

ILLINOIS POLLUTION CONTROL BOARD
January 24, 1985

CITY OF WHITE HALL,)
)
 Petitioner,)
)
 v.) PCB 85-10
)
 ILLINOIS ENVIRONMENTAL)
 PROTECTION AGENCY,)
)
 Respondent.)

OPINION AND ORDER OF THE BOARD (by J. D. Dumelle):

This provisional variance request comes before the Board upon a January 24, 1985 Recommendation of the Illinois Environmental Protection Agency (Agency). The Agency recommends that a provisional variance be granted to the City of White Hall (Petitioner) from 35 Ill. Adm. Code 304.105, 304.120 and 304.141 to allow bypassing of the Petitioner's secondary and tertiary treatment processes for two days while connections to the existing piping are made which will allow future bypassing of only the tertiary treatment process.

The Petitioner owns and operates a municipal wastewater treatment facility (WWTP) in Greene County, Illinois which discharges effluent to Seminary Creek pursuant to NPDES Permit No. IL0022390. This WWTP, which treats the waste of approximately 3,000 persons and has a hydraulic capacity of 360,000 gallons per day, includes an aerated grit chamber, primary clarifier, secondary activated sludge process, rapid sand filters, excess flow clarifier, sludge digestion, and chlorination. (Rec. 1).

According to its discharge monitoring reports, the effluent from the City of White Hall's WWTP averaged 8.6 milligrams per liter (mg/l) biochemical oxygen demand (BOD) and 14.2 mg/l suspended solids for the time period from October, 1983 to September, 1984. (Rec. 1).

The City of White Hall applied to the Board for a variance on August 16, 1984 in PCB 84-126 to allow bypassing of its activated sludge units while the requisite repairs and necessary maintenance were performed on its tertiary filters. However, on November 21, 1984, the Board denied this requested variance. (See: City of White Hall v. IEPA, PCB 84-126, Opinion and Order of November 21, 1984).

On November 7, 1984, the Agency and the City of White Hall participated in a pre-enforcement conference to discuss operational difficulties experienced at the Petitioner's WWTP such as: (1) activated sludge process bypassing; (2) the lack of proper notification

of bypassing; (3) improper sampling; (4) sewer system backups and overflows, and (5) the lack of a properly certified operator. (Rec. 2).

After this meeting was held with the Agency, the City of White Hall submitted a time schedule to the Agency for addressing the previously mentioned problems at its WWTP. (Rec. 2). In this time schedule, the City of White Hall stated that it intended to install a special bypass line to allow routing of the activated sludge effluent directly to the chlorination unit, thereby allowing the tertiary filters to be bypassed as necessary without bypassing the activated sludge units. This tertiary filter bypass line, along with the necessary valves and fittings, will be installed between the activated sludge effluent line and the tertiary filter effluent line. (Rec. 2). The Petitioner intends to install this bypass line as soon as possible between now and March 31, 1985.

In order to install the planned bypass line, the Petitioner needs to bypass the activated sludge process for two periods of time while the bypass line is connected to the tertiary effluent line and to the activated sludge effluent line. The City of White Hall has estimated that the duration of the bypassing of the activated sludge process will be a maximum of eight hours in each case. (Rec. 2). During each bypass period, the Petitioner will provide primary treatment and chlorination to the wastewater prior to discharge.

The Agency believes that the environmental impact of the bypassing will be minimal because of: (1) the short period of bypassing; (2) the application of primary treatment and chlorination to the wastewater, and (3) the higher oxygen levels and reduced biological activity which can be expected in the receiving stream during this time of year. (Rec. 3). In light of this minimal environmental impact, the Agency has concluded that requiring the Petitioner to provide secondary and advanced treatment during the two short bypassing periods would impose an arbitrary or unreasonable hardship upon the City of White Hall. (Rec. 3). It, therefore, recommends that the Board grant the City of White Hall a provisional variance from Sections 304.105, 304.120, and 304.141 to allow bypassing of the Petitioner's secondary and tertiary treatment processes for two days while connections to the existing piping are made which will allow future bypassing of only the tertiary treatment process, subject to certain conditions.

Pursuant to Section 35(b) of the Illinois Environmental Protection Act, the Board hereby grants the provisional variance as recommended.

This Opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

The City of White Hall is hereby granted a provisional variance from 35 Ill. Adm. Code 304.105, 304.120, and 304.141 to allow bypassing of the secondary and tertiary treatment processes of its municipal wastewater treatment facility in Greene County, Illinois while connections to the existing piping are made which will allow future bypassing of only the tertiary treatment process, subject to the following conditions:

1. The period of the variance shall be for a total of two (2) days to allow the Petitioner to complete the work described in its petition for provisional variance. The Petitioner shall complete the work described as soon as possible, but in any event no later than March 31, 1985.
2. The Petitioner shall notify Sandy Bron of the Agency's Springfield Regional Office via telephone at (217) 786-6892 when each activated sludge process bypass begins and ends. The Petitioner shall also submit written verification of the telephone notification within 5 working days to:

Illinois Environmental Protection Agency
4500 South 6th Street Road
Springfield, Illinois 62706
Attention: Sandy Bron
3. During each activated sludge process bypass, the Petitioner shall provide primary treatment and chlorination to the wastewater prior to discharge. Additionally, Petitioner shall keep the length of time that each bypass occurs as short as possible by completing the work on the existing lines as quickly as possible and storing as much of the influent wastewater in the wetwell and/or interceptor sewer as possible without causing sewer overflows, basement backups, etc. in the collection system.
4. During each activated sludge process bypass, the Petitioner shall collect a grab sample of both the influent and the effluent for each 4 hours or part thereof that the bypassing occurs. Each sample shall be analyzed for BOD and suspended solids and the results, along with the time of collection, shall be submitted to Sandy Bron at the Agency address indicated above in item #2 within 10 days.
5. Within 10 days of the date of the Board's Order, the City of White Hall shall execute a Certificate of Acceptance and Agreement to be bound to all terms and conditions of this provisional variance which shall be sent to: Carol Morrison, Illinois Environmental Protection Agency, Division of Water Pollution Control,

Springfield, Illinois 62706. This certification shall have the following form:

CERTIFICATION

I, (We) _____, having read the Order of the Illinois Pollution Control Board in PCB 85-10 dated January 24, 1985, understand and accept said Order, realizing that such acceptance renders all terms and conditions thereto binding and enforceable.

Petitioner

By: Authorized Agent

Title

Date

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion and Order was adopted on the 24th day of January, 1985 by a vote of 5-0.

Dorothy M. Gunn
Dorothy M. Gunn, Clerk
Illinois Pollution Control Board