



October 26, 2021

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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") thirteenth 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

- On October 19 at 4:35 pm, ILAW was notified by an email and phone call from Cahokia Heights of a new October 18th SSO event at 54<sup>th</sup> and Market St Lift Station. ILAW conducted bacterial and residual chlorine sampling as directed by EPA. All results were absent for total coliform and e-coli. Lab results are attached to this letter.
- ILAW has deployed the continuous pressure monitoring equipment as required by Paragraph 74(c) of the UAO. Pressure monitoring and collection as required by the UAO began on September 1, 2021 and ILAW's first monthly report was submitted to EPA with the October 5<sup>th</sup> weekly update.
- To avoid weather related failure in pressure monitors and disruptions in monitoring, ILAW has started installing in-ground pressure monitors and plans to complete this work by November 1, 2021. ILAW plans to keep the hydrant pressure monitors in place till mid-November.

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in customer satisfaction with large water  
utilities in the Midwest two years in a row.**

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

- On October 24<sup>th</sup> at 11:49pm, the hydrant pressure monitor HCV-32 dropped to 19.967 psi for less than a second during a transient event. The corresponding in-ground monitor which ILAW installed for winter monitoring did not drop below 20 psi. Also, the pressure at the Edgemont booster station did not drop below 20 psi.
- Although ILAW believed this event met the definition of a transient event pursuant to Paragraph 74 (e)(iii) of the UAO, ILAW consulted with IEPA out of an abundance of caution.
- After consultation with IEPA on October 25<sup>th</sup>, a boil order and Tier1 public notice was issued to approximately 100 affected customers and bottled water distribution in compliance with the Alternative Water Source Plan commenced on October 26<sup>th</sup> as required by the UAO. Water quality samples were collected on October 25<sup>th</sup>.

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

(Paragraph 74(f-i)): Submitted and approved by EPA.

- The AWSP was triggered by the above-described event and bottled water distribution commenced on October 26<sup>th</sup>.

**Schedule for Correcting Significant Deficiencies** (Paragraphs 74(j-k)): Approved by EPA on October 20; below are updates:

- Choteau Island Intake Building Interior Painting project:
  - Project has been awarded to a construction firm, and work is in progress.
- Inoperative monitoring equipment, which was used for non-regulatory raw water characterization purposes at the Choteau Island intake:
  - Required sample trough for equipment modifications was ordered on June 8, 2021. The sample trough is on back order. ILAW reached out to the supplier to check the status. Sample troughs are expected to ship by the end of October. Contractor is working on scheduling an installation date.

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

- As directed by the EPA, the SSO samples collected earlier this month fulfilled the requirement of monthly monitoring samples, so separate monthly monitoring samples will not be collected for the month of October.

**System Information** (Paragraph 74(q)): Submitted to EPA on August 31, 2021.

**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,

A handwritten signature in blue ink, appearing to read "Rachel Bretz", with a stylized flourish at the end.

Rachel Bretz  
Director of Water Quality

**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