



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

3-004
(PV 04-0)

(217) 782-5544
TDD: (217) 782-9143

November 7, 2003

Dorothy Gunn, Clerk
Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

RE: **NOTICE OF PROVISIONAL VARIANCE APPROVAL**
PV-2004-03

Dear Ms. Gunn:

Pursuant to Subsection 37(b) of the Environmental Protection Act (415 ILCS 5/37(b)), attached is a copy of the Illinois EPA's recent approval of a request for provisional variance. As you know, the Board must maintain for public inspection copies of all provisional variances filed with it by the Illinois EPA. Please feel free to call me at the number referenced above should you have any questions.

Sincerely,

Connie L. Tonsor
Associate Counsel
Division of Legal Counsel

Attachment

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

November 7, 2003

City of Polo)	I EPA 03-004
Petitioner,)	
v.)	
ENVIRONMENTAL PROTECTION AGENCY,)	
Respondent.)	
)	
)	
)	
)	
)	

PV-2004-03

(Provisional Variance- Water)

Re: Provisional Variance From 35 Ill. Adm. Code 302.212 for Ammonia Nitrogen, 304.120(c) for CBOD₅, and 304.120(c) for Suspended Solids
NPDES Permit # IL0030449

Dear Mayor Oosten:

On October 14, 2003, and October 17, 2003, the Illinois Environmental Protection Agency (Illinois EPA) received the attached in which the City of Polo (City) requested a provisional variance from 35 Ill. Adm. Code 302.212 for ammonia nitrogen, and 304.120(c) for CBOD₅ and suspended solids For the reasons discussed below, the Illinois EPA has decided to GRANT the City's request.

The City seeks a provisional variance to replace the center column of the rotary distributor mechanism in the secondary trickling filter process. Units that will remain in operation during the term of the provisional variance include fine screening, primary settling, final settling, tertiary aerated lagoon, wet weather flow lagoon, anaerobic digestion and sludge drying beds.

Based on its review, the Illinois EPA has concluded the following:

1. The environmental impact from the proposed activity should be minimal;
2. No other reasonable alternative appears available;
3. No public water supplies should be affected;
4. No federal regulations will preclude the granting of this request; and
5. The City will face an arbitrary and unreasonable hardship if the request is not granted.

The Illinois EPA hereby GRANTS the City a provisional variance from 35 Ill. Adm. Code 302.212 for ammonia nitrogen, from 35 Ill. Adm. Code 304.120(c) for CBOD₅,

and total suspended solids. The provisional variance will run for a 45-day period beginning October 14, 2003, through November 27, 2003, and is subject to the following specific conditions:

- A. During the variance period, the City's effluent shall meet the monthly average concentrations of 50 mg/l for CBOD₅, 50 mg/l for total suspended solids, and 6.4 mg/l for ammonia nitrogen.
- B. During the variance period, the City's effluent shall meet the daily maximum concentrations of 75 mg/l for CBOD₅, 75 mg/l for total suspended solids, and 8.5 mg/l for ammonia nitrogen.
- C. The City shall notify Jay Balmer of the Illinois EPA by telephone at 217/782-9720 when construction starts and again when construction is completed. Written confirmation of each notice shall be sent within five days to the following address:

Illinois Environmental Protection Agency
Bureau of Water – Water Pollution Control
Attention: Barb Conner
1021 North Grand Avenue East, MC #19
P.O. Box 19276
Springfield, Illinois 62794-9276

- D. The City shall sign a certificate of acceptance of this provisional variance and forward that certificate to Jay Balmer at the address indicated above within ten days of the date of this order. The certification should take the following form:

I (We) _____, hereby accept and agree to be bound by all terms and conditions of the provisional variance granted by the Illinois EPA in _____ dated _____.

Petitioner

Authorized Agent

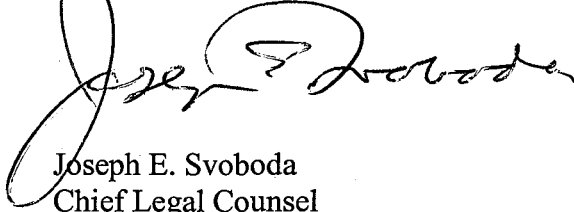
Title

Date

- E. The City shall continue to monitor and maintain compliance with all other parameters and conditions specified in its National Pollutant Elimination Permit No. IL 0030449.

The Illinois EPA grants this provisional variance in accordance with its authority contained in Sections 35(b), 36(c), and 37 (b) of the Illinois Environmental Protection Act (415 ILCS 5/35(b), 36(c), and 37(b)) (2002). The decision to grant this provisional variance is not intended to address compliance with any other applicable laws or regulations.

Sincerely,



Joseph E. Svoboda
Chief Legal Counsel

Enclosure

CC: IPCB, Clerk

Matt Hansen, P.E., Willett, Hofmann & Associates, Inc.

bcc: Connie Tonsor
Roger Callaway
Vera Herst
Joan Muraro
Jay Balmer

WILLETT, HOFMANN & ASSOCIATES, INC.

CONSULTING ENGINEERS

809 EAST SECOND STREET
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ROBERT HOFMANN, P.E., S.E., P.L.S.
1821-1898

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DIRECTOR OF ENVIRONMENTAL ENGINEERING

October 14, 2003

RECEIVED
OCT 16 2003

IEPA

Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control
Compliance Assurance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: City of Polo, Illinois
Wastewater Treatment Plant
NPDES Provisional Variance Request

Gentlemen:

On behalf of the City of Polo, we are requesting a provisional variance for their NPDES permit limits at the wastewater treatment plant per the application requirements stated in TITLE 35: Environmental Protection Agency; Part 180: Procedures and Criteria for Reviewing Applications for Provisional Variances; Subpart B: Applications for Provisional Variances; Section 180.202 b). We have addressed below the 13 items in Section 180.202 b) on an item by item basis.

1. The provisional variance requested is to waive the CBOD₅, Suspended Solids and Ammonia Nitrogen discharge limit and allow the City to discharge settled sewage to the Buffalo Creek for a period of 45 days. The provisional variance is needed to allow the City to replace the center column of the rotary distributor mechanism in their secondary trickling filter process.
2. The provisional variance is needed to allow the City to replace the center column of the rotary distributor mechanism in their secondary trickling filter process. The center column allows the four (4) distributor arms to rotate and discharge the wastewater from the primary clarifier evenly over the trickling filter media. Currently the operator has to manually rotate the distributor arms periodically during the day to get a somewhat even distribution over the trickling filter media.

The City of Polo is a small rural community with a population of 2,477 located approximately 13 miles northwest of Dixon, Illinois in southwest Ogle County.

3. The City of Polo wastewater treatment plant processes approximately 0.313 mgd of domestic sewage a day for treatment and discharge to the Buffalo Creek. The City of Polo operates a tertiary treatment plant, which includes fine screening, primary settling, a secondary trickling filter, final settling, a tertiary aerated lagoon, a wet weather flow lagoon, anaerobic digestions and sludge drying beds.

The City has ordered the center column unit from Walker Process, and a delivery schedule of six (6) weeks is anticipated. Also the City is obtaining a proposal from a local contractor to install the center column unit when it arrives on site. The provisional variance is needed because the operator may not meet effluent standards while he manually operates the distributor arms to try to maintain some uniform flow over the trickling filter. Also the trickling filter will have to be bypassed completely for 2 to 3 days while the center column unit is being replaced.

4. The City will attempt to maintain the best treatment efficiency possible through the trickling filter during the 6 week period while they wait for the new center column unit, by manually rotating the distributor arms periodically during the day. The City will have to bypass completion around the trickling filter for 2 to 3 days while the contractor removes the existing center column and installs the new one. When the trickling filter is being bypassed, the treatment process steps shall include fine screening, primary settling, final settling and tertiary lagoon.

The City's NPDES permit discharge limits are 10 mg/l for CBOD₅, 12 mg/l for suspended solids and 1.4 mg/l (April-October) and 2.2 mg/l (November - March) for Ammonia Nitrogen.

5. There are no materials in the drinking water exceeding the allowable IEPA regulation limits.
6. The environmental impacts of the variance will be minimal to the Buffalo Creek, especially if the City can maintain effluent quality near their current NPDES permit limits for CBOD₅ and suspended solids by still utilizing the trickling filter for six (6) weeks until the new center column arrives and then utilizing all other treatment process while the trickling filter is being repaired and the trickling filter must be completely bypassed.
7. The City will be utilizing all the other treatment process during the repair of the trickling filter to maintain the best effluent quality they can achieve. The City would have to construct additional treatment facilities or haul their wastewater to another treatment plant with reserve capacity to handle the City's wastewater loadings.
8. The City has ordered the center column unit from Walker Process, and a delivery schedule of six (6) weeks is anticipated. The City will still utilize the trickling filter in the treatment process by manually rotating the distributor arms during the day. The trickling filter will not provide as effective treatment with this type of operation, but will provide the maximum treatment available. Also the City is obtaining a proposal from a competent local contractor that is familiar with this type of construction to install the center column unit when it arrives on site. It is anticipated the trickling filter will have to be bypassed for 2 to 3 days while the center column unit is being replaced. The City will utilize the other treatment process to maintain the maximum treatment efficiency possible.

WILLETT, HOFMANN & ASSOCIATES, INC.
CONSULTING ENGINEERS

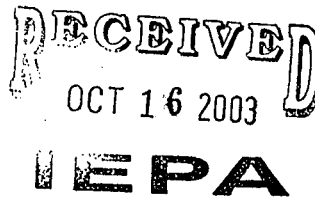
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October 14, 2003



Illinois Environmental Protection Agency
Bureau of Water
Division of Water Pollution Control
Compliance Assurance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

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Wastewater Treatment Plant
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WILLETT, HOFMANN & ASSOCIATES, INC.

Consulting Engineers

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e-mail: wharock@xta.com

Lincolnshire Business Center
701 Essington Road
Joliet, Illinois 60435
815/725-4525

FAX TRANSMITTAL

DATE: October 17, 2003

TO: IEPA

ATTN: Jay Balmer

FROM: Matt Hansen

FAX #: 217.557.1407

NUMBER OF PAGES INCLUDING THIS SHEET 3

REFERENCE: Polo, Illinois

Provisional Variance Request

We revised the letter to include the start and end date of the provisional variance and the average daily and maximum daily limits.

Call if you have any questions.

CONFIDENTIALITY NOTICE

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WILLETT, HOFMANN & ASSOCIATES, INC.
CONSULTING ENGINEERS

C.K. WILLETT, P.E., P.L.S.
1008-1071

ROBERT HOFMANN, P.E., S.E., P.L.S.
1031-1030

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