

ILLINOIS POLLUTION CONTROL BOARD
September 3, 1992

RESIDENTS OF CEDARVILLE,)
)
 Complainant,)
) PCB 91-194
 v.) (Enforcement)
)
 VILLAGE OF CEDARVILLE,)
)
 Respondent.)

ROBERT CROUSE, SYLVIA CROUSE, HOLLY WELLMAN, LARRY WELLMAN, SCOTT HARRIS, TERI HARRIS, MARLENE STEWART and ROBERT STEWART APPEARED FOR THE COMPLAINANT, PRO SE;

CLAYTON LINDSEY, HINSHAW & CULBERTSON, and JOHN H. VOGHT, BECKMIRE, GARRITY & VOGHT APPEARED ON BEHALF OF THE RESPONDENT.

INTERIM OPINION AND ORDER OF THE BOARD (by B. Forcade):

This matter is before the Board on an October 10, 1991, complaint filed by Scott and Teri Harris, Robert and Marlene Stewart, Tim and Cathy Hoefle, Francis and Joyce McAuliffe, Allen and Sandra Schlueter, Robert and Sylvia Crouse, Larry and Holly Wellman, Edward and Cathy Brackemyer, Karen Homer and Larry and Sandra Lawson (Residents) against the Village of Cedarville (Village). The Residents, with the exception of the Lawsons, all reside on Cedar Court in Cedarville, Stephenson County, Illinois. (Tr. at 46.)¹ The Lawsons reside on Cedar Street which is one block from Cedar Court. (Tr. at 46.) The complaint alleges that the Village violated 35 Ill. Adm. Code 306.102(a), Malfunctions, 306.303, Excess Infiltration and 306.304, Overflows in the operation of the village sewerage system. Hearings were held on April 17, 1992 and May 6, 1992, in Freeport, Illinois. Members of the public and press attended the hearing. The Village filed its final brief on June 23, 1992. The Residents did not file a final brief.

BACKGROUND

The population of Cedarville has been stable over the last several years and is approximately 750. (Tr. at 121.) The Cedar Court subdivision was built in 1974. (Tr. at 120.) The Cedarville sanitary sewer system was constructed in 1972 or 1973. (Tr. at 120.) There are three lift stations and one treatment plant in the village. (Tr. at 121.) The system design was based on a population of 1,000 people. (Tr. at 121.)

¹ Tr. at ___ references the transcript from the hearing held on May 6, 1992.

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plant in the village. (Tr. at 121.) The system design was based on a population of 1,000 people. (Tr. at 121.)

The testimony shows that on the days of the sewage backups in 1990, Cedarville experienced a heavy rainfall, somewhere between 2 to 6 inches. (Tr. at 100, 108 and 160.) The complaint involves the flooding of the 10 homes located on Cedar Court (Tr. at 201.) The Village is unaware of any other incidents of sewer backups to resident's basements in the village. (Tr. at 215 & 216.) Cedar Court is the lowest relief point in the area. (Tr. at 46, Comp. Exh. 14.) Cedar Court is the last entry point before the sewage enters the treatment plant. (Tr. at 267.)

The complaint alleges three incidents of sewer backup on September 4, 1986, June 29, 1990 and August 19, 1990. In the complaint, the Residents request two forms of relief:

- (1) Order the Village to locate the problem (excess rainfall infiltration and faulty sewer equipment) and take whatever actions necessary to correct problem.
- (2) Order Village to assume full responsibility for sewage backups to residents' homes hooked up to Village sewer system.

It is clear from the testimony that on the dates alleged in the complaint there were problems with the operation of the sewerage system, resulting in the backup of sewage into the homes of the Residents and causing damage. The Village does not dispute that there was sewage backup in the homes on these dates. The Board will review some of the testimony from the Residents to show the extent of the problem.

Mrs. Harris testified as to what she saw on September 24, 1986.

...there was water coming up out of our floor drains. In certain areas of our basement it was between four and six inches...It was black water... There was a second floor drain in the garage area. That was also between four to six inches deep....We tried to get shop vacs going, and we were trying to stay ahead of it, it continued to come up through the floor drains faster than we could keep up with it.

Tr. at 20.

Mrs. Harris described the condition of the sewer manhole on Cedar Court during the June 1990 incident.

It was to the street full with liquid sewage backup. There was also solid human feces floating in the manhole.

Tr. at 30, Comp. Exh. 1-4.

Mrs. Stewart testified concerning the June 29, 1990, incident.

...our home does not have floor drains. The sewage raw sewage backed up through our sewer pipe over six foot high in our basement and shot out the top of our laundry pipe where our washing machine goes into.

* * *

you can actually see this feces on the floor...you can see it all on top of my washing machine, and the washing machine was also full of it when I opened the lid.

Tr. at 83, Comp. Exh. 29 & 30.

Mrs. Crouse testified as to the conditions at her home on June 29, 1990.

Well, the stuff was just bubbling out of the floor drain....It was coming across that division that the shower has on the shower stall and coming over into the rug. The toilet, it was just bubbling up out of that and coming on the floor and so forth.

Tr. at 92.

FOLLOW-UP ACTIONS

A pump failure in one of the three lift stations was determined to be the cause of the sewage backup in September 1986. (Tr. at 123.) After the failure of the pump in the lift station, the Village replaced one of the two pumps (one pump is a backup pump) in each lift station. (Tr. at 124.) The Village also checked the sewer lines for obstructions and other problems. (Tr. at 125.) The Village also installed a phone alarm system that phones the superintendent, his assistant and shop when a pump fails. (Tr. at 258.) While there was also a pump failure on June 29, 1990, the Village contends that the pump failed after the sewage had backed-up into the homes on Cedar Court and that the pump failure was not the cause of the backup, (Tr. at 131.) There was no problem reported in the lift station on August 19, 1990. (Tr. at 263.) The Village believes that excess water in the system from illegal connections of sump pumps and downspouts

was the cause of the sewage backup on both dates in 1990. (Tr. at 134.)

After the June 29, 1990, incident the Village contacted Mr. Davis of Fehr & Graham, the Village consulting engineer, concerning the sewer problem. (Tr. at 134 & 142.) Fehr & Graham have been the engineer for Cedarville since before 1976 and Mr. Davis has been involved in several projects with Cedarville since 1976. (Tr. at 283.) In a letter of August 1, 1990, the engineer suggested three possible remedies to fix the sewer problem. (Comp. Exh. 14.) The three solutions were: 1) increase the capacity of the sewer, 2) eliminate excess infiltration and 3) installation of back-water check valves. (Comp. Exh. 14, Tr. at 144.) The engineer did not make a field inspection of the sewerage system but based his recommendations on the sewerage system maps and conversations with officials from the Village of Cedarville. (Tr. at 284.) Mr. Davis felt a field inspection would have been useless because it would have been done several days after the incident and only normal flow would be present in the sewer lines. (Tr. at 285.)

The Village has taken the following actions to implement recommendations 2 and 3 of the engineer's suggested remedies.

In December of 1990, the Village initiated a door-to-door inspection for illegal hookups in all households in Cedarville. (Tr. at 229.) The inspection consists of Mr. Buss, the superintendent of the village, and his assistant going to each house and checking for illegal connections and following up on any that they find. (Tr. at 229.) This inspection process is expected to be completed by September of 1992. (Tr. at 230.) At the time of the hearing (May 6, 1992) approximately 10 percent of the homes had been inspected and half of those inspected had illegal connections.² (Tr. at 249.) There are 394 homes in Cedarville. (Tr. at 234.) The illegal connections that have been found by the inspection have been disconnected. (Tr. at 249.) A poster noting the ordinance against illegal hookups was posted in the post office in Cedarville for about one or two weeks shortly after the August 1990 incident. (Tr. at 139, Def. Exh. 6.) Section 2171 of the Cedarville village ordinance was passed sometime prior to 1980 (Tr. at 136) and provides:

STORM WATER IN SANITARY SEWER No person and no building, structure or establishment shall discharge any rain water into the sanitary sewer system.

Def. Exh. 4.

² The Board notes that between December of 1990 and May of 1992 that 10% of the homes in Cedarville had been inspected and the Village plans to inspect the other 90% in a 4 month period.

The Agency, in a publication, stated that "An 8-inch sanitary sewer can handle domestic wastewater flow from up to 465 homes; however, it only takes 12 sump pumps operating at full capacity to overload an 8-inch sanitary sewer." (Tr. at 233, Def. Exh. 14.) The sanitary sewerage system in Cedarville is comprised of mostly 8-inch sewer lines. (Tr. at 233.) The village's inspection of approximately 40 homes revealed twenty illegal connections. The Agency recommends that illegal connections be disconnected. (Tr. at 233.)

In the summer of 1991 the Village board added Section 2184 to the village ordinances. (Tr. at 145, Def. Exh. 7.) This ordinance requires the installation of an automatic valve to prevent back-flow and a manual shut-off valve where the drain intake is below the required elevation. (Def. Exh. 7.) The ordinance further notes that "the risk of sewage escaping through the malfunctioning of any valve so installed....shall be the responsibility of the property owner." (Def. Exh. 7.)

At the March 4, 1991 Village board meeting, while the proposed ordinance was under review by the village board, the Residents presented the Village board with a petition containing almost 200 signatures. (Tr. at 60, Comp. Exh. 22.) The petition asked the Village to look at other alternatives rather than passing the proposed ordinance that places the responsibility on the homeowner to deal with the sewer problem. (Tr. at 60, Comp. Exh. 22.)

The Harisses, Stewarts and Wellmans have installed the valves required by the ordinance in their homes. (Tr. at 77, 86 & 106.) The Crouses are unable to install the valves due to the way that their home is connected to the sewerage system. (Tr. at 97.)

The Village has taken other measures to maintain the sewerage system since the 1986 incident. In 1986, a portion of the sewer line was jetted and televised checking for obstructions or other problems. (Tr. at 126.) The jetting and televising of the sewer lines is performed on an annual basis to selected sections of the sewer line. (Tr. at 226.) The superintendent of the village, Mr. Buss, estimates that 80% of the sewer lines have been jetted and televised. (Tr. at 247.) The alarm system to warn when a pump has failed was upgraded to automatically call the house of the superintendent of public works. (Tr. at 127.) Some manholes that were found to be in waterways have been raised. (Tr. at 237.) The manhole on Cedar Court was not raised because it is level with the street. (Tr. at 255.)

In the mid to late 70's an infiltration/inflow study was performed in Cedarville. (Tr. at 293.) While the tests showed an increase in flow due to infiltration or inflow, the increase fell below EPA guidelines requiring further action. (Tr. at 295.)

The flow through the treatment plant was monitored weekly by a weir gauge. (Tr. at 244.) The system is designed for 250,000 gallons per day peak flow. (Tr. at 213.) The peak flow at the treatment plant was not exceeded on any of the dates in question. (Tr. at 240, Pl. Exh. 11.) The maximum and average flows for the months of June and August in 1990 were below the design capacity. (Tr. at 222.) In 1991 the village installed a daily monitoring recorder. (Tr. at 222.)

While Mr. Buss does not believe that water from the storm water drainage system is infiltrating the sanitary system, dye testing has not been performed to check the flow of the storm water from the street grates. (Tr. at 251.) Mr. Buss plans to perform smoke tests on the sewer lines once the visual inspection of illegal connections is completed. (Tr. at 264.)

On August 23, 1990, the Illinois Environmental Protection Agency (Agency) notified the Village that it had received complaints from residents. (Comp. Exh. 18.) The letter requested the Village explain the incidents and inform the Agency of what actions were being taken to eliminate the overflow problem. (Comp. Exh. 18.) On September 4, 1990, Fred Peska, Mayor of Cedarville, sent the Agency a letter in reply to their inquiry. (Comp. Exh. 19.) The letter stated that Mr. Peska would recommend the Village Board pass an ordinance making automatic back-flow valves and manual shut-off valves mandatory. (Comp. Exh. 19.) The Agency responded to this letter on September 7, 1990, noting some problems associated with the use of these types of valves and offering additional solutions for the problem. (Comp. Exh. 21.) The Agency believed that the cause of the backups was excess inflow/infiltration. (Comp. Exh. 21.) The Agency stated that the installation of valves may shift the backup problem to other residents. (Comp. Exh. 21.) The valves also require maintenance and are not foolproof. (Comp. Exh. 21.) The Agency also noted that pressures exerted during flooding may result in piping failures and overflows from manholes. (Comp. Exh. 21.) The letter further requested that the Village keep the Agency informed of the developments in this matter. (Comp. Exh. 21.)

DISCUSSION

"Overflows from sanitary sewers are expressly prohibited." (35 Ill. Adm. Code 306.304.) Based on the testimony of the Residents the Board finds that the Village of Cedarville violated 35 Ill. Adm. Code 306.304 on September 24, 1986, June 29, 1990 and August 19, 1990.

"Excess infiltration into sewers shall be eliminated, and the maximum practicable flow shall be conveyed to the treatment facilities." (35 Ill. Adm. Code 306.303) The Village believes that excess inflow and infiltration was the cause of the backups

in 1990. While the Village did have an ordinance prohibiting rain water connections to the sewerage system, it did not enforce the ordinance until after the sewer backup. The Village also did not have a system in place to monitor any increase in flow in the sewer lines due to infiltration. Therefore, the Board finds that the Village violated 35 Ill. Adm. Code 306.303 by failing to eliminate excess infiltration from the sewerage system.

The Village of Cedarville, in installing and operating a sanitary sewerage system, is required to install and operate the system in a reliable manner.

All treatment works and associated facilities shall be so constructed and operated to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance, through such measures as multiple units, holding tanks, duplicate power sources or such other measures as may be appropriate.

35 Ill. Adm. Code 306.102(a).

A pump failure was determined to be the cause of the backup in September of 1986. While there was a backup pump at the lift station, it also experienced a failure and did not prevent the overflow. (Tr. at 124.) The backups in June and August 1990 occurred during a heavy rainfall in the area but were not due to a pump failure. The backups from the Cedarville sanitary system were due to the operation of the sanitary system. Due to the system design and the operation of the system the sewer lines were unable to handle the increased flow due to the adverse weather and illegal connections. Therefore, the Board finds that the Village of Cedarville has violated 35 Ill. Adm. Code 306.102(a).

Section 33(c) of the Act states:

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.

Sanitary sewer backups have greatly interfered with the lives of the Residents. Private property has been damaged by the backups. The backups have rendered the basements in the homes of the Residents unusable for a period of time. The backups have also created unsanitary conditions in the homes of the Residents and in the streets. Such conditions certainly threaten the public's health and general welfare.

The backup of sewage into a residence creates a substantial risk of electrocution and the spread of disease. The backup of sewage in this case was extensive enough to spread to lower-level living areas of the Residents' homes. The photos and testimony submitted at hearing reveal the extent and seriousness of the hazard created by the presence of raw sewage in the homes of the Residents. Prompt remedial action is required to avoid the possible dangers that result from sewage backups due to the risk of electrocution and the threat to public health.

The pollution source in this instance is the sanitary sewer system. When functioning properly, sanitary sewers have great economic and social value. However, when a sewerage system malfunctions, the value is seriously diminished to those who experience the malfunctioning first hand.

With regard to the suitability of the location of the pollution source, it is suitable but it is imperative that sanitary sewers function properly due to their inherent close proximity to the residential environment.

The Board must consider the "technical practicability and economic reasonableness" of eliminating the pollution problem. (Section 33 (c)(4).) The Village contends that increasing the capacity of the sewers would be cost prohibitive to a village the size of Cedarville.

The Village did take steps to achieve compliance and prevent future backups of the sewerage system. While there have been no reports of backup since the August 1990 incident, this is not a clear indication that the problem has been alleviated. The backups all occurred during heavy rainfalls. It may be the case

that there has not been a substantial enough rainfall to cause a backup. The Board also notes there were no backups from the August 1990 incident to the time when the Village began to take steps to eliminate the problem.

The Residents contend that the measures taken by the Village to correct the problem are insufficient. The Residents believe that the ordinance requiring the addition of back-flow valves will only shift the problem to other areas and that the main objective of this ordinance was to shift the liability of any backups on the Residents.

The Agency, in its September 7, 1990, letter to the Mayor of Cedarville discussed some of the available solutions to the sewer problem.

Your basic conclusion, as we understand it from the letter, was to mandate automatic backflow valves and manual shut off valves. While it may seem on the surface to be the least costly alternative (particularly if individual residents are required to foot the bill), such actions will likely only shift the backup problem to other residents. These types of valves have several other drawbacks as well. Periodic maintenance is required to keep them operable and they are by no means foolproof. Pressures exerted during flooding can also result in piping failures and overflows from manholes. There are other modifications available such as overhead sewers.....which may be appropriate. Financial assistance from the Village might also be considered.

We would also encourage the Village to aggressively pursue elimination of the inflow and infiltration that is causing the problem in the first place. Issuing a notice prohibiting sump pump connections and checking manholes for leaks is only the first step in this effort. We have enclosed literature to assist you in this regard as well.

Comp. Exh. 21.

The Board shares the concerns of the Agency and the residents concerning the adequacy of the measures taken by the Village in correcting the problem in the sewerage system. Requiring residents to install back-flow valves to prevent sewer backups into homes is an acceptable means of providing some improvement in the reliability of the sewerage system. While the Board finds this to be one of many acceptable measures it does not believe that it alone is an adequate measure under the facts presented in this case. The addition of check valves does not address the problem of excess inflow\infiltration. The Board

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makes no holding on the language of the ordinance concerning the issue of liability due to the possible failure of these valves.

CONCLUSION

In conclusion the Board finds that Cedarville violated 35 Ill. Adm. Code 306.102(a), 306.303 and 306.304. Having found the Village in violation of the Board's rules and regulations, the Board must next determine the appropriate remedy. The record clearly indicates that the Village has taken and continues to take steps to alleviate the problems with the sewers. However, the Board's finding of violation combined with the potential health risk resulting from future violations requires that a more formal program be mandatorily implemented. See City of Freeport v. PCB (2d Dist. 1989), 187 Ill. App. 3d 745, 544 N.E.2d 1, City of Freeport (September 8, 1988), PCB 86-193, 92 PCB 107, Cupp v. South Palos Township Sanitary District (May 29, 1984), PCB 83-104, 58 PCB 223, Daun v. Village of Roselle (December 4, 1980), PCB 80-17, 40 PCB 45, Village of Bourbonnais v. IEPA (October 19, 1983), PCB 83-71, 54 PCB 245, IEPA v. Caseyville Township and St. Clair Township (February 19, 1981), PCB 79-122, 40 PCB 463 and Bobby L. Rush and Martha D. Rush v. Barrington (November 29, 1979), PCB 79-129, 36 PCB 175.

REMEDY

The purpose of the remedy is to bring the sanitary sewer system into compliance with the Board's regulations. The aim of the remedy is to identify and eliminate any existing problems in the Cedarville sewerage system and develop a monitoring and inspection program to minimize problems that may arise in the future. A pump failure at the lift station was believed to be the cause of the backup in 1986. Excess inflow and infiltration appear to be the underlying cause of the backups in 1990.

A pump failure was the cause of the sewer overflow in 1986. After that incident the Village replaced the pumps in the lift stations and improved the alarm system on the pumps. The Village reports that the incidents in 1990 were not caused by a pump failure. The complaint lists no other incident or problem with the operation of the lift station. Because the pump failure was related to only the first incident and the Village has taken action to correct the problem the Board will require no additional action by the Village to alter the operation of the lift station. However, the Board notes that the proper operation of the lift stations is fundamental to providing reliable and dependable sewer service.

The Village concluded that the overflows in 1990 resulted from excess inflow and is testing to confirm the role, if any, of infiltration. The testimony supports this conclusion. The backups occurred during periods of heavy rainfall and a

significant number of illegal connections have been discovered and removed. Determining the full extent of the inflow and infiltration problem and the condition of the sewerage system is ongoing. The Village continues to take measures to locate and alleviate the problem, (door-to-door inspection and smoke test).

The Board directs Cedarville to develop a compliance plan to be submitted to the Board by October 13, 1992. The compliance plan shall detail the steps necessary to achieve and maintain compliance with Sections 306.102, 306.303 and 306.304. The compliance plan shall include specific dates at which particular actions are to be completed and a date when compliance with Sections 306.102, 306.303, and 306.304 will be achieved. The plan shall note the expected dates of any government approval of any remedial action, such as relief sewers, if so required. The compliance plan, in essence, should do four things: 1) provide Cedarville's best evaluation of the source of the sewer overflows and its best assessment of the present state of the sewerage system, 2) identify the specific steps Cedarville intends to implement to eliminate the problems, 3) state the specific date by which each remedial action will be completed, and 4) identify the long term monitoring methods that will ensure basement backups do not occur in the future. In developing a compliance plan Cedarville may consider the following factors.

There are several procedures available to monitor the flow through the sewerage system and detect the presence of excess water. Inflow and Infiltration Analysis and Sewer System Evaluation Surveys provide the needed information to evaluate inflow and infiltration problems. If these reports have been prepared, Cedarville should provide the Board with copies. Once the source of inflow or infiltration is fully verified, the necessary steps can be taken to eliminate the source of excess water. Cedarville should continue with its door-to-door inspections with follow-up to find and eliminate illegal hookups. The results from this inspection will provide the data needed to measure the magnitude of the inflow problem.

A long term program also needs to be developed to monitor and control excess inflow and infiltration in the system. The Village shall submit a compliance plan that develops and implements a program to eliminate excess inflow and infiltration into the system in the future. This program could include a public awareness program, which utilizes publication in a newspaper of general circulation and customer mailings coupled with door-to-door inspections and all legal remedies to force homeowner compliance. This program could also include a program to detect any increase of flow in the sewerage system due to rain. The compliance plan shall also note the anticipated frequency at which inspections of the sewerage system to detect increases in inflow and infiltration will be performed.

The Village may submit to the Board a copy of any previous reports and/or studies on the maintenance and operation of the Cedarville sewerage system compiled since 1986 relevant to the backups on Cedar Court. This information may include any studies or reports concerning other available options to improve the Cedarville sewerage system; while noting that the overall design of the system would appear adequate for Cedarville's present population, the addition of a relief sewer should be considered.

It is not the Board's intention to require Cedarville to conduct any new studies or to copy volumes of reports and studies to the Board. The Board seeks to obtain any readily available information that Cedarville has that supports the compliance plan.

The submission of maps showing the sewer layout and the location of the lift stations would be beneficial to the Board in reviewing the sewerage system. From the complaint and the testimony the area affected by the sewage problem is limited to the residents located on Cedar Court. To limit the amount of information submitted to the Board, Cedarville may exclude any document or portion of a document that relates to other sections of the village. If Cedarville has documents which it believes would be helpful to the Board but the length of such documents make it impractical to copy, Cedarville may submit to the Board a list identifying the document and indicating the size of the document.

The Board has found that the Village violated the provisions of the Board's rules and regulations resulting in sewage backups to the Resident's home on September 4, 1986, June 29, 1990 and August 19, 1990. The Village is required to obtain future compliance with the requirements for the operation of a sewerage system as set forth in the Board's rules and regulations. The Board makes no finding concerning any future liability of the Village.

It is the Board's intention to issue a final order in this matter, incorporating the compliance plan and ordering Cedarville to cease and desist from future violations of the Environmental Protection Act or Board regulations as of December 31, 1992, or the completion date specified in the compliance plan from Cedarville, whichever date is earlier. Cedarville should complete all remedial actions as soon as possible. In the event Cedarville cannot complete all remedial action by December 31, 1992, it may file a motion with the Board to extend the effective date of the cease and desist order. Such motion must include affidavits and supporting information to demonstrate that remedial activities cannot be completed sooner.

The Residents did not request that the Board impose a penalty against Cedarville in this matter. The Board declines to

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impose a penalty against Cedarville at this time. However, failure to make progress in addressing the problem could lead to penalties against Cedarville and limitations on the factors of the sewerage system. The Board will review the appropriateness of a penalty considering the factors provided by Section 42(h) of the Act in its final order.

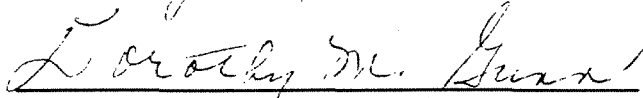
ORDER

It is the order of the Pollution Control Board that:

1. The Village of Cedarville has violated 35 Ill. Adm. Code 306.102, 306.303 and 306.304.
2. The Village shall submit a compliance plan containing the specific steps and timetables for achieving compliance and maintaining future compliance with Sections 306.102, 306.303 and 306.304.
3. The Village shall complete its inspection and removal of illegal hookups and finish the SSES survey by December 1, 1992. The Village shall submit with the compliance plan a detailed report on the status of and the results from the program of inspection and removal of illegal hookups and the smoke test, as well as any new incidents of basement backups.
4. The above information shall be submitted to the Board, the Agency and the complainants by October 13, 1992.
5. The Agency and complainants may file comments on Cedarville's compliance plan, comments shall be submitted to the Board by November 12, 1992.
6. The Board will retain jurisdiction in this matter.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, do hereby certify that the above interim opinion and order was adopted on the 3rd day of September, 1992, by a vote of 7-0.


 Dorothy M. Gunn, Clerk
 Illinois Pollution Control Board