



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217-524-6672

August 13, 2025

CERTIFIED MAIL #9589 0710 5270 1328 8285 57
RETURN RECEIPT REQUESTED

City of Lawrenceville
700 State Street
Lawrenceville, IL 62439

**Re: Violation Notice: Lawrenceville WWTP
IL0029467 – W1010150002
Violation Notice No.: W-2025-50145**

Dear Facility Owner:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131
2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

PLEASE PRINT ON RECYCLED PAPER

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The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by, either agreeing to and signing the proposed CCA, or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA. When compliance is achieved, the owner of the facility must submit a completed statement of compliance form certifying that all Compliance Commitment Agreement measures/events have been successfully completed.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

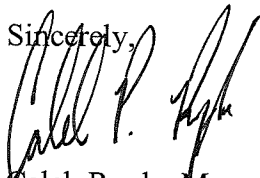
Written communications should be directed to:

Illinois EPA – Division of Water Pollution Control
Attn: Tim Bejster/ CAS#19
2520 W Iles Ave
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, **W-2025-50145**.

Questions regarding this Violation Notice should be directed to Tim Bejster at 217-524-6672 or Timothy.Bejster@Illinois.gov.

Sincerely,



Caleb Ruyle, Manager
Compliance Assurance Section
Bureau of Water, Division of Water Pollution Control

Attachments

ATTACHMENT A

Lawrenceville WWTP – IL0029467

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Questions regarding the violations identified in this attachment should be referred to Tim Bejster at (217) 524-6672 or Timothy.Bejster@Illinois.gov.

On April 24, 2025, a representative of the Illinois EPA conducted a sanitary sewer overflow (“SSO”) investigation in Lawrenceville, Illinois, after receiving a complaint regarding an April 5, 2025, SSO. An active SSO was not observed during this investigation, however, discussions with the complainant and the Chief Operator of Lawrenceville indicated SSO events had occurred during a precipitation event on April 5, 2025. The required 24-hour notification and 5-day written report was not submitted on time.

On June 16, 2025, subsequent information was provided to the Illinois EPA representative based on the May 29, 2025, televised report of the sewer main on Springfield Avenue. This report identified a fractured pipe, protruding taps, roots, and encrustations at several locations. The sewer pipe was observed collapsed at a location upstream of the April 5, 2025, SSO event. Finally, the report identified an area of standing sewer water in the pipe, indicating flow is being restricted and would cause the line to surcharge resulting in basement backups during high periods of flow.

Review of records indicates the facility has failed to submit the Biomonitoring Reports per the reporting requirements of Special Condition 11, Biosolids Monitoring Report per Special Condition 14, and the Annual Progress Report per Special Condition 18. Additionally, the facility has a history of submitting reports and DMRs untimely and has failed to submit the Semi-Annual DMR for 001. Additional self-reported SSO events occurred July 28 and August 4 of 2025.

Based on these findings, the facility is in apparent violation of the Illinois Environmental Protection Act, the Illinois Pollution Control Board Regulations. A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Overflows from Sanitary Sewers are Expressly Prohibited

<u>Violation Date</u>	<u>Violation Description</u>
04/24/2025 07/28/2025 08/04/2025	Overflows from sanitary sewers are prohibited.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2024); 35 Ill. Adm. Code 306.304

Discharge of Contaminants

<u>Violation Date</u>	<u>Violation Description</u>
06/16/2025	No person shall cause, threaten, or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2024)

Unauthorized Point Source Discharge

<u>Violation Date</u>	<u>Violation Description</u>
04/05/2025 07/28/2025 08/04/2025	Except as in compliance with the provisions of the Act, Board regulations, the CWA (Clean Water Act), and the provisions and conditions of the NPDES (National Pollutant Discharge Elimination System) permit issued to the discharger, the discharge of any contaminant or pollutant by any person into the waters of the State from a point source shall be unlawful.
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2024), 35 Ill. Adm. Code 309.102(a)

Failure to Comply with NPDES Permit – Duty to Mitigate

<u>Violation Date</u>	<u>Violation Description</u>
06/16/2025	The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 309.102(a); NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Operation & Maintenance

<u>Violation Date</u>	<u>Violation Description</u>
06/16/2025	The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control to achieve compliance with conditions of the NPDES Permit; Standard Condition 5.
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 309.102(a); NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Twenty-Four Hour Notification

<u>Violation Date</u>	<u>Violation Description</u>
04/05/2025	The permittee shall report any noncompliance within twenty-four hours of an unanticipated bypass, upset, or sanitary sewer overflow per the requirements of the NPDES Permit; Standard Condition 12(f).
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – 5-Day Report

<u>Violation Date</u>	<u>Violation Description</u>
04/10/2025	A written submission shall be provided within 5 days of the time the permittee becomes aware of the circumstances; Standard Condition 12(f).
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Failure to Submit Report

<u>Violation Date</u>	<u>Violation Description</u>
05/31/2024	Failure to comply with the reporting requirements of NPDES permit
08/31/2024	IL0029467;
11/30/2024	Special Condition 11.
02/28/2025	Report: <u>Biomonitoring Report</u>
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Failure to Submit Report

<u>Violation Date</u>	<u>Violation Description</u>
07/31/2025	Failure to comply with the reporting requirements of NPDES permit IL0029467; Special Condition 14. Report: <u>Biosolids Monitoring Report</u>
Rule/Reg.:	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Late Reporting

<u>Violation Date</u>	<u>Violation Description</u>
03/18/2025	Failure to timely submit report; Special Condition 14. Report: <u>Biosolids Monitoring Report; Due: 01/31/2025.</u>
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit IL0029467

Untimely Submittal of DMRs

<u>Violation Date</u>	<u>Violation Description</u>
02/25/2025	Failure to submit Discharge Monitoring Reports at the required frequency.
03/25/2025	
04/25/2025	
05/25/2025	
06/25/2025	
07/25/2025	
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit IL0029467

Failure to Submit DMR

<u>Violation Date</u>	<u>Violation Description</u>
08/25/2024	Failure to submit Discharge Monitoring Reports at the required frequency.
02/28/2025	
Rule/Reg.	Section 12 (f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b) & 309.102(a); NPDES Permit IL0029467

ATTACHMENT B

Lawrenceville WWTP – IL0029467

VN W-2025-50145

In order to assist your facility in attaining compliance with the apparent violations listed in Attachment A, the following is a list of recommendations which are presented for your consideration when addressing the apparent violations:

1. Immediately cease all sanitary sewer overflows from occurring within the Lawrenceville sanitary sewer collection system.
2. Immediately initiate efforts to clean up and maintain the areas where any future Sanitary Sewer Overflows (SSOs) occur, and any areas affected. Following clean-up, hydrated lime should be applied to the affected areas.
3. Immediately initiate efforts to televise and clean the Lawrenceville sanitary sewer collection system sewer main pipes where Sanitary Sewer Overflows (SSOs) occur to identify any damaged pipe or blockage that may allow inflow and infiltration and impede sewer flow.
4. Immediately initiate efforts to smoke test the Lawrenceville sanitary sewer collection system to identify any inflow and infiltration.
5. Immediately repair the fractured, collapsed, and separated pipe; remove protruding taps, roots, and encrustations; remove any downspout, sump pump discharge, and stormwater drains that are tributary to the collection system.
6. Review, fulfill, and update the Capacity, Management, Operation, and Maintenance (CMOM) program that was developed with a routine maintenance schedule and a routine inspection program on your lift stations and collection system to assist in the detection of problems that may be developing.
7. Review and comply with the conditions of your NPDES permit that includes reporting any Sanitary Sewer Overflows (SSOs) within the Lawrenceville sanitary sewer collection system. SSOs include but are not limited to manhole overflows, lift station overflows, and basement backups as well as service line overflows due to a charged sewer main.
8. Continue efforts to conduct and submit an engineering study of Lawrenceville sanitary sewer collection system to determine if the system is adequate to meet the peak flows. In the event the collection system requires a change in capabilities, the facility may require a construction permit from the Agency. Should you have any questions regarding the construction permitting requirements, please contact our Permit Section at 217/782-0610.
9. At all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with conditions of the permit. Proper Operation and maintenance include effective performance, adequate funding, adequate operating staffing and

training, and adequate laboratory and process controls, including appropriate quality assurance procedures.

10. Initiate and implement a 24-hour notification program for process bypass, plant upsets, or sanitary sewer overflows as required by Standard Condition 12(f) of your NPDES Permit IL0029467. All Sanitary Sewer Overflow incidents, including basement backups, should be reported within 24-hours from the time the permittee becomes aware of the circumstances. Within 5 calendar days of becoming aware of the circumstances, a 5-day report shall also be submitted via CDX Portal's NetSewerOverflow and Bypass Reporting program service.
11. The facility has a history of untimely reporting of DMRs and Special Condition reports. Develop Standard Operating Procedures to ensure **timely** submission of all reporting conditions required by NPDES Permit IL0029467. DMRs are due no later than the 25th day of the following month of each monitoring period, and Special Condition reports are due on or before the scheduled due date.
12. Submit the following Semi-Annual DMRs electronically via the electronic reporting tool – NetDMR:

<u>Permitted Feature(s)</u>	<u>Monitoring Period End Date</u>
001-S	07/31/2024
001-S	01/31/2025

13. Submit the missing NPDES schedule reports as soon as possible to the Agency. These reports can be submitted to the Agency email for special condition reports for NPDES permitted facilities: EPA.PrmtSpecCondtns@Illinois.gov and Timothy.Bejster@Illinois.gov.

Schedule Description	Scheduled Date
Special Condition 11 – Semi-Annual Sludge Management Form	7/31/2025
Special Condition 14 – Biomonitoring Report (Acute Toxicity)	5/31/2024 8/31/2024 11/30/2024 2/28/2025

14. NPDES Permit IL0029467 expires September 30, 2025, and no renewal has been submitted to the Illinois EPA Permit Section. If the permittee wishes to continue an activity regulated by this permit after the expiration date of the permit, the permittee must apply for and obtain a new permit. Permit renewals must be submitted no later than 180 days prior to the expiration date in order for the permit to continue in full force and effect. The 180-day window has since passed, as well as the opportunity to request a waiver.