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AUG 11 2005

STATE OF ILLINOIS
Pollution Control Board

August 9, 2005

Honorable Dorothy Gunn
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, IL 60601

Dear Ms. Gunn:

Re: People v. Lake Egypt Water and Wastewater District
No. PCB-06-03

Enclosed are original and copy of an Answer to the People of the State of Illinois' Complaint against Lake Egypt Water and Wastewater District. Would you please file the original and return the copy with your file mark thereon.

Your courtesy and cooperation are appreciated.

Yours very truly,

BLEYER and BLEYER



James B. Bleyer

JBB:dib

Enclosures

cc: Ms. Kristen Laughridge w/encl.

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

AUG 11 2005

STATE OF ILLINOIS
Pollution Control Board

PEOPLE OF THE STATE OF ILLINOIS,
ex rel. LISA MADIGAN, Attorney General
of the State of Illinois,

Complainant,

v.

LAKE EGYPT WATER AND WASTEWATER
DISTRICT,

Respondent.

NO. PCB-06-03
(Enforcement - Water)

ANSWER

COUNT I

NOW Comes the Respondent, Lake Egypt Water and Wastewater District, and for its Answer to Count I of Complainant's Complaint, says:

1. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 1.
2. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 2.
3. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 3.
4. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 4.
5. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 5.

6. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 6.
7. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 7.
8. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 8.
9. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 9.
10. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 10.
11. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 11.
12. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 12.
13. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 13.
14. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 14.
15. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 15.
16. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 16.

17. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 17.

18. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 18.

19. Respondent, Lake Egypt Water and Wastewater District, denies the allegations of Paragraph 19 and states that the reports attached hereto show that the District has been in compliance from July 1, 2003, to the present time. The Respondent denies that there was noncompliance from the period of December 9, 2002, to June 22, 2004.

20. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 20.

21. Respondent, Lake Egypt Water and Wastewater District, admits the allegations of Paragraph 21.

WHEREFORE, Respondent, Lake Egypt Water and Wastewater District, demand Complainant, People of the State of Illinois, ex rel. Lisa Madigan, Attorney General of the State of Illinois, take nothing by Count I of their Complaint and Respondent, Lake Egypt Water and Wastewater District, have judgment in its favor for all relief sought against it in Complainant's Complaint.

BLEYER and BLEYER

By 

James B. Bleyer
Attorney Registration No. 00227935
Attorneys for Respondent, Lake Egypt
Water and Wastewater District

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PROOF OF SERVICE

THE UNDERSIGNED CERTIFIES THAT A COPY OF THE FOREGOING INSTRUMENT WAS SERVED UPON THE ATTORNEYS OF RECORD OF ALL PARTIES TO THE ABOVE CAUSE BY ENCLOSING THE SAME IN AN ENVELOPE ADDRESSED TO SUCH ATTORNEYS AT THEIR BUSINESS ADDRESS AS DISCLOSED BY THE PLEADINGS OF RECORD HEREIN, WITH POSTAGE FULLY PREPAID, AND BY DEPOSITING SAID ENVELOPE IN A U.S. POST OFFICE MAIL BOX IN MARION, ILLINOIS, OR CARBONDALE, ILLINOIS ON THE 9 DAY OF AUG, 2005.



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

217/782-1724

June 22, 2004

Gary R. Rhodes
Lake of Egypt Water and Waste Water District
11484 Lake of Egypt Road
Marion, Illinois 62959

Re: Lake of Egypt PWD (Williamson County-1995200) Alternative Minimum TOC Removal (Step 2)—March 3, 2003 and March 12, 2003

Dear Mr. Rhodes:

We have viewed the May 20, 2004 letter from Lake Of Egypt, which is a request for a Step 2 TOC removal percentage. The information submitted indicates the Step 2 percentage should be 29.73%. This % can be applied retroactively to January 1, 2003 and this point forward. It cannot be used for 2002 since 12 months TOC data was not collected in 2001 as required by 35 Ill. Adm. Code Section 611.383d.

Finished water SUVA cannot be established if the water contains an oxidant such as chlorine. If the treated water contains an oxidant, SUVA must be established by jar testing with no oxidants added.

The water sample for SUVA testing must be collected at the same time and point that TOC samples are taken in order to be considered an alternative compliance standard. Again, the finished water SUVA sample must be free of oxidants

For future testing it recommended that Step 2 jar testing coagulant doses include 10mg/L, 20 mg/L, 30 mg/L, and 40mg/L, alum.

Should you have any questions in regard to this determination, please contact Liam McDonnell at the referenced telephone number. Any questions regarding the compliance aspects of this determination should be directed to Mary Reed at 217/782-9720.

Sincerely

Jerry H. Kuhn, P.E.
Manager, Permit Section
Division of Public Water Supplies

CC: Mary Reed

Jeri Long

L:\Step TOC Letter Lake of Egypt No. 3.doc

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
MARION - 2309 W. Main St., Suite T16, Marion, IL 62959 - (618) 993-7200



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ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217-785-0561

May 19, 2005

GEORGE STOUT

11484 LAKE OF EGYPT ROAD

MARION, IL 62959

Re: IL1995200, LAKE OF EGYPT PWD - Violation Waiver

Dear Water Supply Official:

Since the result(s) and/or reports have now been received for the violation specified below, the violation(s) have been removed from your compliance records. Public notification is no longer required.

<u>Violation Description</u>	<u>Contaminant(s)</u>	<u>Compliance Period</u>
INADEQUATE DBP PRECURSOR REMOVAL	CARBON, TOTAL ORGANIC (TOC)	7/1/2003 - 9/30/2003
INADEQUATE DBP PRECURSOR REMOVAL	CARBON, TOTAL ORGANIC (TOC)	10/1/2003 - 12/31/2003
INADEQUATE DBP PRECURSOR REMOVAL	CARBON, TOTAL ORGANIC (TOC)	1/1/2004 - 3/31/2004

Should you have any questions, please free to call me at 217-785-0561.

Sincerely,

Mary Reed
Drinking Water Compliance Unit
Compliance Assurance Section
Bureau of Water

cc: GARY RHODES

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MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

PRINTED ON RECYCLED PAPER

W.S. No. 1995200 - LAKE OF EGYPT WATER DISTRICT
TOTAL ORGANIC CARBON (TOC) ANALYSIS SUMMARY

TABLE 2 SHOWING ADJUSTED STANDARD OF 29.73 % REQUIRED REDUCTION

DATE COLLECTED	RAW TOC mg/l	FINISHED TOC mg/l	RAW ALKALINITY (mg/l as CaCO3)	PERCENT REMOVAL (1)	REQUIRED PERCENT REMOVAL -7	MONTHLY COMPLIANCE VALUE (2)	QUARTERLY COMPLIANCE VALUE (3)	RUNNING ANNUAL COMPLIANCE VALUE (4)	IN COMPLIANCE Yes or No (5)
06/01/01	4.00	3.20	45	25.64	35	0.73			
07/24/01	3.90	2.90	45	25.64	35	0.73			
08/14/01	3.80	2.80	45	26.32	35	0.75			
09/24/01	3.90	2.90	48	25.64	35	0.73	0.74		
10/23/01	3.80	2.90	45	23.68	35	0.68			
11/13/01	3.70	2.80	42	24.32	35	0.69			
12/26/01	3.90	2.50	38	35.90	35	1.03	0.80		
01/10/02	3.80	2.40	36	36.84	35	1.05			
02/25/02	4.20	2.50	35	40.48	45	0.90			
03/19/02	4.20	2.40	34	42.86	45	0.95	0.97		
04/24/02	4.20	2.40	31	42.86	45	0.95			
05/22/02	4.70	2.50	30	46.81	45	1.04			No
06/06/02	1.80	1.60	30	11.11	35	1.00	1.00	0.88	
07/24/02	4.00	2.50	33	37.50	35	1.07			
08/26/02	4.10	2.90	36	29.27	45	0.65			
09/25/02	3.90	2.60	36	33.33	35	0.95	0.89	0.91	No
10/20/02	4.00	3.20	38	20.00	35	0.57			
11/24/02	3.50	2.80	33	20.00	35	0.57			
12/09/02	3.50	2.80	36	20.00	35	0.57	0.57	0.86	No
01/27/03	4.20	2.90	32	30.95	29.73	1.04			
(6)									
03/05/03	3.90	2.60	35	33.33	29.73	1.12			
03/26/03	3.90	2.60	35	33.33	29.73	1.12	1.09	0.89	No
04/30/03	3.50	2.30	33	34.29	29.73	1.15			
05/28/03	3.40	2.00	34	41.18	29.73	1.39			
06/30/03	3.50	2.20	34	37.14	29.73	1.25	1.26	0.95	No
07/30/03	3.60	2.40	36	33.33	29.73	1.12			
08/26/03	3.80	2.40	47	36.84	29.73	1.24			
09/09/03	3.60	2.40	44	33.33	29.73	1.12	1.16	1.02	Yes
10/28/03	3.80	2.40	48	36.84	29.73	1.24			
11/25/03	3.40	2.30	42	32.35	29.73	1.09			
12/09/03	3.50	2.30	38						
12/16/03	3.50	2.40	38						
Dec. Avg	3.50	2.35	38	32.85	29.73	1.11	1.14	1.16	Yes

W.S. No. 1995200 - LAKE OF EGYPT WATER DISTRICT
TOTAL ORGANIC CARBON (TOC) ANALYSIS SUMMARY

TABLE 2 SHOWING ADJUSTED STANDARD OF 29.73 % REQUIRED REDUCTION

DATE COLLECTED	RAW TOC mg/l	FINISHED TOC mg/l	RAW ALKALINITY (mg/l as CaCO ₃)	PERCENT REMOVAL (1)	REQUIRED PERCENT REMOVAL -7	MONTHLY COMPLIANCE VALUE (2)	QUARTERLY COMPLIANCE VALUE (3)	RUNNING ANNUAL COMPLIANCE VALUE (4)	IN COMPLIANCE Yes or No (5)
01/14/04	3.40	2.40	35						
01/20/04	4.25	2.60							
Jan. Avg.	3.82	2.50	43	34.55	29.73	1.16			
02/04/04	3.60	2.60	43	27.78	29.73	0.93			
03/09/04	3.70	2.40	44	35.14	29.73	1.18	1.09	1.16	Yes
04/12/04	3.60	2.40	45						
04/22/04	3.70	2.20	45						
April Avg	3.65	2.30	45	36.99	29.73	1.24			
05/11/04	3.80	2.40	46	36.84	29.73	1.24			
06/16/04	3.80	2.40	52	36.84	29.73	1.24	1.24	1.16	Yes

NOTES

- (1) [(Raw TOC minus Finished TOC) divided by Raw TOC] times 100.
- (2) Percent Removal divided by Required Percent Removal (Average of all samples collected during the month).
- (3) Average of the three individual Monthly Compliance Values for the quarter.
- (4) Running annual average is the sum of the Quarterly Compliance values for the previous 4 quarters divided by 4.
- (5) If Running Annual Compliance Value is less than 1, you are not in compliance.
- (6) When no sample is collected during a month you have a monitoring violation.
- (7) On 06/22/04, IEPA adjusted their required removal to 29.73% retroactive to 01/01/03, based on SUVA and Jar Testing results.