



Gabriel H. Neibergall
Assistant Counsel
Illinois Environmental Protection Agency
Division of Legal Counsel
2520 West Iles Avenue, P.O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Neibergall:

Thank you for meeting with the City of Lawrenceville and HMG about the Violation # V-2026-00001. Your assistance on this violation is appreciated. Please see below a detailed response and schedule for resolution of the violation below:

LAWRENCEVILLE, IL1010150 VIOLATION NOTICE NO. W-2026-00001

Water Treatment Plant/Distribution System Maintenance

Table with 2 columns: Violation Date, Violation Description, Resolution Date. Contains details for three violations related to wellhead leaking and fire hydrant repairs.

Drinking Water Construction Permit

Table with 2 columns: Violation Date, Violation Description, Resolution Date. Contains details for a violation regarding construction permits for potassium permanganate and hydrofluorosilicic acid feed systems.

Drinking Water Fluoridation



<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to provide adequate fluoridation of 0.7 mg/l in all water discharge to the distribution system (on-going violation)
<u>Resolution Date</u>	12/22/25 The City of Lawrenceville adjusted their chemical feed to maintain a minimum 0.7 mg/l residual. Currently the city is averaging around a 0.8 mg/l residual of fluoride.

Drinking Water Operating Permit

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to obtain an operating permit for the 16 th Street Waterline Upgrade, Construction Permit No. FY2025-0334.
<u>Resolution Date</u>	1/19/26 HLR Engineering submitted a permit extension for this project. The agency has responded that the extension request was received.

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to obtain an operating permit for the Sodium Hypochlorite Feed System, Construction Permit No. FY2024-0412.
12/9/2025	Failure to obtain an operating permit for the Indian Trail Apartment II (SW of James St.), Construction Permit No. FY2017-0687.
12/9/2025	Failure to obtain an operating permit for the Transmission Main Relocation, Construction Permit No. FY2012-0832.
12/9/2025	Failure to obtain an operating permit for the Indian Trail Apartments, Construction Permit No. FY2012-0704.
12/9/2025	Failure to obtain an operating permit for the Lawrenceville Track and Concession Building, Construction Permit No. FY2011-0680.
12/9/2025	Failure to obtain an operating permit for the Air/Vacuum Release and Overboard Valves for Six Wells, Construction Permit No. FY2010-1251.
<u>Resolution Date</u>	6/30/26 HMG Engineering shall submit operating permits for the above projects. The city is planning on running bacteriological testing on these within the next 2 weeks. There will be 2 samples taken at least 24 hours apart for each project.

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to obtain an operating permit for the 10 th Street Waterline Upgrade, Construction Permit No. FY2020-1112.
<u>Resolution Date</u>	1/19/26 Permit No. FY2020-1112 was replaced by Permit No. FY2023-0647. An operating permit was obtained on Permit No. FY2023-0647 on March 12, 2024. Permit No. FY2020-1112 should be cancelled since the improvement was built under another permit. Does that agency need anything formal to cancel this permit? The IEPA LOT form the engineer and the Operating Permit are attached to this letter.

Drinking Water Monthly Operating Reports

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to submit Monthly Operating Reports within 30 days of the last day of each month.
<u>Resolution Date</u>	12/30/25

The city has been emailing the DMR Reports to the agency and the agency has responded that they are receiving the DMR's.

Drinking Water Chlorination

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to maintain a minimum chlorine residual in all active parts of the distribution system, at all times. (on-going violation)
<u>Resolution Date</u>	12/30/25 The city has adjusted the sodium hypochlorite feed to obtain a minimum of 0.5 mg/l free or 1.0 mg/l total. The sodium hypochlorite room currently does not have air conditioning, and sodium hypochlorite degrades exponentially in temperatures above 90° F. The city will continue to improve and monitor their chlorination in their distribution.

Drinking Water Monitoring Site Plan Requirements

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to have an Agency approved, written sample site plan for coliform that identifies repeat sample sites within five service connections upstream and downstream of the original sampling sites representative of water throughout the distribution system. (on-going violation)
<u>Resolution Date</u>	5/30/26 The city has submitted the sample site to IEPA Regional-Marion. John Kinder has requested a map of the sites and the City of Lawrenceville will have that to him by end of May 2026.

Drinking Water Cross-Connection Control Program

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to have a comprehensive cross-connection control program. (on-going violation)
<u>Resolution Date</u>	6/30/26 The city will be sending out the cross-connection survey to Lawrenceville residents in the first week of June 2026 and receiving surveys for the rest of the month. The survey shall have a June 30 th return date requirement. Any unresponsive surveys will be sought out door to door or by phone.

Drinking Water Cross-Connection Device Testing

<u>Violation Date</u> 12/9/2025	<u>Violation Description</u> Failure to perform annual testing of all backflow prevention devices in the system. (on-going violation)
<u>Resolution Date</u>	12/30/25 The city has scheduled a plumber to perform the backflow prevention device annual inspection which is overdue. The backflow device inspections will be completed by the end of May. The plumber will be commissioned to inspect all the Lawrenceville backflow devices annually each year going forward.

Drinking Water Cross-Connection Control Program



<u>Violation Date</u>	<u>Violation Description</u>
12/9/2025	Failure to conduct a cross-connection control program survey at least once every three years. (on-going violation)
<u>Resolution Date</u>	6/30/26
	The city will be sending out the cross-connection survey to Lawrenceville residents in the first week of June 2026 and receiving surveys for the rest of the month. The survey shall have a June 30 th return date requirement. Any unresponsive surveys will be sought out door to door or by phone. The city will continue to send out cross-connection surveys every three years.

Significant Deficiencies Identified in Sanitary Surveys

<u>Violation Date</u>	<u>Violation Description</u>
12/9/2025	Failure to correct all significant deficiencies identified in April 14, 2023, Notice of Significant Deficiencies.
<u>Resolution Date</u>	12/31/26
	The city has addressed all the violations from the previous inspection other than the Toyota Plant fire protection detention tank. Currently the detention tank could backflow into the system if pressure was lost in distribution. The city operator currently overflows this tank 2 times a week to maintain a chlorine residual in this tank in case the situation happens. The city wishes to install an in-line RPZ to protect the distribution and eliminate the water loss. The city will continue to maintain a chlorine residual until the RPZ is installed.

Drinking Water Monitoring

<u>Violation Date</u>	<u>Violation Description</u>
10/14/2025	Disinfectants and Disinfection By-Products (DBPs) sample results were not received for the August 2025 monitoring period.
<u>Violation Date</u>	<u>Violation Description</u>
7/29/2025	Lead and Copper sample results were not received for the January 1, 2025, to June 30, 2025, monitoring period.
<u>Resolution Date</u>	8/30/26
	The city has submitted the sample sites to the agency. The next round of testing is due at the end of August 2026. The city shall submit these test results to the agency. Both DBP testing and Lead & Copper testing will be completed by August 30 th .

Failure to Submit Notice of Known Potential Service Line Containing Lead Certification Form

<u>Violation Date</u>	<u>Violation Description</u>
7/3/2025	Failure to provide notification to customers of potential or known service line containing lead.
<u>Resolution Date</u>	6/30/26
	The city will submit notification forms to all homes with lead or containing lead service lines by end of June 2026.
<u>Violation Date</u>	<u>Violation Description</u>
7/3/2025	Failure to submit to the Agency a certification form confirming that persons served through a lead, galvanized requiring replacement, or lead status unknown service line have been informed of their service line material.



Resolution Date **6/30/26**
The city will submit certification forms to the agency that all homes with lead or containing lead service lines have been notified by the city by the end of June 2026.

Drinking Water Treatment Recommendations

Violation Date Violation Description
1/23/2025 Failure to submit source water treatment recommendation.

Resolution Date **12/30/25**
The city has submitted the source water protection plan, and the agency has responded to that receipt.

Violation Date Violation Description
1/23/2025 Failure to submit an optimal corrosion control treatment recommendation.

Resolution Date **5/14/25**
The city received a letter from the Agency March 14, 2025, from Chris Johnson that the City of Lawrenceville was exempt from this testing requirement.

Drinking Water Supplemental Construction Permit

Violation Date Violation Description
12/9/2025 Failure to obtain a supplemental construction permit for the instillation of 60-gallon sodium hypochlorite day tanks.

Resolution Date **6/30/26**
HMG Engineers shall submit an As-Built construction permit to change the day tanks from 30-gallon storage to 60-gallon storage tanks. The design notes called out 55-gallon tank, and the feed calculations showed the need for this sizing. The permit application was submitted to the agency on 8/21/23. The permit was issued 1/5/24 calling out 30-gallon day tanks.

Please use the above as a schedule for the resolution of the Lawrenceville violation. The city wishes to resolve these violations and reestablish their good graces with the IEPA Water and Regional IEPA-Marion. Please let us know if there is anything else HMG or the City of Lawrenceville can do to resolve these issues.

Best Regards,

HMG ENGINEERS, INC.

John A. Wieter, P.E.

Encl.
CC: Lawrenceville Mayor David Courtney
 File LAW000.2501