



August 31, 2021

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 Bureau of Water – Division of Public Water Supplies  
 Illinois Environmental Protection Agency  
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Re: **August 2, 2021 Unilateral Administrative Order**

Dear Mr. Adamiec and Mr. Brown:

In compliance with Paragraph 74(s) of the UAO, please find below Illinois-American Water Company's ("ILAW") fifth weekly update to EPA and IEPA on ILAW's progress with complying with the UAO. For organizational purposes, ILAW has used the headings from Paragraph 74 of the UAO to provide this weekly update.

**Monitoring and Inspections** (Paragraphs 74(a-c)): Ongoing

- ILAW has not been notified of any new SSO in Cahokia Heights since the last weekly update.
- ILAW submitted a Standard Operating Procedure for Cahokia Heights SSO notifications to the EPA for review on 08/25/2021.
- ILAW has deployed the continuous pressure monitoring equipment as required by Section 74(c) of the UAO. Data collection began on 08/26/2021 per monitoring specifications in Exhibit 2 (attached with this letter). Preliminary data will be submitted to EPA on 09/03/2021 for further discussion.

**Low Pressure/Loss of Pressure Events** (Paragraphs 74(d-e)): Ongoing

- A 10-inch water main break occurred on Wednesday 08/25/2021 in ILAW's Cahokia Heights service area that impacted approximately 120 service connections. The area impacted was from 36th to Bond and 43rd to Bond. The main repair work started at approximately 4:00 pm and the main was shut down at approximately 6:30 pm on 08/25/2021.

**Illinois American Water was ranked highest  
 in customer satisfaction with large water  
 utilities in the Midwest two years in a row.**

For J.D. Power 2021 award information,  
 visit [jdpower.com/awards](http://jdpower.com/awards).



- Boil order and Tier 1 public notice were issued to affected customers in consultation with IEPA and bottled water distribution commenced pursuant to the AWSP. ILAW notified customers at 7:51 pm on 08/25/2021 by phone using ILAW's Code Red system. Sandwich boards were also placed in the affected area at that time.
- Main repair was completed at approximately 5:00 am on Thursday 08/26/2021. After passing water quality tests, the boil order was lifted at approximately 9:30 am on Friday 08/27/2021. Sandwich boards were placed in the area to further communicate the lifting as requested by the EPA and ILAW's Code Red system was used.

### **Alternative Water Source Plan (AWSP) Development and Implementation**

(Paragraph 74(f-i)): Submitted; Awaiting EPA approval)

- ILAW submitted the revised AWSP on 08/24/2021 and is waiting for approval from EPA. The AWSP was activated for the above main break on 08/25/2021.

### **Schedule for Correcting Significant Deficiencies (Paragraphs 74(j-k)): Ongoing**

- ILAW anticipates submitting the proposed plan to address items noted in the April 2021 Report within the 45-day time period.

**Sample Siting Plan (Paragraphs 74(l-p)): Submitted and approved by the IEPA and EPA;**  
Sampling Ongoing

- ILAW received approval from IEPA, and the sites have been added to the RTCR plan.
- Bacteria samples were collected at the four approved sampling locations on 8/24/21. All results were absent for total coliform and e-coli. Lab results are attached in compliance with Paragraph 74(p) of the UAO.

### **System Information (Paragraph 74(q)): Completed**

Attached with this weekly update is the data from ILAW's files requested to be produced in Section 74(q) of UAO. For ease of reference, we have copied in the information requests from the UAO.

**i. An updated water distribution atlas, including locations of air release valves, elevation of valves, elevation of venting, and material type and size of pipes and appurtenances;**

Attached with this letter is an updated water distribution atlas for ILAW's Cahokia Heights system (CahokiaHeights\_DistributionAtlas082621\_All.pdf). Pipe layout, material type, size of pipes, and appurtenances such as hydrants and valves are included in the water distribution atlas. There are no air release valves in the ILAW service area within Cahokia Heights. Please note ILAW has marked this Atlas as "Proprietary and Confidential" and request that this Atlas be treated as Confidential Business Information by IEPA and EPA.

**ii. Copies of records of line breaks for the period of time January 2018 to present;**

Please see attached a table (Main Repairs 2018-Present) setting forth the information in ILAW's files regarding main repairs in the Cahokia Heights service area. Please note ILAW has marked this table as "Proprietary and Confidential" as this table includes asset information of ILAW. ILAW requests that this table be treated as Confidential Business Information by IEPA and EPA.

**iii. Copies of records of low pressure/no pressure events for the period of time January 2018 to present;**

Please see attached a table (Low Pressure-No Pressure Events: 2018-Present) setting forth the information in ILAW's files regarding main repairs in the Cahokia Heights service area. Please note ILAW has marked this table as "Proprietary and Confidential" as this table includes asset information of ILAW. ILAW requests that this table be treated as Confidential Business Information by IEPA and EPA.

**iv. Average depth of distribution system;**

Included in the water distribution atlas from item (i) above.

**v. Maps of Pressure Zones;**

Included in the water distribution atlas from item (i) above.

**vi. Dates, times, duration, and location of fire flows and flushing events for the period of time January 2018 to present;**

Please see attached a table (Flushing Events 2018-Present) setting forth the information in ILAW's files regarding main repairs in the Cahokia Heights service area.

**vii. Dates, times, duration, and location of other high flow events for the period of time January 2018 to present; and**

Please see attached a spreadsheet (High Flow Events 2018-Present) setting forth the information in ILAW's files regarding main repairs in the Cahokia Heights service area. Please note ILAW has marked this table as "Proprietary and Confidential" as this table includes asset information of ILAW. ILAW requests that this table be treated as Confidential Business Information by IEPA and EPA.

**viii. For each finished water storage tank:**

ILAW operates two ground storage tanks at the Edgemont Booster Station site. Tanks have the same size and elevations.

**A. Overflow elevation - 459.0 ft**

**B. Normal low-level elevation**

Edgemont ground storage tanks are fed through transmission mains from East St. Louis water treatment plant. The inlet control valves at the tanks are adjusted to regulate the flow into the tanks and the pressures within the gradient. The control valve is normally maintained in a partially closed position. Edgemont booster station takes suction from the tanks and delivers the water into the Belleville gradient. The normal low water level in the tanks averages approximately 18.3 ft using the monthly minimum data for the January 2018-August 2021 period.

**C. Tank bottom elevation - 419.0 ft**

**D. Grade elevation - 419.0 ft**

**E. The elevation of the highest and lowest water level in each tank for each month for the period of time January 2018 to present.**

Please see attached a table (Edgemont Tanks Monthly Min Max Water Levels).

**Notification and Reporting** (Paragraphs 74(r-t)): Ongoing

- ILAW is submitting weekly updates to EPA and has set a weekly regular meeting time with EPA.

We look forward to discussing this weekly update on our schedule telephone conference tomorrow.

Very truly yours,



Rachel Bretz  
Director of Water Quality

Enclosures: Exhibit 2 – ILAW Continuous Pressure Monitoring Locations (08-26-2021)  
8.24.21 Bacterial Sample Results (Parag. 74(p))  
Cahokia Heights – ILAW Water Distribution Atlas (Proprietary and Confidential)  
Main Repairs 2018 – Present Table (Parag. 74(q)(ii)) (Proprietary and Confidential)  
Low Pressure-No Pressure Events 2018 – Present Table (Parag. 74(q)(iii)) (Proprietary and Confidential)  
Flushing Events 2018-Present Table (Parag. 74(q)(vi))  
High Flow Events 2018-Present Table (Parag. 74(q)(vii)) (Proprietary and Confidential)  
Edgemont Tanks Monthly Min Max Water Levels Table (Parag. 74(q)(viii)(E))

## CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Rachel Bretz  
Director of Water Quality