



# 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

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

**RECEIVED  
CLERK'S OFFICE**

**JAN 30 2004**

**STATE OF ILLINOIS  
Pollution Control Board**

January 29, 2003

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

**RE: NOTICE OF PROVISIONAL VARIANCE APPROVAL  
PV-2004-39**

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 for the City of Trenton. 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 above number should you have any questions.

Sincerely,

Connie L. Tonsor  
Associate Counsel  
Division of Legal Counsel

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

January 29, 2004

City of Trenton	)	
	)	
Petitioner,	)	
	)	
v.	)	
	)	IEPA-2004-39
ILLINOIS ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	(Provisional Variance- Water)
	)	
Respondent.	)	
	)	

Re: Provisional Variance From 35 Ill. Adm. Code 302.212 for Ammonia Nitrogen, 304.120(c) for CBOD<sub>5</sub>, and 304.120(c) for Suspended Solids NPDES Permit # IL0026701

Dear Mr. Rodden:

The Agency has completed its technical review of the attached provisional variance request submitted by the City of Trenton on January 26, 2004. Based on the review, the Agency GRANTS the requested provisional variance subject to specific conditions set forth below for a period of 16 days.

The City of Trenton has two activated sludge plants, one rated at 0.1 million gallons per day ("mgd") and the other rated at 0.4 mgd. The City seeks a provisional variance from its current NPDES permit (No. IL026701) limitations for total suspended solids ("TDS"), biological oxygen demand (BOD) and ammonia for its 0.4 mgd extended aeration activated sludge plant so that it can repair the return activated sludge line. on its 0.4 mgd plant In order to make the repair, the City must take the plant temporarily offline to pump the water out of the clarifier and pump a portion of the water out of the aeration tank in order to gain access to the problem line. The pumped water will be routed to either the holding tank, sludge drying bed and/or into the 0.1 mgd plant. No untreated water will be discharged. The repairs are to be made on January 27 and 28 2004, and it is expected that the plant will be back in compliance by February 11, 2004

The Agency's review of the requested provisional variance 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 effected;
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 Agency hereby GRANTS the City of Trenton a provisional variance from 35 Ill. Adm. Code 302.212 for ammonia nitrogen, from 304.120(c) for CBOD<sub>5</sub> and suspended solids for a period of 16 days beginning January 27, 2004, subject to the following specific conditions:

- A. During the variance period, the City's effluent shall meet the monthly average concentrations of 70 mg/l for CBOD<sub>5</sub>, 70 mg/l for suspended solids and 12 mg/l for ammonia nitrogen.
- B. The City shall notify Barb Conner of the Agency 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

- C. The City shall sign a certificate of acceptance of this provisional variance and forward that certificate to Barb Conner 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 Agency in \_\_\_\_\_ dated \_\_\_\_\_.

\_\_\_\_\_  
Petitioner

\_\_\_\_\_  
Authorized Agent

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

- D. The City shall continue to monitor and maintain compliance with all other parameters and conditions specified in its National Pollutant Discharge Elimination System Permit No. IL0026701.

Sincerely,

*Joseph E. Svoboda*  
Joseph E. Svoboda  
Chief Legal Counsel

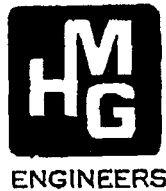
WDI

Enclosure

cc: IPCB, Clerk

HENRY, MEISENHEIMER & GENDE, INC.

1075 LAKE ROAD, PO BOX 70  
CARLYLE, ILLINOIS 62231  
(618) 594-3711  
FAX (618) 594-8217  
HMG@HMGENGINEERS.COM



HAROLD D. MEISENHEIMER  
GARY R. FULTON  
DAVID W. RODDEN  
SCOTT A. RAKERS  
BRADLEY G. HUMMERT

January 26, 2004

Ms. Barb Conner  
Illinois Environmental Protection Agency  
Bureau of Water  
Compliance Assurance Section  
P.O. Box 19276 MC#19  
Springfield, Illinois 62794-9276  
Fax # (217) 557-1407

Re: Trenton, Illinois  
NPDES Permit No. IL0026701  
Provisional Variance Application

Dear Ms. Conner:

The City of Trenton has two activated sludge plants, one being rated at 0.1 mgd and the other at 0.4 mgd. As discussed this same date, the City of Trenton is experiencing a problem with the return activated sludge line on the 0.4 mgd plant. This plant is an extended aeration activated sludge plant and the return of activated sludge is an essential component to this process. The City of Trenton is currently using a gas powered portable pump to return activated sludge, but this will not result in a consistently compliant effluent. The City is requesting a provisional variance so this plant can be temporarily taken off-line so repairs can be made.

Application for a provisional variance requires providing specific information as listed in Title 35, Subtitle A, Chapter II, Part 180, Subpart B, Section 180.202 B of the Illinois Statutes. The following numbers correspond to the numbered items in this regulation of which a copy is attached.

- 1 The City of Trenton's current NPDES permit levels and the proposed variance levels follows:

	Requirement (ppm)	
	Average	Maximum
Total Suspended Solids	12	24
BOD	10	20
Ammonia	4	8

- 2 The City of Trenton desires to temporarily take off-line their existing 0.4 mgd plant to repair the return activated sludge line. For the City to fix this submerged line they must

pump the water out of the clarifier and a portion of the water out of the aeration tank allowing for access to the problem line. The exact problem will not be known until the water is pumped out. The pumped water will be routed to either the holding tank, sludge drying bed and/or into the 0.1 mgd plant. No untreated water will be discharged. All water will ultimately be treated by the 0.1 mgd plant or the 0.4 mgd plant when placed back in service. There is no other way to fix the problem line.

The City of Trenton is a community of 2,610 people and typically have flows in the vicinity of 0.225 mgd this time of year. If flows exceed the plants design of 100,000 gpd, and no more excess flow capacity is available in their holding tank, the plant's effluent quality could suffer due to hydraulic overloading. Therefore a variance is sought.

- 3 The City's personnel will have new piping, clamps and miscellaneous repair items on-hand to fix the problem once the plant is taken out of service.
- 4 The effluent will be discharged to the normal receiving stream.
- 5 N/A
- 6 Shutting the 0.4 mgd plant down may temporarily result in higher discharge levels of BOD, Solids and Ammonia than allowed for in the City's NPDES permit. No adverse stream affects are expected. Biological activity is very low this time of year and this stream is not in direct contact with humans nor is it a direct water source for a public water supply.
- 7 The existing NPDES permitted effluent levels provide a hardship, because it does not allow for this plant to be temporarily taken out of service for repairs. The problem will only worsen with time and the effluent quality will steadily diminish to a point where the permit levels can no longer be met.
- 8 Compliance with the NPDES permit will be met within 7 days of the repair. The repairs will be made on January 27 and 28 of 2004. The plant should be back in compliance by February 5, 2004 if not sooner.
- 9 Alternate methods of compliance include:
  - a. Having the community quit using the sewer system which is not practical nor will it stop the influent and inflows caused by leaky sewers to the plant.
  - b. Continuing to pump the return activated sludge with a portable pump. This will not consistently provide effluent meeting the NPDES permit and is not practical.
  - c. Fix the problem by taking the plant temporarily out of service. Barring no additional problems, this should result in long term service in compliance with the NPDES permit.
- 10 The variance is requested from January 27, 2004 through February 5, 2004.
- 11 No provisional variances have been granted to the City of Trenton in the last year.

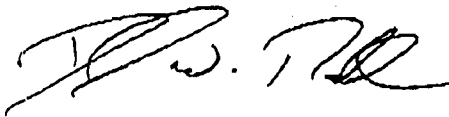
12 The City is believed to be currently in compliance, but it is becoming more and more difficult each day because of the deteriorating effluent quality from the problem plant.

13 No.

Should you have any questions regarding these matters please contact me at your convenience.

Very truly yours,

HENRY, MEISENHEIMER & GENDE, INC.



David W. Rodden, P.E.



Encl.

Cc: Chris Port, IEPA Collinsville  
Margaret Conley, Mayor  
Pat Bassler  
Roger Mauc  
File 5038

HENRY, MEISENHEIMER & GENDE, INC.

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HAROLD D. MEISENHEIMER  
GARY R. FULTON  
DAVID W. RODDEN  
SCOTT A. RAKERS  
BRADLEY G. HUMMERT

**FAX**

Date: 1-26-04  
Number of pages including cover sheet: 3

To: Barb Conner

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Phone: 217 782 9720

Fax phone: 217 557-1407

CC: \_\_\_\_\_

From: Dave Bick

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Phone: 618-594-3711

Fax phone: 618-594-8217

REMARKS:     Urgent     For your review     Reply ASAP     Please comment

*Hard copies in mail. Call w/ questions.*

*Tracy*

*Dave*

**CONFIDENTIALITY NOTICE:** This facsimile transmission is intended only for the addressee named above. It contains information that is privileged, confidential or otherwise protected from use and disclosure. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying or dissemination of this transmission or the taking of any action in reliance of its contents or other use is strictly prohibited. If you have received this transmission in error, please notify us by telephone immediately so that we may arrange for its return. Thank you for your cooperation.



HENRY, MEISENHEIMER & GENDE, INC.

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January 26, 2004

Ms. Barb Conner  
Illinois Environmental Protection Agency  
Bureau of Water  
Compliance Assurance Section  
P.O. Box 19276 MC#19  
Springfield, Illinois 62794-9276  
Fax # (217) 557-1407

Re: Trenton, Illinois  
NPDES Permit No. IL0026701  
Provisional Variance Application - Amended

Dear Ms. Conner:

As discussed we are amending items 1, 8 and 10 from the previous letter. This amendment sets variance limits and revises the ending date of the variance to February 11, 2004 to insure adequate time is available for the activated sludge to become active. Please replace the previously numbered paragraphs with the following corresponding numbers:

- 1 The City of Trenton's current NPDES permit levels and the proposed variance levels follows:

	Requirement (ppm)		Variance Levels (ppm)
	<u>Average</u>	<u>Maximum</u>	<u>Maximum</u>
Total Suspended Solids	12	24	70
BOD	10	20	70
Ammonia	4	8	12

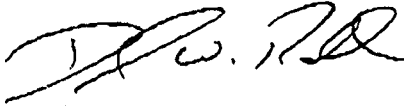
- 8. The repairs will be made on January 27 and 28 of 2004. The plant should be back in compliance by February 11, 2004 if not sooner.

- 10 The variance is requested from January 27, 2004 through February 11, 2004.

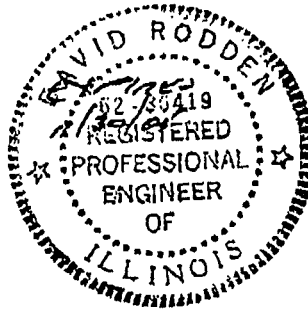
Should you have any questions regarding these matters please contact me at your convenience.

Very truly yours,

HENRY, MEISENHEIMER & GENDE, INC.



David W. Rodden, P.E.



Encl.

Cc: Chris Port, IEPA Collinsville  
Margaret Conley, Mayor  
Pat Bassler  
Roger Maue  
File 5038