REGION 5
CHICAGO, IL 60604

VIA ELECTRONIC MAIL

David Courtney
Mayor
City of Lawrenceville
700 State Street
Lawrenceville, Illinois 62439
david.courtney@lawrencevilleil.org

Subject: U.S. EPA Clean Water Act March 10-13, 2026 Inspection Report for National Pollutant Discharge Elimination System Permit IL0029467

Dear Mayor David Courtney:

Enclosed, please find a copy of the U.S. Environmental Protection Agency inspection report that describes and documents the Clean Water Act inspection activities at City of Lawrenceville Sewage Treatment Plant in Lawrenceville, Illinois between March 10th and March 13th, 2026. Please review the areas of concern beginning on page 17 of the inspection report and provide a response within 30 calendar days of your receipt of this letter describing any actions that you may have taken to address the areas of concern.

If you have any questions or concerns regarding this letter, or the inspection report, please contact Eric Small at 312-886-6680 or small.eric@epa.gov.

Sincerely,

TAYLOR JERGER

Digitally signed by TAYLOR JERGER
Date: 2026.05.22 11:40:34 -05'00'

Taylor Jerger
Acting Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch
U.S. EPA Region 5 Enforcement and Compliance Assurance Division

cc: Aaron Tipsword, Water and Sewer Department Superintendent, City of Lawrenceville, aaron.tipsword@yahoo.com
Joey Logan-Pugh, Bureau of Water Chief, Illinois Environmental Protection Agency, joey.l.logan-pugh@illinois.gov
Todd Bennett, Bureau of Water Field Operations Section Manager, Illinois Environmental Protection Agency, todd.bennett@illinois.gov
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT: Clean Water Act Inspection Report
City of Lawrenceville Sewage Treatment Plant, 1502 3rd Street, Lawrenceville, Illinois

FROM: Eric Small, Physical Scientist
Water Enforcement and Compliance Assurance Branch, Section 2

BASIC INFORMATION

Facility Name: City of Lawrenceville Sewage Treatment Plant

Facility Type: Sewage Treatment Plant (STP)

National Pollutant Discharge Elimination System (NPDES) Permit Number: IL0029467

Date(s) of Inspection: March 10-13, 2026

U.S. Environmental Protection Agency (EPA) Inspector(s):

1. Eric Small, Physical Scientist
2. Keith Middleton, Environmental Engineer
3. Kenneth Gunter, Chemist

Facility Representative(s):

1. Aaron Tipsword, City of Lawrenceville Water and Sewer Department Superintendent
2. David Courtney, City of Lawrenceville Mayor
3. Russ Goins, City of Lawrenceville Council Member – Ward 3 Alderperson
4. Mark Griggs, City of Lawrenceville Street Department Superintendent
5. Jason Lyle, City of Lawrenceville Water and Sewer Department Electrician
6. Matt Campbell, City of Lawrenceville Water and Sewer Department Laborer
7. Josh Ward, City of Lawrenceville Water and Sewer Department Laborer
8. Wyatt Bice, City of Lawrenceville Water and Sewer Department Laborer
9. Josh Harlan, City of Lawrenceville Water and Sewer Department Equipment Operator

Contact Information:

- Aaron Tipsword, City of Lawrenceville Water and Sewer Department Superintendent, aaron.tipsword@yahoo.com, 618-943-4821
- David Courtney, City of Lawrenceville Mayor, david.courtney@lawrencvilleil.org, 618-943-2116

Facility Name: City of Lawrenceville Sewage Treatment Plant
Facility Location: 1502 3rd Street, Lawrenceville, Illinois
Date of Inspection: March 10-13, 2026

Inspection Type: The Clean Water Act inspection of the City of Lawrenceville (Lawrenceville or "City") reviewed the following components: the STP, the sewer collection system, and the laboratory.

Facility Notification:

☐ Unannounced Inspection
☒ Announced Inspection. The inspection was announced to Lawrenceville on February 26, 2026.

Arrival Date and Time: 8:11 A.M. on March 10, 2026
Departure Date and Time: 1:28 P.M. on March 13, 2026

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Provided Confidential Business Information (CBI) notification

The following information was obtained verbally from Lawrenceville staff and representatives at various points during the inspection. This information is not necessarily noted in chronological order of receipt.

Sewage Treatment Plant Overview:
The Water and Sewer Department has seven employees who share duties between wastewater and drinking water operations as needed. The STP was built in 1961 and at the time of inspection was designed with the following treatment units:

- Influent Pump Station with Two Flygt Pumps
- Headworks with Vulcan Screw Press
- Primary Clarifier (1 MGD capacity)
- Flow Splitter
- North and South Schrieber Units (0.5 MGD capacity for each)
- Chlorine Contact Tank
- Aerobic Digester
- Sludge Storage Lagoon, located east of the STP
- Equalization Basin (20 MG), located north of the STP

At the time of inspection, Mr. Tipsword was the operator of the Lawrenceville STP. Mr. Tipsword has been with Lawrenceville since 2013 and became Superintendent of the Water and Sewer Department in 2018. At the time he was named Superintendent, Mr. Tipsword held a Class 3 Wastewater Treatment Works Operator Licensure Certification, and Mr. Tipsword indicated that there was a Class 1 operator on staff overseeing the STP. Based on Discharge Monitoring Reports (DMRs), the previous Class 1 operator of record stopped signing DMRs in approximately 2018. Between 2018 and 2024, Mr. Tipsword stated that he made steps to obtain his Class 1 Operator Licensure. Mr. Tipsword obtained his Class 1 Operator Licensure on July 2, 2024 and noted that he was not the operator of the STP until Class 1 license acquisition in 2024. Mr. Tipsword stated he had recently received a notice of Class 1 Operator licensure revocation by the Illinois Environmental Protection Agency (Illinois EPA). Mayor Courtney stated that no other current Lawrenceville STP staff has the appropriate licensure for the NPDES permit, and Lawrenceville is actively in discussions with a new operator to fill the role.

The STP 2020 National Pollutant Discharge Elimination System (NPDES) permit reflects two outfalls: Outfall 001 and Outfall 002 (formerly identified as Outfall A01 in the permit preceding the 2020 NPDES permit). Outfall 001 corresponds to the final effluent discharge from the STP. Mr. Tipsword stated that Outfall 001 is inspected daily and its discharge point to the Embarras River is inspected approximately two-to-three times a year due to accessibility issues with seasonal flooding. Mr. Tipsword stated that the STP discharges effluent 24 hours a day. Outfall 002 refers to the discharge point from the STP Equalization Basin located north of the STP. Outfall 002 is unmetered and has a manual valve that, during the opening conference, Mr. Tipsword stated was closed and has been not in use since at least 2013. However, submitted DMRs for the period between August 2018 and July 2025 include effluent monitoring results for Outfall 002. Mr. Tipsword indicated that, for some unspecified amount of time, the values reported for Outfall 002 were not actual measurements but rather were duplicates of the Outfall 001 monitoring data. Mr. Tipsword stated that in September 2025 he ceased reporting Outfall 001 data for Outfall 002.

Submitted DMRs for Outfall 001 for June 2020 through July 2025 show ammonia nitrogen values of 2.75 mg/L for each month except for two months. Submitted DMRs for Outfall 002 for May 2022 through July 2025 show ammonia nitrogen values of 2.75 mg/L for each month except for one. Mr. Tipsword attributed the identical 2.75 mg/L ammonia nitrogen values reported on the DMRs to the purchase of the wrong ammonia nitrogen test kit with a range from 0 to 2.75 mg/L.

At the time of inspection, Lawrenceville was operating its STP without an NPDES permit. The previous permit was issued on September 29, 2020 and expired on September 30, 2025. Mr. Tipsword indicated that Lawrenceville had submitted an NPDES permit application to the Illinois EPA in March 2025, but it was never received. Lawrenceville subsequently sent an application to the Illinois EPA in August 2025, which was not within 180 days prior to expiration.

Mr. Tipsword stated that the dry weather base flow into the STP is approximately 500,000 Gallons Per Day (GPD). Mr. Tipsword stated that a "decent rain" would typically have an inflow rate between 1.2-1.4 Million Gallons per Day (MGD). Mr. Tipsword stated that he observed inflow at approximately 4.0 MGD on March 9, 2026. Mr. Tipsword stated that in his tenure with the City, he has observed the Influent flow meter reading in excess of 8.0 MGD at least one time. The 2020 NPDES permit has a design average flow of 1.0 MGD and a design maximum flow of 2.16 MGD. Mr. Tipsword stated that the rain gauge at the STP was inoperable and that he is currently using the rain gauge data from Lawrenceville–Vincennes International Airport to estimate rainfall during precipitation events.

Mr. Tipsword stated that no chemical addition is added to the primary clarifier. Mr. Tipsword noted a few recent repairs for the primary clarifier, including its weir being replaced in approximately October 2025 and a chain for the drive gear being replaced in early 2026. Lawrenceville STP disinfects effluent between April and November at Outfall 001. Mr. Tipsword stated that dosage of chlorine is manually adjusted to keep within effluent limits while chlorinating. Chlorine gas is mixed with non-potable water in the chlorine equipment room and then added to the first two effluent chambers in the chlorine contact tank. Mr. Tipsword manually adjusts the chlorine addition as needed. Mr. Tipsword stated that chlorination is conducted using a designated gas cylinder in the storage room. Mr. Tipsword records the daily amount of chlorine gas used during the disinfection.

Mr. Tipsword stated that approximately three-to-four years ago, the Schrieber units at the Lawrenceville STP turned black for approximately one week and that a burning chemical smell was noted at the STP during this time period. Mr. Tipsword stated that there was no spike in zinc or hexavalent chromium sample results at that

time. Mr. Tipsword also noted a second septic event that began sometime between August and September 2025, where "everything went black." Mr. Tipsword attributed the second septic event to problems with the STP's headworks. It is unclear whether either event was reported to the Illinois EPA. Mr. Tipsword stated that the North Schrieber had a catastrophic failure approximately a year ago. Mr. Tipsword stated that a drive assembly for the north unit is currently on order and the plan is to have a local machine shop reweld it to the unit. Mr. Tipsword stated that once the North Schrieber is operational, the South Schreiber will be taken offline for repair.

Mr. Tipsword stated that the current location of Lawrenceville's STP leaves it vulnerable to flooding. This has resulted in water from the Embarras River being pumped into the STP at times. Mr. Tipsword also stated that a black, tar-like substance can be seen coming up from the ground, especially in the summer months. He noted this specifically in areas east of the STP and south of the excess sludge lagoon storage. Mayor Courtney indicated that Lawrenceville is exploring the purchase of land as a future location for a new STP.

In March 2022, HMG Engineers (HMG), Lawrenceville's engineering contractor, and the City developed a Phosphorus Discharge Optimization Plan and a Phosphorus Feasibility Study. Within this plan, HMG concluded that it was not financially feasible to treat for phosphorus using the current STP setup. Mr. Tipsword stated that the proposed first stage phosphorus limit might be achievable with new equipment at the current STP, but that the second stage was not possible to meet unless a new STP was constructed. Mr. Tipsword stated that there have been communications between HMG and Illinois EPA pertaining to the Nutrient Assessment Reduction Plan (NARP) and that NARP development would likely occur after the construction of a new STP.

Lawrenceville has not land-applied sludge since at least 2013. At the time of the inspection, Mr. Tipsword stated that waste activated sludge is sent to the aerobic digester. According to a recently submitted sludge report for the time period between July 1, 2025 and December 31, 2025, Lawrenceville generated 644,800 gallons or 45.7 dry tons of sludge.

Monitoring and Sampling Activities:

At the time of the inspection, Mr. Tipsword indicated that he is responsible for conducting all sampling activities for the Lawrenceville STP. Mr. Tipsword stated that Lawrenceville samples its effluent from Outfall 001 three times a week for the following pollutants: dissolved oxygen, pH, ammonia nitrogen, five-day carbonaceous biochemical oxygen demand ($CBOD_5$), and total suspended solids. Total nitrogen and phosphorus are sampled once a month. Mr. Tipsword samples Lawrenceville influent three times a week for five-day biochemical oxygen demand (BOD_5) and total suspended solids (TSS). Mr. Tipsword stated that Lawrenceville STP conducts internal sampling every couple of weeks to evaluate compliance using either a sludge judge or mixed liquor suspended solids tests. Mr. Tipsword stated that the in-situ dissolved oxygen meters have been non-functional since 2013. Mr. Tipsword stated that compliance samples are currently being sent to Teklab, Inc. Environmental Laboratory (Teklab) for all the NPDES permit required pollutant parameters.

The semi-annual compliance monitoring required by the NPDES permit was not completed for an unspecified period of time. At the time of inspection, Lawrenceville was beginning to conduct semi-annual compliance monitoring by collecting a grab sample at the effluent compliance sampling point for a ten-week period. Lawrenceville was on the fourth week of this sampling effort. All semi-annual compliance monitoring parameters are being analyzed by Teklab. Mr. Tipsword stated that recent semi-annual compliance monitoring reports showed non-detects for all parameters.

Mr. Tipsword stated that Lawrenceville had not conducted biomonitoring from 2020 to October 2025 and has since resumed biomonitoring in October 2025. At the time of the inspection, the Lawrenceville STP had conducted three biomonitoring tests and intended to conduct another biomonitoring test in March 2026. Biomonitoring samples are sent to Teklab and assessed for toxicity by TRE Environmental Strategies. Biomonitoring samples measure the acute toxicity of Outfall 001 effluent for two aquatic species: *Ceriodaphnia dubia*, a type of water flea, and *Pimephales promelas*, a fathead minnow. Mr. Tipsword stated that a February 3, 2026 biomonitoring sample had a result in excess of 20% toxicity, which will prompt an additional sampling event. Mr. Tipsword stated that he had consulted with TRE Environmental Services, who had suggested the toxicity exceedance was due to ammonia nitrogen levels in the STP's effluent.

Collection System Information:
Describing the sanitary sewer collection system, Mr. Tipsword stated that it is mostly comprised of clay tile pipe, with some polyvinyl chloride. The collection system includes approximately 35 miles of both gravity and force main sewerage and seven lift stations. The area serviced by the sanitary sewer collection system includes the incorporated City, along with an industrial park near Airport Road and the Toyota Boshoku Plant, both connected by a force main and located east of Lawrenceville. Based on billing, the STP has approximately 2,000 connections to the collection system. Mr. Tipsword stated that most of the connections are residences and approximately 350 are tied to commercial or industrial enterprises.

Mr. Tipsword stated that Lawrenceville – in conjunction with HMG – developed a new Capacity, Management, Operations, and Maintenance (CMOM) Plan in March 2026 as part of a Compliance Commitment Agreement with Illinois EPA. Mr. Tipsword showed the EPA Inspection Team the prior CMOM Plan, which was published in August 2012. Mr. Tipsword stated that the North and South Lift Stations are the oldest lift stations within the community. Mr. Tipsword stated that daily inspections of lift stations have not been logged historically but that logging will begin in accordance with the new CMOM.

Mr. Tipsword stated that there are party line service connections (multiple homes connected to the same privately owned sewer lateral) throughout Lawrenceville. Lawrenceville representatives indicated that party line service maintenance is not the responsibility of the City. Mr. Tipsword highlighted some areas within the City that have party line sewers as follows:

- Homes north of Walnut Street between 7th and 8th Street
- Homes on 12th and the west side of 11th Street from Walnut Street to Charles Street
- Some homes on 15th Street
- Some homes on 16th Street, induced by another house blocking two other homes.

Mr. Tipsword stated that infiltration and inflow (I/I) is a challenge in the collection system. Mr. Tipsword attributed the I/I to the age of the clay tiles, private lateral maintenance, and downspouts being connected to the sewer system. At the time of the inspection, Mr. Tipsword stated that Lawrenceville plans to enact a five-year plan to smoke test all sewer pipes within the City starting in the summer of 2026 to further understand how I/I affects the system, beginning with the Lincoln Heights neighborhood. Mr. Tipsword stated that the east side of Lawrenceville has not been smoke tested to his knowledge. Mr. Tipsword stated that HMG is actively working on a Sewer System Evaluation Survey and anticipates its completion in June 2026 as part of a Compliance Commitment Agreement with the Illinois EPA.

Mr. Tipsword stated that Lawrenceville has a Sewer Use Ordinance in place that does not allow for sump pumps to be connected to the City's sanitary sewer collection system. Mr. Tipsword said that there are portions of Lawrenceville where downspouts from residences homes are still connected to the sanitary system. Mr.

Tipsword added that downspouts are allowed to be connected to the storm sewer but not to the City's sanitary collection system.

Mr. Tipsword stated that stormwater and sanitary waste from the Indian-Texaco Refinery had been sent to the Lawrenceville STP during its operation. Mr. Tipsword stated that the City's storm sewer had previously run through portions of the Indian-Texaco Refinery, located south of Lawrenceville. Mr. Tipsword estimated that sometime between 2005 and 2007, these connections were blocked off. Mr. Tipsword also stated that in approximately 2015, volatiles were noted west of Manhole #183 and east of Manhole #186.

Mr. Tipsword indicated that he has encountered illicit dumping activities into the City's collection system. Mr. Tipsword stated that, in approximately September 2025, there was a flatbed truck with a tank in the back that was illegally dumping into a manhole near the intersection of 3rd Street and Hickory Street. Mr. Tipsword told EPA inspectors that some septic haulers have historically introduced their septic waste into the collection system though no septic haulers had been discharging into the STP within the past six months.

Combined Sewer System:

When EPA asked about Lawrenceville's combined sewer collection system, Mr. Tipsword stated that he did not know much about it. Formerly, Lawrenceville had areas of its collection system that were permitted as a combined sewer area. The combined sewer system was tributary to four permitted combined sewer overflow (CSO) outfalls – noted as Discharge Numbers 003-006 in the City's 1999 and 2004 permits – located on the north end of the City along the Embarras River. The 2020 NPDES permit does not include information on any of these CSO outfalls. The 2004 NPDES permit describes the possible need for a Long-Term Control Plan (LTCP) to address the City's combined sewer system. During the inspection, the EPA Inspection Team asked Mr. Tipsword for a copy of an LTCP. Lawrenceville representatives were not aware of an LTCP for the City. Mr. Tipsword believed that all former combined sewer outfalls had been closed.

EPA reviewed the City's Sewer Map (Appendix F of the 2026 CMOM Plan) and noted two other potential sewer outfalls, and it was unclear if these outfalls had ever been permitted. The first potential outfall ("Unknown Outfall #1") is depicted near the old Indian-Texaco Refinery and would discharge to the Embarras River. This outfall appears to be controlled by an upstream regulator station, "Hickory Street Regulator Station". It is uncertain whether this regulator structure is still connected to the sanitary sewer system. The second potential outfall ("Unknown Outfall #2") is depicted on the northeast side of the City. According to the Sewer Map, it appears that the sanitary sewer system is connected to a 12-inch sewer segment that could potentially discharge to the Embarras River.

Sanitary Sewer Overflows:

Mr. Tipsword stated that Lawrenceville experienced a series of intense rain events in early April 2025, where he estimated that Lawrenceville sustained approximately 10 inches of rain in a week and 5 inches of rain between April 4-5, 2025. Mr. Tipsword characterized this event as "the worst-case scenario" and stated that several residents experienced basement flooding, specifically in the Lincoln Heights neighborhood, located on the City's northwest side. Mr. Tipsword stated that Lawrenceville televised a series of streets in the Lincoln Heights neighborhood in response to the basement flooding.

Mr. Tipsword stated that sanitary sewer overflows (SSOs) were historically recorded via work order, timesheet, or by phone calls to Mr. Tipsword. Mr. Tipsword explained a revised procedure for addressing SSOs, which he

stated has been in place since approximately August 2025. If a basement backup occurs, the affected citizen should call the Water and Sewer Department. If the event occurs during business hours, a receptionist will ask for a citizen's name, address, phone number, and the nature of the complaint. If the event occurs after hours, the citizen's call is directed to county dispatch (911) in Bridgeport, Illinois. From county dispatch, the phone call is subsequently directed to Mr. Tipsword's phone. If Mr. Tipsword answers, it is recorded in his phone's notes app with the address, time, and matter at hand. If Mr. Tipsword does not answer, the phone call then goes to Mike Hardiman, who is the Assistant Superintendent of the Water and Sewer Department. Upon receipt of the complaint, Mr. Tipsword stated that employees of the Water and Sewer Department are dispatched to the location, where they evaluate flow in the upstream and downstream manholes of the reporting residence. Mr. Tipsword stated that the response time is generally within 30 minutes of the phone call. If an issue is identified within the main, Mr. Tipsword stated that the City's sewer jet truck or a local plumber is deployed to further assist. Within 24 hours, Mr. Tipsword stated that he calls Bruce Rodely of the Illinois EPA's Marion Regional Field Office to report the SSO. Mr. Tipsword indicated that Lawrenceville currently has a policy in which City employees do not enter a residence during a response.

Mr. Tipsword added he had received three phone calls from residents regarding SSOs on Saturday, March 7, 2026 in response to an approximate 2-inch rain event. Mr. Tipsword proceeded to show the EPA Inspection Team his preliminary record of each incident on the notes app. Moving forward, Mr. Tipsword anticipates using the CMOM to log these events.

As of the morning of March 10, 2026, Mr. Tipsword stated that there have been 29 SSOs reported to the Illinois EPA via Central Data Exchange (CDX) upon implementation of the SSO reporting process. An exact time for the new reporting process was not provided. Mr. Tipsword estimated that approximately 95% of these overflows are attributed to problems with private laterals. Mr. Tipsword stated that the majority of SSOs have occurred during dry weather. Mr. Tipsword stated that there are no constructed SSO points within the collection system.

Mr. Tipsword stated only one SSO has reached a receiving water. This incident occurred at the Drinking Water Plant Backwash Lift Station on January 7, 2026 and entered the Embarras River. Mr. Tipsword stated that Lawrenceville had not experienced any SSOs out of any manholes for "a long time."

FACILITY WALK-THROUGH OCCURRED: YES

Photos and/or Videos: were taken during the inspection. See Appendix A and B for Digital Image and Video Logs.

Field Measurements: were not taken during this inspection.

The following is a summary of EPA's inspection activities and observations for each day of the inspection. The summary for each day is not necessarily noted in chronological order.

March 10, 2026

A National Centers for Environmental Information rain gauge at Lawrenceville-Vincennes International Airport measured 0 inches of rain on March 10, 2026.

The EPA Inspection Team observed the Lawrenceville representatives respond to an SSO complaint at a residence on the 1000 Block of 16th Street. During the response, EPA observed water being discharged from a

hose connected to the home's basement onto the eastern side of 16th Street. Once reaching 16th Street, water flowed from the hose south and subsequently entered the storm sewer on the northeastern intersection of 16th Street and Locust Street (see Photos 1-5 in Appendix A; Video 1 in Appendix B). Mr. Tipsword stated that the home has a party line lateral that connects to the City's main through an alley. Lawrenceville representatives tested the water coming out of the hose for chlorine and stated that the test was absent for a chlorine. Mr. Tipsword stated that if chlorine was present, Water and Sewer Department staff would characterize the water as drinking water and look for a water main break. The EPA Inspection Team then observed Lawrenceville Water and Sewer Department representatives check sanitary sewer manholes on Locust Street, which Mr. Tipsword stated were upstream and downstream of the party line connection point. Mr. Tipsword explained that if manholes upstream and downstream of the party line lateral were flowing, the issue was not the result of the City's sewer main. Manhole #224 (see Photos 6 and 9 in Appendix A) was observed to be flowing at 1:26 P.M., and Manhole #225 (see Photos 7-8 in Appendix A) was observed to be flowing east at 1:29 P.M.

Mr. Lyle stated that he evaluates the condition and operation of each lift station daily. The following lift stations were visited during the March 10, 2026 site walkthrough:

- Yost Apartment Lift Station (see Photo 10 in Appendix A)
    - Mr. Lyle stated that this lift station receives wastewater from the Indian Trail Apartments. This lift station maintains a high-level alarm, an audible alarm, a single-phase pump, and has a generator hook-up that can be used if necessary. The lift station is manually operated due to a Programmable Logic Controller (PLC) issue.
- River Run Lift Station (see Photo 11 in Appendix A)
    - Mr. Lyle stated that wastewater from the River Run Lift Station is directed toward North Lift Station. This lift station receives a very low flow rate compared to other lift stations.
- North Lift Station (see Photo 12-13 in Appendix A)
    - This lift station serves a large portion of the residences and businesses on the north side of the City. This station is equipped with a PLC, three-stage high-level alarm, an audible alarm, and a diesel power generator. One of the pumps in this unit is out because of lightning damage.
- Drinking Water Plant Backwash Lift Station (see Photo 14-15 in Appendix A)
    - Mr. Lyle stated that this lift station is used to clean sand filters during daily filter backwash operations at the Drinking Water Plant. Mr. Lyle stated that an incident had occurred whereby one of the two pumps in the unit was not pumping and led to a sanitary sewer overflow occurring on January 7, 2026. An erosional channel was observed to the north of the lift station leading to the Embarras River.
- South Lift Station (see Photo 16-17 in Appendix A)
    - This lift station serves a large portion of the residences and businesses on the south side of the City. This station is equipped with a PLC, a three-phase lift station and a three-stage high-level alarm.
- Toyota Boshoku Lift Station (see Photo 18 in Appendix A)
    - Mr. Lyle stated that wastewater from this lift station is sent westward into the force main. This station is equipped with a PLC, a heating unit, and an audible alarm.
- Industrial Park Lift Station (see Photo 19 in Appendix A)
    - Mr. Lyle stated that wastewater from this lift station is sent westward into the force main. This unit seldom operates due to the small number of businesses that utilize it within the industrial park and is equipped with an audible alarm.

At approximately 3:50 P.M. on March 10, 2026, the EPA Inspection Team drove back by the 1000 Block of 16th Street (see Photos 20-22 in Appendix A), where the morning response took place. EPA observed a discharge

occurring at a different residence on the 1000 Block of 16th Street at 3:50 PM. Mr. Tipsword later indicated that he drove around the 1000 Block of 16th Street at approximately 5:00 P.M. on March 10, 2026 and did not observe water being pumped from a hose connected to either of the aforementioned residences on the 1000 Block of 16th Street.

March 11, 2026

A National Centers for Environmental Information rain gauge at Lawrenceville-Vincennes International Airport measured 1.95 inches of rain on March 11, 2026.

The following manholes were visited during the EPA inspection on March 11, 2026:

- Manhole #76 (see Photo 23 in Appendix A)
- Manhole #77 (see Photo 24 in Appendix A)
- Manhole #79 (see Photo 25 in Appendix A)
    - City staff stated that the manhole had been paved over at some point and rediscovered during sewer televising last year.
    - A new manhole is anticipated sometime in spring or summer of 2026.
- Manhole #80 (see Photo 26 in Appendix A)
    - Flow was observed to be primarily entering manhole from pipe directed north, connected to River Run Lift Station.
- Manhole #72 (see Photo 27 in Appendix A)
- Manhole #71 (see Photo 28 in Appendix A)
- Manhole #70 (see Photo 29 in Appendix A)
- Manhole #69 (see Photo 30 in Appendix A)
- Manhole #68
    - Manhole was sealed and unable to be opened.
- Manhole #53 (see Photo 33 in Appendix A)
- Manhole #144 (see Photo 35 in Appendix A)
    - City staff stated that the main near this manhole was related to a sewer backup in February 2026.
    - Downspouts were observed to go into the ground from a nearby address.
- Manhole #142 (see Photo 36 in Appendix A)
    - Some debris was observed in this manhole.
- Manhole #143 (see Photo 37 in Appendix A)
    - Manhole was observed to be in poor condition, with some visible roots on the sides.
    - City staff stated that a backup in a utility room occurred near this manhole.
- Manhole #128 (see Photo 38 in Appendix A)
- Manhole #157.A.3 (see Photo 39 in Appendix A)
    - Root intrusion was observed on the lateral.
    - Downspouts were connected to the ground in this area.
- Manhole #157.A.2
    - This manhole was unable to be opened because the whole structure was moving upon attempted opening.
- Manhole #157.A.8 (see Photo 40 in Appendix A)
    - Downspouts were connected to the ground in this area.
- Manhole #215 (see Photo 41 in Appendix A)
    - Debris was noted in this manhole.

- Manhole #222 (see Photo 50 in Appendix A)
  - Approximately 6 inches of water depth in this manhole.
  - Rock and other debris was observed in this manhole.
- Manhole #213 (see Photo 51 in Appendix A)
- Manhole #214 (see Photo 52 in Appendix A)
  - Debris was observed in this manhole.
- Manhole #170.A (see Photo 53 in Appendix A)
  - Debris was observed in this manhole.
- Manhole #349 (see Photo 56 in Appendix A)
- Manhole #348 (see Photos 57-60 and 86 in Appendix A; Videos 3 and 7 in Appendix B)
  - An overflow was observed to be occurring at this manhole at 1:23 P.M. and at 3:09 P.M.
- Manhole #5 (see Photo 61 in Appendix A)
- Manhole #352 (see Photo 62 in Appendix A)
  - An overflow was observed to be occurring at this manhole at 1:30 P.M.
- Manhole #356 (see Photo 63-65 in Appendix A; Videos 4-5 in Appendix B)
  - An overflow was observed to be occurring at this manhole at 1:33 P.M.
- Manhole #360 (see Photos 66-72 in Appendix A)
  - An overflow was observed to be occurring at this manhole at 1:37 P.M. and was not overflowing at 3:11 P.M.
- Manhole #7 (see Photo 73 in Appendix A)
  - Approximately 3 feet of capacity[1] remained at the time of the photograph.
- Manhole #8 (see Photo 75 in Appendix A)
  - Approximately 10 feet of capacity remained at the time of this photograph.
- Manhole #361 (see Photo 76 in Appendix A)
  - Approximately 4 feet of capacity remained at the time of this photograph.
- Manhole #343 (see Photo 77 in Appendix A)
  - Approximately 5 feet of capacity remained at the time of this photograph.
- Manhole #344 (see Photos 78 and 85 in Appendix A; Video 6 in Appendix B)
  - An overflow was observed to be occurring at this manhole at 1:56 P.M. and at 3:07 P.M.
- Manhole #341 (see Photo 79 in Appendix A)
  - Approximately 4 feet of capacity remained at the time of this photograph.
- Manhole #339 (see Photo 80 in Appendix A)
  - Approximately 4 feet of capacity remained at the time of this photograph.
- Manhole #338 (see Photo 81 in Appendix A)
  - Approximately 2 feet of capacity remained at the time of this photograph.
- Manhole #330
  - This manhole was bolted shut and unable to be opened.
- Manhole #203 (see Photo 82 in Appendix A)
  - Street flooding was occurring near this manhole.
- Manhole #336 (see Photo 83 in Appendix A)
  - Not noted on CMOM Sewer Map.
- Manhole #335 (see Photo 84 in Appendix A)
  - Not noted on CMOM Sewer Map.

[1] Capacity indicates the difference between water surface elevation in the manhole to the street elevation

During the morning, the EPA Inspection Team walked portions of the southern and western borders of the Lawrenceville City Cemetery to understand stormwater drainage from the Lincoln Heights Neighborhood (see Photos 31-32 in Appendix A). The EPA Inspection Team also revisited the 1000 Block of 16th Street, noting downspouts were connected to the ground (see Photo 34 in Appendix A).

The EPA Inspection Team observed bubbling in the grass near the intersection of Christy Avenue and 3rd Street (see Photos 54 and 55 in Appendix A; Video 2 in Appendix B). The bubbling was first noted on the southwestern side of the intersection, approximately 4 feet south of Christy Avenue. Bubbling was also noted on the northwestern side of the intersection at about the same distance from 3rd Street. The bubbling on the north side of the intersection entailed three visible areas of bubbling in a linear fashion, approximately 4 feet north of Christy Avenue. Mr. Tipsword later indicated that there is not a known portion of the collection system in this area.

The EPA Inspection Team had a conversation with Mark Griggs, Street Department Superintendent, about storm sewers on the south side of the town, near the Indian Refinery – Texaco Lawrenceville Superfund Site. Mr. Griggs estimated that in approximately 2000, a 30-inch storm sewer that parallelled the railroad and discharged to the Embarras River was closed and replaced with the installation of a 60-inch storm sewer beginning near the intersection of Adams Street and 11th Street to Hickory Street and 3rd Street. Mr. Tipsword stated that workers have become lightheaded when entering manholes near the Texaco Ball Diamond.

The EPA Inspection Team went to the four Combined Sewer Outfall locations noted in Lawrenceville's 1999 and 2004 NPDES permits. Mr. Tipsword and Mr. Griggs were unfamiliar with the locations of the outfalls. The EPA Inspection Team – accompanied by Mr. Tipsword and Mr. Griggs – first visited the location associated with Discharge Number 003, and observed a structure discharging to the Embarras River on the west side of 10th Street's northern terminus with the Embarras River (see Photos 88-90 in Appendix A). Mr. Griggs believed that this discharge observed was from the City's storm sewer collection system.

The EPA Inspection Team visited the location of Discharge Number 004. At this location, Mr. Griggs identified a storm sewer structure at the north terminus of 12th Street with a corrugated metal pipe directed to the north (see Photo 92 in Appendix A). Two sinkholes were also observed to the north of the storm sewer structure in an orientation similar to the corrugated metal pipe; neither the end of the corrugated metal pipe nor any discharge to the north of the storm sewer structure were observed (see Photo 91 in Appendix A).

The EPA Inspection Team subsequently visited the locations of Discharge Numbers 005 and 006. The EPA Inspection Team observed an overflow event occurring from the North Lift Station's wet well and discharging into a channel hydraulically connected to the Embarras River (see Photos 93-99 in Appendix A; see Videos 8-9 in Appendix B). During the overflow event, the EPA Inspection Team noted the north lift station light to be green and not signaling an alarm (see Photo 99 in Appendix A).

The EPA Inspection Team revisited the 1000 Block of 16th Street and observed water being pumped from one of the residences that had been pumping water from a basement backup the preceding day. The water was flowing into the northeast storm sewer grate at the intersection of 16th Street and Locust Street (see Photos 100-104 in Appendix A; see Videos 10-11 in Appendix B). The resident stated that they had approximately 6 inches of water in their basement, and a neighboring resident stated that they had 2 feet of water in their basement, adding that basement backups had been occurring for many years. The neighboring resident indicated that they were going to be turning on their pump imminently.

March 12, 2026

A National Centers for Environmental Information rain gauge at Lawrenceville-Vincennes International Airport measured 0 inches of rain on March 12, 2026.

Mr. Tipsword stated that he visited the manholes on 3rd Street at 4:15 P.M. and the North Lift Station at 6:00 P.M. on March 11, 2026, and observed that no SSOs were occurring at those respective times. Mr. Tipsword also told the EPA Inspection Team that a bypass to the Equalization Basin from the STP occurred from 1:15 P.M. to 7:00 P.M. on March 11, 2026, adding that this was the first diversion to the Equalization Basin since August 2025. Mr. Tipsword indicated that the wastewater had remained in the Equalization Basin and had not been pulled back into the STP at that time.

The EPA Inspection Team and Mr. Tipsword completed a walkthrough of Lawrenceville's STP. The walkthrough began in the STP main office/storage building, where EPA observed the STP influent pump control panel. The EPA Inspection Team noted that the information displayed for the influent pumps identified one pump with a flow of 3,600 gallons per minute (see Photo 105 in Appendix A). Mr. Tipsword stated that the flow readout on this process control panel is inaccurate and not working properly. The panel noted the water surface elevation in the wet well to be at 3.00 feet. Mr. Tipsword stated that the main office/storage building floods when the wet well exceeds 15 feet. The EPA Inspection Team also observed two blowers operating in standard mode. Mr. Tipsword indicated that these blowers had replaced a series of six blowers.

The EPA Inspection Team observed the influent flow meter control panel (see Photos 107-108 in Appendix A). Mr. Tipsword stated that the influent flow meter had broken sometime the prior week, as the EPA Inspection Team noted the influent gauge to be stuck at 4.3170 MGD since March 6, 2026 (see Photo 108 in Appendix A). The EPA Inspection Team observed the wet well (see Photo 109 in Appendix A) and adjacent influent flow meter location (see Photo 110 in Appendix A).

The EPA Inspection Team walked to the Lawrenceville STP Headworks (see Photos 111-114 in Appendix A). Mr. Tipsword showed EPA a manual bar screen used to capture debris in the wastewater prior to the Vulcan screw press (see Photo 111 in Appendix A). Mr. Tipsword stated that the bar screen is cleaned one-to-two times per day by an STP operator. The influent grab sample is taken prior to the bar screen. The EPA Inspection Team next walked on the elevated platform in the headworks structure to the disassembled Vulcan screw press. Mr. Tipsword stated that the Vulcan screw press broke and had been removed from operation since October 2025 (see Photo 112 in Appendix A). Mr. Tipsword also pointed out the location of the influent composite sampler, a HACH Sigma SDSOU sampler with a Haier refrigerator, which he stated had not been in use due to a power issue since October 2025 (see Photo 113 in Appendix A). The EPA Inspection Team observed that the composite sampler had soiled tubing. As a result, Mr. Tipsword has been taking all influent samples in front of the bar screen as grab samples since October 2025.

The EPA Inspection Team left the STP Headworks and walked to the STP's primary clarifier (see Photos 115-118 and 125 in Appendix A). The EPA Inspection Team observed floatable debris and scum within the primary clarifier as well as algae buildup within the primary clarifer weir (see Photos 116-118 and 125 in Appendix A). The EPA Inspection Team also noted that the skimmer arm was broken along with noticeable corrosion (see Photos 118 and 125 in Appendix A). Mr. Tipsword stated that the primary weir is cleaned once per week, but that he had not been able to clean it this week. Mr. Tipsword also stated that lubrication of the unit occurs weekly. A second bar screen is located after the primary clarifier prior to wastewater entering the flow splitter.

Mr. Tipsword then guided the EPA Inspection Team to the South Schrieber unit (see Photos 119-122 and 124 in Appendix A). The EPA Inspection Team observed floatable solids and debris in the outer ring of the South Schrieber unit, which is where aeration and mixing occurs by design (see Photos 119-120 in Appendix A). Mr. Tipsword stated that the scum pump for the South Schrieber unit was broken with a clog in the connecting sewerage at the time of the inspection and a replacement pump was being delivered later in the day. Mr. Tipsword stated that denitrification is currently occurring in the inner ring after evaluating the unit with a contractor (see Photo 121 in Appendix A). Mr. Tipsword stated that TSS will begin to be lowered once the replacement scum pump is installed. Mr. Tipsword also stated that weekly maintenance occurs through the application of grease to the top and bottom of the unit and changes of oil in the gear box as prescribed in the CMOM. Mr. Tipsword told EPA that once wastewater from the inner ring flows over the weir, it is directed to the chlorine contact tank. Mr. Tipsword stated that there was no activated sludge blanket in the inner ring of the South Schrieber unit and is currently in the process of accumulating a sludge blanket. He indicated that the microorganisms within Lawrenceville STP have not been evaluated for at least a couple of years. Mr. Tipsword stated that he last utilized the sludge judge on the South Schrieber unit, which appeared to be approximately 6-inches and black in color. He added that during good operations, mixed liquor suspended solids were between 2,500-2,600 and wasting would occur twice a week in 30-minute intervals.

The EPA Inspection Team then walked to the North Schrieber unit, which Mr. Tipsword stated was inoperable at the time of the inspection (See Photos 123 and 126 and 141 in Appendix A). The EPA Inspection Team noticed corrosion to have occurred on portable hoist support beams, with one entirely missing. Mr. Tipsword stated that the City is awaiting a new motor in the gearbox for this unit. Mr. Tipsword stated that a catastrophic failure of the unit had occurred sometime between late 2025 and early 2026. Mr. Tipsword informed EPA that he told Illinois EPA about the North Schrieber unit at the time of failure. Mr. Tipsword estimated that the North Schrieber unit had approximately three feet of water in the outer ring.

Mr. Tipsword also showed the EPA Inspection Team the waste and return activated sludge feed control unit, which consists of a manual control valve (see Photo 127 in Appendix A). Mr. Tipsword stated that the south return feed is currently rusted out. Mr. Tipsword additionally stated that the STP is actively returning 100% of the activated sludge since its acquisition of new microorganisms in February 2026.

Mr. Tipsword showed the EPA Inspection Team the Composite Sampler Building, where composite effluent samples for Outfall 001 are taken via a 24-hour Hach AS 950 Effluent Composite Sampler (see Photos 128-131 in Appendix A). The EPA Inspection Team noted that the effluent composite sampler had soiled tubing, and no thermometer was located in the refrigerator to ensure temperature conditions were met (see Photos 128-131 in Appendix A). Mr. Tipsword stated that effluent composite samples are currently taken three times a week, during the following time intervals: Monday 8:00 A.M. to Tuesday 8:00 A.M., Tuesday 8:00 A.M. to Wednesday 8:00 A.M., and Wednesday 8:00 A.M. to Thursday 8:00 A.M.

The EPA Inspection Team and Mr. Tipsword then walked to the chlorine contact tank, which is where Mr. Tipsword stated that the STP collects composite samples prior to disinfection (see Photos 132-134 in Appendix A). Suspended solids were observed in the chlorine contact tank, which Mr. Tipsword attributed to the broken pump in the South Schrieber unit. Mr. Tipsword stated that STP has no dechlorination and that grab samples are taken after the chlorine contact tank and prior to discharge. Mr. Tipsword stated that the dosage of chlorine is manually controlled and is based on the effluent flow rate. Mr. Tipsword also stated that the effluent flow meter had failed approximately a month ago and that Illinois EPA was providing guidance on how to estimate effluent flow.

At the STP's Sludge Storage Lagoon, Mr. Tipsword showed the EPA Inspection Team the hose used to pump out water in the North Schrieber unit, which he stated had occurred in January 2026 (see Photo 135 in Appendix A). Mr. Tipsword estimated that the South Schrieber unit had most recently been pumped to the Sludge Storage Lagoon around 2017. The EPA Inspection Team then walked around the perimeter of the Sludge Storage Lagoon, noting feminine products and solids floating at the surface. Less than a foot of freeboard was observed in the Sludge Storage Lagoon, with three areas of potential berm failure located on the north end of the lagoon and one located on the southeast side (see Photos 136-140 in Appendix A).

At approximately 1:55 P.M., the EPA Inspection Team visited the south side of Lawrenceville STP's Equalization Basin (see Photos 142-145 in Appendix A). Mr. Tipsword stated that flow to and from the Lawrenceville STP and the Equalization Basin is by gravity. Mr. Tipsword also indicated that the southeast side of the Equalization Basin receives flow from the STP, and the southwest side of the Equalization Basin has the return to the STP; although, later in the inspection, Mr. Tipsword indicated that the southeast side of the Equalization Basin was a discharge location, controlled by a manual valve. Mr. Tipsword stated that, on occasion, a valve is manually opened to return flow from the Equalization Basin back to the Headworks of the STP.

As part of the inspection, EPA conducted a laboratory audit, evaluating the instrumentation, documentation, quality control and quality assurance procedures, and practices employed at the Lawrenceville STP Laboratory (see Photos 146-149 and 152-162 in Appendix A). The assessment checklist can be found in Appendix C. An inspection report for an Illinois EPA Clean Water Act inspection conducted in September 2025 stated the following: "The lab was in an unsatisfactory state and no lab bench sheets could be provided. It was recommended that the facility immediately cease all laboratory analysis and send all future samples to an offsite commercial lab. It was recommended to Operator Tipsword that he speak with the City of Lawrenceville and the consulting engineers about obtaining a commercial lab and that he would speak with the City about getting technical assistance with the lab." Since then, the City has been using an outside laboratory for compliance sampling. Mr. Tipsword stated that during the week of the EPA inspection, Illinois EPA gave the STP permission to start conducting pH and Dissolved Oxygen (DO) samples and attach their results to the DMRs. Mr. Tipsword stated that Lawrenceville's pH and DO samples are still not being used as the primary compliance samples for the DMRs. Mr. Tipsword stated that bench sheets had formerly been generated onto a USB. Mr. Tipsword stated that his computer crashed, resulting in the corruption of his USB and mechanism for recording sample information. Mr. Tipsword stated he was unable to produce historical bench sheets due to this computer crash. Mr. Tipsword also indicated that the Lawrenceville STP will be participating in the EPA Discharge Monitoring Report—Quality Assurance (DMR-QA) study program moving forward.

Following the laboratory audit, the EPA Inspection Team observed the STP's aerobic digester (see Photo 163 in Appendix A). Mr. Tipsword stated that the aerobic digester receives waste activated sludge from north and south Schrieber units and the chlorine contact tank. Mr. Tipsword next showed the EPA Inspection Team Lawrenceville's jetter truck, estimating its age to be at least 25-30 years old (see Photo 164 in Appendix A). Mr. Tipsword stated that the jetter is shared with the Street Department and estimated that it can jet at approximately 500 pounds per square inch (PSI) – down from approximately 2,000 PSI when the jetter was new. Mr. Tipsword indicated that this degraded jetter pressure limited its effectiveness to clean parts of the sewer collection system and Lawrenceville is intending to purchase a new jetter truck in the near future.

After reviewing a few diagrams located in Lawrenceville STP's main building (see Photos 150-151 in Appendix A), the EPA Inspection Team and Mr. Tipsword returned to the Equalization Basin at approximately 4:10 P.M. Mr. Tipsword stated that the City's stormwater system flows in a canal to the south of the Equalization Basin, which had contributed to the high water level in the channel to the south of the Equalization Basin (see Photos

165-168 in Appendix A). Mr. Tipsword estimated that water in the Equalization Basin was 20 feet deep and indicated that the level observed in the Equalization Basin is rather constant. Mr. Tipsword indicated that City staff had recently begun vegetation removal around the Equalization Basin structure on the southwest end. The EPA Inspection Team also noted that the Equalization Basin gate and portions of the fence were in poor condition and accessible to the public. Mr. Tipsword stated that there has been a magmeter next to the Equalization Basin influent structure.

The Equalization Basin Outfall Structure Manhole (see Photos 169-172 in Appendix A) was opened during inspection at approximately 4:43 P.M. on March 12, 2026. The EPA Inspection Team had the following observations pertaining to the Equalization Basin Outfall Structure Manhole using the Zistos WAD-PSW11 sewer camera:

- Located on the southeast side of the Equalization Basin.
- Observed floating solids in this manhole.
- Flow direction was indistinguishable in this manhole as water was swirling.
- Water in the manhole was occasionally burping on the north and south sides.

To the north of the manhole, the EPA Inspection Team heard a waterfall-like sound emanating from the Equalization Basin Outfall Structure on the southeast corner of the Equalization Basin and noted a decreasing waterline on the cement above the water level on the Equalization Basin Outfall Structure (see Video 12 in Appendix B). Mr. Tipsword stated he was unfamiliar with the exact location of Outfall 002 and that he had not heard that sound before. The EPA Inspection Team could not discern if there was a pipe to the south of the Equalization Basin and sought to return the next day when the water level was projected to be lower.

March 13, 2026

A National Centers for Environmental Information rain gauge at Lawrenceville-Vincennes International Airport measured 0 inches of rain on Friday, March 13, 2026.

The following manholes were observed during inspection on March 13, 2026:

- Manhole #49.A (see Photo 173 in Appendix A)
- Manhole #277 (see Photo 174 in Appendix A)
    - Downspouts were observed to go into the ground near this location.
- Manhole #LH (see Photo 175 in Appendix A)
    - Manhole not depicted on the City's CMOM Sewer Map.
- Manhole #278 (see Photo 176 in Appendix A)
- Manhole #279 (see Photos 177-178 in Appendix A)
    - I/I was noted in this manhole, with water squirting from the structure.
    - Clastic debris was noted in this manhole despite being on a brick-lined street.
- Manhole #52 (see Photo 179 in Appendix A)
    - I/I was noted in this manhole.
- Manhole #51 (see Photo 180 in Appendix A)
    - I/I was noted in this manhole, noting portions of the casing were wet on the sides.
- Manhole #50 (see Photos 181-183 in Appendix A)
    - There was an opening on the south side of the cement casting with paper debris on the grass underneath it.
    - A brownish-yellow colored foam was observed in the cemetary creek downstream of this manhole (see Photos 184, 186, and 187 in Appendix A).

- Manhole #45 (see Photo 185 in Appendix A)

At approximately 10:28 A.M. on March 13, 2026, the EPA Inspection Team, with Lawrenceville representatives present, observed a corrugated metal pipe oriented northward into a channel hydraulically connected to the Embarras River, coinciding with the description used for Discharge Number 006 in the 1999 and 2004 NPDES permits (see Photo 188 in Appendix A). A smaller pipe was also observed on the western bank of the channel, observed to be oriented to the northwest. City staff believed that both pipes are part of the City's storm sewer collection system.

The EPA Inspection Team and Mr. Tipsword revisited the Equalization Basin Outfall Structure and observed a berm with trees present in the southeast corner of the Equalization Basin, due to the reduced water level (see Photos 189-190 in Appendix A; see Video 13 in Appendix B). The EPA Inspection Team walked out onto the berm and observed water flowing through a broken gate on the Equalization Basin Outfall Structure (see Photos 191, 194-195 in Appendix A). It was unclear to the EPA Inspection Team how long the gate had been compromised.

The Equalization Basin Outfall Structure Manhole (see Photos 192-193 in Appendix A; Videos 14-15 in Appendix B) was opened during inspection at approximately 10:52 A.M. and evaluated using the Zistos WAD-PSW11 sewer camera. Upon opening, EPA noted floating solids that were observed in the manhole. The EPA Inspection Team also observed incoming flow from a pipe facing north and outgoing flow into a pipe facing south toward the location of Outfall 002.

To the immediate south of the Equalization Basin Outfall Structure Manhole, the EPA Inspection Team located a submerged pipe – noted as Outfall 002 in STP diagrams – within the stormwater channel (see Photos 196-197 and 201 in Appendix A; Videos 16-17 in Appendix B). Mr. Tipsword stated that this channel directs water east to the Embarras River. The EPA Inspection Team noted floating debris downstream of the Outfall 002 Effluent Structure (see Photos 198 and 200 in Appendix A). Mr. Tipsword also noted that a beaver dam was removed by City staff sometime in Fall of 2025, which had been backing up the stormwater in Lawrenceville. The EPA Inspection Team observed toilet paper in the removed beaver dam structure sitting on the south bank of the stormwater channel (see Photo 199 in Appendix A).

CLOSING CONFERENCE

☒ Provided EPA point of contact to the Facility
☒ Obtained email address for Facility point of contact
☒ Explained Inspection Report process
☒ Confirm CBI status at end of closing conference. No CBI claimed.
☒ Discussed Preliminary Area(s) of Concern
☒ Cyber Security questions asked

At 12:34 P.M., the EPA Inspection Team began the closing conference with Mr. Tipsword. Mayor Courtney and Mr. Lyle were also present for portions of the closing conference. During the closing conference, Mr. Tipsword stated that an SSO was occurring at 1710 12th Street, attributing it to an issue with a private lateral. Mr. Tipsword also provided a few status updates regarding STP equipment: (1) Mr. Lyle would be evaluating the influent flow meter control panel later that day, (2) a new effluent flow meter was placed on order, and (3) the sludge pump for the South Schrieber unit had arrived at the STP. The closing conference ended at 1:28 P.M. on

Friday, March 13, 2026. Mr. Tipsword committed to sending over documents requested by EPA by March 23, 2026.

Areas of Concern:

Any non-specified reference to the NPDES permit in the below section references the NPDES permit issued on September 29, 2020 with an expiration date of September 30, 2025. The below Areas of Concern do not encompass review of all documents submitted by Lawrenceville to EPA in conjunction with the inspection or all information conveyed to the EPA by Lawrenceville representatives at the time of the inspection.

1. Discharge Without a Permit: Section 301(a) of the Clean Water Act requires facilities that discharge pollutants from a point source into navigable waters to obtain authorization to discharge pursuant to an NPDES permit issued by EPA or a State agency that has an approved NPDES program.
    a. Duty to Reapply: Standard Condition 2 of the expired NPDES permit requires a permittee to apply and obtain a new permit by submitting a proper application as required by the [Illinois Environmental Protection] Agency no later than 180 days prior to the expiration date.

    At the time of the inspection, the STP was operating under a permit with an expiration date of September 30, 2025. EPA inspection information indicates Lawrenceville's application was not received by the Illinois EPA until August 18, 2025, less than 180 prior to expiration. At the time of inspection Lawrenceville did not have an active NPDES permit.

2. Operator Certification: Special Condition 2 of the expired NPDES permit requires the use or operation of the facility to be by or under the supervision of a Certified Class 1 Operator.

    Mr. Tipsword became the Class 1 Operator in July of 2024. Based on statements made by Lawrenceville representatives at the time of the inspection, it is unclear if a Class 1 Operator was running the STP between 2018 and July of 2024, when Mr. Tipsword acquired his Class 1 Wastewater Treatment Works Operator Licensure. Moreover, at the time of the inspection, Mr. Tipsword had received a notice of Class 1 Operator licensure revocation, and Lawrenceville had not finalized selection of a new Class 1 Operator.

3. Overflow Events and Basement Backups Observed During EPA Inspection: EPA observed the following during the inspection:
    a. Five manholes and one lift station were overflowing at the following locations:
        i. Manhole #248 at the Intersection of 3rd Street and Maple Street on March 11, 2026
        ii. Manhole #352 at the Intersection of 3rd Street and Lexington Avenue on March 11, 2026
        iii. Manhole #356 at the Intersection of 3rd Street and DuBois Street on March 11, 2026
        iv. Manhole #360 at the Intersection of 3rd Street and Jefferson Street on March 11, 2026
        v. Manhole #344 at the Intersection of 3rd Street and Washington Avenue on March 11, 2026
        vi. North Lift Station on March 11, 2026
    b. Three Basement Backups at the following locations:
        i. Two residences along the 1000 Block of 16th Street on March 10, 2026
        ii. One residence along the 1000 Block of 16th Street on March 11, 2026

    No SSOs had been reported from any of these locations prior to the inspection.

Additionally, Mr. Tipsword stated that an SSO occurred at a residence along the 1700 Block of 12th Street during the closing conference on March 13, 2026. This event was not observed by the EPA Inspection Team.

4. SSO Reporting: Special Condition 12 of the expired NPDES permit prohibits SSOs and requires that all SSOs be reported to the Illinois EPA.

   As of the morning of March 10, 2026, Mr. Tipsword stated that there had been 29 SSOs reported to the Illinois EPA via Central Data Exchange (CDX) since the new reporting process began in August 2025. As of the writing of this report, 44 SSOs have been reported between April 5, 2025 and May 1, 2026, amounting to an estimated volume of 36,386 gallons leaving the collection system prior to treatment. The first reported SSO (April 5, 2025) coincides with the April 2025 storm event described by Mr. Tipsword. The reported SSO occurring on April 5, 2025 is not mapped with a GPS location, does not have a recorded duration, recorded start/end time, nor estimated volume; the cause is noted as being a "Flooding of Collection System - Hurricane or Large Stormwater Event." Mr. Tipsword indicated that SSOs were historically recorded via work order or timesheet prior to the new reporting system being implemented. No records have been submitted to the EPA Inspection Team for any SSOs occurring prior to April 5, 2025.

5. Numeric Effluent Exceedances: The City's expired NPDES permit has a series of discharge limitations pertaining to Outfall 001 for the following parameters: TSS, pH, fecal coliform, chlorine residual, ammonia nitrogen, dissolved oxygen, and $CBOD_5$.

   From April 2021 through March 2026, Lawrenceville STP reported the following 15 numeric effluent limit exceedances on DMRs:

Monitoring Period Month	Parameter	Limit	Reported Value	Type of Exceedance	% Exceedance
October 2025	Ammonia Nitrogen	4.7 mg/L	16.7 mg/L	Daily Maximum	255%
October 2025	Ammonia Nitrogen	85 mg/l	153.21 mg/l	Daily Maximum	80%
October 2025	Fecal Coliform	400 per 100 mL	<20,000 per 100 mL	Daily Maximum	4,900%
November 2025	Ammonia Nitrogen	6 mg/L	13.7 mg/L	Daily Maximum	128%
November 2025	Ammonia Nitrogen	108 mg/L	133.67 mg/L	Daily Maximum	24%
December 2025	Ammonia Nitrogen	6 mg/L	10 mg/L	Daily Maximum	67%
January 2026	Dissolved Oxygen	3.5 mg/L	1 mg/L	Daily Minimum	71%
January 2026	Dissolved Oxygen	4 mg/L	1.42 mg/L	Daily Minimum	65%
January 2026	Dissolved Oxygen	5.5 mg/L	2.88 mg/L	Minimum Weekly Average	48%
January 2026	Ammonia Nitrogen	6 mg/L	11.9 mg/L	Monthly Average Minimum	98%

February 2026	Dissolved Oxygen	3.5 mg/L	1 mg/L	Daily Minimum	71%
February 2026	Dissolved Oxygen	4 mg/L	1.2 mg/L	Minimum Weekly Average	70%
February 2026	Dissolved Oxygen	5.5 mg/L	3.62 mg/L	Monthly Average Minimum	34%
February 2026	Ammonia Nitrogen	6 mg/L	11.9 mg/L	Daily Maximum	98%
March 2026	Ammonia Nitrogen	4.7 mg/L	8.2 mg/L	Daily Maximum	74%

6. Operation and Maintenance of Lawrenceville STP: Standard Condition 5 of the City's expired NPDES permit requires proper operation and maintenance of "...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 this permit."

   The EPA Inspection Team observed the following at the Lawrenceville STP that may have caused or contributed to the effluent limit exceedances tabulated above:
   a. Plant Influent
      i. The process control panel for plant influent presents inaccurate data and was not working properly, according to Mr. Tipsword.
   b. Plant Headworks
      i. Since 2025, the Vulcan screw press serving as preliminary treatment has been nonoperational.
      ii. The influent composite sampler has been without power since October 2025 and had soiled tubing.
   c. Primary Clarifier
      i. Floatable debris, scum, and algae were observed in the primary clarifier, including on the primary clarifer weir.
      ii. The skimmer arm was broken and had visible signs of corrosion on the metallic and concrete units.
   d. Schrieber Units
      i. South Schrieber Unit
         1. The scum pump for the South Schrieber unit was broken with a clog in the line at the time of the inspection.
         2. Floatable solids were observed in the South Schrieber unit.
         3. The south activated sludge return to the South Schrieber enclosure was rusted out.
      ii. North Schrieber Unit
         1. The North Schrieber unit was inoperable and needed a new motor in the gearbox at the time of the inspection. Corrosion was also noted on the beams of the unit, with one beam entirely missing.
      iii. The in-situ dissolved oxygen setup has been non-functional since 2013.
   e. Chlorine Contact Tank
      i. A high degree of suspended solids were observed in the chlorine contact tank.
      ii. The STP does not dechlorinate during chlorination season.

f. Sludge Storage Lagoon
    i. The lagoon maintained less than a foot of freeboard.
    ii. Four areas of potential berm failure were observed on the berm of the lagoon, with three areas on the north end and one area on the southeast side.
    iii. Untreated wastewater is being pumped into the sludge lagoon in response to the failure of the North Scheiber unit.
g. Sludge Blanket
    i. Mr. Tipsword stated that there was no activated sludge blanket at the time of the inspection.
h. Equalization Basin
    i. The Equalization Basin Outfall Structure had a broken gate, where effluent was being discharged into the stormwater canal that leads to the Embarras River.
    ii. The Equalization Basin Outfall Structure was structurally unsound.
i. Outfall 001 Effluent
    i. The effluent flow meter was inoperable at the time of the inspection and had been so for approximately a month.
    ii. The effluent composite sampler tubing was soiled with a dark-colored media and the corresponding fridge lacked a thermometer.

7. Operation and Maintenance of Lawrenceville STP Collection System: Standard Condition 5 of the expired NPDES permit requires proper operation and maintenance of "...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 this permit."

   The EPA Inspection Team noted the below operation and maintenance concerns observed from review of Lawrenceville's collection system:
    a. North Lift Station:
        i. An overflow event, reported to be approximately 20,000 gallons, occurred at this lift station during the EPA inspection on March 11, 2026.
        ii. During the overflow event observed on March 11, 2026, there was no audible overflow alarm and the warning light was green.
        iii. One of the two pumps in the North Lift Station is non-functioning due to a lightning strike.
    b. South Lift Station:
        i. The audible alarm at the South Lift Station has been disconnected.
    c. Yost Lift Station:
        i. The lift station needs to be operated manually as the PLC cannot communicate with the pump.
    d. Drinking Water Plant Backwash Lift Station:
        i. An SSO event occurred at this lift station on January 7, 2026.
        ii. An erosional channel was observed to the north of the lift station leading to the Embarras River.
    e. The below manholes exhibited concerns associated with tree roots:
        i. Manhole #143
        ii. Manhole #157.A.3
    f. The below manholes exhibited concerns associated with I/I:
        i. Manhole #51

ii. Manhole #52
iii. Manhole #279

g. The below manholes exhibited concerns associated with debris:
   i. Manhole #142
   ii. Manhole #170.A
   iii. Manhole #214
   iv. Manhole #215
   v. Manhole #222
   vi. Manhole #279

h. The below manholes exhibited structural concerns:
   i. Manhole #50: There was a hole on the south side of the cement casting with paper debris on the grass beneath it.
   ii. Manhole #157.A.2: This manhole was unable to be opened because the whole structure was moving upon attempted opening.

i. Post-inspection review of Manhole #2147 (see Photo 167 in Appendix A), an elevated manhole located south of the Equalization Basin, shows the northeastern side of the manhole to be stained or coated with a black substance.

8. Capacity, Management, Operations, and Maintenance (CMOM) Plan: Special Condition 12 of the expired NPDES permit requires the City to update its CMOM plan at least annually and maintain it at the facility for review during inspections. The CMOM requires, inter alia, the following elements: Measures and Activities, including a complete map (Special Condition 12.A), Design and Performance Provisions (Special Condition 12.B), an Overflow Response Plan (Special Condition 12.C), a System Evaluation Plan (Special Condition 12.D), Reporting and Monitoring Requirements (Special Condition 12.E), and a Third Party Notice Plan (Special Condition 12.F). Additional information pertaining to this requirement can be located under Special Condition 12.

   The EPA Inspection Team obtained the following information during the inspection and review of documents pertaining to the CMOM:

   a. Annual Revision of CMOM: Mr. Tipsword stated that Lawrenceville – in conjunction with HMG – developed a new CMOM in March 2026. Mr. Tipsword showed the EPA Inspection Team the prior CMOM, which was published in August 2012. The CMOM was not updated annually between August 2012 to March 2026. Mr. Tipsword stated Lawrenceville realized a new CMOM was needed during completion of the 2025 permit renewal application.
   b. CMOM Sewer Map (Appendix F): Special Condition 12.A of the NPDES permit requires a complete map and system inventory for the collection system owned and operated by the permittee. The map in the 2026 CMOM does not have a date corresponding with its generation. The following observations indicate that the 2026 CMOM Sewer Map is not currently representative:
      i. Number of Lift Stations: The current CMOM Sewer Map has two lift stations (North Lift Station and South Lift Station); the EPA Inspection Team observed seven lift stations within Lawrenceville's collection system.
      ii. Portions of Collection System Missing: The CMOM Sewer Map does not outline the collection system for the following portions of Lawrenceville:
         1. The residential and commercial properties, as well as the high school, on the southwest side of Lawrenceville;
         2. The industrial park to the west of May Chapel Road and Toyota Boshoku Plant with the connecting force main to 3rd Street; and

3. The River Run neighborhood on the north side of U.S. Route 50.

iii. Observed Manholes Not on CMOM Sewer Map: Lawrenceville staff provided the EPA Inspection Team with the following manhole numbers during the inspection that were not locatable on the CMOM Sewer Map:
   1. Manhole #335
   2. Manhole #336
   3. Manhole #LH

iv. Paved Over Manholes: During the inspection, Lawrenceville staff indicated they uncovered a paved over manhole (Manhole #79) on Springfield Avenue and additional manholes could be paved over near 18th and 20th Streets, as some mapped manholes were not locatable.
   1. The EPA Inspection Team observed Manhole #79 to be buried under gravel while the City was awaiting a replacement manhole.
   2. The EPA Inspection Team could not locate a series of manholes on 18th and 20th Street that were noted on the CMOM Sewer Map and GIS data.

v. Combined Sewer System: The CMOM Sewer Map delineates Lawrenceville's combined sewer system with the approximate boundaries: north of Hickory Street between 8th and 11th Streets until Walnut Street and north of Jefferson Street between 14th Street and 10th Street until the Embarras River. Mr. Tipsword believed that all former combined sewer outfalls had been closed.

vi. Potential Constructed Sewer Outfalls: Post-inspection review of the CMOM Sewer Map identified two potential constructed sewer outfalls:
   1. The first potential outfall ("Unknown Outfall #1") is depicted near the old Indian-Texaco Refinery and would discharge to the Embarras River. This outfall appears to be controlled by an upstream regulator station, "Hickory Street Regulator Station," located near 5th Street and Hickory Street. It is uncertain whether this regulator structure is still connected to the sanitary sewer system as shown on the City's Sewer Map. However, during observation of Manholes #335 and #336, flow was discerned to be flowing to the south or west, toward the "Hickory Street Regulator Station" and Indian Refinery – Texaco Lawrenceville Superfund Site.
   2. The second potential outfall ("Unknown Outfall #2") is depicted on the northeast side of the City, north of the 3rd Street and U.S. Route 50 intersection. According to the CMOM Sewer Map, it appears that the sanitary sewer system is connected to a 12-inch sewer segment that could potentially discharge to the Embarras River.

vii. Bubbling Near 3rd and Christy Avenue: The EPA Inspection Team observed bubbling on the north and south sides of Christy Avenue near the intersection with 3rd Street. Mr. Tipsword indicated that there is not a known portion of the collection system in this area. Review of the CMOM Sewer Map shows an arrow pointed to the west between 3rd and 4th Street on Christy Avenue, which would be topographically upgradient.

viii. Flow Direction from Manhole #279: The EPA Inspection Team observed flow from Manhole #279 to be flowing to the west, whereas the CMOM Sewer Map shows flow entering the manhole to the north and exiting to the east.

c. Regular Sewer System Maintenance/Cleaning Schedules: Special Condition 12.B.1 of the expired NPDES permit requires the CMOM to contain regular schedules for sewer system maintenance and cleaning. The March 2026 CMOM does not contain a maintenance/cleaning schedule for the collection system.

d. Documentation of Unplanned Maintenance: Special Condition 12.A.3 of the expired NPDES permit requires the CMOM to have documentation of unplanned maintenance. The March 2026 CMOM reviewed does not contain any unplanned maintenance documentation.
e. Preventative Maintenance Programs for Collection System Blockages: Special Condition 12.A.5 of the expired NPDES permit requires the CMOM to have preventative maintenance programs to prevent collection system blockages. This permit condition also requires the identification and prioritization of structural deficiencies in the system owned and operated by the permittee. The March 2026 CMOM reviewed does not contain information about preventative maintenance programs or structural deficiencies in the system.
f. Evaluation of Collection System Capacity and Sources of I/I: Special Condition 12.A.4 of the expired NPDES permit requires the CMOM to have an assessment of the capacity of the collection and treatment system owned and operated by the permittee at critical junctions and immediately upstream of locations where overflows and backups occur or are likely to occur. The March 2026 CMOM reviewed does not contain this type of assessment.
g. Development of Asset Management Strategy: Special Condition 12.A.7 of the expired NPDES permit requires the permittee to develop and implement an Asset Management strategy and incorporate it into its CMOM. The March 2026 CMOM reviewed does not contain an Asset Management Strategy.
h. Overflow Response Plan: Special Condition 12.C of the expired NPDES permit requires the CMOM to have an Overflow Response Plan with a series of elements. The March 2026 CMOM does not include the following elements: (1) identification of specific areas where overflows and back-ups within the permittee's system occur; (2) identification of the root cause of the overflow or basement backup and corresponding file documentation; (3) an evaluation of locations where basement backups and sanitary sewer overflows occur and the cause of those incidents; and (4) identification of actions or remediation efforts to reduce risk of reoccurrence of overflows or basement backups in the future and corresponding file documentation.
i. Summary of Existing SSO and I/I Areas in the System and Sources: Special Condition 12.D.1 of the expired NPDES permit requires the CMOM have a summary of existing SSO and excessive I/I areas in the system and the sources of contribution. The March 2026 CMOM reviewed does not contain a summary with this information.
j. Construction Schedules for Correction of Excessive I/I Areas and SSOs: Special Condition 12.D.5 of the expired NPDES permit requires the CMOM to have construction schedules for areas with excessive I/I and SSOs. The March 2026 CMOM reviewed does not contain any construction schedules to address areas with excessive I/I or SSOs.
k. SSO Detection Program: Special Condition 12.E.1 of the expired NPDES permit requires the CMOM to have a SSO detection program. The March 2026 CMOM does not include a program for SSO detection.
l. Public Notification Plan: Special Condition 12.F of the expired NPDES permit requires the CMOM to have a Third Party Notice Plan with a series of elements. The March 2026 CMOM does not identify overflows within the permittee's system that would be reported or include what specific information would be reported.

9. Combined Sewer System: The 1994 CSO Control Policy (59 FR 18691.C) states that permittees with combined sewer systems should immediately undertake a process to accurately characterize their sewer systems, to demonstrate implementation of the nine minimum controls, and to develop a long-term CSO control plan.

The 2026 CMOM Sewer Map in Appendix F identifies a combined sewer area on the east side of the City with the approximate boundaries: north of Hickory Street between 8th and 11th Streets until Walnut Street and north of Jefferson Street between 14th Street and 10th Street until the Embarras River. The combined sewer system was tributary to four permitted CSO outfalls located north along the Embarras River. In the City's 1999 and 2004 NPDES permits, these outfalls were identified as the following: Discharge Number 003 – Just West of the Lawrenceville High School on 10th Street; Discharge Number 004 – East of the NYC Railroad Tracks on the north end of 12 Street (railroad tracks have been removed); Discharge Number 005 – At the north lift station at the north end of 14th Street; and Discharge Number 006 – On 14th Street just north of the Walnut Street intersection

a. Status of Combined Sewer System: The 2020 NPDES permit does not include information on any of these CSO outfalls. City of Lawrenceville staff were unfamiliar with the combined system depicted on the 2026 CMOM Sewer Map and location of Discharge Numbers 003-006 listed in the City's 1999 and 2004 NPDES permits. Mr. Tipsword believed that all former combined sewer outfalls had been closed.
b. Long-Term Control Plan: The 2004 NPDES permit describes the possible need for a Long-Term Control Plan to address the City's combined sewer system. During the inspection, the EPA Inspection Team asked Mr. Tipsword for a copy of an LTCP. Lawrenceville representatives were not aware of an LTCP for the City.

10. Laboratory Concerns: Lawrenceville's expired permit required that all monitoring be conducted according to test procedures approved under 40 CFR Part 136.

The laboratory audit of Lawrenceville STP (see Appendix C) resulted in the following Areas of Concern:

a. Absence of Quality Assurance and Quality Control (QA/QC) Procedures: 40 CFR Part 136.7 requires the permittee/laboratory to use suitable QA/QC procedures when conducting compliance analyses with any Part 136 chemical method or an alternative method specified by the permitting authority. Lawrenceville STP did not have documentation of these QA/QC activities.
b. Absence of Standard Operating Procedures: 40 CFR Part 136.7(2) requires the twelve quality control elements to be clearly documented in the written standard operating procedure for each analytical method not containing QA/QC procedures. At the time of the inspection, Lawrenceville STP did not have standard operating procedures for the following parameters: pH, TSS, $CBOD_5$, dissolved oxygen, and ammonia nitrogen.
c. Unapproved Test Procedure for pH: 40 CFR Part 136 requires the analysis of pollutants for reports required to be submitted under NPDES permits to be conducted using approved test procedures. Lawrenceville STP was using Hach Method 10076 (Colorimetric Phenol Red) to analyze pH at the time of the inspection, which is not an approved test procedure.
d. Insufficiently Sensitive Test Procedure for Ammonia Nitrogen: 40 CFR Part 122.21(e)(3) and 40 CFR Part 122.44(i)(1)(iv) require test procedures to be sufficiently sensitive. Lawrenceville STP used a Hach ammonia nitrogen test procedure that was not sufficiently sensitive.
e. Proper Operation and Maintenance of the Laboratory: Lawrenceville's expired NPDES permit required the permittee to properly operate and maintain (O&M) all treatment systems and control facilities to ensure compliance with effluent limitations and prevent excessive pollutant discharges. During the inspection EPA identified multiple instances of improper operations and maintenance of equipment such as lack of fresh calibration solution, no documentation of routine replacement of probes and membranes, and lack of an NIST thermometer in the refrigerator. See Appendix C for a full list of concerns.

f. Bench Sheets: The bench sheets provided were missing information to support proper performance of sampling and document QA/QC. After the inspection, the STP provided the EPA Inspection Team with copies of bench sheets for January 2025 and February 2026. The "Lab Sheet Final" and "5 Day B.O.D. Worksheet" for January 2025 have September 2019 crossed out. See Appendix C for full list of concerns.

g. Discharge Monitoring Report – Quality Assurance Study 45 – Section 308 of the Clean Water Act requires major and selected minor permittees under the NPDES program to participate in the annual Discharge Monitoring Report - Quality Assurance study program. Inspection information indicates that Lawrenceville STP did not participate in the DMR-QA Study 45 and has not obtained a waiver.

11. Indian-Texaco Refinery Lawrenceville Superfund Site: Section 301(a) of the Clean Water Act requires facilities that discharge pollutants from a point source into navigable waters to obtain authorization to discharge pursuant to an NPDES permit issued by EPA or a State agency that has an approved NPDES program.

    Mr. Tipsword stated that stormwater and sanitary waste from the Indian-Texaco Refinery had been sent to the Lawrenceville STP during its operation. The 2025 NPDES permit application indicates that Lawrenceville STP does not, or has not been notified, that it receives wastewaters originating from remedial activities, including those undertaken pursuant to CERCLA and Sections 3004(7) or 3008(h) of RCRA.

    a. Location of Lawrenceville STP with Respect to Operable Unit 2 (Oily Soil Areas, Indian Acres): During the inspection, Mr. Tipsword stated that a black, tar-like substance can be seen coming up from the ground, especially in the summer months, specifically in areas east of the STP and south of the excess sludge lagoon storage. The source of the black, tar-like substance is not clear. The following information may be relevant to further investigating the source: A January 2025 Illinois EPA Fact Sheet ("Fact Sheet") depicts Operable Units of the Indian-Texaco Refinery Lawrenceville Superfund Site. It appears from that depiction that portions of the STP – including the South Schrieber unit, Sludge Storage Lagoon, and Outfall 001 – may be located within the Operable Unit 2 boundary. Operable Unit 2 is described in the Fact Sheet to have accumulated waste materials from the disposal of byproducts related to the refinery's operations, including filter cake material and tarry acidic sludges that may release sulfurous gases if disturbed; the Fact Sheet also describes the surface and subsurface soils to be contaminated with polycyclic aromatic hydrocarbons (PAHs), benzene, ethylbenzene, naphthalene, arsenic, and lead. Mr. Tipsword also stated that due to flooding in this area, the STP has pumped river water on occasion, which would emanate from this area.

    b. Manholes Near Texaco Ball Diamond: Mr. Tipsword stated that Lawrenceville workers have become lightheaded when entering manholes west of Manholes #335 and #336, near the Texaco Ball Diamond. While the cause is not clear, these manholes may be located within the City Storm Sewer Investigation (CSSI) Area portion of Operable Unit 1 of the Indian-Texaco Refinery Lawrenceville Superfund Site per the depiction of operable units in the aforementioned Fact Sheet. The Fact Sheet describes the CSSI Area of Operable Unit 1 as a 10-acre non-contiguous area to the north of the refinery property, having surface soil and subsurface soil contaminated with PAHs, benzene, ethylbenzene, naphthalene, arsenic, and lead from refinery operations over the decades, including releases associated with tanks and piping.

c. Volatiles Near Manholes #183 and #185: Mr. Tipsword stated that in approximately 2015, volatiles were noted west of Manhole #183 and east of Manhole #186, near the intersection of 12th Street and Orchard Street. While the source of the volatiles is not clear, these manholes appear to be located within the main process area portion of Operable Unit 1, as depicted in the aforementioned Fact Sheet.
d. CMOM Sewer Map: The CMOM Sewer Map located in Appendix F shows several connections that the collection system has, or has had, to areas adjacent to or within the Indian-Texaco Refinery Lawrenceville Superfund Site:
    i. Area South of Hickory Street Regulator Station: The CMOM Sewer Map depicts a 6-inch pipe to Lawrenceville STP Headworks and a 36-inch gravity sanitary sewer pipe composed of PVC that connects to the southwest side of Lawrenceville STP's Equalization Basin. The area with these mapped connections is adjacent to or within Operable Unit 2 of the Indian-Texaco Refinery Lawrenceville Superfund Site.
    ii. Unknown Outfall #1: To the south of the Hickory Street Regulator Station, the CMOM Sewer Map shows a 39-inch outfall to the Embarras River over portions of Operable Units 1 and 2 of the Indian-Texaco Refinery Lawrenceville Superfund Site.
    iii. Texaco Storm Sewer: The CMOM Sewer Map shows a 6-inch force main and 4-inch force main connected to the "Texaco Storm Sewer" from the South Lift Station. It is currently unclear if this connection still exists or if a rerouted storm sewer enters the delineated area of the Indian-Texaco Refinery Lawrenceville Superfund Site.

12. Party Line Sewer Connections: The City of Lawrenceville has several areas with party line sewer connections in areas where SSO complaints have been received.

13. Influent Monitoring: The expired NPDES permit requires influent monitoring of flow, BOD_5, and TSS. Influent flow is to be monitored continuously. BOD_5 and TSS are to be monitored via composite sampling three days a week.
    a. Influent Flow Monitoring: At the time of the inspection, the influent flow meter was non-functional, with the gauge stuck at 4.3170 MGD since March 6, 2026.
    b. BOD_5 and Suspended Solids Influent Sample Collection: Since October 2025, influent samples have been collected as grab samples due to a power issue with the influent composite sampler.

14. Outfall 001 Effluent Monitoring: The expired NPDES permit requires effluent monitoring for Outfall 001.
    a. Effluent Flow Monitoring: The expired NPDES permit requires continuous flow monitoring of effluent exiting from Outfall 001. Due to the effluent flow meter being inoperable for approximately a month, Mr. Tipsword indicated that the flow is currently being estimated. Calculated pollutant loadings for effluent parameters are flow-dependent measurements.
    b. Calculation of % Total Removal: The expired NPDES permit requires the calculation for 85% removal of BOD_5 and suspended solids. At the time of the inspection, Mr. Tipsword stated that this calculation is not being conducted for the Outfall 001 discharge.
    c. Significant Non-Compliance for Ammonia Nitrogen Exceedances: The City is currently in significant non-compliance for Ammonia Nitrogen effluent exceedances from Outfall 001.
    d. Reporting: Submitted DMRs for Outfall 001 for June 2020 through July 2025 consistently show ammonia nitrogen values of 2.75 mg/L for each month except for two months. Mr. Tipsword attributed the identical 2.75 mg/L ammonia nitrogen values reported on the DMRs to the purchase of the wrong ammonia nitrogen test kit with a range from 0 to 2.75 mg/L.

15. Outfall 002 Effluent Limitations, Monitoring, and Reporting: The expired NPDES permit has a series of discharge limitations pertaining to Outfall 002 for the following parameters: TSS, pH, Fecal Coliform, Chlorine Residual, Ammonia Nitrogen and $CBOD_5$. The permit also requires continuous monitoring of total flow.

    Mr. Tipsword was unaware that the gate for Outfall 002 was broken and stated that he diverts wastewater from the Headworks to the Equalization Basin during high flow events and did so on March 11, 2026 from 1:15 P.M. to 7:00 P.M.

    a. Effluent Flow Monitoring: At the time of the inspection, an unknown amount of effluent was discharging out of Outfall 002 due to a broken gate on the Equalization Basin Outfall Structure. Effluent exiting Outfall 002 was not being monitored for flow or for any of the aforementioned parameters for which the expired NPDES permit imposes discharge limitations. During the inspection, the operator was unfamiliar with the exact location of Outfall 002. It is unclear how long the gate had been compromised and unmonitored.
    b. Calculation of % Total Removal: The NPDES permit requires the calculation for 85% removal of BOD_5 and suspended solids. At the time of the inspection, this calculation was not being conducted for Outfall 002.
    c. Duration and Rainfall Intensity: The NPDES permit requires reporting the duration of each Outfall 002 discharge and rainfall event, including rainfall intensity, to be provided in the comment section of the Discharge Monitoring Report. The March 2026 Discharge Monitoring Report does not comment on the duration or rainfall event/intensity of the Outfall 002 discharge that occurred at the time of the inspection. Furthermore, Mr. Tipsword indicated that the rain gauge at the STP was inoperable and that he is currently using the rain gauge data from Lawrenceville-Vincennes International Airport to estimate rainfall during precipitation events.
    d. Effluent Sampling: During observation of the discharge from Outfall 002, no sampling equipment was present. Review of the Discharge Monitoring Report for the March 2026 monitoring period indicates a failure to sample the Outfall 002 discharge for any required parameters.
    e. Reporting: Mr. Tipsword stated that Outfall 002 has not been utilized since at least 2013. However, submitted DMRs for the period between August 2018 and July 2025 include effluent monitoring results for Outfall 002. Mr. Tipsword indicated that, for some unspecified amount of time, the values reported for Outfall 002 were not actual measurements but rather were duplicates of the Outfall 001 monitoring data. Mr. Tipsword stated that in September 2025 he ceased reporting Outfall 001 data for Outfall 002.

16. Chlorination Activities and Representative Sampling Point: Special Condition 6 of the expired NPDES permit requires the permittee to conduct effluent monitoring at a point representative of the discharge, but prior to entry into the receiving stream.

    During the inspection, Mr. Tipsword stated that the STP collects composite samples prior to disinfection at the beginning of the chlorine contact tank. During chlorination season, collection of composite samples from this location for NPDES compliance purposes may not be representative of the discharge.

17. Sampling for Total Residual Chlorine During April and November: Special Condition 8 of the expired NPDES permit requires the permittee to sample on a daily grab basis when chlorinating.

    Mr. Tipsword stated that Lawrenceville STP disinfects effluent between April and November. DMRs reviewed for April 2021 to November 2025 do not contain total residual chlorine sampling data.

18. Late DMRs: Special Condition 16 of the expired NPDES permit requires the permittee to record monitoring results on DMR electronic forms using one such form for each outfall each month. The DMR form shall be submitted to Illinois EPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

    The observations below describe DMRs during the monitoring period between April 2021 and March 2026:

    a. Late DMRs for Influent: Review of Discharge Monitoring Report reporting values for Lawrenceville STP influent show late DMR submittals for the following 5 months: October 2021, November 2021, December 2021, January 2022, and August 2025. The DMRs were submitted between 12 and 131 days late.
    b. Late DMRs for Outfall 001: Review of DMR reporting values for Lawrenceville STP effluent from Outfall 001 show late DMR submittals for the following 7 months: July 2021, January 2022, July 2022, January 2023, July 2024, January 2025, and August 2025. The DMRs were submitted between 12 and 352 days late.
    c. DMRs with Laboratory Error or Invalid Test for Influent: Review of submitted DMRs show laboratory errors or invalid tests for BOD_5 and TSS for August 2025 and September 2025.
    d. DMRs with Laboratory Error or Invalid Test for Outfall 001: Review of submitted DMRs show laboratory errors or invalid tests for several Outfall 001 parameters during the following months: August 2025, September 2025, and November 2025.
    e. DMR with Failure to Sample/Conduct Required Analysis for Influent: Review of submitted DMRs show a failure to sample/conduct required analysis for influent flow in December 2025.
    f. DMRs with Failure to Sample/Conduct Required Analysis for Outfall 001: Review of submitted DMRs show a failure to sample/conduct required analysis for several Outfall 001 parameters during the following months: October 2025, December 2025, and January 2026.
    g. DMRs with Failure to Sample/Conduct Required Analysis for Outfall 002: Review of submitted DMRs show a failure to sample/conduct required analysis for all Outfall 002 parameters during March 2026.

19. Exceedance of Design Maximum Flow Through STP: The expired NPDES permit has a design average flow of 1.0 MGD and a design maximum flow of 2.16 MGD. The 2025 NPDES permit application states the annual average flow rate was 0.66 in 2025, 0.66 MGD in 2024, and 0.95 MGD in 2023; it also states that the maximum daily flow rate was 2 MGD in 2025, 2 MGD in 2024, and 0.86 MGD in 2023.

    Mr. Tipsword stated that a "decent rain" would typically have an inflow rate between 1.2-1.4 MGD. The EPA Inspection Team observed the influent gauge to be stuck at 4.3170 MGD since March 6, 2026. Mr. Tipsword stated that in his tenure with the City, he has observed the flow meter reading in excess of 8.0 MGD at least one time.

20. Reporting Noncompliance: Standard Condition 12(f) of the City's expired NPDES permit requires the City to report any noncompliance which may endanger health or the environment to the Illinois EPA in Standard Condition 12(f).

    During the inspection, Mr. Tipsword stated that approximately three-to-four years ago, the Schrieber units at the Lawrenceville STP turned black for approximately one week and that a burning chemical smell was noted at the STP during this time period. Mr. Tipsword also noted a second septic event that began sometime between August and September 2025, where "everything went black." Mr. Tipsword attributed

the second event to problems with the STP's Headworks. It is unclear whether either event was reported to the Illinois EPA. Mr. Tipsword also stated that the burning chemical smell can be noted at the STP occasionally.

21. Lawrenceville STP Bypasses: Standard Condition 13 of the expired NPDES permit prohibits bypass unless it meets a series of three criteria: (1) if it was unavoidable to prevent loss of life, personal injury, or severe property damage, (2) there was no feasible alternatives to the bypass, and (3) the permittee submits notice to Illinois EPA as noted in Standard Condition (13)(c).

    Review of information in EPA Enforcement and Compliance History Online (ECHO) identifies two bypass events:

    a. October 20-28, 2025 Unanticipated Bypass Event – This event is noted as an emergency bypass from the STP to the "City of Lawrenceville Lagoon" with an estimated volume of 6,204,345 gallons due to a blockage at the STP.
    b. May 4-5, 2026 Anticipated Bypass Event – This event is noted as an anticipated bypass to the Embarras River with an estimated volume of 2.4 gallons due to a stormwater bypass valve leaking from the stem.

    During the inspection on March 11, 2026, Mr. Tipsword indicated that the wet weather event induced the need for a bypass to the Equalization Basin from the STP between 1:15 P.M. to 7:00 P.M. This event is not recorded in ECHO. The expired NPDES permit allows flow from the STP to be diverted to the Equalization Basin when STP influent flow reaches design maximum flow. It is unclear whether this condition was satisfied as the influent flow meter was out of service at the time of the inspection.

22. Missing Records Requested: Standard Condition 10(b) of the expired NPDES permit requires the permittee to retain records of all reports required by the permit for a period of at least three years from the date of the permit, measurement, report or application. Appendix D references records that were requested as part of the U.S. EPA Clean Water Act inspection.

    Records received by EPA from Lawrenceville STP after the inspection are noted in Appendix E. Not all records requested were available at the time of the inspection or received after the inspection.

23. Biomonitoring Data and Reporting: Special Condition 11 of the expired NPDES permit requires the Facility to conduct biomonitoring of the effluent from Outfall 001. Specifically, Special Condition 11.A of the expired NPDES permit states that acute toxicity tests should entail two different bioassays: one for *Ceriodaphnia dubia*, a type of water flea, and another for *Pimephales promelas*, a fathead minnow.
    a. Testing Frequency: Special Condition 11.B of the expired NPDES permit requires the City to conduct acute toxicity tests using 24-hour composite samples unless otherwise authorized by the Illinois EPA. The samples are to be collected in the 54th, 51st, 48th, 45th, 18th, 15th, 12th, and 9th month prior to the expiration date of the NPDES permit. Mr. Tipsword stated that the STP had not conducted biomonitoring from 2020 to October 2025. At the time of the inspection, Lawrenceville STP had conducted three biomonitoring tests (collected in September 2025, December 2025, and February 2026) under the expired NPDES permit according to Mr. Tipsword.
    b. Biomonitoring Sampling Point for Receiving Water: The location of the biomonitoring sampling point for the receiving water is unclear.
    c. Toxicity Results: Special Condition 11.D of the expired NPDES permit states that if a bioassay results in toxicity to > 20% of organisms in the 100% effluent treatment, the Illinois EPA may

require, upon notification, six additional rounds of monthly testing on the affected organism(s) to be initiated within 30 days of the toxic bioassay. It also states that if any of the additional bioassays result in toxicity to ≥ 50% of organisms tested in the 100% effluent treatments, the permittee must contact the Illinois EPA within one day of the results becoming available to the permittee and begin the toxicity identification and reduction evaluation process. Two of the three tests analyzing acute toxicity in fathead minnows did not pass and exceeded ≥ 50% toxicity:

i. The October 2025 test noted a 10% survival of fathead minnows after 96 hours in 100% effluent and a 40% survival of fathead minnows after 96 hours in the collected sample of the receiving water.
ii. The February 2026 test noted a 10% survival of fathead minnows after 96 hours in 100% effluent.

It is unclear whether additional testing was requested by Illinois EPA.

d. Toxicity Identification and Reduction Evaluation: Special Condition 11.E of the expired NPDES permit requires the STP to contact the Illinois EPA within one day of the results becoming available to the permittee if toxicity to ≥ 50% of organisms tested in the 100% effluent treatments is reached. This special condition also requires the permittee to begin the toxicity identification evaluation process outlined in the permit. It is unclear whether this process was initiated from the October 2025 and February 2026 biomonitoring results.
e. Biomonitoring Sample Quality Assurance and Quality Control: Review of Chain of Custody for biomonitoring samples yields the following collection and analysis concerns:
    i. October 2025 Biomonitoring Report: The Teklab receiving checklist notes that samples were out of temperature compliance and not preserved with ice upon receipt. The receiving water sample collected was noted as a grab sample. The effluent was noted as a composite sample collected from 6:00 A.M. to 11:08 A.M. on September 30, 2025.
    ii. December 2025 Biomonitoring Report: The Teklab receiving checklist notes that samples did not meet holding time requirements. The Chain of Custody denotes a composite sample start date/time of 10:00 A.M. on December 1, 2025 and notes sampling time of the receiving water at 8:30 A.M. and effluent at 9:00 A.M. on December 2, 2025.
f. 2025 NPDES Permit Application: 40 CFR Part 122.21 (j)(5) requires permit applicants to perform Whole Effluent Toxicity testing pursuant to paragraph (j)(5)(ii). The 2025 permit application indicates that Lawrenceville STP has conducted either a minimum of four quarterly WET tests for one year preceding the permit application or at least four annual WET tests in the past 4.5 years. During the inspection, Mr. Tipsword stated that Lawrenceville had not conducted biomonitoring from 2020 to October 2025. The 2025 permit application states that the WET tests were submitted to Illinois EPA on November 22, 2023 with a summary of results noted as a date range from February 28, 2022 to November 22, 2023 and denotes these tests as not resulting in toxicity.

24. Holding Times for Compliance Samples: 40 CFR Part 136 methods require dissolved oxygen, total residual chlorine, and pH to be analyzed within 15 minutes of sample collection.

    An inspection report for an Illinois EPA Clean Water Act inspection conducted in September 2025 stated the following: "The lab was in an unsatisfactory state and no lab bench sheets could be provided. It was recommended that the facility immediately cease all laboratory analysis and send all future samples to an offsite commercial lab. It was recommended to Operator Tipsword that he speak with the City of Lawrenceville and the consulting engineers about obtaining a commercial lab and that he would speak with the City about getting technical assistance with the lab." Since the Illinois EPA inspection,

Lawrenceville STP has been sending its NPDES compliance samples to Teklab in Collinsville, Illinois for analysis.

25. Nutrient Area Reduction Plan: Special Condition 21 of the expired NPDES permit requires the permittee to develop and submit, or be a part of a watershed group that develops and submits, a Nutrient Assessment Reduction Plan that will meet a series of requirements noted in the permit by December 31, 2024.

    In a response to the Illinois EPA Violation Notice No. W-2025-50218, the City's contractor, HMG, intends to submit a NARP by December 2030 after construction of a new sewage treatment plant.

26. Semi-Annual Effluent Monitoring and Reporting: Special Condition 9 of the expired NPDES permit requires the permittee to conduct semi-annual monitoring of its effluent for a series of parameters noted in the condition and report concentrations. Sampling of these parameters should be conducted via 24-hour effluent composite unless otherwise noted.
    a. Missing Semi-Annual Effluent Monitoring Reports: Mr. Tipsword indicated that semi-annual compliance monitoring was not completed for an unspecified period of time. Lawrenceville STP supplied six semi-annual reports completed between February 13, 2026 and March 17, 2026. Three DMRs were noted to also be semi-annual reports for the monitoring periods between February 1, 2022 and July 31, 2022; August 1, 2022 and January 31, 2023; and February 1, 2023 and July 31, 2023.
    b. Semi-Annual Monitoring Conducted Via Grab Sample: Collection of composite samples is required for some of the parameters for which semi-annual monitoring is required. Mr. Tipsword indicated that semi-annual monitoring is currently being conducted via grab sample. Review of previously submitted semi-annual monitoring reports indicates that composite samples were collected for some parameters.

27. Phosphorus Discharge Optimization Plan: Special Condition 18 of the expired NPDES permit requires the STP to develop and implement a Phosphorus Discharge Optimization Plan within 18 months of the effective date of the permit. A schedule to implement optimization measures for both influent and effluent reduction measures is a requirement of this special condition.
    a. No Implementation Schedule: EPA's review of the Phosphorus Discharge Optimization Plan indicates that the plan does not contain a schedule to address proposed influent and effluent reduction measures.

28. Sludge Management Report Forms: Special Condition 14 of the expired NPDES permit requires the permittee to submit a semi-annual report of the quantities of sludge generated and disposed of by January 31 and July 31 of each year, reporting the preceding January through June and July through December interval of sludge disposal operations.
    a. Sludge Management Report Form for the July 1, 2025 – December 31, 2025 Reporting Period: The sludge management form for the reporting period between July 1, 2025 through December 31, 2025 has an undated signature and references the generation of 644,800 gallons of sludge and 45.7 dry tons. The report also notes disposal of sludge into the lagoon but does not provide the quantity of sludge disposed. It is unclear how the amount of dry tons was calculated.
    b. Sludge Management Report Form for the January 1, 2025 – June 30, 2025 Reporting Period: The sludge management form for the reporting period between January 1, 2025 through June 30, 2025 states that no sludge was generated or disposed.

29. Annual Fiscal Data Forms: Special Condition 10 of the expired NPDES permit requires the permittee to submit a "Fiscal Report Form For NPDES Permittees" during January of each year. Annual fiscal data forms were requested as part of the inspection.

    EPA did not receive copies of any annual fiscal data forms.

DIGITAL SIGNATURES

Eric Small, Physical Scientist
Water Enforcement and Compliance Assurance Branch, Section 2
U.S. EPA Region 5 Enforcement and Compliance Assurance Division

Report Author Signature: ERIC SMALL Digitally signed by ERIC SMALL Date: 2026.05.22 11:10:57 -05'00'

Taylor Jerger, Acting Section Supervisor
Water Enforcement and Compliance Assurance Branch, Section 2
U.S. EPA Region 5 Enforcement and Compliance Assurance Division

Section Supervisor Signature: TAYLOR JERGER Digitally signed by TAYLOR JERGER Date: 2026.05.22 11:40:04 -05'00'

APPENDICES AND ATTACHMENTS

1. APPENDIX A: DIGITAL IMAGE LOG
2. APPENDIX B: VIDEO LOG
3. APPENDIX C: LAWRENCEVILLE STP LABORATORY QUALITY ASSURANCE CHECKLIST
4. APPENDIX D: LIST OF REQUESTED DOCUMENTATION
5. APPENDIX E: DOCUMENTS RECEIVED FROM FACILITY
6. APPENDIX F: LAWRENCEVILLE SEWER MAP IN CMOM