

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

May 5, 2005

RECEIVED
CLERK'S OFFICE

MAY 16 2005

STATE OF ILLINOIS
Pollution Control Board

Lincoln Place Mobile Home Park)
)
 Petitioner,)
)
 v.)
)
 ILLINOIS ENVIRONMENTAL PROTECTION)
 AGENCY,)
)
 Respondent.)

IEPA-05-~~05~~ 05

(Provisional Variance- Water)

Re: Provisional Variance From 35 Ill. Adm. Code 304.120(a) for Total Suspended Solids, and 304.122 for Fecal Coliform NPDES Permit # IL0062651

Dear Mr. Shugerts:

The Agency has completed its technical review of the attached provisional variance request submitted by the Lincoln Place Mobile Home Park on May 4, 2005. Based on the review, the Agency GRANTS the requested provisional variance subject to specific conditions set forth below for a period of 7 days.

Lincoln Place Mobile Home Park is seeking a provisional variance from the TSS and Fecal Coliform limitations specified in their NPDES permit for a period of seven days beginning May 5, 2005 so that needed repairs can be made to their wastewater treatment plant.

The Lincoln Place Mobile Home Park wastewater treatment consists of a three-cell aerated lagoon followed by a sand filter and disinfection. The wastewater treatment plant has a design average flow of 0.053 MGD and a design maximum flow of 0.1 MGD. The permit contains effluent limitations of 25mg/l monthly average and 40 mg/l daily maximum for CBOD and 37 mg/l monthly average and 45 mg/l for total suspended solids. The permit also limits fecal coliform to 400 per 100 ml. Discharge is directly to the Sangamon River.

A provisional variance is being sought due to flood damage that occurred in 2002 when the Sangamon River flooded the wastewater treatment facility. The flood resulted in damage to a mooring for the baffle curtain in the lagoon and it also fouled the sand filter with river sediment. In order to make the necessary repairs to the baffle curtain the

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Lincoln Place Mobile Home Park)
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IEPA-05-146

(Provisional Variance- Water)

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1021 North Grand Avenue East, MC #19
Springfield, Illinois 62794-9276

D. The Lincoln Place MHP shall sign a certificate of acceptance of this provisional variance and forward that certificate to Roger Callaway at the address indicated above within one day 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

The Lincoln Place MHP shall continue to monitor and maintain compliance with all other parameters and conditions specified in its National Pollutant Discharge Elimination System Permit No. IL0062651.

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,



William D. Ingersoll
Acting Chief Legal Counsel

Enclosure

CC: IPCB, Clerk

Essex Partners Inc.
175 Corporate Woods, Suite 110
Rochester, New York 14623

RECEIVED
MAY 04 2005
IEPA

585-272-2350
Fax 585-272-2396

VIA FACSIMILE - 217-557-1407

May 4, 2005

Illinois Environmental Protection Agency
CAS-19
1021 North Grant Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: Lincoln Place MHP - IL0062651

Dear Mr. Galloway:

This letter is to request a variance to exceed our permitted Total Suspended Solids (TSS) and Fecal Coli Form levels in bypass our normal sewage water filtration process at Lincoln Place MHP located in Springfield, IL. Based on Title 35: Environmental Protection, Subtitle A: General provisions, Chapter 1: Pollution Control Board, Part 104 Regulatory Relief Mechanisms, Subpart B: variances, Section 104.204 the following information has been provided.

Section 104.204

- a) We are requesting a variance to exceed our permitted Total Suspended Solids (TSS) and Fecal Coli Form levels in bypassing the permitted sewage lagoon filtration process to reduce the water level with-in our lagoon to make repairs to the sewage lagoon facility.
- b)
1. Sewage lagoon located at Lincoln Place MHP 1236 North Oak Lane Road, Springfield, IL 62707.
 2. The discharge is located at the north east corner of the MHP and discharges into the Sangamon River
 3. No know variance requests prior to this request.
 4. Sewage lagoon permit # IL0062651, Outfall 0010.
 5. There are two persons employed by Lincoln Place MHC and the facility was originally built in 1972 and renovated in 1997.
 6. Waste water enters the sewage lagoon from the community. It is aerated with aerators that are installed in the three cells of the lagoon. The water is pumped from the lagoon to two sand filters. The sand filters are used for the filtration of the waste water that comes from the lagoon and the water is discharged to the Sangamon River. The water is sent through a chlorinator during the months of May through November before being discharged.
 7. Please see description in sub section 6.
 8. Please see attachment # 1 (DMR Summary for Period of 9/30/03 - 1/31/05)

● Page 3

May 4, 2005

2. We would be looking to remove approximately 3.25 million gallons of water from the lagoon in the process of lowering the level by 6-6 1/2 feet. Please also see attachment # 4 (Greene & Bradford Inc. – Environmental impact statement.)
3. We do not feel that there will be an impact during the variance period. Should the testing show levels higher than allowable by the variance standard we would stop the bypass process and proceed to and alternative method to lower the level.

- h) This is not applicable to our request.
- i) Our permit number has been provided in the above information.
- j) This is not applicable to our request.
- k) We would request the variance to begin on Thursday, May 6, 2005 and end on Wednesday, May 12 2005.
- l) This is not applicable to our request.
- m) This is not applicable to our request.
- n) This is not applicable to our request.

Should you have any questions with the information provided above please contract me immediately at 585-202-3100. I thank you for taking the time to review our request and we look forward to your communication as soon as possible.

Sincerely,

Keith W. Shugerts
(km)

Keith W Shugerts
VP of Development & Purchasing

TMI Analytical Services, LLC

NECAP Accredited #10447

2110 N. Republic St.
Springfield, IL 62702
217-694-8642 Fax: 217-694-6656
tmi@tmi-lab.com

28-Apr-05

Steve Bishoff
Rapps Engineering & Applied Science
821 S. Durkin Dr. P.O. Box 7349
Springfield, IL 62704

TEL: (217) 787-2118
FAX: (217) 787-6641

RE: Rapps, Lincoln

Order No.: 0504050

Dear Steve Bishoff:

TMI Analytical Services, LLC received 10 sample(s) on 4/21/2005 for the analyses presented in the following report.

There were no problems with the analyses unless noted on the case narrative or qualified on the analytical results. The final report includes this cover letter, analytical report and a copy of the chain of custody. It may also include but not be limited to letters of explanation or raw data.

Erica Treadway
Inorganic Supervisor

TMI Analytical Services, LLC

Date: 28-Apr-05

CLIENT: Rapps Engineering & Applied Science
Project: Rapps, Lincoln
Lab Order: 0504050

CASE NARRATIVE

All samples were received and analyzed within method required holding times unless noted below. Samples met specified acceptance criteria except where noted below or qualified on the report.

Report Qualifiers:

- A Increased reporting limit due to equipment calibration
- B Analyte detected in the associated Method Blank
- F Analyte failed to meet the required acceptance criteria for dry basis analysis
- M Matrix Interference(s) Identified
- RL Not Detected at the Reporting Limit
- SUB Substrate(s) noted
- V Verification trend and accuracy failed to meet the required acceptance criteria
- A The laboratory control sample failed to meet the required acceptance criteria
- E Value above specification range
- H Holding time for preparation or analysis exceeded
- P Chemical preservation discrepancy noted in time of analysis
- SC Scan Only
- UNBC Too numerous to count

TMI Analytical Services, LLC

Laboratory Results Date: 24-Apr-05

CLIENT: Rapps Engineering & Applied Science Lab Order: 0304050
 Project: Rapps, Lincoln

Lab ID: 0504050-001 Collection Date: 4/21/2005 10:33:00 AM
 Client Sample ID: L-1 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 3.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 6.0		mg/L	4/22/2005	AP

Lab ID: 0504050-002 Collection Date: 4/21/2005 10:36:00 AM
 Client Sample ID: L-2 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 51.6		mg/L	4/22/2005	AP

Lab ID: 0504050-003 Collection Date: 4/21/2005 10:27:00 AM
 Client Sample ID: L-3 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 54.1		mg/L	4/22/2005	AP

Lab ID: 0504050-004 Collection Date: 4/21/2005 10:26:00 AM
 Client Sample ID: L-4 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 47.5		mg/L	4/22/2005	AP

TMI Analytical Services, LLC

Laboratory Results Date: 25-Apr-05

CLIENT: Rapps Engineering & Applied Science Lab Order: 0504050
 Project: Rapps, Lincoln

Lab ID: 0504050-005 Collection Date: 4/21/2005 10:21:00 AM
 Client Sample ID: L-5 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 51.6		mg/L	4/22/2005	AP

Lab ID: 0504050-006 Collection Date: 4/21/2005 10:18:00 AM
 Client Sample ID: L-6 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/21/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 55.7		mg/L	4/22/2005	AP

Lab ID: 0504050-007 Collection Date: 4/22/2005 10:15:00 AM
 Client Sample ID: L-7 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 3.1		mg/L	4/22/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 54.0		mg/L	4/22/2005	AP

Lab ID: 0504050-008 Collection Date: 4/21/2005 10:12:00 AM
 Client Sample ID: L-8 Matrix: AQUEOUS

Analytes	RL	Result	Qual	Units	Date Analyzed	Analyst
BOD, 5 DAY Biochemical Oxygen Demand	12.0	E405.1/SMB210B 4.1		mg/L	4/22/2005	AP
RESIDUE, SUSPENDED (TSS) Residue, Suspended (TSS)	15.0	E100.2/SMB2540D 53.8		mg/L	4/22/2005	AP

CLIENTS		Engine Engineering & Applied Science		Lab Order# 0304850		Project# Engng, Lincoln	
TMI Analytical Services, LLC		Laboratory Results		Date: 28-Apr-05			
Lab ID#:	0304050-009	Collection Date:	4/21/2005 10:00:00 AM	Client Sample ID#:	IL-9	Matrix:	AQUEOUS
Analyst:		HL	Result:	Qual:	Units:	Date Analyzed:	
BOD, 5 DAY	EA0219M110B	DL	ng/L	4/22/2005	AP	Analyst:	AP
Biosolids Oxygen Demand							
Pressure, Suspended (PS)	EA0220M140D	SL	mg/L	4/22/2005	AP	Analyst:	AP
Residue, Suspended (SR)							
Lab ID#:	0304050-010	Collection Date:	4/21/2005 10:00:00 AM	Client Sample ID#:	IL-10	Matrix:	AQUEOUS
Analyst:		HL	Result:	Qual:	Units:	Date Analyzed:	
BOD, 1 DAY	EA0219M110B	DL	ng/L	4/22/2005	AP	Analyst:	AP
Biosolids Oxygen Demand							
Pressure, Suspended (PS)	EA0220M140D	SL	mg/L	4/22/2005	AP	Analyst:	AP
Residue, Suspended (SR)							
Lab ID#:	0304050-011	Collection Date:	4/21/2005 10:00:00 AM	Client Sample ID#:	IL-11	Matrix:	AQUEOUS
Analyst:		HL	Result:	Qual:	Units:	Date Analyzed:	
BOD, 1 DAY	EA0219M110B	DL	ng/L	4/22/2005	AP	Analyst:	AP
Biosolids Oxygen Demand							
Pressure, Suspended (PS)	EA0220M140D	SL	mg/L	4/22/2005	AP	Analyst:	AP
Residue, Suspended (SR)							

FACILITY: LINCOLN PLACE MHP
 IL NUMBER: 1L0062651
 OUTFALL: 0010

DMR SUMMARY

DATE	INFL FLOW		EFF FLOW		pH		SUSPENDED SOLIDS TSS			CBOD			BOD			AMMONIA		CHLORINE		FECAL MAX	NO Discharge	EXCESS FLOW
	AVE	MAX	AVE	MAX	MIN	MAX	INF	AVE	MAX	INF	AVE	MAX	INF	AVE	MAX	AVE	MAX	AVE	MAX			
9/30/2003	0.048	0.050	0.105	0.217	8.0	8.0	44	2	2	1	2	142					0.49	460	-			
10/31/2003	0.046	0.049	0.031	0.040	8.0	8.0	77	2	2	2	2	172					0.55	63				
11/30/2003	0.048	0.048	0.024	0.036	8.2	8.2	61	2	2	3	3	90										
12/31/2003	0.047	0.049	0.033	0.062	8.1	8.1	38	6	6	5	5	102										
1/31/2004	0.047	0.051	0.033	0.057	8.1	8.1	84	12	12	12	12	102										
2/29/2004	0.053	0.063	0.050	0.120	8.1	8.1	145	7	7	9	9	108										
3/31/2004	0.050	0.053	0.055	0.108	8.2	8.2	31	17	17	15	16	90										
4/30/2004	0.049	0.052	0.033	0.041	8.1	8.1	145	4	4	3	3	175										
5/31/2004	0.048	0.057	0.030	0.046	8.1	8.1	81	9	9	4	4	138					0.44	20				
6/30/2004	.051	.056	.032	.044	8.1	8.1	72	2	2	3	3	178					0.54	1100	-			
7/31/2004	.057	.066	.056	.108	7.9	7.9	78	2	2	6	6	190					0.40	0				
8/31/2004	.058	.062	.064	.088	8.0	8.0	37	2	2	2	2	76					0.42	540	-			
9/30/2004	0.055	0.048	0.041	0.090	8.0	8.4	42	7	7	2	2	112					0.58	2.0				
10/31/2004	0.056	0.059	0.036	0.059	8.3	8.3	171	2	2	3	3	175										
12/31/2004	.046	.052	.053	.079	8.1	8.1	68	2	2	2	2	68					0.75					
1/31/2005	.048	.050	.035	.050	8.1	8.1	67	7	7	4	4	88					0.75					
Permit Limits	-	-	0.053	0.100	6	9	-	37	45	-	25	40	-	-	-	-	-	0.75	400/100	not	(May -> Oct.)	
			MGD	MGD																		

Attachment #2

Memo

To: Richard Harry @ Greene and Bradford
From: Steve Bishoff @ Rapps
Date: 4/30/05
Re: Lincoln Mobile Home Park

Richard -

Attached are the results from the sampling I undertook last week at the Lincoln Mobile Home Park. The results are summarized below.

<u>Sample No.</u>	<u>Sample Description</u>	<u>BOD</u>	<u>TSS</u>
L-1	0 to 1' Depth	< 12.0 mg/L	46.0 mg/L
L-2	1' to 2' Depth	< 12.0 mg/L	51.8 mg/L
L-3	2' to 3' Depth	< 12.0 mg/L	54.1 mg/L
L-4	3' to 4' Depth	< 12.0 mg/L	47.8 mg/L
L-5	4' to 5' Depth	< 12.0 mg/L	51.6 mg/L
L-6	5' to 6' Depth	< 12.0 mg/L	56.7 mg/L
L-7	6' to 7' Depth	< 12.0 mg/L	54.0 mg/L
L-8	7' to 8' Depth	< 12.0 mg/L	63.9 mg/L
L-9	8' to 9' Depth	< 12.0 mg/L	51.6 mg/L
L-10	9' to 10' Depth	< 12.0 mg/L	53.6 mg/L

Also, the result of the grab sample for fecal coliform was 4,500 / 100ml.

As soon as I get the signed laboratory reports, I will forward them to your attention. If you have any questions, please call.



5/3/2005

Lincoln Place Sewer Lagoon Repairs

ATTACHMENT # 3

Item	Cost	Vendor	Comments
New sand for Filters	\$1,165.00	Vulcan Construction Materials	100 tons of new sand required to be added to existing sand in filters before cleaning the filters. This cost includes trucking sand to property but not down to filters.
Trucking Sand	\$500.00	Thomas Newell	Transport sand down to filters from drop point and adding it to the existing sand in the filters.
Sand Filter Cleaning	\$6,000.00	Thomas Newell	This cost includes cleaning of both filters to make them 100% functional.
Repair of Butterfly Valve	\$1,126.00	Petersburg Plumbing	Repair a broken valve used to sub divide the sand filters. See attached quote.
Sub-Total:	\$8,791.00		This sub total are the items that need to be done to provide a functional filtration system. All this can be done with-out a variance.
Lowering of water level		EPA/Water Compliance Group	A variance needs to be requested and we may need to rent or borrow some pumps to be used to bring the level down quickly. This cost is unknown at this point. The lagoon level would need to drop about 10 feet to properly repair all items.
Screening repairs	\$6,256.00	Petersburg Plumbing	Repair the baffle wall floats and re-attach the wall at the mooring point in the water. This can not be done until the water level is lowered. See attached quote.
Installation of new intake valves	\$5,836.00	Petersburg Plumbing	Core drill or use existing openings to install three (3) new 6" gate valves with handwheels including stems and standoffs to mount the handwheels where they can be reached from the lift station. See attached quote.
Sub-Total:	\$12,092.00		This sub total are the items that should be done to make the total facility more efficient to run. The screening would need to be done to reduce the chance of further damage in the future.
Total:	\$20,883.00		Total of all items listed above.

MAY-03-2005 12:40

ESSEX PARTNERS

585 272 2396

P.06.07

Attachment 4-D

Back-up

Petersburg Plumbing and Heating Co.

P.O. Box 440 • 117 North 7th Street
PETERSBURG, ILLINOIS 62675
(217) 632-2221

Attn: Mr. Keith Shugerts

PROPOSAL SUBMITTED TO Essex Partners, Inc.		PHONE 1-585-272-2350	DATE March 9, 2005
STREET 175 Corporate Woods, Suite 110		JOB NAME Lincoln Place - Lagoon Repairs	
CITY, STATE AND ZIP CODE Rochester, NY 14623		JOB LOCATION Springfield, IL	
ARCHITECT	DATE OF PLANS None	JOB PHONE	

We hereby submit specifications and estimates for:
 Furnish labor, material and equipment to: (Owner to drop lagoon water level by 10 feet and remove and re-install floating aerators if required)

- Core drill 3 holes or use existing openings if possible to install 3 each 6 inch flanged gate valves with handwheels. Includes extension stems and stand-offs to mount the handwheels where they can be reached from the top of the lagoon effluent lift station.
 Not To Exceed \$5,836.00
- Replace broken butterfly valve in the sand filter piping.
 Not To Exceed \$1,126.00
- Install a swivel 90 bend to the lowest new 6 inch gate valve in Item 1, draw-off piping and winch mechanism to raise and lower piping.
 Not To Exceed \$8,726.00
- Repair baffle wall floats and mooring posts as required.
 Not To Exceed \$6,256.00

We Propose hereby to furnish material and labor -- complete in accordance with above specifications, for the sum of:

Payment to be made as follows: _____ dollars (\$ _____).

Net 30 Days

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. Any alteration or deviation from above specifications involving extra costs will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance. Our workers are fully covered by Workmen's Compensation Insurance.

Authorized Signature *Kim A. Favero*
Kim A. Favero, Vice President
 Note: This proposal may be withdrawn by us if not accepted within 60 days.

Acceptance of Proposal — The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Date of Acceptance: _____ Signature _____

Attachment #4**Description of Environmental Impact**

The owners of the Lincoln Mobile Home Park, Sangamon County, Illinois, operate a privately owned Wastewater Treatment Facility (WWTF) for the residents of the park. The WWTF is a three-cell aerated lagoon followed by a sand filter and disinfection facilities. The lagoon cells are divided by a proprietary fabric baffle wall. The wall prevents short-circuiting of the lagoon flow from cell to cell. The aerators are pontoon-mounted units. The owner has an NPDES permit with an outfall to the Sangamon River.

The lagoon has an average depth of 11 feet (allowing for 2 feet of freeboard). The effluent is pumped from the lagoon to the sand filter. There is one operational draw off for the pump station located approximately 4.5 feet up from the lagoon bottom. Another existing draw off located approximately 2 feet from the bottom is non-functional. There are no additional draw off pipes.

The WWTF was flooded by the Sangamon River in 2002. The flood damaged a mooring for the baffle curtain, and also fouled the sand filter with river sediment.

The owner is proposing to lower the lagoon 6-6.5 feet in order to make the repairs to the baffle curtain mooring, and to install additional draw-offs in the pump station. The owner is requesting a variance from the IEPA to by-pass the filter and disinfection processes, and discharge the effluent to the Sangamon River.

The filter and disinfection process are sized by design standards for an average of 53,000 gallons/day. It is not feasible to draw down the lagoon through the filter and disinfection process due to the time required for a draw-down. The maximum discharge limit as set by the NPDES permit is 100,000 gallons/day. The average influent to the lagoon is 53,000 gallons/day. The net effect would be a pumpage of approximately 50,000 gallons/day to effluent. This would require 70 days to reach the desired lagoon level for the repairs. Also, this does not account for excessive flows, which occur during wet weather. The owner is in a difficult position to fluctuate the lagoon levels even in a normal operational strategy to provide storage in anticipation of wet weather conditions.

Attachment #1 is a summary of the Discharge Monitoring Reports (DMR'S) from September 2003 to January, 2005, as provided by the owner's contract operator. The regulated discharge limits for BOD, TSS, and fecal coliforms, are 25 ppm, 37 ppm, and 400/100 ml respectively. The maximum discharge limits for BOD and TSS are 40 ppm and 45 ppm respectively. The averages for the treated effluent for the 16-month period are 5 ppm BOD and 5 ppm TSS.

Field samples were taken on April 21, 2005 to determine the water quality in the lagoon in Cell #3 prior to discharge to the sand filter. Samples were taken at 1 foot intervals of depth starting at 6 inches deep to approximately 10 foot deep. The testing was done to determine a profile of the water quality for the desired depth of de-watering requested by the owner. A summary of the lab results are in Attachment #2. The BOD at all depths was tested to be lower than the regulatory limit of 12 ppm. The TSS varied between 46 ppm at 6 inches to 64 ppm at 7.5 feet. The average of the samples TSS is 53 ppm. The fecal coliforms tested at 4500 /100 ml.

The samples show that the BOD concentrations would have no adverse impact on the environment if IEPA allowed a variance to discharge without filtration. However, the TSS samples show that there would be a minimal environmental impact to the receiving water if a variance were allowed.

RECEIVED
MAY 04 2005

Environmental Protection Agency
STATE OF ILLINOIS

Suspended solids are a physical indicator of wastewater quality. These are regulated to reduce discharge of solids to open waters in order to prevent anaerobic conditions and sludge deposition. The owner is proposing to pump the lagoon level down 6.5 feet from the present level. This would require pumpage of approximately 3.5 million gallons. The pumpage would need to be at a rate of about 500 gallons/minute for a draw down period of five-six days. Thus, the flow to the river would be about 720,000 gallons/day. This would result in an extra loading of solids to the river of about 80 pounds per day above the regulatory limit. The total extra loading for ten days would be about 400 pounds of solids.

If the existing treatment process is considered (using the avg TSS of 5 ppm), normally the plant is below the discharge limit of solids by a factor of 32 ppm, or 14 pounds per day at an average flow of 53,000 gpd.

Thus, the net effect is that they would produce 400 pounds of extra solids by not filtering for a five day period, yet would be able to recover by normal plant operations in a period of about one month (30 days X 14 pounds per day = 420 pounds).

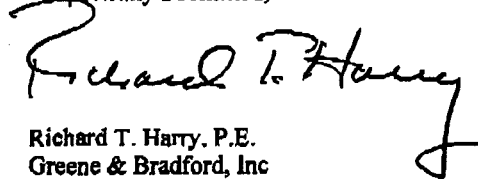
The short term negative impact of solids loading can be considered minor in comparison to the long term benefit of making the plant improvements to maintain the high quality of effluent over the long term.

The fecal coliform concentration is used as an indicator of pathogenic organisms in wastewater. Disinfection is used to lower fecal coliform counts during the season from May-October because of the recreational use of the river. The disinfection exemption is in effect from November to May. It has recently expired for this season (today's date May 4).

The negative impact of allowing higher fecal concentrations during the recreational season is that the water could be ingested by a person being submerged in the river at the location of the discharge. There is risk in allowing a higher concentration limit for a short period of time (5-6 days). However, that risk is minimal considering the season is still cool in temperature, and also offset by the normal seasonal risk of relaxing the limits for a six month period. A variance for this requirement would have minor environmental impact in comparison with the positive impact of the proposed improvements.

In summary, the owner is requesting a temporary variance from the NPDES limits for TSS and fecal coliforms for a short term period in order to bypass the flows and complete the necessary repairs. The owner is proposing that the TSS shall not exceed 60 ppm as a result of the bypass operations.

Respectfully Submitted,



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