	USEPA REGION V - UNLATERAL ADMINISTRATIVE ORDER				12/6/2021
	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				
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	lbm		8/27/2021	plan approved 9/23/21
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	lbm			per approved plan
10	Describe how this information will be distributed to users	lbm			per plan
11	Designate contact person(s) for questions	lbm			~~Lynn Branson Matchingtouch~~ Note, new asst. director of water and sewer dept is Sharlin Pfeffer. New designated contact person for this order will be Dennis Traiteur
12	Include a detailed map of the water system	zy, dt, ts		8/13/2021	individual maps previously submitted. New consolidated maps to be completed going forward as part of capital improvements plan
13	(source can be bottled water or a licensed water distributor)				
14	**This requirement is triggered by > 5% total coliform result from sampling**				
15	Begin continuous monitoring of pressure in the system	dt,rm,zy		10/22/2021	
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		9/10/2021	Church Road tank work completed week of 11/1/21
18	Provide copies of the following:				
19	Updated water system atlas	zy,ts,jwn		9/10/2021	previous submittal of all location, material and sizing details for former Village of Cahokia. Plans for former Commonfields area have been transmitted to EPA
20	Line breaks from Jan 2018 to present	dt,rm,lbm		9/3/2021	submitted 9/3/21
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		8/27/2021	
27	Overflow elevation			8/27/2021	info provided on 9/10/21
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	**45 DAYS FROM ORDER (BY COB 9/16/21)** – submit plan to IEPA and EPA to correct deficiencies in April 2021 investigation	jwn,ms		9/10/2021	plan submitted on 9/10/21, reviewed with EPA on 9/22/21
33	**RECURRING AND EVENT BASED REQUIRMENTS**				
34	**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		ongoing	
35	**WITHIN 24 HRS OF EACH LINE BREAK OR LOW/LOSS OF PRESSURE EVENT**				
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			see note on line 34 above
40	**LOW/LOSS OF PRESSURE IS TRIGGERED BY READING BELOW 20 PSI AT ANY TIME**				
41	**WITHIN 24 HRS OF ANY VIOLATION OR POTENTIAL VIOLATION** – notify IEPA and EPA and Illinois American Water CO.	dt,lbm		ongoing	

OTHER NOTES:

1. Monthly reports on routine and special water quallity analysis and on water pressure monitoring are attached for month of November.

2. Proposal received from PTT and Liquid Engineering for repairs to Spring and Mullins and Falling Springs storage tanks has been reviewed by City and is being revised and resubmitted by PTT for acceptance.

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.