MATRIX TYPE		BOITLE COUNT	
NORMAL		RUSH		4-11-19		6:50am		X		WW		1	
RUSH RESULTS VIA (PLEASE CIRCLE): FAX PHONE		PHONE # IF DIFFERENT FROM ABOVE		4-11-19		7:20am		X		WW		1	
7 RELINQUISHED BY: (SIGNATURE)		8 COMMENTS: (FOR LAB USE ONLY)		DATE		TIME		DATE		TIME		DATE	
		SAMPLE TEMPERATURE UPON RECEIPT 0.7 °C		4-12-19		1000							
RELINQUISHED BY: (SIGNATURE)		RECEIVED BY: (SIGNATURE)		DATE		TIME		DATE		TIME		DATE	
RELINQUISHED BY: (SIGNATURE)		RECEIVED BY: (SIGNATURE)		DATE		TIME		DATE		TIME		DATE	

The sample temperature will be measured upon receipt at the lab. By initiating this area you request that the lab notify you before proceeding with analysis. If the sample temperature is outside of the range of 0-15°C. By not initiating this area you allow the lab to proceed with analytical testing regardless of the sample temperature.



August 20, 2019

Vincent Maggi
LaSalle WWTP
745 Second St
LaSalle, IL 61301

RE: WETT Multiple 96 hour

Dear Vincent Maggi:

Please find enclosed the analytical results for the **2** sample(s) the laboratory received on **8/7/19 10:15 am** and logged in under work order **9081196**. All testing is performed according to our current TNI accreditations unless otherwise noted. This report cannot be reproduced, except in full, without the written permission of PDC Laboratories, Inc.

If you have any questions regarding your report, please contact your project manager. Quality and timely data is of the utmost importance to us.

PDC Laboratories, Inc. appreciates the opportunity to provide you with analytical expertise. We are always trying to improve our customer service and we welcome you to contact the Director of Client Services, Lisa Grant, with any feedback you have about your experience with our laboratory at 309-683-1764 or lgrant@pdclab.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chad Cooper'.

Chad Cooper
Laboratory Supervisor
(417) 864-8924
ccooper@pdclab.com





ANALYTICAL RESULTS

Sample: 9081196-01
Name: Effluent Composite- SOUTH (Old)
Matrix: Waste Water - Composite

Sampled: 08/06/19 08:39
Received: 08/07/19 10:15

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - SPMO									
Chlorine - Total Residual	< 0.10	mg/L	H	08/07/19 15:37	1	0.10	08/07/19 15:37	cih	SM 4500-Cl G*
Conductivity	2400	umhos/cm		08/07/19 13:09	1	0.10	08/07/19 13:09	cih	SM 2510B
Dissolved Oxygen	9.0	mg/L	H	08/07/19 13:27	1	1.0	08/07/19 13:27	cih	SM 4500-O G*
pH	8.0	pH Units	H	08/07/19 13:27	1		08/07/19 13:27	cih	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		08/07/19 13:27	1		08/07/19 13:27	cih	SM 4500 H B*
General Chemistry - STL									
Alkalinity - total as CaCO3	290	mg/L		08/15/19 09:54	1	20	08/15/19 15:08	SCI	SM 2320B*
Nutrients - SPMO									
Ammonia-N	< 0.10	mg/L	V	08/13/19 11:17	1	0.10	08/13/19 11:17	KMR	EPA 350.1 - QC 10-107-06-1-I & J*
Total Metals - STL									
Hardness	490	mg/L		08/09/19 14:37	20	4.7	08/13/19 14:50	WPS	SM 2340B
Calcium	130	mg/L	Q4	08/09/19 14:37	20	1.9	08/13/19 14:50	WMN	EPA 200.7
Magnesium	41	mg/L		08/09/19 14:37	1	0.050	08/12/19 18:04	WPS	EPA 200.7
WETT - SPMO									
C. dubia - % Mortality in 100% effluent	< 1.0	%		08/07/19 14:42	1	1.0	08/07/19 14:42	cih	EPA 2000.0/2002.0*
C. dubia - LC 50	>100	%		08/07/19 14:42	1	1.0	08/07/19 14:42	cih	EPA 2000.0/2002.0*
P. promelas - % Mortality in 100% effluent	< 1.0	%		08/07/19 14:42	1	1.0	08/07/19 14:42	cih	EPA 2000.0/2002.0*
P. promelas - LC 50	>100	%		08/07/19 14:42	1	1.0	08/07/19 14:42	cih	EPA 2000.0/2002.0*



ANALYTICAL RESULTS

Sample: 9081196-02
Name: Upstream Grab- SOUTH (Old)
Matrix: Surface Water - Grab

Sampled: 08/06/19 08:50
Received: 08/07/19 10:15

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
<u>General Chemistry - SPMO</u>									
Chlorine - Total Residual	< 0.10	mg/L	H	08/07/19 15:37	1	0.10	08/07/19 15:37	cih	SM 4500-Cl G*
Conductivity	670	umhos/cm		08/07/19 13:09	1	0.10	08/07/19 13:09	cih	SM 2510B
Dissolved Oxygen	9.1	mg/L	H	08/07/19 13:27	1	1.0	08/07/19 13:27	cih	SM 4500-O G*
pH	8.5	pH Units	H	08/07/19 13:27	1		08/07/19 13:27	cih	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		08/07/19 13:27	1		08/07/19 13:27	cih	SM 4500 H B*
<u>Nutrients - SPMO</u>									
Ammonia-N	< 0.10	mg/L	V	08/13/19 11:17	1	0.10	08/13/19 11:17	KMR	EPA 350.1 - QC 10-107-06-1-I & J*



NOTES

Specific method revisions used for analysis are available upon request.

* Not a TNI accredited analyte

Memos

Report of Acute Toxicity Testing

Reference Toxicity Test:

PDC Laboratories, INC. conducts a monthly reference toxicant test to demonstrate and obtain consistent, precise results for permit compliance purposes. This demonstration is to ensure satisfactory laboratory performance. The most recent reference test results are as follows:

Date Initiated: August 6, 2019

Date Concluded: August 8, 2019

Reference Toxicant: Potassium Chloride (KCl)

Lot Number: 18A195207

Expiration: N/A

Standards ID: SPMO6-22A

Moderately Hard Synthetic Water: 3-9BC2

Prepared: July 31, 2019

Expiration: August 14, 2019

Analyst: CIH

Pimephales promelas: 48 hour Acute Test - LC50 = 812.5 mg/L

SPMO %CV = 15.27 %

National Limits (75th Percentile) = 17.9% CV

National Control Limit (90th Percentile) = 33% CV

Ceriodaphnia dubia: 48 hour Acute Test - LC50 = 666.7 mg/L

SPMO %CV = 24.36 %

National Limits (75th Percentile) = 29%CV

National Control Limit (90th Percentile) = 34%CV

Literature Cited:

- 1.) APHA. 1992. Standard methods for the examination of water and wastewater, 18th Ed. American Public Health Association, Washington, D.C.
- 2.) USEPA. 2002. Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms, 5th ed. EPA-821-R-02-012
- 3.) USEPA 2000. Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2). June 2000. EPA 833-R-00-003



Certifications

CHI - McHenry, IL - 4314 W Crystal Lake Road A, McHenry, IL 60050

TNI Accreditation for Drinking Water, Wastewater, Fields of Testing through IL EPA Lab No. 100279

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17556

PIA - Peoria, IL - 2231 W Altorfer Drive, Peoria, IL 61615

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553

Drinking Water Certifications: Iowa (240); Kansas (E-10338); Missouri (870)

Wastewater Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

Hazardous/Solid Waste Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPIL - Springfield, IL - 1210 Capitol Airport Drive, Springfield, IL 62707

TNI Accreditation through IL EPA Lab No. 100323

SPMO - Springfield, MO - 1805 W Sunset Street, Springfield, MO 65807

USEPA DMR-QA Program

STL - St. Louis, MO - 3278 N Highway 67, Florissant, MO 63033

TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS Lab No. E-10389

TNI Accreditation for Wastewater, Hazardous, and Solid Waste Analysis through IL EPA No. 200080

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 171050

Missouri Department of Natural Resources

Microbiological Laboratory Service for Drinking Water

Qualifiers

- H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.
- Q4 The matrix spike recovery result is unusable since the analyte concentration in the sample is greater than four times the spike level. The associated blank spike was acceptable.
- V Verification standard recovery failed to meet the required acceptance criteria on repeat instrumental analyses.

Certified by: Chad Cooper, Laboratory Supervisor



PDC Laboratories Inc, SPMO.

EPA Test Methods: 2002.0 & 2000.0

Multiple Dilution WET Test

Client Permit #: IL-0029424

PP Hatch SPM07-10A

CD Hatch 022319A

MHSF 3-9302

Board/Shelf 1

Sample # 9051194

Client LaSalle South

Cup	Conc.	Initial	24 hour	48 hour	72 hour	96 hour	Set Times			
P1	6.25	10	10	10	10	10	Start Date/Time:	8.7.19	1442	
P2	50	10	10	10	10	10	Date	Time	Analyst	
P3	25	10	10	9	10	9	0 Hour	8.7.19	1442	NSW
P4	50	10	10	10	10	10	24 Hour	8.8.19	1404	NSW
P5	6.25	10	10	10	10	10	48 Hour	8.9.19	1357	NSW
P6	25	10	10	10	10	10	72 Hour	8.10.19	1345	Kume
P7	0	10	10	10	10	10	96 Hour	8.11.19	1407	NSW
P8	12.5	10	10	10	10	10	End Date/Time:	8.11.19	1407	
P9	888	10	10	10	10	10	Results			
P10	888	10	10	10	10	10	Pimephales promelas			
P11	100	10	10	10	10	10	96 Hour Result	Date	Analyst	
P12	12.5	10	10	10	10	10	LC 50	>100	8.12.19	NSW
P13*	100	10	10	10	10	10	TUa	<1	8.12.19	NSW
P14*	0	10	10	10	10	10	P-Value	-	-	-
C1	50	5	5	5			Ceriodaphnia Dubia			
C2	12.5	5	5	5			48 Hour Result	Date	Analyst	
C3	0	5	5	5			LC 50	>100	8.12.19	NSW
C4	25	5	5	5			TUa	<1	8.12.19	NSW
C5	0	5	5	5			P-Value	-	-	-
C6	888	5	5	5			Filtered (Y/N):	Y	8.7.19	NSW
C7	100	5	5	5			Light Check:	-	-	-
C8	12.5	5	5	5			PP Fry Age:	7 days	8.7.19	NSW
C9	6.25	5	5	5			CD Neonates Age:	24 hrs	8.7.19	NSW
C10	100	5	5	5			Comments: PP fry were set in 200 ml of conc. w/in a 250 ml cup .CD were set in 15 ml of conc. w/in a 30 ml cup			
C11	25	5	5	5			C13-could not find 5th dead neonate			
C12	50	5	5	5						
C13	6.25	5	4	4						
C14	50	5	5	5						
C15	12.5	5	5	5						
C16	6.25	5	5	5						
C17	6.25	5	5	5						
C18	888	5	5	5						
C19	100	5	5	5						
C20	0	5	5	5						
C21	100	5	5	5						
C22	25	5	5	5			Analyst Signature:	<u>Naomi Wilson</u>		
C23	888	5	5	5			Date:	<u>8.16.19</u>		
C24	12.5	5	5	5			Read and Understood By:	<u>Krista Rice</u>		
C25*	0	5	5	5			Date:	<u>8.19.19</u>		
C26*	888	5	5	5			Logbook:	<u>3</u>		
C27*	50	5	5	5			Report #:	<u>56</u>		
C28*	25	5	5	5						

* These cups only used when upstream samples are provided.

EPA Test Methods: 2002.0 & 2000.0

POC Laboratories Inc. SPMO.

Routine Chemistries

Client Permit # **11-0029424**
 PP Hatch **SPMPT-10A**
 Client **LA SAILER SOUTH CD Hatch**
 Sample # **9081190**
 Client **LA SAILER SOUTH CD Hatch**
 MHSF **3-91363**
 Board/Shelf **2**

pH	4.00	Initial	Date	Time	Analyst	48 Hour	Date	Time	Analyst	DO (mg/L)	Date	Time	1 Hour				96 Hour		
													Initial	Date	Time	Analyst		24 Hour	48 Hour
DO (mg/L)	7.00	4.01	8.7.19	11:10	CH	8.43	8.7.19	13:25	NSW	13.30	8.8.19	12:50	15.48	8.8.19	13:27	17.30	17.30	17.30	17.30
DO (mg/L)	10.00	7.00	10.01	10:02	CH	9.00	8.10	8:49	NSW	8.7.19	8.7.19	8:49	8.7.19	8.7.19	8:49	8.7.19	8.7.19	8.7.19	8.7.19
DO (mg/L)	Curve	98.3	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0	98.0
Cup #	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49	49
Concentration	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF	MHSF
pH (EPA 150.1)	7.82	8.44	8.43	8.35	8.21	8.43	8.47	7.94	8.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19	8.7.19
Ammonia (mg/L)	0.20	0.05	0.05	0.06	0.07	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06
Conductivity (µMols) (SM 2510B)	309	309	309	309	309	309	309	309	309	309	309	309	309	309	309	309	309	309	309
Chlorine (mg/L)	4500Cl-G	0.65	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64
Ammonia (mg/L)	EPA 350.1	0.0055	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061	0.0061
Alkalinity (mg/L)	2320B	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02	7.02
Hardness (mg/L)	2007	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0	14.0
Temperature (°C)	Fathead Minnow	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2	22.2
Test	MHSF	8.44	8.41	8.41	8.63	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41	8.41
DO (mg/L)	Fathead Minnow	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3	23.3
Temperature (°C)	MHSF	8.62	8.72	8.72	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43	8.43
DO (mg/L)	Fathead Minnow	7.54	7.22	7.25	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35	7.35
Temperature (°C)	MHSF	7.19	7.23	7.09	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19	7.19
Test	MHSF	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7
DO (mg/L)	Fathead Minnow	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0	30.0
Temperature (°C)	MHSF	7.53	7.19	7.13	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20	7.20
Test	MHSF	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6	24.6
DO (mg/L)	Fathead Minnow	11.07	8.22	8.21	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38	8.38
Temperature (°C)	MHSF	7.49	7.23	7.29	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50
Test	MHSF	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7
DO (mg/L)	Fathead Minnow	37.0	27.50	27.30	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50
Temperature (°C)	MHSF	27.0	27.50	27.30	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50	27.50
Conductivity (µMols)	Fathead Minnow	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7	24.7

Analyst Signature: *Heath Wilson*
 Date: 8-16-19
 Read and Understood By: *Kinda Rice*
 Date: 8-14-19

PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

State where samples collected IL MO

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT LASALLE - SOUTH (OLD) ADDRESS 400 RIVER RD CITY, STATE ZIP LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER MONDAY P.O. NUMBER FAX NUMBER		MEANS SHIPPED UPS DATE SHIPPED 8-6-19		ANALYSIS REQUESTED 3		(FOR LAB USE ONLY) 4 LOGIN # 9081196 LOGGED BY: Sam LAB PROJ. # TEMPLATE: PROJ. MGR.: CHAD COOPER	
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT		DATE COLLECTED TIME COLLECTED SAMPLE TYPE GRAB COMP		MATRIX TYPE BOTTLE COUNT		WFT Test Shipping		REMARKS	
WET TEST EFFLUENT COMPOSITE		8-6-19 8:35		WW X		3		1-P, 16gal Cube, Wup	
UPSTREAM GRAB (IF AVAILABLE)		8-6-19 8:50		WW X		1		1-P, 250ml, HAD03 1-P, 150ml, Wup 1-P, 16gal Cube, Wup	
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TATS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE		DATE COLLECTED TIME COLLECTED SAMPLE TYPE GRAB COMP		MATRIX TYPE BOTTLE COUNT		WFT Test Shipping		REMARKS	
6 The sample temperature will be measured upon receipt at the lab. By initiating this area you request that the lab notify you, before proceeding with analysis, if the sample temperature is outside of the range of 0-14.0°C. By not initiating this area you allow the lab to proceed with analytical testing regardless of the sample temperature.		DATE RESULTS NEEDED		MATRIX TYPE BOTTLE COUNT		WFT Test Shipping		REMARKS	
7 RELINQUISHED BY: (SIGNATURE) DATE TIME		RECEIVED BY: (SIGNATURE) DATE TIME		MATRIX TYPE BOTTLE COUNT		WFT Test Shipping		REMARKS	
8 COMMENTS: (FOR LAB USE ONLY)		RECEIVED BY: (SIGNATURE) DATE TIME		MATRIX TYPE BOTTLE COUNT		WFT Test Shipping		REMARKS	

PDC Laboratories, Inc.
 9081196

SENDING LABORATORY

PDC Laboratories, Inc.
 1805 West Sunset Street
 Springfield, MO 65807
 (417) 864-8924

RECEIVING LABORATORY

PDC Laboratories, Inc. - St Louis
 3278 N Highway 67
 Florissant, MO 63033
 (314) 432-0550

Sample: 9081196-01
Name: Effluent Composite- SOUTH (Old)

Sampled: 08/06/19 08:39
Matrix: Waste Water
Preservative: Cool <6

Analysis	Due	Expires	Comments
04-Alk	08/19/19 16:00	08/20/19 08:39	
04-Ca 200.7 WWTot	08/16/19 16:00	02/02/20 08:39	
04-Mg 200.7 WWTot	08/16/19 16:00	02/02/20 08:39	

Please email results to Chad Cooper at ccooper@pdclab.com

Date Shipped: 8-7-19 Total # of Containers: 2 Sample Origin (State): IL PO #:
 Turn-Around Time Requested NORMAL RUSH Date Results Needed:

Relinquished By	Date/Time	Received By	Date/Time	Sample Temperature Upon Receipt	<u>4.7</u> °C
<u>Stacy Wolf</u>	<u>8-7-19 1500</u>	<u>Jim Clark</u>	<u>8/8/19</u>	Sample(s) Received on Ice	Y or N
				Proper Bottles Received in Good Condition	Y or N
				Bottles Filled with Adequate Volume	Y or N
				Samples Received Within Hold Time	Y or N
				Date/Time Taken From Sample Bottle	Y or N

PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

State where samples collected MO

IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT LASALLE - SOUTH (OLD) ADDRESS 400 RIVER RD CITY, STATE ZIP LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER WEDNESDAY P.O. NUMBER FAX NUMBER PHONE NUMBER 815-223-8816 SAMPLER (PLEASE PRINT) Vincent Maggi SAMPLER'S SIGNATURE <i>[Signature]</i>		MEANS SHIPPED UPS DATE SHIPPED 8-8-19 MATRIX TYPES: WW- WASTEWATER DW- DRINKING WATER GW- GROUND WATER WWSL- SLUDGE NAS- SOLID LCHT- LEACHATE OTHER: MATRIX TYPE BOTTLE COUNT		ANALYSIS REQUESTED WET Test Shipping		(FOR LAB USE ONLY) 4 LOGIN # 9081196 LOGGED BY: Sam LAB PROJ. # TEMPLATE: PROJ. MGR.: CHAD COOPER	
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED 8-8-19 7:22 8-8-19 7:30 TIME COLLECTED 7:22 7:30		SAMPLE TYPE GRAB COMP X X		WET Test Shipping		REMARKS 1- P. Maggi 1- P. Maggi, Varp	
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH-TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE DATE 8-8-19 TIME RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE)		DATE COLLECTED 8-8-19 TIME COLLECTED 7:22 7:30		SAMPLE TYPE GRAB COMP X X		WET Test Shipping		COMMENTS: (FOR LAB USE ONLY) 8 SAMPLE TEMPERATURE UPON RECEIPT CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE	
RELINQUISHED BY: (SIGNATURE) RELINQUISHED BY: (SIGNATURE) RELINQUISHED BY: (SIGNATURE)		DATE 8-8-19 TIME DATE TIME DATE TIME		DATE RESULTS NEEDED DATE TIME		WET Test Shipping		SAMPLE TEMPERATURE UPON RECEIPT 3.2 °C CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE	



November 14, 2019

Vincent Maggi
LaSalle WWTP
745 Second St
LaSalle, IL 61301

RE: WETT Multiple 96 hour

Dear Vincent Maggi:

Please find enclosed the analytical results for the **2** sample(s) the laboratory received on **11/6/19 10:21 am** and logged in under work order **9110780**. All testing is performed according to our current TNI accreditations unless otherwise noted. This report cannot be reproduced, except in full, without the written permission of PDC Laboratories, Inc.

If you have any questions regarding your report, please contact your project manager. Quality and timely data is of the utmost importance to us.

PDC Laboratories, Inc. appreciates the opportunity to provide you with analytical expertise. We are always trying to improve our customer service and we welcome you to contact the Director of Client Services, Lisa Grant, with any feedback you have about your experience with our laboratory at 309-683-1764 or lgrant@pdclab.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chad Cooper'.

Chad Cooper
Laboratory Supervisor
(417) 864-8924
ccooper@pdclab.com





ANALYTICAL RESULTS

Sample: 9110780-01
Name: Effluent Composite- SOUTH (Old)
Matrix: Waste Water - Composite

Sampled: 11/05/19 07:08
Received: 11/06/19 10:21
PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - PIA									
Alkalinity - total as CaCO3	320	mg/L		11/12/19 13:00	1	10	11/12/19 13:00	MGU	SM 2320B
General Chemistry - SPMO									
Chlorine - Total Residual	< 0.10	mg/L	H	11/08/19 09:48	1	0.10	11/08/19 09:48	CIH	SM 4500-Cl G*
Conductivity	1300	umhos/cm		11/06/19 12:39	1	0.10	11/06/19 12:39	CIH	SM 2510B
Dissolved Oxygen	8.4	mg/L	H	11/06/19 12:35	1	1.0	11/06/19 12:35	CIH	SM 4500-O G*
pH	7.7	pH Units	H	11/06/19 12:39	1		11/06/19 12:39	CIH	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		11/06/19 15:42	1		11/06/19 15:42	CIH	SM 4500 H B*
Nutrients - SPMO									
Ammonia-N	0.30	mg/L		11/08/19 14:40	1	0.10	11/08/19 14:40	CIH	EPA 350.1 - QC 10-107-06-1-I & J*
Total Metals - PIA									
Total Hardness as CaCO3	420	mg/L		11/12/19 09:28	10	2.9	11/13/19 12:34	ZSA	SM 2340B
Calcium	120	mg/L		11/12/19 09:28	10	1.0	11/13/19 12:34	ZSA	EPA 200.7
Magnesium	32	mg/L		11/12/19 09:28	1	0.10	11/12/19 13:41	ZSA	EPA 200.7
WETT - SPMO									
C. dubia - % Mortality in 100% effluent	20	%		11/06/19 15:42	1	1.0	11/06/19 15:42	CIH	EPA 2000.0/2002.0*
C. dubia - LC 50	>100	%	X	11/06/19 15:42	1	1.0	11/06/19 15:42	CIH	EPA 2000.0/2002.0*
P. promelas - % Mortality in 100% effluent	< 1.0	%		11/06/19 15:42	1	1.0	11/06/19 15:42	CIH	EPA 2000.0/2002.0*
P. promelas - LC 50	>100	%		11/06/19 15:42	1	1.0	11/06/19 15:42	CIH	EPA 2000.0/2002.0*



ANALYTICAL RESULTS

Sample: 9110780-02
Name: Upstream Grab- SOUTH (Old)
Matrix: Surface Water - Grab

Sampled: 11/05/19 07:40
Received: 11/06/19 10:21
PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
<u>General Chemistry - SPMO</u>									
Chlorine - Total Residual	< 0.10	mg/L	H	11/08/19 09:48	1	0.10	11/08/19 09:48	CIH	SM 4500-Cl G*
Conductivity	610	umhos/cm		11/06/19 12:39	1	0.10	11/06/19 12:39	CIH	SM 2510B
Dissolved Oxygen	8.9	mg/L	H	11/06/19 12:35	1	1.0	11/06/19 12:35	CIH	SM 4500-O G*
pH	7.7	pH Units	H	11/06/19 12:39	1		11/06/19 12:39	CIH	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		11/06/19 15:42	1		11/06/19 15:42	CIH	SM 4500 H B*
<u>Nutrients - SPMO</u>									
Ammonia-N	< 0.10	mg/L		11/08/19 14:40	1	0.10	11/08/19 14:40	CIH	EPA 350.1 - QC 10-107-06-1-I & J*



NOTES

Specifications regarding method revisions and method modifications used for analysis are available upon request. Please contact your project manager.

* Not a TNI accredited analyte

Memos

Report of Acute Toxicity Testing

Reference Toxicity Test:

PDC Laboratories, INC. conducts a monthly reference toxicant test to demonstrate and obtain consistent, precise results for permit compliance purposes. This demonstration is to ensure satisfactory laboratory performance. The most recent reference test results are as follows:

Date Initiated: October 8, 2019

Date Concluded: October 10, 2019

Reference Toxicant: Potassium Chloride (KCl)

Lot Number: 18A195207

Expiration: N/A

Standards ID: SPMO6-22A

Moderately Hard Synthetic Water: 3-11CC1

Prepared: September 27, 2019

Expiration: October 11, 2019

Analyst: CIH

Pimephales promelas: 48 hour Acute Test - LC50 = 678.6 mg/L

SPMO %CV = 15.72 %

National Limits (75th Percentile) = 17.9% CV

National Control Limit (90th Percentile) = 33% CV

Ceriodaphnia dubia: 48 hour Acute Test - LC50 = 617.4 mg/L

SPMO %CV = 24.96 %

National Limits (75th Percentile) = 29%CV

National Control Limit (90th Percentile) = 34%CV

Literature Cited:

- 1.) APHA. 1992. Standard methods for the examination of water and wastewater, 18th Ed. American Public Health Association, Washington, D.C.
- 2.) USEPA. 2002. Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms, 5th ed. EPA-821-R-02-012
- 3.) USEPA 2000. Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2). June 2000. EPA 833-R-00-003



Certifications

CHI - McHenry, IL - 4314 W Crystal Lake Road A, McHenry, IL 60050

TNI Accreditation for Drinking Water, Wastewater, Fields of Testing through IL EPA Lab No. 100279

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17556

PIA - Peoria, IL - 2231 W Altorfer Drive, Peoria, IL 61615

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553

Drinking Water Certifications: Iowa (240); Kansas (E-10338); Missouri (870)

Wastewater Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

Hazardous/Solid Waste Certifications: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPIL - Springfield, IL - 1210 Capitol Airport Drive, Springfield, IL 62707

TNI Accreditation through IL EPA Lab No. 100323

SPMO - Springfield, MO - 1805 W Sunset Street, Springfield, MO 65807

USEPA DMR-QA Program

STL - St. Louis, MO - 3278 N Highway 67, Florissant, MO 63033

TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS Lab No. E-10389

TNI Accreditation for Wastewater, Hazardous, and Solid Waste Analysis through IL EPA No. 200080

Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 171050

Missouri Department of Natural Resources

Microbiological Laboratory Service for Drinking Water

Qualifiers

- H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.
- X LCS failure did not affect client results.

Certified by: Chad Cooper, Laboratory Supervisor



PDC Laboratories Inc, SPMO.

EPA Test Methods: 2002.0 & 2000.0

Multiple Dilution WET Test

Client Permit #: IL-0029424

Sample # 9110780

PP Hatch 102819A

MHSF 3-13AC2

Client Lasalle S

CD Hatch 1024191CB

Board/Shelf 003/3

Cup	Conc.	Initial	24 hour	48 hour	72 hour	96 hour	Set Times		
							Date	Time	Analyst
P1	25	10	10	10	10	10			
P2	6.25	10	10	10	10	10	0 Hour	11.16.19	1542 NSW
P3	888	10	10	10	10	10	24 Hour	11.7.19	1442 NSW
P4	50	10	10	10	10	10	48 Hour	11.8.19	1342 CIH
P5	6.25	10	10	10	10	10	72 Hour	11.9.19	1325 NSW
P6	100	10	10	10	10	10	96 Hour	11.10.19	1700 CIH
P7	25	10	10	10	10	10	Results		
P8	0	10	10	10	10	10	Pimephales promelas		
P9	50	10	10	10	10	10	96 Hour Result	Date	Analyst
P10	0	10	10	10	10	10	LC 50	>100	11.11.19 CIH
P11	12.5	10	10	10	10	10	TUa	<1	11.11.19 CIH
P12	100	10	10	10	10	10	Ceriodaphnia Dubia		
P13*	12.5	10	10	10	10	10	48 Hour Result	Date	Analyst
P14*	888	10	10	10	10	10	LC 50	>100	11.11.19 CIH
C1	25	5	5	5			TUa	<1	11.11.19 CIH
C2	888	5	5	5				Date	Analyst
C3	50	5	5	5			Filtered (Y/N):	Y	11.10.19 NSW
C4	6.25	5	5	5			Light Check:	—	—
C5	100	5	3	3			PP Fry Age:	9 days	11.16.19 NSW
C6	12.5	5	5	5			CD Neonates Age:	< 24 hrs.	11.16.19 NSW
C7	25	5	5	5			Comments: PP fry were set in 200 ml of conc. w/in a 250 ml cup .CD were set in 15 ml of conc. w/in a 30 ml cup		
C8	100	5	4	4			LCS failure did not affect client results. NSW		
C9	888	5	4	4					
C10	100	5	5	5					
C11	6.25	5	5	5					
C12	12.5	5	5	5					
C13	50	5	5	5					
C14	888	5	4	4					
C15	50	5	5	5					
C16	25	5	5	5					
C17	0	5	5	5					
C18	50	5	5	5					
C19	12.5	5	5	5					
C20	12.5	5	5	5					
C21	6.25	5	5	5					
C22	0	5	5	5					
C23	0	5	5	5					
C24	100	5	5	4					
C25*	25	5	5	5					
C26*	6.25	5	5	5					
C27*	888	5	4	4					
C28*	0	5	5	5					

Analyst Signature: [Signature]
Date: 11.13.19

Read and Understood By: [Signature]
Date: 11-13-19

Logbook: 3 Report #: 95

* These cups only used when upstream samples are provided.

EPA Test Methods: 2002.0 & 2000.0

Routine Chemistries

Sample # 9110780 Client LaSalle SouthCo Hatch
 Client Permit # L-0029424 PP Hatch 102319A
 MHSF 3-13AC2 Board/Shelf 00313

Calibration data		Initial/Received		96 hour		48 hour		24 hour		12 hour		6 hour		3 hour		1 Hour		24 Hour		48 Hour		72 Hour		96 Hour				
DO (mg/L)	Pressure (mmHg)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst	DO (mg/L)	Date	Time	Analyst
4.00	7.00	11/01/19	11:21	NSW	4.01	11/2/19	11:45	CIH	4.00	11/10/19	17:00	CIH	4.01	11/10/19	17:00	CIH	4.01	11/10/19	17:00	NSW	4.01	11/10/19	17:00	NSW	4.01	11/10/19	17:00	NSW
10.00	10.02	11/01/19	11:21	NSW	10.03	11/2/19	11:45	CIH	10.01	11/10/19	17:00	CIH	10.01	11/10/19	17:00	CIH	10.01	11/10/19	17:00	NSW	10.01	11/10/19	17:00	NSW	10.01	11/10/19	17:00	NSW
Curve	97.2	11/01/19	11:21	NSW	97.0	11/2/19	11:45	CIH	97.0	11/10/19	17:00	CIH	97.0	11/10/19	17:00	CIH	97.0	11/10/19	17:00	NSW	97.0	11/10/19	17:00	NSW	97.0	11/10/19	17:00	NSW
Concentration																												
pH (EPA 150.1)																												
DO mg/L (SM 5010)																												
DO mg/L Received																												
Conductivity (µMhos) (SM 2510B)																												
Chlorine (mg/L)																												
Ammonia (mg/L)																												
Alkalinity (mg/L)																												
Hardness (mg/L)																												
Temperature (°C)																												
Test																												
DO (mg/L)																												
Temperature (°C)																												
Test																												
DO (mg/L)																												
Temperature (°C)																												
Test																												
pH																												
DO (mg/L)																												
Temperature (°C)																												
Test																												
Conductivity (µMhos) Renewal Period:																												
DO (mg/L)																												
Temperature (°C)																												
Test																												
pH																												
DO (mg/L)																												
Temperature (°C)																												
Test																												
Conductivity (µMhos)																												

Analyst Signature: *Carla...*
 Date: 11.13.19
 Read and Understood By: *[Signature]*
 Date: 11-15-19

*Upstream only performed if supplied by the client


PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)




1 CLIENT ADDRESS LASALLE - SOUTH (OLD) 400 RIVER RD LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER MONDAY PHONE NUMBER 85-233-3816 FAX NUMBER (PLEASE PRINT) Vincent Maggi SIGNATURE 	MEANS SHIPPED UPS DATE SHIPPED 11-5-19 MATRIX TYPES: WW- WASTEWATER DW- DRINKING WATER GW- GROUND WATER WWSL- SLUDGE WWS- SOLID LCHT-LEACHATE OTHER:	ANALYSIS REQUESTED WET Test Shipping	(FOR LAB USE ONLY) 4 LOGIN # 9110780 LOGGED BY SMC LAB PROJ # TEMPLATE: PROJ. MGR. CHAD COOPER
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED 11-5-19 11-5-19 TIME COLLECTED 7:08 pm 7:40 am SAMPLE TYPE GRAB COMP X X RUSH	BOTTLE COUNT 3 1 MATRIX TYPE WW WW	REMARKS 1- P, 1 Gal Cube, Vup 1- P, 250.0, HNO3 1- P, Vup, 150 ml 1- P, 1 Gal Cube, Vup	COMMENTS: (FOR LAB USE ONLY) 8 SAMPLE TEMPERATURE UPON RECEIPT 6.5 °C CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO POC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE (RUSH TAT IS SUBJECT TO POC LABS APPROVAL AND SURCHARGE) NORMAL DATE RESULTS NEEDED DATE RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE)		DATE 11-5-19 TIME DATE TIME DATE TIME	DATE 11-6-19 TIME 1021 DATE TIME DATE TIME	RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE) RECEIVED BY: (SIGNATURE)	COMMENTS: (FOR LAB USE ONLY) 8 SAMPLE TEMPERATURE UPON RECEIPT 6.5 °C CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE

PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD
 State where samples collected IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT LASALLE - SOUTH (OLD) ADDRESS 400 RIVER RD CITY, STATE ZIP LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER WEDNESDAY P.O. NUMBER MEANS SHIPPED DATE SHIPPED PHONE NUMBER 815-488-1733 FAX NUMBER 11-7-19 SAMPLER (PLEASE PRINT) Vincent Maggi SAMPLER'S SIGNATURE 		ANALYSIS REQUESTED WET Test Shipping		(FOR LAB USE ONLY) LOGIN # 9110780 LOGGED BY: Saw LAB PROJ. # TEMPLATE: PROJ. MGR.: CHAD COOPER	
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED 11-7-19 7:28am 11-7-19 7:50am TIME COLLECTED 7:28am 7:50am		DATE RESULTS NEEDED RUSH		REMARKS 1 Gal Wmp ↓	
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE PHONE # IF DIFFERENT FROM ABOVE		DATE 11-7-19 TIME RECEIVED BY: (SIGNATURE) 		DATE 11-8-19 TIME 1000 RECEIVED BY: (SIGNATURE) 		COMMENTS: (FOR LAB USE ONLY) SAMPLE TEMPERATURE UPON RECEIPT 1.0 °C CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE	

PDC Laboratories, Inc.
 9110780

BLW

SENDING LABORATORY

PDC Laboratories, Inc.
 1805 West Sunset Street
 Springfield, MO 65807
 (417) 864-8924

RECEIVING LABORATORY

PDC Laboratories, Inc.
 2231 W Altorfer Dr
 Peoria, IL 61615
 (309) 692-9688

Sample: 9110780-01
 Name: Effluent Composite- SOUTH (Old)

Sampled: 11/05/19 07:08
 Matrix: Waste Water
 Preservative: Cool <6

Analysis	Due	Expires	Comments
Alk	11/15/19 16:00	11/19/19 07:08	
Ca 200.7 WWTot	11/15/19 16:00	05/03/20 07:08	
Mg 200.7 WWTot	11/15/19 16:00	05/03/20 07:08	

Please email results to Chad Cooper at ccooper@pdclab.com

Date Shipped: 11-6-19 Total # of Containers: 2 Sample Origin (State): IL PO #: —

Turn-Around Time Requested NORMAL RUSH Date Results Needed: —

Relinquished By	Date/Time	Received By	Date/Time	Sample Temperature Upon Receipt	°C
<i>Stacey Wolf</i>	<u>11-6-19</u>	<i>BLW</i>	<u>11-19</u>		<u>4</u>
Relinquished By	Date/Time	Received By	Date/Time	Sample(s) Received on Ice	Y or N
			<u>1000</u>		<input checked="" type="checkbox"/>
				Proper Bottles Received in Good Condition	<input checked="" type="checkbox"/>
				Bottles Filled with Adequate Volume	<input checked="" type="checkbox"/>
				Samples Received Within Hold Time	<input checked="" type="checkbox"/>
				Date/Time Taken From Sample Bottle	Y or N
					<input checked="" type="checkbox"/>



February 11, 2020

Vincent Maggi
LaSalle WWTP
745 Second St
LaSalle, IL 61301

RE: WETT Multiple 96 hour

Dear Vincent Maggi:

Please find enclosed the analytical results for the **2** sample(s) the laboratory received on **2/5/20 10:25 am** and logged in under work order **0020827**. All testing is performed according to our current TNI accreditations unless otherwise noted . This report cannot be reproduced, except in full, without the written permission of PDC Laboratories, Inc.

If you have any questions regarding your report, please contact your project manager. Quality and timely data is of the utmost importance to us.

PDC Laboratories, Inc. appreciates the opportunity to provide you with analytical expertise. We are always trying to improve our customer service and we welcome you to contact the Director of Client Services, Lisa Grant, with any feedback you have about your experience with our laboratory at 309-683-1764 or lgrant@pdclab.com.

Sincerely,

Chad Cooper
Laboratory Supervisor
(417) 864-8924
ccooper@pdclab.com





ANALYTICAL RESULTS

Sample: 0020827-01
Name: Effluent Composite- SOUTH (Old)
Matrix: Waste Water - Composite

Sampled: 02/04/20 07:10
Received: 02/05/20 10:25
PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
General Chemistry - SPMO									
Chlorine - Total Residual	0.11	mg/L	H	02/05/20 16:00	1	0.10	02/05/20 16:00	CIH	SM 4500-Cl G*
Conductivity	1700	umhos/cm		02/05/20 13:00	1	0.10	02/05/20 13:00	NSW	SM 2510B
Dissolved Oxygen	8.2	mg/L	H	02/05/20 12:22	1	1.0	02/05/20 12:22	NSW	SM 4500-O G*
pH	7.4	pH Units	H	02/05/20 13:00	1		02/05/20 13:00	NSW	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		02/05/20 14:13	1		02/05/20 14:13	NSW	SM 4500 H B*
General Chemistry - STL									
Alkalinity - total as CaCO3	280	mg/L		02/10/20 10:56	1	20	02/10/20 15:33	SJP	SM 2320B*
Nutrients - SPMO									
Ammonia-N	< 0.10	mg/L		02/06/20 13:15	1	0.10	02/06/20 13:15	CIH	EPA 350.1 - QC 10-107-06-1-I & J*
Total Metals - STL									
Hardness	450	mg/L		02/07/20 09:30	1	0.47	02/07/20 18:50	JMW1	SM 2340B
Calcium	120	mg/L		02/07/20 09:30	1	0.19	02/07/20 18:50	JMW1	EPA 200.7*
Magnesium	35	mg/L		02/07/20 09:30	1	0.10	02/07/20 18:50	JMW1	EPA 200.7*
WETT - SPMO									
C. dubia - % Mortality in 100% effluent	< 1.0	%		02/05/20 14:13	1	1.0	02/05/20 14:13	NSW	EPA 2000.0/2002.0*
C. dubia - LC 50	>100	%		02/05/20 14:13	1	1.0	02/05/20 14:13	NSW	EPA 2000.0/2002.0*
P. promelas - % Mortality in 100% effluent	< 1.0	%		02/05/20 14:13	1	1.0	02/05/20 14:13	NSW	EPA 2000.0/2002.0*
P. promelas - LC 50	>100	%		02/05/20 14:13	1	1.0	02/05/20 14:13	NSW	EPA 2000.0/2002.0*



ANALYTICAL RESULTS

Sample: 0020827-02
Name: Upstream Grab- SOUTH (Old)
Matrix: Surface Water - Grab

Sampled: 02/04/20 07:21
Received: 02/05/20 10:25
PO #: South (Old)

Parameter	Result	Unit	Qualifier	Prepared	Dilution	MRL	Analyzed	Analyst	Method
<u>General Chemistry - SPMO</u>									
Chlorine - Total Residual	< 0.10	mg/L	H	02/05/20 16:00	1	0.10	02/05/20 16:00	CIH	SM 4500-Cl G*
Conductivity	770	umhos/cm		02/05/20 13:00	1	0.10	02/05/20 13:00	NSW	SM 2510B
Dissolved Oxygen	10	mg/L	H	02/05/20 12:22	1	1.0	02/05/20 12:22	NSW	SM 4500-O G*
pH	7.7	pH Units	H	02/05/20 13:00	1		02/05/20 13:00	NSW	SM 4500-H B - SW 9040
Temperature at pH measurement	23	°C		02/05/20 14:13	1		02/05/20 14:13	NSW	SM 4500 H B*
<u>Nutrients - SPMO</u>									
Ammonia-N	< 0.10	mg/L		02/06/20 13:15	1	0.10	02/06/20 13:15	CIH	EPA 350.1 - QC 10-107-06-1-I & J*



NOTES

Specifications regarding method revisions and method modifications used for analysis are available upon request. Please contact your project manager.

* Not a TNI accredited analyte

Memos

Report of Acute Toxicity Testing

Reference Toxicity Test:

PDC Laboratories, INC. conducts a monthly reference toxicant test to demonstrate and obtain consistent, precise results for permit compliance purposes. This demonstration is to ensure satisfactory laboratory performance. The most recent reference test results are as follows:

Date Initiated: February 4, 2020

Date Concluded: February 4, 2020

Reference Toxicant: Potassium Chloride (KCl)

Lot Number: 18A195207

Expiration: N/A

Standards ID: SPMO6-22A

Moderately Hard Synthetic Water: 3-15CC1

Prepared: February 1, 2020

Expiration: February 15, 2020

Analyst: CIH

Pimephales promelas: 48 hour Acute Test - LC50 = 750 mg/L

SPMO %CV = 11.56 %

National Limits (75th Percentile) = 17.9% CV

National Control Limit (90th Percentile) = 33% CV

Ceriodaphnia dubia: 48 hour Acute Test - LC50 = 736.8 mg/L

SPMO %CV = 24.55 %

National Limits (75th Percentile) = 29%CV

National Control Limit (90th Percentile) = 34%CV

Literature Cited:

1.) APHA. 1992. Standard methods for the examination of water and wastewater, 18th Ed. American Public Health Association, Washington, D.C.

2.) USEPA. 2002. Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms, 5th ed. EPA-821-R-02-012

3.) USEPA 2000. Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2). June 2000. EPA 833-R-00-003



Certifications

CHI - McHenry, IL - 4314-A W. Crystal Lake Road A, McHenry, IL 60050

TNI Accreditation for Drinking Water and Wastewater Fields of Testing through IL EPA Accreditation No. 100279
Illinois Department of Public Health Bacterial Analysis in Drinking Water Approved Laboratory, Registry No. 17556

PIA - Peoria, IL - 2231 W. Altorfer Drive, Peoria, IL 61615

TNI Accreditation for Drinking Water, Wastewater, Solid and Hazardous Material Fields of Testing through IL EPA Accreditation No. 100230

Illinois Department of Public Health Bacterial Analysis in Drinking Water Approved Laboratory, Registry No. 17553

Drinking Water Certifications/Accreditations: Kansas (E-10338); Missouri (870)

Wastewater Certifications/Accreditations: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

Solid and Hazardous Material Certifications/Accreditations: Arkansas (88-0677); Iowa (240); Kansas (E-10338)

SPIL - Springfield, IL - 1210 Capitol Airport Drive, Springfield, IL 62707

Illinois Department of Public Health Bacterial Analysis in Drinking Water Approved Laboratory, Registry No. 17592

SPMO - Springfield, MO - 1805 W Sunset Street, Springfield, MO 65807

USEPA DMR-QA Program

STL - Hazelwood, MO - 944 Anglum Rd, Hazelwood, MO 63042

TNI Accreditation for Wastewater, Solid and Hazardous Material Fields of Testing through KS - E-10389

TNI Accreditation for Wastewater, Solid and Hazardous Material Fields of Testing through IL - Pending

Illinois Department of Public Health Bacterial Analysis in Drinking Water Approved Laboratory, Registry No. 171050

Missouri Department of Natural Resources - Certificate of Approval for Microbiological Laboratory Service - No. 1050

Qualifiers

H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.

Certified by: Chad Cooper, Laboratory Supervisor



PDC Laboratories Inc, SPMO.

EPA Test Methods: 2002.0 & 2000.0

Multiple Dilution WET Test

Client Permit #: IL-0029424

Sample # 0020827
Client Lasalle South

PP Hatch 020320A
CD Hatch 012220ICA

MHSF 3-15 ccl
Board/Shelf 602/2

Cup	Conc.	Initial	24 hour	48 hour	72 hour	96 hour	Set Times		
P1	50	10	10	10	10	10	Date	Time	Analyst
P2	888	10	10	10	10	9	0 Hour	2-5-20	1413 NSW
P3	12.5	10	10	10	10	10	24 Hour	2-6-20	1356 NSW
P4	25	10	10	10	10	10	48 Hour	2-7-20	1300 NSW
P5	50	10	10	9	9	7	72 Hour	2-8-20	1200 C11
P6	100	10	10	10	10	10	96 Hour	2-9-20	1300 NSW
P7	25	10	10	10	10	10	Results		
P8	0	10	10	10	10	10	Pimephales promelas		
P9	100	10	10	10	10	10	96 Hour Result	Date	Analyst
P10	6.25	10	10	10	10	10	LC 50	>100	2-9-20 NSW
P11	12.5	10	10	10	10	10	TUa	<1	2-9-20 NSW
P12	0	10	10	10	10	10	Ceriodaphnia Dubia		
P13*	6.25	10	10	10	10	10	48 Hour Result	Date	Analyst
P14*	888	10	10	10	10	10	LC 50	>100	2-9-20 NSW
C1	6.25	5	5	5	5	5	TUa	<1	2-9-20 NSW
C2	6.25	5	5	5	5	5		Date	Analyst
C3	50	5	5	5	5	5	Filtered (Y/N):	Y	2-5-20 NSW
C4	0	5	5	5	5	5	Light Check:	52.6	2-11-20 NSW
C5	50	5	5	5	5	5	PP Fry Age:	2 days	2-5-20 NSW
C6	888	5	5	5	5	5	CD Neonates Age:	< 24 hrs.	2-5-20 NSW
C7	12.5	5	5	5	5	5	Comments: PP fry were set in 200 ml of conc. w/in a 250 ml cup. CD were set in 15 ml of conc. w/in a 30 ml cup		
C8	0	5	5	5	5	5			
C9	888	5	5	5	5	5			
C10	100	5	5	5	5	5			
C11	25	5	5	5	5	5			
C12	12.5	5	5	5	5	5			
C13	12.5	5	5	5	5	5			
C14	100	5	5	5	5	5			
C15	50	5	5	5	5	5			
C16	100	5	5	5	5	5			
C17	25	5	5	5	5	5			
C18	6.25	5	5	5	5	5			
C19	25	5	5	5	5	5			
C20	50	5	5	5	5	5			
C21	25	5	5	5	5	5			
C22	12.5	5	5	5	5	5			
C23	100	5	5	5	5	5			
C24	6.25	5	5	5	5	5			
C25*	0	5	5	5	5	5			
C26*	888	5	5	5	5	5			
C27*	888	5	5	5	5	5			
C28*	0	5	5	5	5	5			

Analyst Signature: Noah Wilson
Date: 2-11-20
Read and Understood By: [Signature]
Date: 2-11-20
Logbook: 4 Report #: 6

* These cups only used when upstream samples are provided.

Sample # 0020824
 Client LAVALLE SWTH
 Client Permit # 11-0079424
 PP Hatch 02082024
 CD Hatch 01282024
 MHSF 3-15661
 Board/Shell 00212

Routine Chemistries

Calibration data

Curve	Initial	1 Hour	24 Hour	48 Hour	72 Hour	96 Hour
4.00	4.01	4.01	4.01	4.01	4.01	4.01
7.00	7.00	7.00	7.00	7.00	7.00	7.00
10.00	10.01	10.01	10.01	10.01	10.01	10.01
Curve	98.7	98.7	98.7	98.7	98.7	98.7

DO (mg/L)	Temperature (°C)	Test	Method	Effluent	Upstream	Date	Time	Batch	Analyst	DO (mg/L)	Temperature (°C)	Test	Method	Effluent	Upstream	Date	Time	Batch	Analyst
7.50	24.1	MHSF	4500CG	7.50	8.15	2-5-20	1300	R003377	NSW	7.50	24.1	MHSF	4500CG	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	EPA 350.1	7.50	8.15	2-5-20	1300	R003377	NSW	7.50	24.1	MHSF	EPA 350.1	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	2320B	7.50	8.15	2-5-20	1300	R003377	NSW	7.50	24.1	MHSF	2320B	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	200.7	7.50	8.15	2-5-20	1300	R003377	NSW	7.50	24.1	MHSF	200.7	7.50	8.15	2-5-20	1300	R003377	NSW

Comments: DO recalibrated @ 125.2. NSW 100.0000g 725.0000mg 2-5-20 H QUALIFIER ADDED TO DS PH NSW 2-11-20

DO (mg/L)	Temperature (°C)	Test	Method	Effluent	Upstream	Date	Time	Batch	Analyst
7.50	24.1	MHSF	4500CG	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	EPA 350.1	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	2320B	7.50	8.15	2-5-20	1300	R003377	NSW
7.50	24.1	MHSF	200.7	7.50	8.15	2-5-20	1300	R003377	NSW

*Upstream only performed if supplied by the client

Analyst Signature: *Paul Wilson*
 Date: 2-11-2020
 Read and Understood By: *Paul Wilson*
 Date: 2-11-2020


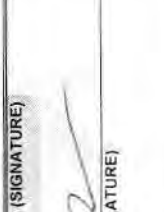
PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

State where samples collected MO IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT LASALLE - SOUTH (OLD) ADDRESS 400 RIVER RD LASALLE, IL 61301 CONTACT PERSON VINNY MAGGI		PROJECT NUMBER MONDAY PHONE NUMBER 815-223-8816 FAX NUMBER Vincent Maggi SAMPLER'S SIGNATURE 		MEANS SHIPPED UPS DATE SHIPPED 2-4-20		ANALYSIS REQUESTED WET Test Shipping		(FOR LAB USE ONLY) LOGIN # 0020827 LOGGED BY: JMW LAB PROJ. # TEMPLATE: PROJ. MGR.: CHAD COOPER					
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED 2-4-20 2-9-20		TIME COLLECTED 7:10 7:21		SAMPLE TYPE GRAB COMP X X		MATRIX TYPE WW WW		BOTTLE COUNT 3 1		REMARKS 1-P, 1 Gal Cube, Vap 1-P, 250ml, HNO3 1-P, 150ml, Vap 1-P, 1 Gal Cube, Vap	
5 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE PHONE # IF DIFFERENT FROM ABOVE:		DATE RESULTS NEEDED RUSH		DATE RESULTS NEEDED		COMMENTS: (FOR LAB USE ONLY)		COMMENTS: (FOR LAB USE ONLY)					
7 RELINQUISHED BY: (SIGNATURE) 		DATE 2-4-20 TIME 9:00 AM		RECEIVED BY: (SIGNATURE) Tracy Wolf		DATE 2-5-20 TIME 10:25		SAMPLE TEMPERATURE UPON RECEIPT 0.5 °C					
RELINQUISHED BY: (SIGNATURE)		DATE TIME		RECEIVED BY: (SIGNATURE)		DATE TIME		CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE					

PDC Laboratories, Inc.
 0020827

SENDING LABORATORY

PDC Laboratories, Inc.
 1805 West Sunset Street
 Springfield, MO 65807
 (417) 864-8924

RECEIVING LABORATORY

PDC Laboratories, Inc. - Hazelwood
 944 Anglum Road
 Hazelwood, MO 63042
 (314) 432-0550

Sample: 0020827-01
 Name: Effluent Composite- SOUTH (Old)

Sampled: 02/04/20 07:10
 Matrix: Waste Water
 Preservative: Cool <6

Analysis	Due	Expires	Comments
04-Alk	02/14/20 16:00	02/18/20 07:10	
04-Ca 200.7 WWTot	02/14/20 16:00	08/02/20 07:10	
04-Mg 200.7 WWTot	02/14/20 16:00	08/02/20 07:10	

Please email results to Chad Cooper at ccooper@pdclab.com

Date Shipped: 2-5-20 Total # of Containers: 2 Sample Origin (State): IL PO #: —

Turn-Around Time Requested NORMAL RUSH Date Results Needed: —

Relinquished By	Date/Time	Received By	Date/Time	Sample Temperature Upon Receipt	<u>1.4</u> °C
<u>Stacey Wolf</u>	<u>2-5-20</u>	<u>Jill Clark</u>	<u>2/6/20</u>	Sample(s) Received on Ice	<u>Y</u> or N
				Proper Bottles Received in Good Condition	<u>Y</u> or N
				Bottles Filled with Adequate Volume	<u>Y</u> or N
				Samples Received Within Hold Time	<u>Y</u> or N
				Date/Time Taken From Sample Bottle	<u>Y</u> or N

PDC LABORATORIES, INC.
 1805 W. SUNSET
 SPRINGFIELD, MO 65807

PHONE # 417-864-8924
 FAX # 417-864-7081

CHAIN OF CUSTODY RECORD

State where samples collected MO IL

ALL HIGHLIGHTED AREAS MUST BE COMPLETED BY CLIENT (PLEASE PRINT)

1 CLIENT ADDRESS LASALLE - SOUTH (OLD) 400 RIVER RD LASALLE, IL 61301 VINNY MAGGI		PROJECT NUMBER WEDNESDAY PHONE NUMBER P.O. NUMBER FAX NUMBER		MEANS SHIPPED UPS DATE SHIPPED 2-6-20		ANALYSIS REQUESTED WET Test Shipping		(FOR LAB USE ONLY) LOGIN # 0020827 LOGGED BY: Snuw LAB PROJ. # TEMPLATE: PROJ. MGR.: CHAD COOPER					
2 SAMPLE DESCRIPTION AS YOU WANT ON REPORT WET TEST EFFLUENT COMPOSITE UPSTREAM GRAB (IF AVAILABLE)		DATE COLLECTED 2-6-20 7:15 AM 2-6-20 7:58 AM		TIME COLLECTED 7:15 AM 7:58 AM		SAMPLE TYPE WW WW		MATRIX TYPE WW WW		BOTTLE COUNT 1 1		REMARKS 1-P, 1 Gal Cube, Disp ↓	
3 TURNAROUND TIME REQUESTED (PLEASE CIRCLE) (RUSH TAT IS SUBJECT TO PDC LABS APPROVAL AND SURCHARGE) RUSH RESULTS VIA (PLEASE CIRCLE) FAX PHONE (PHONE # IF DIFFERENT FROM ABOVE)		DATE 2-6-20 TIME		RECEIVED BY: (SIGNATURE) Stacy Wolf		DATE 2-7-20 TIME 1025		COMMENTS: (FOR LAB USE ONLY) SAMPLE TEMPERATURE UPON RECEIPT 0.4 °C					
4 CHILL PROCESS STARTED PRIOR TO RECEIPT SAMPLE(S) RECEIVED ON ICE PROPER BOTTLES RECEIVED IN GOOD CONDITION BOTTLES FILLED WITH ADEQUATE VOLUME SAMPLES RECEIVED WITHIN HOLD TIME(S) (EXCLUDES TYPICAL FIELD PARAMETERS) DATE AND TIME TAKEN FROM SAMPLE BOTTLE		DATE 2-6-20 TIME		RECEIVED BY: (SIGNATURE) [Signature]		DATE 2-6-20 TIME		RECEIVED BY: (SIGNATURE) [Signature]					
5 RELINQUISHED BY: (SIGNATURE) [Signature]		DATE 2-6-20 TIME		RECEIVED BY: (SIGNATURE) [Signature]		DATE 2-6-20 TIME		RECEIVED BY: (SIGNATURE) [Signature]					

Attachment E
PDOP Progress Report

Technical Memorandum

**Phosphorus Discharge
Optimization Plan
(PDOP) Progress Report**
City of LaSalle, Illinois



Date: February 22, 2022
To: IEPA
From: Terry Boyer, PE, Donohue & Associates, Inc.
Brian Brown, City of LaSalle
Patrick Watson, City of LaSalle
Re: City of LaSalle, Illinois
NPDES Permit No. IL0029424 – PDOP Status Annual Progress Report
Reporting Period: Through February 22, 2022

The NPDES permit requires the City to provide a progress report by March 31 every year.

The PDOP concluded the following:

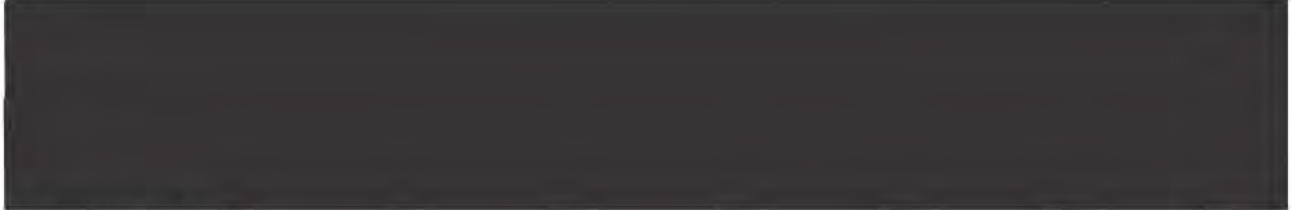
“As EBPR is not currently the recommend phosphorus removal strategy for the LaSalle WWTP, most of the optimization methods suggested would not provide significant reductions in effluent phosphorus compared to the capital costs of implementing these methods. If at a later time EBPR is determined to be the most appropriate method for phosphorus reduction the effectiveness of these optimization methods will be reconsidered.”

Therefore there is no status to report for this reporting period.

Exhibit 4

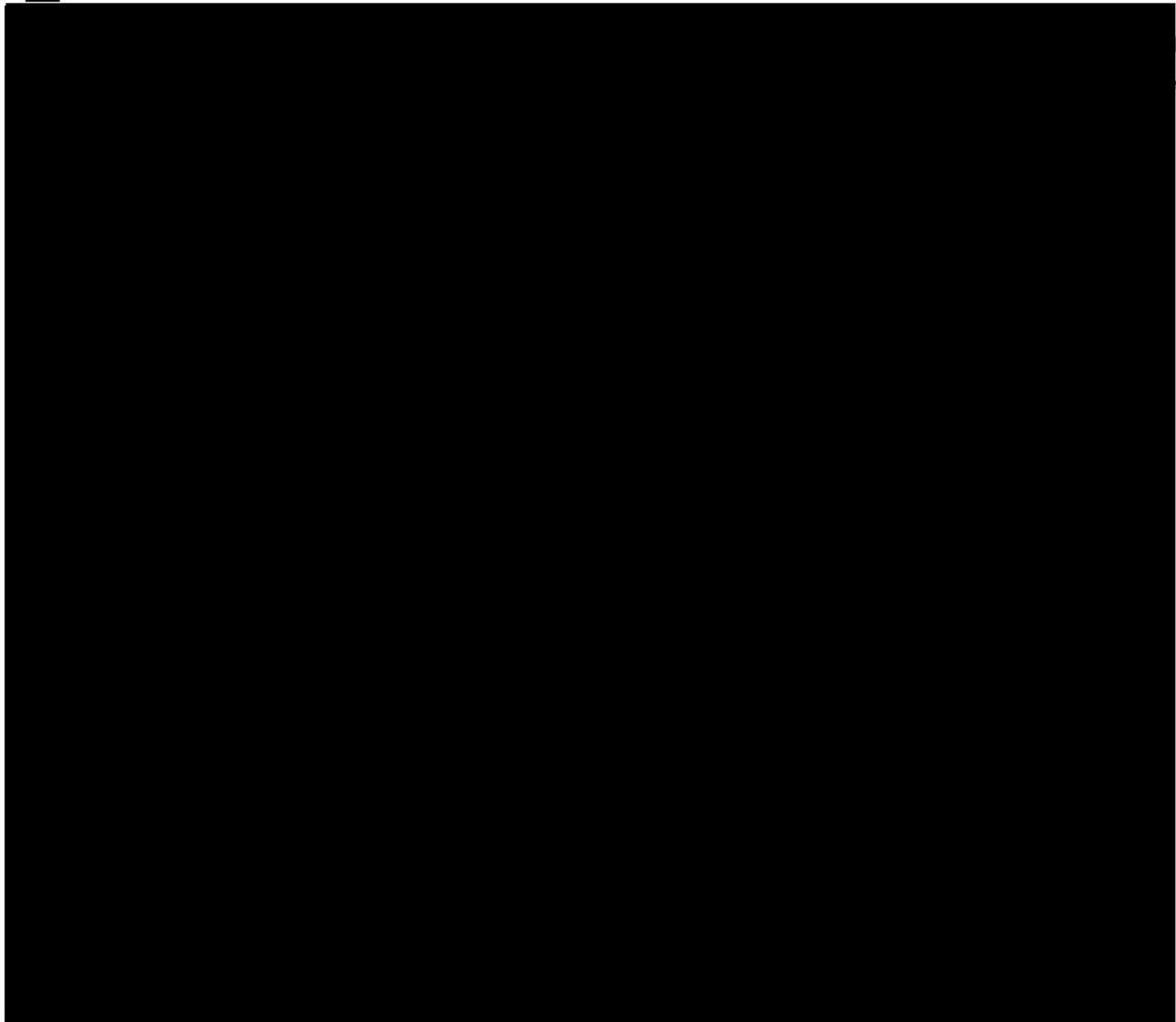
REGULAR MEETING OF THE LA SALLE CITY COUNCIL
City Council Chambers, 745 2nd Street, LaSalle, Illinois
6:30 P.M., Monday, October 2, 2023

AGENDA



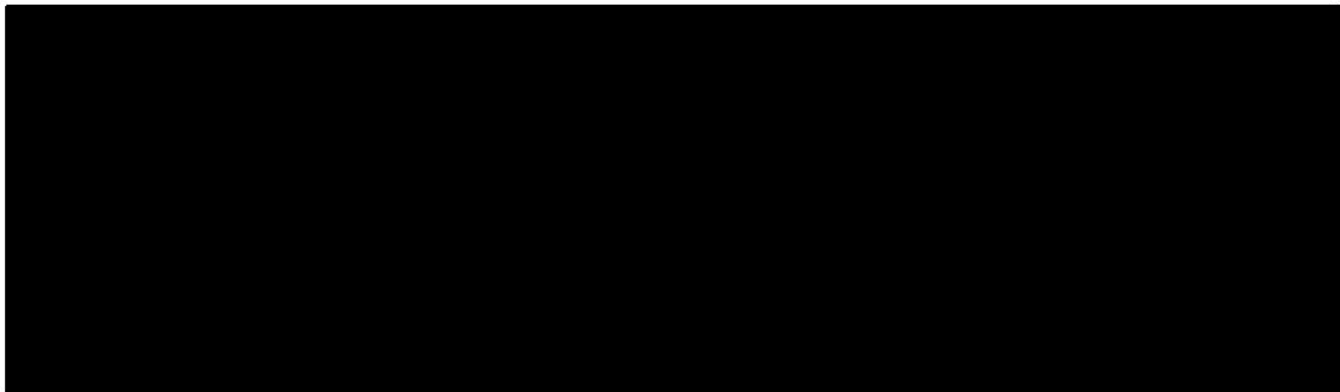
COMMENTS





DISCUSSION AND POTENTIAL ACTION ON THE FOLLOWING ADDITIONAL ORDINANCES/RESOLUTIONS:

An Ordinance authorizing and approving Stipulation and Proposal for Settlement with the Illinois Environmental Protection Agency and Illinois Attorney General (regarding Wastewater Treatment Plant Reporting and related matters)



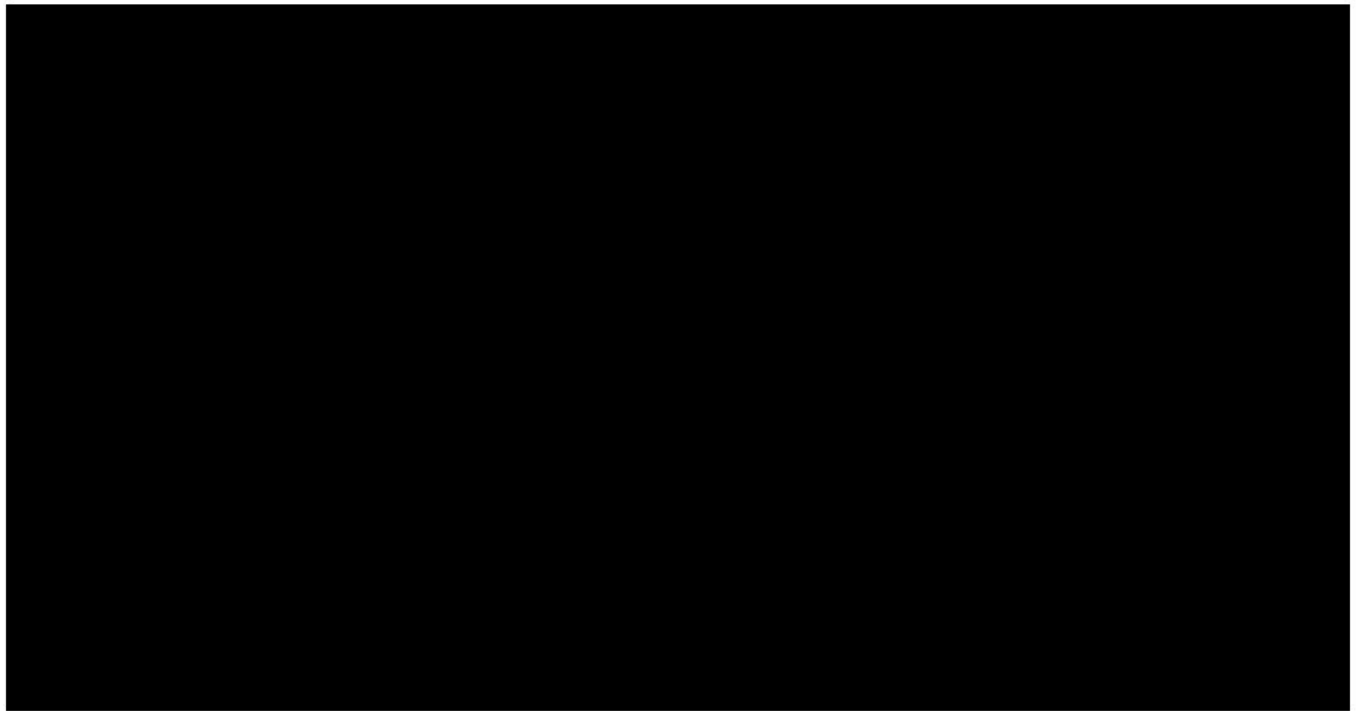


Exhibit 5

Ordinance Number 3035

AN ORDINANCE AUTHORIZING AND APPROVING STIPULATION AND PROPOSAL FOR SETTLEMENT WITH THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY AND ILLINOIS ATTORNEY GENERAL (REGARDING WASTEWATER TREATMENT PLANT REPORTING AND RELATED MATTERS)

WHEREAS, the City Council of the City of LaSalle deems it to be in the best interest of the citizens of the City of LaSalle and the public in general that the City of LaSalle authorize, approve and confirm the entering into of a Stipulation and Proposal for Settlement with the Illinois Environmental Protection Agency and the Illinois Attorney General regarding Wastewater Treatment Plant Reporting and Related Matters; and

WHEREAS, the City Council of the City of LaSalle deems it to be an appropriate exercise of corporate authority of the City of LaSalle including, but not limited to, the power to prevent and abate nuisances, the power to promote and protect the public health, safety and welfare, and the home rule authority of the City of LaSalle that the City of LaSalle enter into from time to time agreements such as that involved within this ordinance with governmental agencies including but not limited to, the Illinois Environmental Protection Agency and the Illinois Attorney General, which Stipulation and Proposal for Settlement shall be consistent in general with attached Exhibit "A", a copy of which is hereby made a part hereof, subject to the remainder of the terms and provisions contained herein;

NOW THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF LASALLE, LASALLE COUNTY, ILLINOIS, AS FOLLOWS:

Section One: That the above referenced recitals are hereby made a part and portion of the ordained portion of this Ordinance.

Section Two: That the City of LaSalle hereby authorizes, approves and confirms the entering into of a certain Stipulation and Proposal for Settlement with the Illinois Environmental Protection Agency (hereinafter from time to time "Illinois EPA") and the Illinois Attorney General regarding Wastewater Treatment Plant reporting and related matters, consistent with the terms of the proposed agreement attached hereto and made a part hereof as Exhibit "A", subject only to such modifications as may be approved jointly by the Mayor and the Superintendent of Wastewater. The signature of the Mayor on any document shall be conclusive evidence of the joint agreement of both the Mayor and the Superintendent of Wastewater.

Section Three: That the Mayor, the City Clerk, the Superintendent of Public Works, Superintendent of Wastewater, and such other City officials as are appropriate in the circumstances are hereby authorized and empowered to do and perform such acts as are reasonable and appropriate in the circumstances, including, but not limited to, the signing of such documents as may be appropriate in the circumstances in furtherance of carrying out and effectuating the Stipulation and Proposed Settlement with Illinois Environmental Protection Agency and the Illinois Attorney General, attached hereto and made a part hereof as Exhibit "A". Additionally, all actions taken to date by the Mayor, Superintendent of Public Works, Superintendent of Wastewater, and other City officials and employees in furtherance of actions taken in furtherance

of effectuating and carrying out said Stipulation and Proposed Settlement are hereby ratified and approved in their entirety.

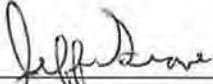
Section Four: That in the event that any provision and/or portion of a provision of this Ordinance should be declared invalid and/or unenforceable, the invalidity and/or unenforceability of any said provision shall not affect the remainder of this Ordinance.

Section Five: That this Ordinance shall become in effect upon its passage, approval and publication as provided by law.

PASSED AND ADOPTED at a regular meeting of the City Council of the City of LaSalle, LaSalle County, Illinois, held on the 2nd day of October, 2023, by a roll call vote, with:

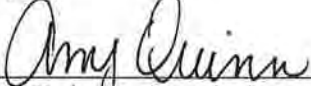
MAYOR AND ALDERMEN	AYE VOTE	NAY VOTE	ABSTAIN / ABSENT
James W. Bacidore	X		
Robert Thompson	X		
Tom Ptak	X		
Jerry Reynolds	X		
John Lavieri	X		
Joseph Jeppson	X		
Therold Herndon	X		
Jordan Crane	X		
Jeff Grove, Mayor			

APPROVED:



Jeff Grove, Mayor

ATTEST:



Amy Quinn, City Clerk



BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
)	
Complainant,)	
)	
v.)	PCB No. 24-
)	
CITY OF LASALLE,)	
An Illinois municipal corporation,)	
)	
Respondent.)	

STIPULATION AND PROPOSAL FOR SETTLEMENT

Complainant, PEOPLE OF THE STATE OF ILLINOIS, by KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA”), and CITY OF LASALLE (“City” or “Respondent”), (collectively “Parties to the Stipulation”), have agreed to the making of this Stipulation and Proposal for Settlement (“Stipulation”) and submit it to the Illinois Pollution Control Board (“Board”) for approval. This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Board’s approval of this Stipulation and issuance of relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/1, et seq. (2022), and the Board’s regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to the Stipulation that it be a final adjudication of this matter.

I. STATEMENT OF FACTS

A. Parties

1. On X DATE, a Complaint was filed on behalf of the People of the State of Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 31 of the Act, 415 ILCS 5/31 (2022), against the

Respondent.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2022).

3. At all times relevant to the Complaint, Respondent has been an Illinois municipal corporation organized and operating under the laws of the State of Illinois.

4. At all times relevant to this Complaint, Respondent has owned and operated the LaSalle Wastewater Treatment Plant – South (“WWTP-South”) located at 400 River Street, LaSalle, Illinois, which collects and treats wastewater for its residents and businesses, which it discharges into the Illinois River through its Outfall 001.

5. On November 23, 2015, Illinois EPA issued Respondent NPDES permit No. IL0029424 (“NPDES Permit”) for discharges of wastewater from the LaSalle WWTP-South. The NPDES Permit was in effect at all times relevant to this Stipulation and Proposal for Settlement.

B. Allegations of Non-Compliance

Complainant contends that the Respondent has violated the following provisions of the Act and Board regulations:

Count I: Failure to maintain effluent contaminant limits within the parameters of its NPDES permit in violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), Sections 304.141(a) and 309.102(a) of the Illinois Pollution Control Board (“Board”) Water Pollution Regulations, 35 Ill. Adm. Code 304.141(a) and 309.102(a), and the terms and conditions of its NPDES Permit.

Count II: Failure to maintain effluent contaminant levels in such a way as to cause, threaten, or allow water pollution in violation of Section 12(a) of the Act, 415 ILCS 5/12(a) (2022).

Count III: Failure to comply with the reporting requirements of the NPDES Permit, in violation of Section 12(f) of the Act, 415 ILCS 5/12(f) (2022), and Sections 305.102(b) and 309.102(a) of the Board Water Pollution Regulations, 35 Ill. Adm. Code 305.102(b) and 309.102(a), and NPDES Permit Special Conditions Nos. 15, 17, and 21.

C. Non-Admission of Violations

The Respondent represents that it has entered into this Stipulation for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Stipulation and complying with its terms, the Respondent does not affirmatively admit the allegations of violation within the Complaint and referenced within Section I.B herein, and this Stipulation shall not be interpreted as including such admission.

D. Compliance Activities to Date

1. On February 23, 2022, LaSalle untimely submitted to Illinois EPA its semi-annual Combined Sewage Outfall ("CSO") Long-Term Control Planning ("LTCP") reports, which had been due as follows: (1) report due December 1, 2019; (2) report due June 1, 2020; (3) report due December 1, 2020; (4) report due June 1, 2021; and (5) report due December 1, 2021.

2. On February 23, 2022, LaSalle untimely submitted its biomonitoring reports required by Special Condition No. 17 as follows: (1) report due May 1, 2019; (2) report due August 1, 2019; (3) report due November 30, 2019; and (4) report due February 29, 2020.

3. On February 23, 2022, LaSalle untimely submitted to Illinois EPA Phosphorus Discharge Optimization Plan annual progress reports as follows: (1) the report due March 31, 2019; (2) the report due March 31, 2020; and (3) the report due March 31, 2021.

II. APPLICABILITY

This Stipulation shall apply to and be binding upon the Parties to the Stipulation. The Respondent shall not raise as a defense to any enforcement action taken pursuant to this Stipulation the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Stipulation. This Stipulation may be used against the Respondent in any subsequent enforcement action or permit proceeding as

proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2022).

III. IMPACT ON THE PUBLIC RESULTING FROM ALLEGED NON-COMPLIANCE

Section 33(c) of the Act, 415 ILCS 5/33(c) (2022), provides as follows:

In making its orders and determinations, the Board shall take into consideration all the facts and circumstances bearing upon the reasonableness of the emissions, discharges, or deposits involved including, but not limited to:

1. the character and degree of injury to, or interference with the protection of the health, general welfare and physical property of the people;
2. the social and economic value of the pollution source;
3. the suitability or unsuitability of the pollution source to the area in which it is located, including the question of priority of location in the area involved;
4. the technical practicability and economic reasonableness of reducing or eliminating the emissions, discharges or deposits resulting from such pollution source; and
5. any subsequent compliance.

In response to these factors, the Parties to the Stipulation state the following:

1. The Illinois EPA's information gathering responsibilities were hindered by the Respondent's violations thereby threatening human health and the environment.
2. There is social and economic benefit to the facility.
3. Operation of the facility was and is suitable for the area in which it is located.
4. Maintaining contaminants within NPDES Permit levels, and submitting timely reports, are both technically practicable and economically reasonable.
5. Respondent has subsequently complied with the Act and the Board and Illinois EPA regulations.

IV. CONSIDERATION OF SECTION 42(h) FACTORS

Section 42(h) of the Act, 415 ILCS 5/42(h) (2022), provides as follows:

In determining the appropriate civil penalty to be imposed under . . . this Section, the Board is authorized to consider any matters of record in mitigation or aggravation of penalty, including but not limited to the following factors:

1. the duration and gravity of the violation;
2. the presence or absence of due diligence on the part of the respondent in attempting to comply with requirements of this Act and regulations thereunder or to secure relief therefrom as provided by this Act;
3. any economic benefits accrued by the respondent because of delay in compliance with requirements, in which case the economic benefits shall be determined by the lowest cost alternative for achieving compliance;
4. the amount of monetary penalty which will serve to deter further violations by the respondent and to otherwise aid in enhancing voluntary compliance with this Act by the respondent and other persons similarly subject to the Act;
5. the number, proximity in time, and gravity of previously adjudicated violations of this Act by the respondent;
6. whether the respondent voluntarily self-disclosed, in accordance with subsection (i) of this Section, the non-compliance to the Agency;
7. whether the respondent has agreed to undertake a "supplemental environmental project," which means an environmentally beneficial project that a respondent agrees to undertake in settlement of an enforcement action brought under this Act, but which the respondent is not otherwise legally required to perform; and
8. whether the respondent has successfully completed a Compliance Commitment Agreement under subsection (a) of Section 31 of this Act to remedy the violations that are the subject of the complaint.

In response to these factors, the Parties to the Stipulation state as follows:

1. Respondent failed to stay within its permitted effluent limitations. The violation began in June, 2021 and was resolved by September, 2021. Respondent further failed to timely submit to Illinois EPA multiple reports required by its NPDES Permit. The violations began March

31, 2021 and were resolved on February 23, 2022.

2. Respondent was diligent in attempting to come back into compliance with the Act, Board regulations, and applicable federal regulations, once the Illinois EPA notified it of its noncompliance.

3. The civil penalty takes into account any economic benefit realized by the Respondent as a result of avoided or delayed compliance.

4. Complainant has determined, based upon the specific facts of this matter, that a penalty of Five Thousand, Seven Hundred and Forty Dollars (\$5,740.00) will serve to deter further violations and aid in future voluntary compliance with the Act and Board regulations.

5. To Complainant's knowledge, Respondent has no previously adjudicated violations of the Act.

6. Self-disclosure is not at issue in this matter.

7. The settlement of this matter does not include a supplemental environmental project.

8. A Compliance Commitment Agreement was not at issue in this matter.

V. TERMS OF SETTLEMENT

A. Penalty Payment

The Respondent shall pay a civil penalty in the sum of Five Thousand, Seven Hundred and Forty Dollars (\$5,740.00) within thirty (30) days from the date the Board adopts and accepts this Stipulation.

B. Stipulated Penalties, Interest, and Default

1. If the Respondent fails to make any payment required by this Stipulation on or before the date upon which the payment is due, the Respondent shall be in default and the

remaining unpaid balance of the penalty, plus any accrued interest, shall be due and owing immediately. In the event of default, the Complainant shall be entitled to reasonable costs of collection, including reasonable attorney's fees.

2. Pursuant to Section 42(g) of the Act, interest shall accrue on any penalty amount owed by the Respondent not paid within the time prescribed herein. Interest on unpaid penalties shall begin to accrue from the date such are due and continue to accrue to the date full payment is received. Where partial payment is made on any penalty amount that is due, such partial payment shall be first applied to any interest on unpaid penalties then owing.

3. The stipulated penalties shall be enforceable by the Complainant and shall be in addition to, and shall not preclude the use of, any other remedies or sanctions arising from the failure to comply with this Stipulation.

C. Payment Procedures

1. All payments required by this Stipulation shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF"). Payments shall be sent by first class mail and delivered to:

Illinois Environmental Protection Agency
Fiscal Services
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

2. The case name and case number shall appear on the face of the certified check or money order.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

3. A copy of the certified check or money order and any transmittal letter shall be sent to:

Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602

D. Future Compliance

1. Respondent shall comply with effluent permit limitations and timely file all future required reports.

2. In addition to any other authorities, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, shall have the right of entry into and upon the Respondent's facility which is the subject of this Stipulation, at all reasonable times for the purposes of conducting inspections and evaluating compliance status. In conducting such inspections, the Illinois EPA, its employees and representatives, and the Attorney General, his employees and representatives, may take photographs, samples, and collect information, as they deem necessary.

3. This Stipulation in no way affects the responsibilities of the Respondent to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.

4. The Respondent shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

E. Release from Liability

In consideration of the Respondent's payment of the \$5,740.00 penalty, its commitment to cease and desist as contained in Section V.D.4 above, completion of all activities required

hereunder, and upon the Board's approval of this Stipulation, the Complainant releases, waives, and discharges the Respondent from any further liability or penalties for the violations of the Act and Board regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Complainant's Complaint filed on X DATE. The Complainant reserves, and this Stipulation is without prejudice to, all rights of the State of Illinois against the Respondent with respect to all other matters, including but not limited to, the following:

- a. criminal liability;
- b. liability for future violation of state, federal, local, and common laws and/or regulations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. liability or claims based on the Respondent's failure to satisfy the requirements of this Stipulation.

Nothing in this Stipulation is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, or entity other than the Respondent.

F. Correspondence, Reports and Other Documents

Any and all correspondence, reports and any other documents required under this Stipulation, except for penalty payments, shall be submitted as follows:

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

As to the Complainant

Cara V. Sawyer
Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington Street, Suite 1800
Chicago, Illinois 60602
cara.sawyer@ilag.gov

Gabriel H. Neibergall
Assistant Counsel
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Zane Austin
Illinois Environmental Protection Agency
Bureau of Water / Division of Water Pollution Control
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Paul Jungles
Illinois Environmental Protection Agency
Bureau of Water / Field Operations Section
Peoria Regional Office
412 SW Washington Street, Suite D
Peoria, Illinois

As to the Respondent

James A. McPhedran
City Attorney
Meyers & Flowers, LLC
1200 Maple Drive
Peru, Illinois 61354
jim@meyers-flowers.com
csg@meyers-flowers.com

G. Enforcement of Stipulation

Upon the entry of the Board's Order approving and accepting this Stipulation, that Order is a binding and enforceable order of the Board and may be enforced as such through any and all available means.

H. Execution of Stipulation

The undersigned representatives for the Parties to the Stipulation certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Stipulation and to legally bind them to it. This Stipulation may be executed by the parties in one or more counterparts, all of which taken together shall constitute one and the same instrument.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

WHEREFORE, the Parties to the Stipulation request that the Board adopt and accept the foregoing Stipulation and Proposal for Settlement as written.

PEOPLE OF THE STATE OF ILLINOIS

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

KWAME RAOUL
Attorney General
State of Illinois

MATTHEW J. DUNN, Chief
Environmental Enforcement/
Asbestos Litigation Division

JOHN J. KIM, Director
Illinois Environmental Protection Agency

BY: _____
STEPHEN J. SYLVESTER, Chief
Environmental Bureau
Assistant Attorney General

BY: _____
CHARLES W. GUNNARSON
Chief Legal Counsel

DATE: _____

DATE: _____

CITY OF LASALLE

BY: Jeff Kane

ITS: Mayor

DATE: 10/11/23

Exhibit 6

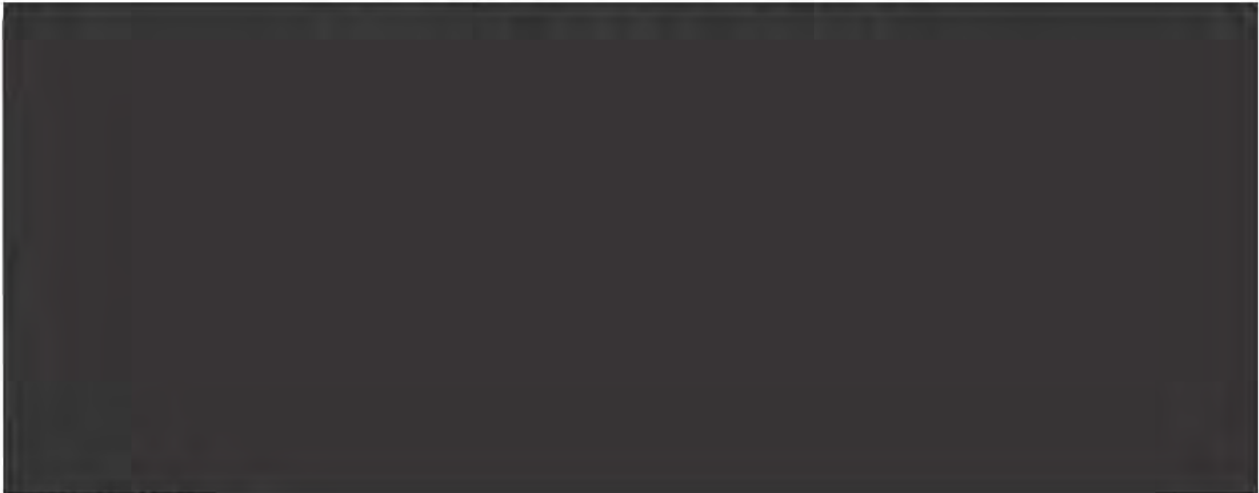
MINUTES OF THE REGULAR MEETING

OF THE LA SALLE CITY COUNCIL

October 2, 2023

A regular meeting of the La Salle City Council of La Salle, Illinois was held, Monday, October 2, 2023, at 6:30 p.m. with Mayor Jeff Grove presiding with proper notices being duly and continuously posted.

The meeting was called to order at 6:35 p.m.

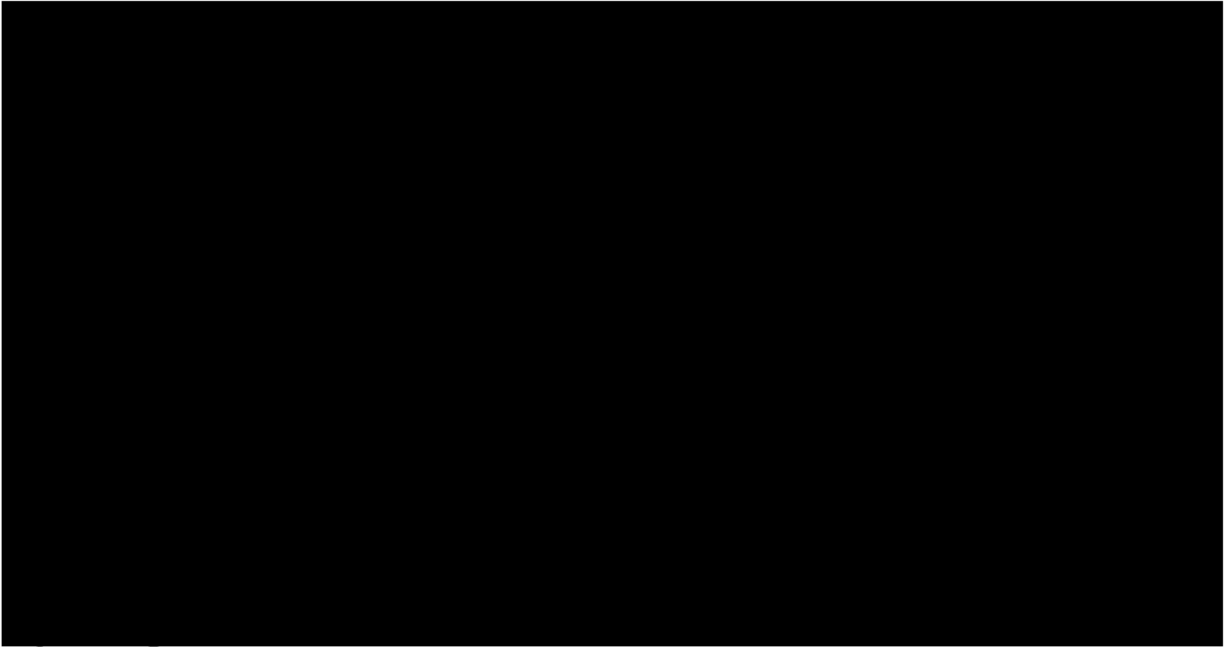


COMMENTS

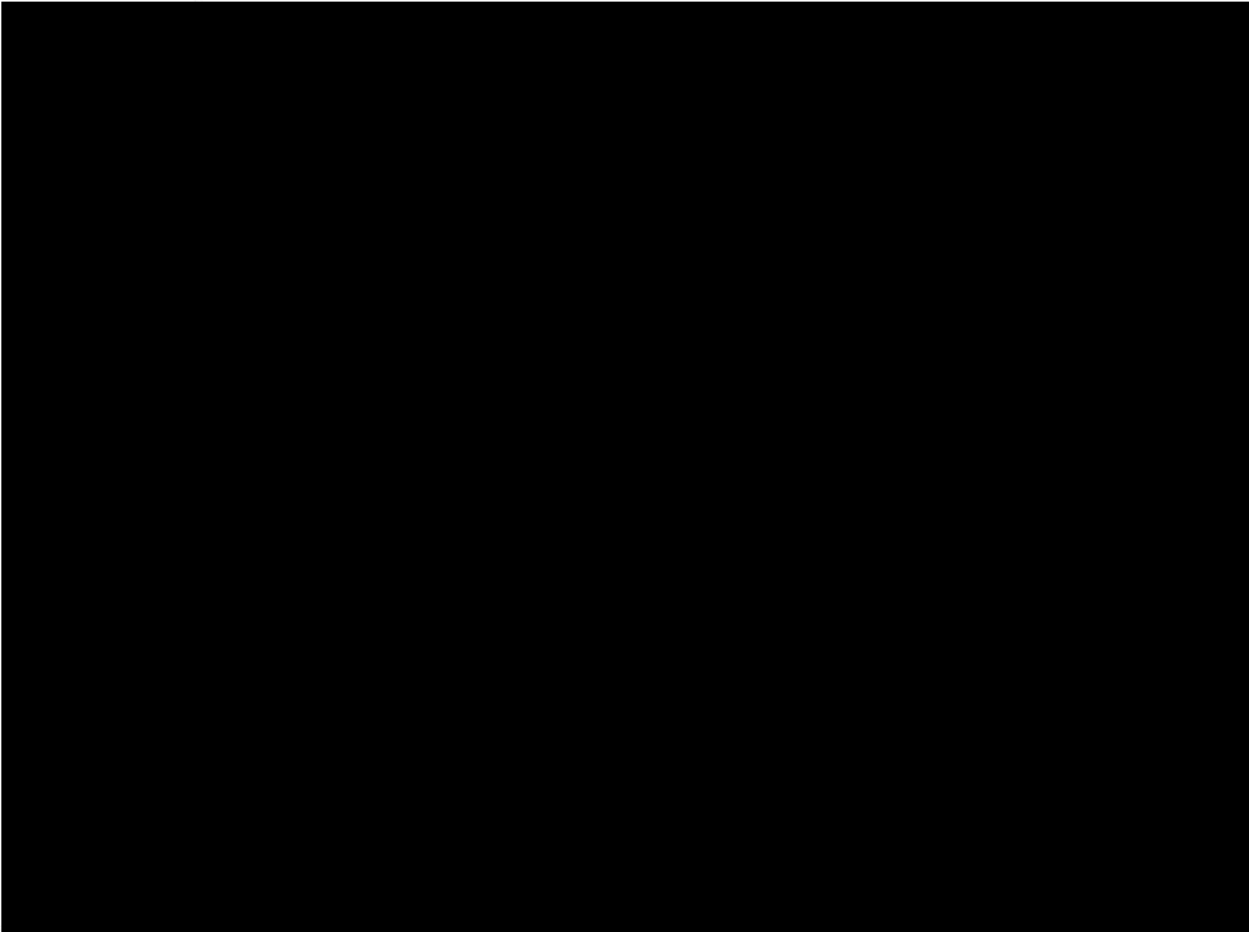


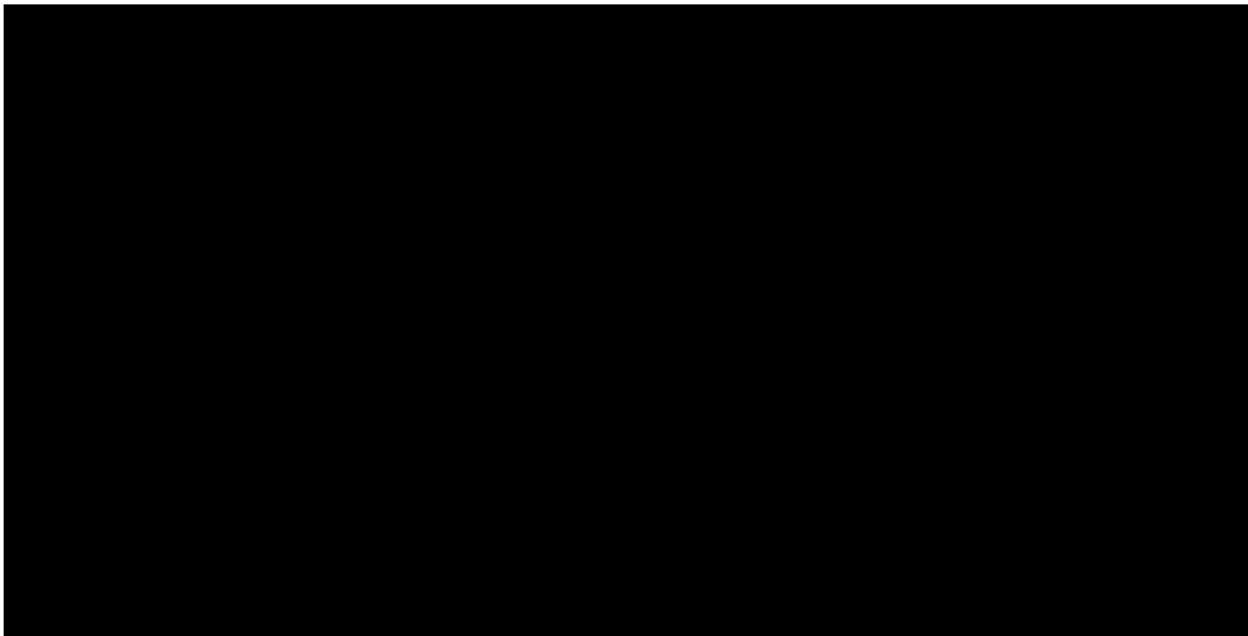
Resident Dawn Hicks



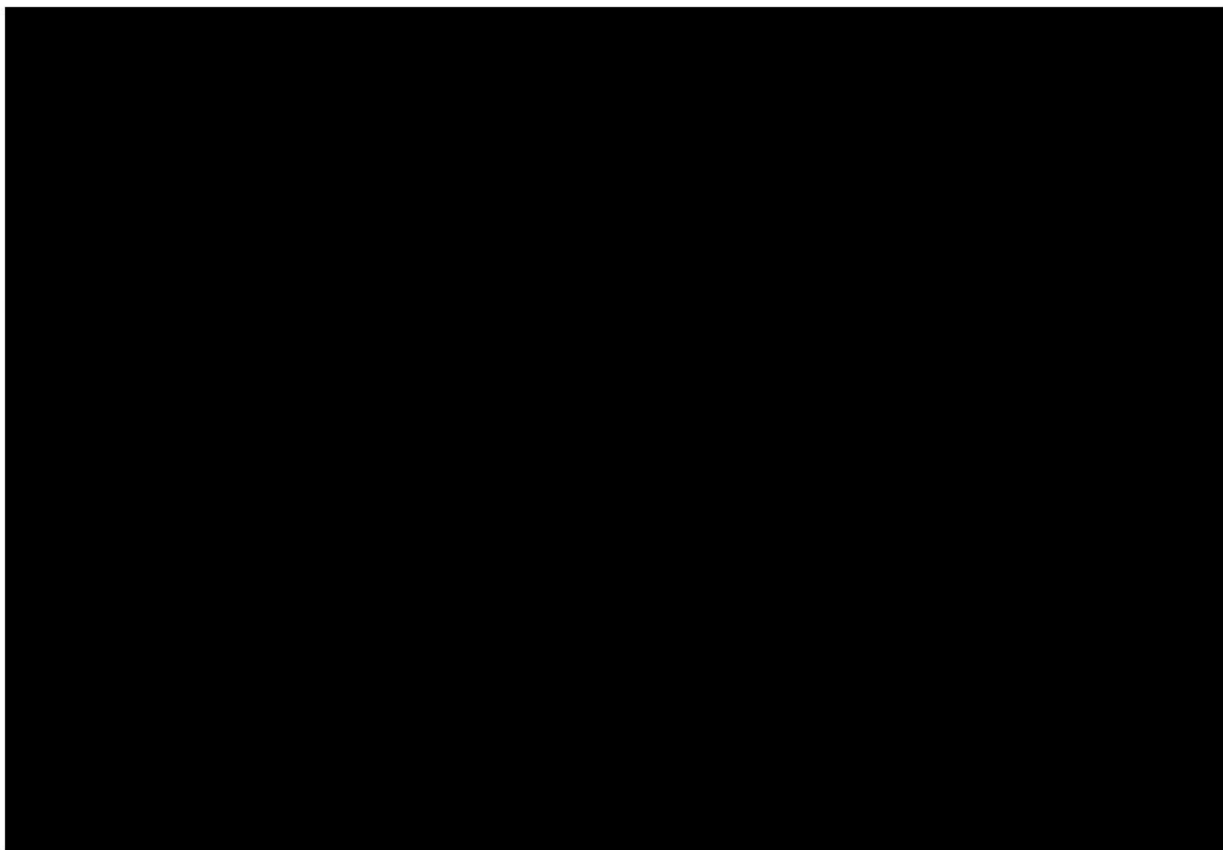


Jamie Hicks





Marty Schneider





DISCUSSION AND POTENTIAL ACTION ON THE FOLLOWING ADDITIONAL ORDINANCES/RESOLUTIONS:

Moved by Alderman Reynolds and seconded by Alderman Ptak to approve an ordinance authorizing and approving stipulation and proposal for Settlement with the Illinois Environmental Protection Agency and Illinois Attorney General (regarding Wastewater Treatment Plant Reporting). Each and every Alderman has a copy.

ROLL CALL

AYE: Aldermen Crane, Bacidore, Thompson, Ptak, Reynolds, Lavieri, Jeppson, Herndon

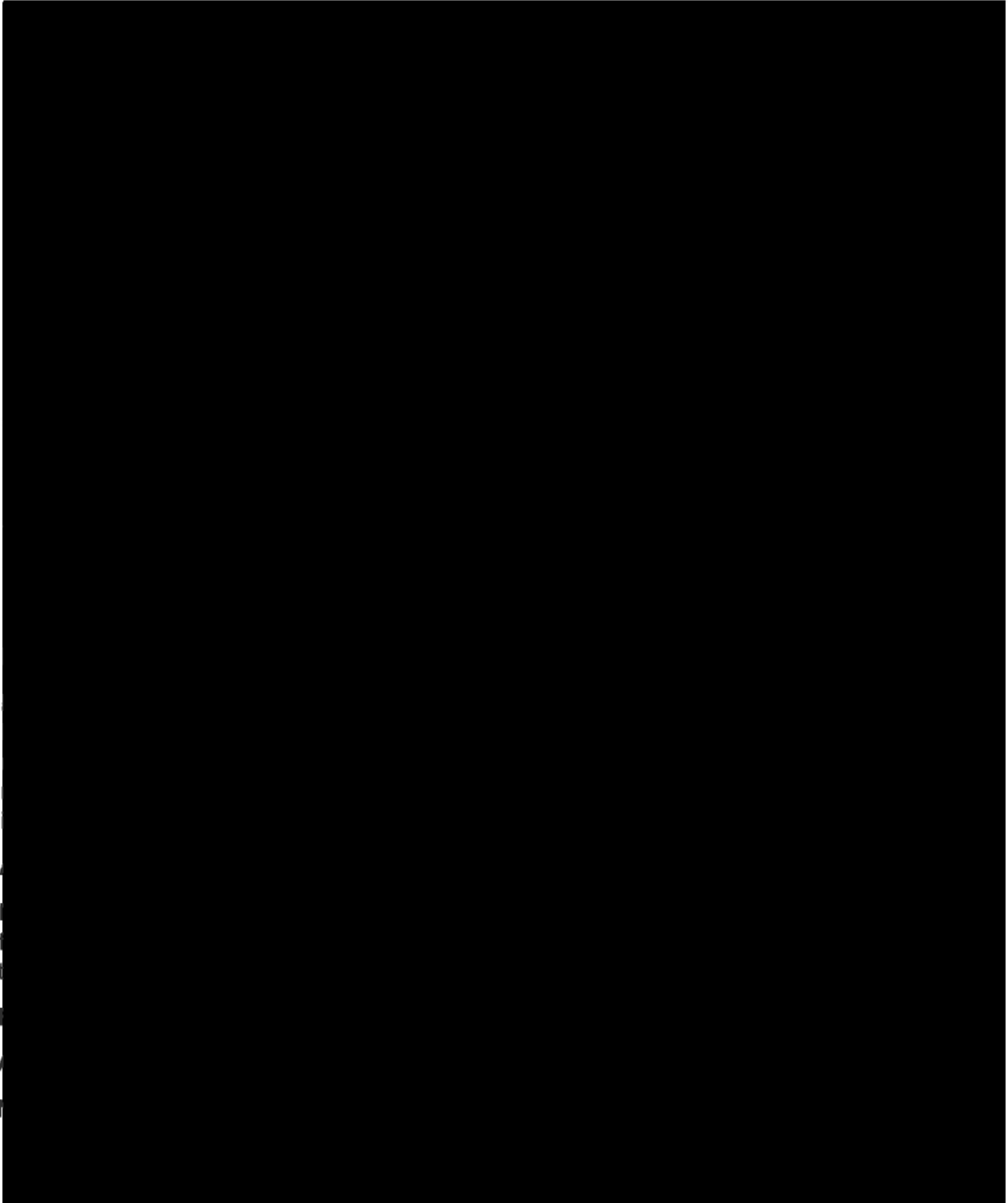
NAY: None **Absent:** None **Abstain:** None

MOTION CARRIED: 8-0





McPhedran also mentioned that the earlier ordinances were regarding reporting issues in regard to period time and transition regarding semiannual CSL long term recording and biomonitoring.



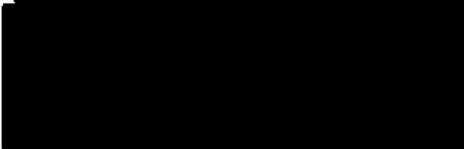
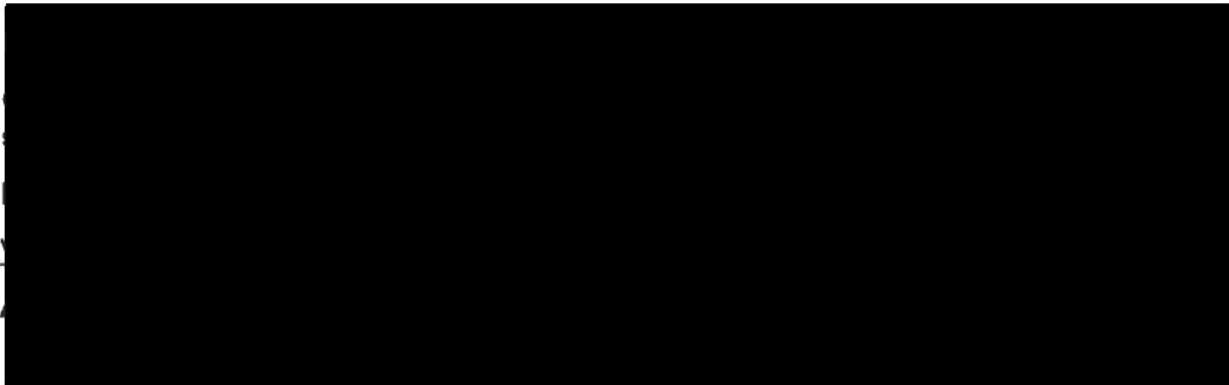


Exhibit 7

Transcription of Portion of Tape Recording from 10/02/2023 LaSalle City Council Meeting

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

DISCUSSION AND POTENTIAL ACTION OF THE FOLLOWING ADDITIONAL ORDINANCES/RESOLUTIONS.

Quinn: An Ordinance authorizing and approving stipulation and proposal for settlement with the Illinois Environmental Protection Agency and Illinois Attorney General regarding wastewater treatment plant reporting and related matters.

Reynolds: Your honor I make a motion to approve the Ordinance as read which all of us has a copy.

Ptak: I'll second that.

Mayor: Motion Alderman Reynolds & Alderman Ptak to approve the Ordinance and everyone has a copy. Please start the roll call w/ Alderman Crane:

Quinn: calls roll in order below
Crane, Bacidore, Thompson, Ptak, Reynolds, Lavieri, Jeppson, Herndon: Aye

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Jim: [REDACTED]

And in full disclosure also in regard to the earlier Ordinance that had gotten approved that was regarding some reporting issues in regard to a period of time of transition regarding semi-annual CSO long term reporting and also bio-monitoring. It's a small fine of \$5,740.00, by the way in regard to that in this there is no admission of factual allegations especially in regard to this \$5,740, because Brian, you and Terry Boyer do not even agree that we were really in violation on [Brian Brown: Not at all] the state one. But for \$5,740, not really worth arguing, so I wanted to bring that up so that we were being fully transparent with the community. Anything you have to add to either one of those Brian?

Brian: Nope.

Mayor: Thank you attorney.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]