ILLINOIS POLLUTION CONTROL BOARD
September 20, 1984

LAKE WILLIAMSON CHRISTIAN CENTER, Petitioner,	)	
v.	)	PCB 84-145
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, Respondent.	)	

OPINION AND ORDER OF THE BOARD (by W. J. Nega):

This provisional variance request comes before the Board upon a September 18, 1984 Recommendation of the Illinois Environmental Protection Agency (Agency). The Agency recommends that a 45-day provisional variance be granted to Illinois District Assembly of God Lake Williamson Christian Center from 35 Ill. Adm. Code 304.141(a) to provide relief from its NPDES Permit effluent limitations during the period that repairs are made to its wastewater treatment facility.

The Petitioner owns and operates a Christian Center which holds retreats and seminars near the City of Carlinville in Macoupin County, Illinois. The total permanent population which is served by the sewage treatment facilities is less than 350 persons.

The Petitioner's wastewater treatment facilities consists of three naturally aerated lagoon cells which have volumes of 1.3 million gallons, 3.1 million gallons, and 4.5 million gallons respectively, as well as chlorination facilities. Effluent from the wastewater treatment facilities is discharged into Lake Williamson via an unnamed tributary. (Rec. 1).

The requested provisional variance is sought to allow higher concentrations of BOD and suspended solids during the time period that the berms of the largest lagoon cell are being repaired. (Rec. 2). This 4.5 million gallon capacity cell will be dewatered over a 15-day period, thereby resulting in a maximum discharge of 335,000 gallons per day (i.e., 300,000 gallons per day from the large lagoon cell and influent flow of up to 35,000 gallons per day = maximum discharge of 335,000 gallons per day).

The Petitioner's plan provides that the water from the large lagoon cell will be treated in the other two cells, operated in series, along with the incoming raw sewage flow and then chlorinated and discharged. (Rec. 2). It is estimated that the detention time in the other two lagoon cells will be approximately 13 days, assuming a maximum flow rate of 335,000 gallons per day. (Rec. 2).

Depending on weather conditions at the time the repairs are made, it is anticipated that the repairs to the berms may take up to 30 days. During this time period, it is estimated that the maximum flow rate would be 35,000 gallons per day of raw sewage, which would result in a detention time of about 125 days. The large lagoon cell would be returned to service upon completion of the requisite repairs. (Rec. 2).

Pursuant to its present NPDES Permit No. IL0045373, the Petitioner is allowed to discharge 10 milligrams per liter (m/1) BOD and 12 mg/1 suspended solids in its treated effluent. During the time of this requested provisional variance, the Petitioner has requested that it be allowed to discharge an effluent with 120 mg/1 BOD and 90 mg/1 suspended solids. However, considering the previously mentioned detention times, the Agency considers that the effluent limits requested by the Petitioner are excessive. Thus, the Agency has recommended an effluent limit of 50 mg/1 for both BOD and suspended solids during the time period that the large lagoon cell is being drained, and has suggested that effluent limits of 30 mg/1 BOD and 37 mg/1 suspended solids during the actual repair period are reasonable and appropriate in the instant case. (Rec. 2).

Temporary storage as an alternative to discharging the contents of the large lagoon cell into Lake Williamson has been considered by the Petitioner. However, this potential alternative would increase construction costs by 27% and is estimated to cost about $16,900. Such an expensive alternative would not only greatly increase the Petitioner's costs, but it would also significantly lengthen the time period before necessary repairs to the berms of the large lagoon would be completed. The Petitioner would have to spend time in obtaining an Agency permit and in reclaiming the temporary storage site, and repairs might not be completed "before the onset of inclement winter weather". (Rec. 3).

The Agency has concurred with the Petitioner that the berms of the large lagoon cell are in need of repair and that the controlled discharge of the contents of the large cell will present a minimal environmental impact upon Lake Williamson. (Rec. 2). In light of the expected minimal environmental impact

of the controlled discharge of the contents of the large lagoon cell to Lake Williamson, the Agency has concluded that the expensive alternative of temporary storage would be an unnecessary hardship.

The Agency has concluded that compliance on a short-term basis with the provisions of 35 Ill. Adm. Code 304.141(a) would impose an arbitrary or unreasonable hardship upon the Petitioner. Therefore, the Agency recommends that the Board grant the Illinois District Assembly of God Lake Williamson Christian Center a provisional variance from Section 304.141(a) for a period of 45 days, 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 Illinois District Assembly of God Lake Williamson Christian Center is hereby granted a provisional variance from 35 Ill. Adm. Code 304.141(a), subject to the following conditions:

1. This provisional variance shall commence when draining of the large lagoon cell is begun and shall continue for 45 days, or until the large cell is returned to service, whichever occurs first.

2. During the period that the large cell is being drained, the effluent discharged shall be limited to 50 mg/1 BOD and 50 mg/1 suspended solids and pH of 6.0 to 9.0.

3. During the remainder of the provisional variance period, the effluent discharged shall be limited to 30 mg/1 BOD, 37 mg/1 suspended solids, and pH of 6.0 to 9.0.

4. The Petitioner shall record the flow and sample the effluent a minimum of once per week. Each sample shall be analyzed for BOD, suspended solids, and pH. The analysis results shall then be recorded with the flow data.

5. The Petitioner shall notify Sandra Bron (the Agency field representative) via telephone at 217/786-6892 when draining of the large lagoon cell is begun; when draining of the large cell is completed; and when the large cell is placed back into service.

6. Within 10 days after the large lagoon cell is placed back in service, the Petitioner shall submit to the Agency a

written report containing the sampling and analysis information obtained as delineated in items #4 and #5 above. This report shall be sent to:

Mr. James Frost
Illinois Environmental Protection Agency
Division of Water Pollution Control
Compliance Assurance Section
2200 Churchill Road
Springfield, Illinois 62706

7. The Petitioner shall provide the best treatment practicable during the period of this provisional variance.

8. Within 10 days of the date of the Board's Order, the Petitioner shall execute a Certificate of Acceptance and Agreement which shall be sent to the Agency at the address specified in item #6 of this Order.

This certification shall have the following form:

I, (We) _____, having read the Order of the Illinois Pollution Control Board in PCB 84-145 dated September 20, 1984, 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 20th day of September, 1984 by a vote of 6-0.

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