

USEPA REGION V - UNLATERAL ADMINISTRATIVE ORDER					9/3/2021
v RESPONDENTS - City of Cahokia Heights (and Illinois American Water Co.)					
DEADLINES AND REQUIREMENTS STIPULATED BY ORDER:					
DATE SPECIFIC REQUIREMENTS	ASSIGNED	IN PROGRESS	COMPLETED	COMMENTS/STATUS	
1	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
2	7 DAYS FROM ORDER (BY COB 8/9/21)				
3	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
4	Provide EPA and IEPA bacteriological sampling data for Jan 2021 to July 2021, including chlorine residual data	dt,rm		8/6/2021	
5	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
6	Send weekly updates of progress towards compliance with the Order	jwn		ongoing	first report submitted 8/6/21
7	15 DAYS FROM ORDER (BY COB 8/17/21)				
8	Develop and submit to EPA and IEPA an Alternative Water Source Plan	lbn		8/27/2021	draft revised to include more detail on notification and distribution of water
9	Show how and where it will provide at least 1 gallon of potable water per person per day at no cost to the user	lbn			per revised plan attached hereto
10	Describe how this information will be distributed to users	lbn			per plan
11	Designate contact person(s) for questions	lbn			Lynn Branson Matchingtouch
12	Include a detailed map of the water system	zy, dt, ts		8/13/2021	individual maps of each system found in archives and attached hereto, new map being developed
13	(source can be bottled water or a licensed water distributor)				
14	<b>This requirement is triggered by &gt; 5% total coliform result from sampling</b>				
15	Begin continuous monitoring of pressure in the system	dt,rm,zy	yes		discussed at weekly mtg., see note below
16	30 DAYS FROM ORDER (BY COB 9/1/21)				
17	Inspect the tank at Church Road, and initiate repairs indicated by inspection within 45 days of report	dt,zy	yes		inspection conducted 8/16/21, also inspected Spring and Mullins tank, reports pending from Pittsburgh Tank and Tower
18	Provide copies of the following:				
19	Updated water system atlas	zy,ts,jwn	yes	8/13/2021	draft plans submitted, EPA review pending, additional information on pipe materials being annotated to map of former Commonfields system
20	Line breaks from Jan 2018 to present	dt,rm,lbn		9/3/2021	attached hereto
21	Low pressure/no pressure events from Jan 2018 to present	dt		9/3/2021	no past telemetry, but attached hereto are flow measurements from historical records
22	Avg depth of system	dt		8/4/2021	avg depth = 48" to top of pipe
23	Maps of pressure zones			9/3/2021	no records exist of this information as no past telemetry (i.e. SCADA system) existed to measure and record systemwide pressure, discussed at this week's meeting and clarified that pressure is relatively equal across entire system, primarily due to flat topography

24	Dates, times, duration and locations of fire flows and flushing events from Jan 2018 to present	dt,rm		9/3/2021	no fire flow records exist, and system wide flushing plan was not previously in use
25	Dates, times, duration and locations of other high flow events from Jan 2018 to present	dt,rm		9/3/2021	see note on item from line 21 above
26	For each finished storage tank	dt,zy	yes	8/27/2021	
27	Overflow elevation			8/27/2021	info provided attached hereto
28	Normal low level elevation			8/27/2021	"
29	Tank bottom elevation			8/27/2021	"
30	Grade elevation			8/27/2021	grade elevations surveyed 8/16/21
31	High and low water elevation for each month from Jan 2018 to present			8/27/2021	
32	<b>45 DAYS FROM ORDER (BY COB 9/16/21)</b> – submit plan to IEPA and EPA to correct deficiencies in April 2021 investigation	jwn,ms	yes		
33	<b>RECURRING AND EVENT BASED REQUIREMENTS</b>				
34	<b>WITHIN 24 HRS OF EACH SSO EVENT, AND AT LEAST MONTHLY</b> – conduct additional bacterial and residual chlorine monitoring and report results to EPA and IEPA until Sept 1, 2022	dt,rm	yes		sampling stations are on order
35	<b>WITHIN 24 HRS OF EACH LINE BREAK OR LOW/LOSS OF PRESSURE EVENT</b>				
36	Consult with IEPA and report to EPA on need for a boil order	dt,rm,lbm		9/3/2021	
37	Issue a Tier 1 public notice and copy IEPA and EPA	dt,rm,lbm		9/3/2021	
38	Immediately repair any line breaks or cause of pressure loss	dt,rm,lbm		ongoing	
39	Begin special purpose sampling for total coliform and residual chlorine	dt,rm,lbm			sampling stations are on order
40	<b>LOW/LOSS OF PRESSURE IS TRIGGERED BY READING BELOW 20 PSI AT ANY TIME</b>				
41	<b>WITHIN 24 HRS OF ANY VIOLATION OR POTENTIAL VIOLATION</b> – notify IEPA and EPA and Illinois American Water CO.	dt,lbm		ongoing	

OTHER NOTES:

1. Pressure monitoring options discussed at weekly mtg. EPA clarified request for these monitors to be one fixed location downstream of pump station and three transitory locations throughout system, to be potentially movable to other locations TBD, per the UAO, Attachment A, Paragraph 3. City agreed to install these monitors on hydrants within one week of receipt of materials, with notification given to EPA of date of receipt. City still investigating ways to make these locations secure from vandalism and winterization. Meter vault type monitors will not be purchased based on this new understanding.
2. Previous boil order rescinded on 8/30/21. New boil order issued 9/2/21 for Delano Drive, 12 customers.
3. SSO notification procedure similar to boil order procedure being written and will be submitted when complete
4. Per note in line number 23 above, no distinct pressure zones exist within system, as entire system operated as one relatively equal pressure, with no measurable affect from booster pumps. The entire system is built at relatively the same elevations, due to the extremely flat topography across the City, and all of the American Bottoms region.

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.