

USEPA REGION V - UNLATERAL ADMINISTRATIVE ORDER				8/13/2021
v RESPONDENTS - City of Cahokia Heights (and Illinois American Water Co.)				
DEADLINES AND REQUIREMENTS STIPULATED BY ORDER:	ASSIGNED	IN PROGRESS	COMPLETED	COMMENTS/STATUS
DATE SPECIFIC REQUIREMENTS				
48 HOURS FROM ORDER (by COB 8/4/21) – Notify EPA of intent to comply with the Order	ms		8/4/2021	letter to J. Clark, et al
7 DAYS FROM ORDER (BY COB 8/9/21)				
Review and submit to EPA and IEPA the current Sample Siting Plan for consistency with the RTCR (revised coliform rule)	dt,rm		8/6/2021	plans for former Cahokia and Commonfields combined into one
Provide EPA and IEPA bacteriological sampling data for Jan 2021 to July 2021, including chlorine residual data	dt,rm		8/6/2021	
Set up mutually agreeable regular meeting schedule with IEPA and EPA	ms		8/9/2021	mtgs to be weekly on Wed at 3 pm CDST
Send weekly updates of progress towards compliance with the Order	jwn		ongoing	first report submitted 8/6/21
15 DAYS FROM ORDER (BY COB 8/17/21)				
Develop and submit to EPA and IEPA an Alternative Water Source Plan	lbm	yes	8/13/2021	draft submitted, attached hereto
Show how and where it will provide at least 1 gallon of potable water per person per day at no cost to the user	lbm	yes		
Describe how this information will be distributed to users	lbm	yes		
Designate contact person(s) for questions	lbm	yes		
Include a detailed map of the water system (source can be bottled water or a licensed water distributor)	zy, dt, ts	yes	8/13/2021	individual maps of each system found in archives and attached hereto, new map being developed
This requirement is triggered by > 5% total coliform result from sampling				
Begin continuous monitoring of pressure in the system	dt,rm,zy	yes		have contacted providers of systems for pressure monitoring, see note below
30 DAYS FROM ORDER (BY COB 9/1/21)				
Inspect the tank at Church Road, and initiate repairs indicated by inspection within 45 days of report	dt,zy	yes		new inspection sched for 8/16/21, to also include other storage tanks in system
Provide copies of the following:				
Updated water system atlas	zy,ts,jwn	yes		
Line breaks from Jan 2018 to present	dt,rm,lbm	yes		info being compiled
Low pressure/no pressure events from Jan 2018 to present	dt	yes		no past telemetry, but operator records of past boil orders, complaint logs, and other events are being compiled
Avg depth of system	dt		8/4/2021	avg depth = 48" to top of pipe
Maps of pressure zones		no		no records exist of this information as no past telemetry (i.e. SCADA system) existed to measure and record systemwide pressure

Dates, times, duration and locations of fire flows and flushing events from Jan 2018 to present	dt,rm	yes		no record of fire flows, as no past SCADA system, and all fire dept's in area are volunteer staffed, but records of flushing events are being compiled
Dates, times, duration and locations of other high flow events from Jan 2018 to present	dt,rm	yes		high flow events from major main breaks are being compiled
For each finished storage tank	dt,zy	yes		
Overflow elevation				
Normal low level elevation				
Tank bottom elevation				
Grade elevation				
High and low water elevation for each month from Jan 2018 to present				
45 DAYS FROM ORDER (BY COB 9/16/21) – submit plan to IEPA and EPA to correct deficiencies in April 2021 investigation	jwn,ms	yes		
RECURRING AND EVENT BASED REQUIRMENTS				
WITHIN 24 HRS OF EACH SSO EVENT, AND AT LEAST MONTHLY – conduct additional bacterial and residual chlorine monitoring and report results to EPA and IEPA until Sept 1, 2022	dt,rm	yes		need to clarify sites to north near SSO areas that are IAWC owned, not Cahokia (formerly northern Centreville)
WITHIN 24 HRS OF EACH LINE BREAK OR LOW/LOSS OF PRESSURE EVENT				
Consult with IEPA and report to EPA on need for a boil order	dt,rm,lbm	yes		
Issue a Tier 1 public notice and copy IEPA and EPA	dt,rm,lbm			
Immediately repair any line breaks or cause of pressure loss	dt,rm,lbm			
Begin special purpose sampling for total coliform and residual chlorine	dt,rm,lbm			
LOW/LOSS OF PRESSURE IS TRIGGERED BY READING BELOW 20 PSI AT ANY TIME				
WITHIN 24 HRS OF ANY VIOLATION OR POTENTIAL VIOLATION – notify IEPA and EPA and Illinois American Water CO.	dt,lbm	yes		

OTHER NOTES:

1. Boil order issued on 8/3/21 has been rescinded as chlorine residuals have returned to levels > than 1.0 mg/l. New boil order issued 8/12/21 for extreme northern part of service area and remains in effect for 145 water connections in Golden Gardens neighborhood. Residual level of chlorine was below limits. Report to IEPA attached.
2. We have contacted providers of continuous pressure monitoring systems, and are awaiting their proposals and scheduling. Brochure attached.
3. Unannounced field inspection by USEPA and IEPA was conducted 8/12/21

Respondent certifies that any information or representation it has supplied to EPA concerning this matter was, at the time of submission true, accurate, and complete and that there has been no material change regarding the truthfulness, accuracy or completeness of such information or representation. EPA shall have the right to institute further actions to recover appropriate relief if EPA obtains evidence that any information provided and/or representations made by Respondent to EPA regarding matters relevant to this Order are false or, in any material respect, inaccurate. This right shall be in addition to all other rights and causes of action that EPA may have, civil or criminal, under law or equity in such event. Respondent and its officers, directors and agents are aware that the submission of false or misleading information to the United States government may subject a person to separate civil and/or criminal liability.