

NPDES Permit No. IL0029173
Notice No. Bdf:11091501.daa

Public Notice Beginning Date: **November 3, 2011**

Public Notice Ending Date: **December 5, 2011**

National Pollutant Discharge Elimination System (NPDES)
Permit Program

PUBLIC NOTICE/FACT SHEET
of
Draft Reissued NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois EPA
Division of Water Pollution Control
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-0610

Name and Address of Discharger:

City of Highland
1115 Broadway
Highland, Illinois 62249

Name and Address of Facility:

City of Highland STP
12916 Iberg Road
Highland, Illinois
(Madison County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES Permit to discharge into the waters of the state and has prepared a draft Permit and associated fact sheet for the above named discharger. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. All comments on the draft Permit and requests for hearing must be received by the IEPA by U.S. Mail, carrier mail or hand delivered by the Public Notice Ending Date. Interested persons are invited to submit written comments on the draft Permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the Permit applicant. The NPDES Permit and notice numbers must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft Permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicates a significant degree of public interest in the draft Permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final Permit is issued. For further information, please call Brant Fleming at 217/782-0610.

The following water quality and effluent standards and limitations were applied to the discharge:

Title 35: Environmental Protection, Subtitle C: Water Pollution, Chapter I: Pollution Control Board and the Clean Water Act were applied in determining the applicable standards, limitations and conditions contained in the draft Permit.

The applicant is engaged in treating domestic and industrial wastewater for the City of Highland.

The length of the Permit is approximately 5 years.

The main discharge number is 001. The seven day once in ten year low flow (7Q10) of the receiving stream, Sewer Creek, is 0 cfs.

The design average flow (DAF) for the facility is 1.60 million gallons per day (MGD) and the design maximum flow (DMF) for the facility is 4.00 MGD. Treatment consists of screening, grit removal, oxidation ditch and activated sludge. Sludge treatment consists of aerobic digestion, belt filtration, sludge drying beds and land application.

This treatment works has an approved pretreatment program. There are 5 noncategorical SIUs and 0 CIUs.

This Permit recognizes and continues the year-round disinfection exemption approved by the IEPA on October 22, 1991 and August 10, 2011 and included in past NPDES permit actions since that date. It is the IEPA's tentative decision that under Illinois Pollution Control Board regulations, the following reach of waterbody is not classified for primary contact use activities and is not subject to the fecal coliform water quality standard of 35 Ill. Adm. Code 302.209.

This draft permit does not contain requirements for disinfection of the discharge from discharge number(s) 001. Sewer Creek from the facility discharge in Section 9, T3N, R5N, to its confluence with Sugar Creek and thence to the point of confluence with Lake Branch has been determined to be unsuited to support primary contact activities (swimming) due to physical, hydrologic or geographic configuration. Anyone knowing of primary contact activities occurring within this water segment is invited to submit comments to the IEPA. Comments should give the nature of the activities (i.e swimming, fishing, canoeing, etc.), the location and months of the year when these activities have been observed. The IEPA is also interested in obtaining information on the proximity of residential dwellings and the accessibility of the public to this water segment. Anyone with such information is asked to submit comments to the IEPA on this draft permit action. Instructions for submitting comments are contained earlier in this document.

Application is made for the existing discharge(s) which is (are) located in Madison County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude	Longitude	Stream Classification	Biological Stream Characterization
001	Sewer Creek	38° 43' 24" North	89° 39' 39" West	General Use	Not Rated
A01	Sewer Creek	38° 43' 24" North	89° 39' 39" West	General Use	Not Rated

To assist you further in identifying the location of the discharge(s) please see the attached map.

The stream segment(s), (OHE-HL-C1) receiving the discharge from outfall(s) 001 is (are) on the 2010 303 (d) list of impaired waters.

The following parameters have been identified as the pollutants causing impairment:

Potential Causes	Potential Uses Impaired
Total phosphorus	Aquatic Life

The discharge(s) from the facility is (are) proposed to be monitored and limited at all times as follows:

Discharge Number(s) and Name(s): 001 STP Outfall

Load limits computed based on a design average flow (DAF) of 1.60 MGD (design maximum flow (DMF) of 4.00 MGD).

The effluent of the above discharge(s) shall be monitored and limited at all times as follows:

Parameter	LOAD LIMITS lbs/day* DAF (DMF)			CONCENTRATION LIMITS mg/L			Regulation
	Monthly Average	Weekly Average	Daily Maximum	Monthly Average	Weekly Average	Daily Maximum	
CBOD ₅	133 (334)		267 (667)	10		20	35 IAC 304.120 40 CFR 133.102
Suspended Solids	160 (400)		320 (801)	12		24	35 IAC 304.120 40 CFR 133.102
pH	Shall be in the range of 6 to 9 Standard Units						35 IAC 304.125
Fecal Coliform	Monitor Only (May through October)						35 IAC 309.146
Chlorine Residual						0.05	35 IAC 302.208
Ammonia Nitrogen: Apr.-May/Sept.-Oct. Jun.-Aug. Nov.-Feb. March	20 (50) 20 (50) 53 (133) 32 (80)	80 (200) 76 (190) -- 80 (200)	140 (350) 164 (410) 148 (370) 140 (350)	1.5 1.5 4.0 2.4	6.0 5.7 -- 6.0	10.5 12.3 11.1 10.5	35 IAC 355 and 35 IAC 302

Phosphorus	Monitor Only					35 IAC 309.146
Total Nitrogen	Monitor Only					35 IAC 309.146
			Monthly Average not less than	Weekly Average not less than	Daily Maximum	
Dissolved Oxygen						
March-July			--	6.0	5.0	35 IAC 302.206
August-February			5.5	4.5	3.5	

*Load Limits are calculated by using the formula: $8.34 \times (\text{Design Average and/or Maximum Flow in MGD}) \times (\text{Applicable Concentration in mg/L})$.

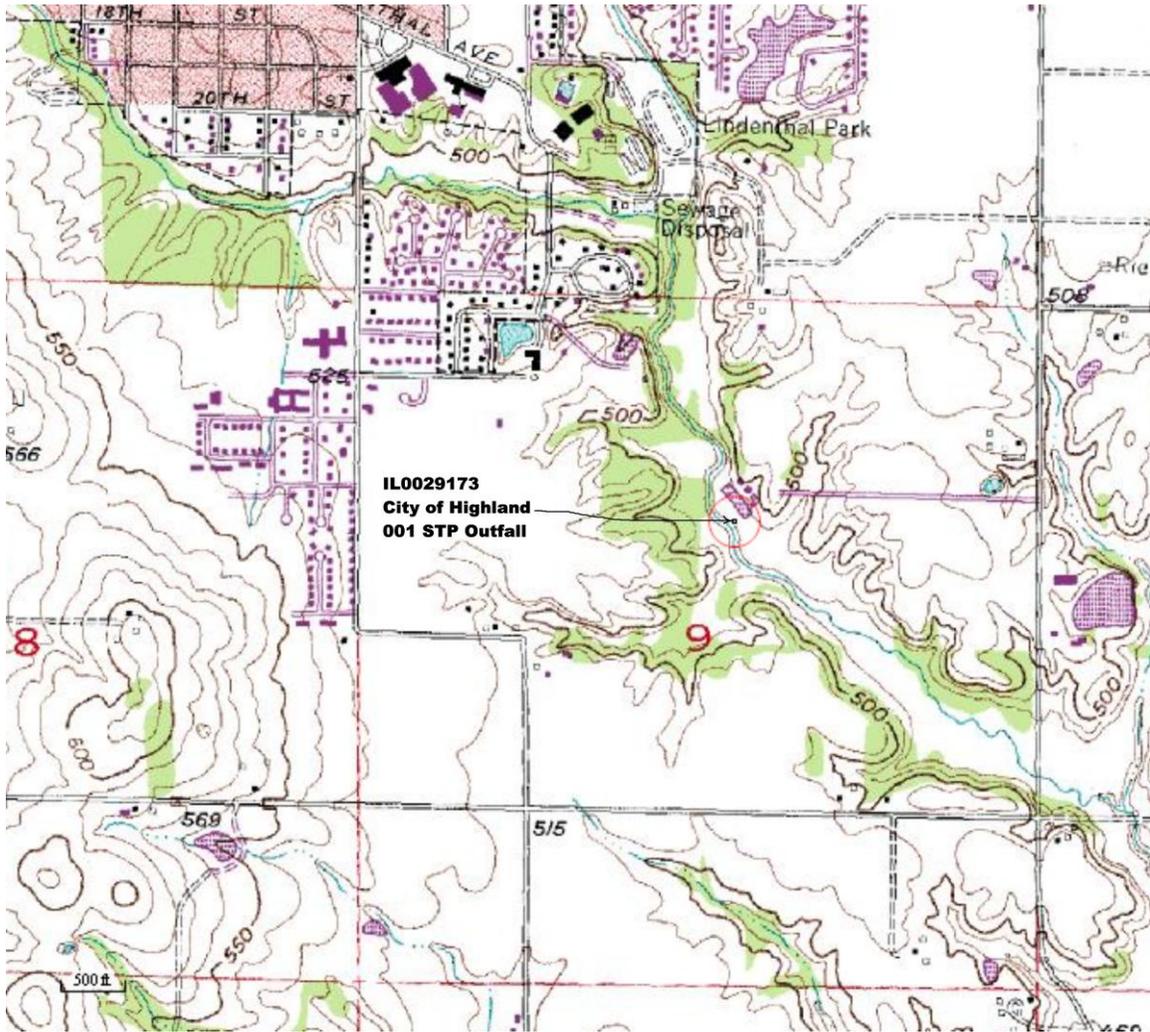
This Permit contains an authorization to treat and discharge excess flow as follows:

Discharge Number(s) and Name(s): A01 Excess Flow Basin (Flows over 4.00 MGD)

Parameter	CONCENTRATION LIMITS mg/L		Regulation
	Monthly Average		
BOD ₅		30	40 CFR 133.102
Suspended Solids		30	40 CFR 133.102
Fecal Coliform	Daily Maximum Shall Not Exceed 400 per 100 mL		35 IAC 304.121
pH	Shall be in the range of 6 to 9 Standard Units		35 IAC 304.125
Chlorine Residual		0.75	35 IAC 302.208

This draft Permit also contains the following requirements as special conditions:

1. Reopening of this Permit to include different final effluent limitations.
2. Operation of the facility by or under the supervision of a certified operator.
3. Submission of the operational data in a specified form and at a required frequency at any time during the effective term of this Permit.
4. More frequent monitoring requirement without Public Notice in the event of operational, maintenance or other problems resulting in possible effluent deterioration.
5. Prohibition against causing or contributing to violations of water quality standards.
6. Effluent sampling point location.
7. Controlling the sources of infiltration and inflow into the sewer system.
8. A requirement to monitor and a limit of 0.05 mg/L for residual chlorine when it is used.
9. The Permittee implements and administers an industrial pretreatment program pursuant to 40 CFR §403.
10. Burden reduction.
11. Submission of annual fiscal data.
12. A requirement for biomonitoring of the effluent.
13. Submission of semi annual reports indicating the quantities of sludge generated and disposed.
14. Recording the monitoring results on Discharge Monitoring Report Forms using one such form for each outfall each month and submitting the forms to IEPA each month.
15. A condition allowing revised effluent limitations based on a completed Total Maximum Daily Load study.
16. A requirement for submission of a Capacity, Management, Operations and Maintenance Plan to deal with sanitary sewer overflows and basement backups.
17. Conditional authorization to discharge from high level emergency bypass(es) based on 40 CFR.
18. Provisions of 40 CFR Section 122.41 (n).
19. Additional monitoring requirement for Mercury and Bis(2-ethylhexyl)phthalate.
20. Permittee shall prepare and implement an evaluation plan to evaluate excess flow.



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Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

Issue Date:

Effective Date:

Name and Address of Permittee:

City of Highland
1115 Broadway
Highland, Illinois 62249

Facility Name and Address:

City of Highland STP
12916 Iberg Road
Highland, Illinois
(Madison County)

Receiving Waters: Lindenthal Creek to Sugar Creek

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of the Ill. Adm. Code, Subtitle C, Chapter I, and the Clean Water Act (CWA), the above-named Permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the Permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

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Effluent Limitations, Monitoring, and Reporting

FINAL

Discharge Number(s) and Name(s): 001 STP Outfall

Load limits computed based on a design average flow (DAF) of 1.60 MGD (design maximum flow (DMF) of 4.00 MGD).

Excess flow facilities (if applicable) shall not be utilized until the main treatment facility is receiving its maximum practical flow.

From the modification date of this Permit until the expiration date, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

Parameter	LOAD LIMITS lbs/day DAF (DMF)*			CONCENTRATION LIMITS MG/L			Sample Frequency	Sample Type
	Monthly Average	Weekly Average	Daily Maximum	Monthly Average	Weekly Average	Daily Maximum		
Flow (MGD)							Continuous	
CBOD ₅ **	133 (334)		267 (667)	10		20	1 Day/Week	Composite
Suspended Solids	160 (400)		320 (801)	12		24	1 Day/Week	Composite
pH	Shall be in the range of 6 to 9 Standard Units						1 Day/Week	Grab
Fecal Coliform	Monitor Only (May through October)						1 Day/Month	Grab
Chlorine Residual						0.05	***	Grab
Ammonia Nitrogen:								
Apr.-May/Sept.-Oct.	20 (50)	80 (200)	140 (350)	1.5	6.0	10.5	1 Day/Week	Composite
Jun-Aug.	20 (50)	76 (190)	164 (410)	1.5	5.7	12.3	1 Day/Week	Composite
Nov.-Feb.	53 (133)	--	148 (370)	4.0	--	11.1	1 Day/Week	Composite
March	32 (80)	80 (200)	140 (350)	2.4	6.0	10.5	1 Day/Week	Composite
Phosphorus	Monitor Only						1 Day/Month	Composite
Total Nitrogen	Monitor Only						1 Day/Month	Composite
Mercury****							****	Grab
Bis(2-ethylhexy)**** phthalate							****	Grab
				Monthly Average not less than	Weekly Average not less than	Daily Minimum		
Dissolved Oxygen								
March-July				--	6.0	5.0	1 Day/Week	Composite
August-February				5.5	4.5	3.5	1 Day/Week	Composite

*Load limits based on design maximum flow shall apply only when flow exceeds design average flow.

**Carbonaceous BOD₅ (CBOD₅) testing shall be in accordance with 40 CFR 136.

***See Special Condition 8.

****See Special Condition 19.

Flow shall be reported on the Discharge Monitoring Report (DMR) as monthly average and daily maximum.

Fecal Coliform shall be reported on the DMR as a daily maximum value.

pH shall be reported on the DMR as minimum and maximum value.

Chlorine Residual shall be reported on the DMR as daily maximum value.

Dissolved Oxygen shall be reported on the DMR as a minimum value.

Phosphorus and Total Nitrogen shall be reported on the DMR as a daily maximum value.

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Effluent Limitations, Monitoring, and Reporting

FINAL

Discharge Number(s) and Name(s): A01 Excess Flow Basin (Flows over 4.0 MGD)

These flow facilities shall not be utilized until the main treatment facility is receiving its maximum practical flow.

From the modification date of this Permit until the expiration date, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

Parameter			CONCENTRATION LIMITS mg/L	Sample Frequency	Sample Type
			Monthly Average		
Total Flow (MG)			See Below	Daily When Discharging	Continuous
BOD ₅			30	Daily When Discharging	Grab
Suspended Solids			30	Daily When Discharging	Grab
Fecal Coliform	Daily Maximum Shall Not Exceed 400 per 100 mL			Daily When Discharging	Grab
pH	Shall be in the range of 6 to 9 Standard Units			Daily When Discharging	Grab
Chlorine Residual			0.75	Daily When Discharging	Grab

Total flow in million gallons shall be reported on the Discharge Monitoring Report (DMR) in the quantity maximum column.

Report the number of days of discharge in the comments section of the DMR.

Fecal Coliform shall be reported on the DMR as daily maximum.

Chlorine Residual shall be reported on the DMR as a monthly average concentration.

pH shall be reported on the DMR as a minimum and a maximum.

BOD₅ and Suspended Solids shall be reported on the DMR as a monthly average concentration.

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Influent Monitoring, and Reporting

The influent to the plant shall be monitored as follows:

Parameter	Sample Frequency	Sample Type
Flow (MGD)	Continuous	
BOD ₅	1 Day/Week	Composite
Suspended Solids	1 Day/Week	Composite

Influent samples shall be taken at a point representative of the influent.

Flow (MGD) shall be reported on the Discharge Monitoring Report (DMR) as monthly average and daily maximum.

BOD₅ and Suspended Solids shall be reported on the DMR as a monthly average concentration.

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SPECIAL CONDITION 1. This Permit may be modified to include different final effluent limitations or requirements which are consistent with applicable laws, regulations, or judicial orders. The IEPA will public notice the permit modification.

SPECIAL CONDITION 2. The use or operation of this facility shall be by or under the supervision of a Certified Class 1 operator.

SPECIAL CONDITION 3. The IEPA may request in writing submittal of operational information in a specified form and at a required frequency at any time during the effective period of this Permit.

SPECIAL CONDITION 4. The IEPA may request more frequent monitoring by permit modification pursuant to 40 CFR Section 122.63 and Without Public Notice in the event of operational, maintenance or other problems resulting in possible effluent deterioration.

SPECIAL CONDITION 5. The effluent, alone or in combination with other sources, shall not cause a violation of any applicable water quality standard outlined in 35 Ill. Adm. Code 302.

SPECIAL CONDITION 6. Samples taken in compliance with the effluent monitoring requirements shall be taken:

- A. For Discharge Number 001 - During dry weather flows (no excess flow discharge), samples shall be taken at a point representative of the flows but prior to entry into the receiving stream. During periods of excess flow discharge, CBOD₅, Suspended Solids, and Ammonia Nitrogen, if Ammonia Nitrogen monitoring and sampling is required on the Effluent Limitations, Monitoring, and Reporting Page of this Permit, shall be monitored at a point representative of the discharge but prior to admixture with the excess flow. If Fecal Coliform limits are different for Discharge Numbers 001 and A01, sampling shall occur at a point representative of the discharge and prior to admixture, if hardware allows. Other parameters may be sampled after admixture but prior to entry into the receiving stream.
- B. For Discharge Number A01 - Samples for all parameters shall be taken at a point representative of the discharge but prior to entry into the receiving stream. If Fecal Coliform limits are different for Discharge Numbers 001 and A01, sampling shall occur at a point representative of the discharge and prior to admixture, if hardware allows. The sampling point for other parameters may be at a point after admixture with the dry weather flows.

SPECIAL CONDITION 7. This Permit may be modified to include requirements for the Permittee on a continuing basis to evaluate and detail its efforts to effectively control sources of infiltration and inflow into the sewer system and to submit reports to the IEPA if necessary.

SPECIAL CONDITION 8. For Discharge No. 001, any use of chlorine to control slime growths, odors or as an operational control, etc. shall not exceed the limit of 0.05 mg/L (daily maximum) total residual chlorine in the effluent. Sampling is required on a daily grab basis during the chlorination process. Reporting shall be submitted on the DMR's on a monthly basis.

SPECIAL CONDITION 9.

A. Publicly Owned Treatment Works (POTW) Pretreatment Program General Provisions

- 1. The Permittee shall implement and enforce its approved Pretreatment Program which was approved on September 11, 2000 and all approved subsequent modifications thereto. The Permittee shall maintain legal authority adequate to fully implement the Pretreatment Program in compliance with Federal (40 CFR 403), State, and local laws and regulations. The Permittee shall:
 - a. Carry out independent inspection and monitoring procedures at least once per year, which will determine whether each significant industrial user (SIU) is in compliance with applicable pretreatment standards; **[Note, where the POTW has been granted such authority, the following provision should be added: "Where the Permittee has been authorized to reduce oversight for "middle tier" SIUs consistent with 40 CFR 403.12(e)(3), the Permittee must monitor and conduct inspections of designated IUs at least once every two years. If the IU no longer meets the conditions for reduced reporting, the Permittee must immediately begin sampling and inspecting such IUs at least once a year."];**
 - b. Evaluate whether each SIU needs a slug control plan or other action to control slug discharges. If needed, the SIU slug control plan shall include the items specified in 40 CFR 403.8(f)(2)(vi). For IUs identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional SIUs must be evaluated within 1 year of being designated an SIU;
 - c. Update its inventory of Industrial Users (IUs) at least annually and as needed to ensure that all SIUs are properly identified, characterized, and categorized;
 - d. Receive and review self monitoring and other IU reports to determine compliance with all pretreatment standards and

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- requirements, and obtain appropriate remedies for noncompliance by any IU with any pretreatment standard and/or requirement;
- e. Investigate instances of noncompliance, collect and analyze samples, and compile other information with sufficient care as to produce evidence admissible in enforcement proceedings, including judicial action;
 - f. Require development, as necessary, of compliance schedules by each industrial user to meet applicable pretreatment standards; and,
 - g. Maintain an adequate revenue structure for continued operation of the Pretreatment Program.
2. The Permittee shall issue/reissue permits or equivalent control mechanisms to all SIUs prior to expiration of existing permits or prior to commencement of discharge in the case of new discharges. The permits at a minimum shall include the elements listed in 40 CFR § 403.8(f)(1)(iii).
 3. The Permittee shall develop, maintain, and enforce, as necessary, local limits to implement the prohibitions in 40 CFR § 403.5 which prohibit the introduction of specific pollutants to the waste treatment system from any source of nondomestic discharge.
 4. In addition to the general limitations expressed in Paragraph 3 above, applicable pretreatment standards must be met by all industrial users of the POTW. These limitations include specific standards for certain industrial categories as determined by Section 307(b) and (c) of the Clean Water Act, State limits, or local limits, whichever are more stringent.
 5. The USEPA and IEPA individually retain the right to take legal action against any industrial user and/or the POTW for those cases where an industrial user has failed to meet an applicable pretreatment standard by the deadline date regardless of whether or not such failure has resulted in a permit violation.
 6. The Permittee shall establish agreements with all contributing jurisdictions, as necessary, to enable it to fulfill its requirements with respect to all IUs discharging to its system.
 7. Unless already completed, the Permittee shall within six (6) months of the effective date of this Permit submit to USEPA and IEPA a proposal to modify and update its approved Pretreatment Program to incorporate Federal revisions to the general pretreatment regulations. The proposal shall include all changes to the approved program and the sewer use ordinance which are necessary to incorporate the revisions of the Pretreatment Streamlining Rule (which became effective on November 14, 2005), which are considered required changes, as described in the Pretreatment Streamlining Rule Fact Sheet 2.0: Required changes, available at: http://cfpub.epa.gov/npdes/whatsnew.cfm?program_id=3. This includes any necessary revisions to the Permittee's Enforcement Response Plan (ERP).
 8. Within 6 months from the effective date of this permit, the Permittee shall conduct a technical re-evaluation of its local limitations consistent with U.S. EPA's Local Limits Development Guidance (July 2004), and submit the evaluation and any proposed revisions to its local limits to IEPA and U.S. EPA Region 5 for review and approval. To demonstrate technical justification for new local industrial user limits or justification for retaining existing limits, the following information must be submitted to U.S. EPA:
 - a. Total plant flow
 - b. Domestic/commercial pollutant contributions for pollutants of concern
 - c. Industrial pollutant contributions and flows
 - d. Current POTW pollutant loadings, including loadings of conventional pollutants
 - e. Actual treatment plant removal efficiencies, as a decimal (primary, secondary, across the wastewater treatment plant)
 - f. Safety factor to be applied
 - g. Identification of applicable criteria:
 - i. NPDES permit conditions
 - Specific NPDES effluent limitations
 - Water-quality criteria
 - Whole effluent toxicity requirements
 - Criteria and other conditions for sludge disposal
 - ii. Biological process inhibition
 - Nitrification
 - Sludge digester
 - iii. Collection system problems
 - h. The Permittee's sludge disposal methods (land application, surface disposal, incineration, landfill)
 - i. Sludge flow to digester

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- j. Sludge flow to disposal
 - k. % solids in sludge to disposal, not as a decimal
 - l. % solids in sludge to digester, not as a decimal
 - m. Plant removal efficiencies for conventional pollutants
 - n. If revised industrial user discharge limits are proposed, the method of allocating available pollutants loads to industrial users
 - o. A comparison of maximum allowable headworks loadings based on all applicable criteria listed in g, above
 - p. Pollutants that have caused:
 - i. Violations or operational problems at the POTW, including conventional pollutants
 - ii. Fires and explosions
 - iii. Corrosion
 - iv. Flow obstructions
 - v. Increased temperature in the sewer system
 - vi. Toxic gases, vapors or fumes that caused acute worker health and safety problems
 - vii. Toxicity found through Whole Effluent Toxicity testing
 - viii. Inhibition
 - q. Pollutants designated as "monitoring only" in the NPDES permit.
 - r. Supporting data, assumptions, and methodologies used in establishing the information a through q above
9. The Permittee's Pretreatment Program has been modified to incorporate a Pretreatment Program Amendment approved on October 14, 2003. The amendment became effective on the date of approval and is a fully enforceable provision of your Pretreatment Program.

Modifications of your Pretreatment Program shall be submitted in accordance with 40 CFR § 403.18, which established conditions for substantial and nonsubstantial modifications.

B. Reporting and Records Requirements

1. The Permittee shall provide an annual report briefly describing the permittee's pretreatment program activities over the previous calendar year. Permittees who operate multiple plants may provide a single report providing all plant-specific reporting requirements are met. Such report shall be submitted no later than April 28 of each year, and shall be in the format set forth in IEPA's POTW Pretreatment Report Package which contains information regarding:
- a. An updated listing of the Permittee's significant industrial users, indicating additions and deletions from the previous year, along with brief explanations for deletions. The list shall specify which categorical Pretreatment standards, if any, are applicable to each Industrial User. **[Note, where the POTW has been granted such authority, the following provision should be added: "The list must also identify Industrial Users subject to categorical Pretreatment Standards that are subject to reduced reporting requirements under 40 CFR § 403.12(e)(3), and identify which Industrial Users are Non-Significant Categorical Industrial Users."]**
 - b. A descriptive summary of the compliance activities including numbers of any major enforcement actions, (i.e., administrative orders, penalties, civil actions, etc.), and the outcome of those actions. This includes an assessment of the compliance status of the Permittee's industrial users and the effectiveness of the Permittee's Pretreatment Program in meeting its needs and objectives.
 - c. A description of all substantive changes made to the Permittee's Pretreatment Program. Changes which are "substantial modifications" as described in 40 CFR § 403.18(c) must receive prior approval from the Approval Authority.
 - d. Results of sampling and analysis of POTW influent, effluent, and sludge.
 - e. A summary of the findings from the priority pollutants sampling. As sufficient data becomes available the IEPA may modify this Permit to incorporate additional requirements relating to the evaluation, establishment, and enforcement of local limits for organic pollutants. Any permit modification is subject to formal due process procedures pursuant to State and Federal law and regulation. Upon a determination that an organic pollutant is present that causes interference or pass through, the Permittee shall establish local limits as required by 40 CFR § 403.5(c).
2. The Permittee shall maintain all pretreatment data and records for a minimum of three (3) years. This period shall be extended during the course of unresolved litigation or when requested by the IEPA or the Regional Administrator of USEPA. Records shall be available to USEPA and the IEPA upon request.

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3. The Permittee shall establish public participation requirements of 40 CFR 25 in implementation of its Pretreatment Program. The Permittee shall at least annually, publish the names of all IU's which were in significant noncompliance (SNC), as defined by 40 CFR § 403.8(f)(2)(viii), in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the Permittee or based on any more restrictive definition of SNC that the POTW may be using.
4. The Permittee shall provide written notification to the Deputy Counsel for the Division of Water Pollution Control, IEPA, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 within five (5) days of receiving notice that any Industrial User of its sewage treatment plant is appealing to the Circuit Court any condition imposed by the Permittee in any permit issued to the Industrial User by Permittee. A copy of the Industrial User's appeal and all other pleadings filed by all parties shall be mailed to the Deputy Counsel within five (5) days of the pleadings being filed in Circuit Court.

C. Monitoring Requirements

1. The Permittee shall monitor its influent, effluent and sludge and report concentrations of the following parameters on monitoring report forms provided by the IEPA and include them in its annual report. Samples shall be taken at annual intervals at the indicated reporting limit or better and consist of a 24-hour composite unless otherwise specified below. Sludge samples shall be taken of final sludge and consist of a grab sample reported on a dry weight basis.

STORET CODE	PARAMETER	Minimum reporting limit
01097	Antimony	0.07 mg/L
01002	Arsenic	0.05 mg/L
01007	Barium	0.5 mg/L
01012	Beryllium	0.005 mg/L
01027	Cadmium	0.001 mg/L
01032	Chromium (hex) (grab not to exceed 24 hours)*	0.01 mg/L
01034	Chromium (total)	0.05 mg/L
01042	Copper	0.005 mg/L
00718	Cyanide (weak acid dissociable)* (grab)	5.0 ug/L
00720	Cyanide (total) (grab)	5.0 ug/L
00951	Fluoride*	0.1 mg/L
01045	Iron (total)	0.5 mg/L
01046	Iron (Dissolved)*	0.5 mg/L
01051	Lead	0.05 mg/L
01055	Manganese	0.5 mg/L
71900	Mercury (effluent grab)***	1.0 ng/L**
01067	Nickel	0.005 mg/L
00556	Oil (hexane soluble or equivalent) (Grab Sample only)*	5.0 mg/L
32730	Phenols (grab)	0.005 mg/L
01147	Selenium	0.005 mg/L
01077	Silver (total)	0.003 mg/L
01059	Thallium	0.3 mg/L
01092	Zinc	0.025 mg/L

* Influent and effluent only

**1 ng/L = 1 part per trillion.

***Utilize USEPA Method 1631E and the digestion procedure described in Section 11.1.1.2 of 1631E, other approved methods may be used for influent (composite) and sludge.

Unless otherwise indicated, concentrations refer to the total amount of the constituent present in all phases, whether solid, suspended or dissolved, elemental or combined including all oxidation states. Where constituents are commonly measured as other than total, the phase is so indicated.

2. The Permittee shall conduct an analysis for the one hundred and ten (110) organic priority pollutants identified in 40 CFR 122 Appendix D, Table II as amended. This monitoring shall be done annually and reported on monitoring report forms provided by the IEPA and shall consist of the following:
 - a. The influent and effluent shall be sampled and analyzed for the one hundred and ten (110) organic priority pollutants. The sampling shall be done during a day when industrial discharges are expected to be occurring at normal to maximum levels.

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Samples for the analysis of acid and base/neutral extractable compounds shall be 24-hour composites.

Five (5) grab samples shall be collected each monitoring day to be analyzed for volatile organic compounds. A single analysis for volatile pollutants (Method 624) may be run for each monitoring day by compositing equal volumes of each grab sample directly in the GC purge and trap apparatus in the laboratory, with no less than one (1) mL of each grab included in the composite.

Wastewater samples must be handled, prepared, and analyzed by GC/MS in accordance with USEPA Methods 624 and 625 of 40 CFR 136 as amended.

- b. The sludge shall be sampled and analyzed for the one hundred and ten (110) organic priority pollutants. A sludge sample shall be collected concurrent with a wastewater sample and taken as final sludge.

Sampling and analysis shall conform to USEPA Methods 624 and 625 unless an alternate method has been approved by IEPA.

- c. Sample collection, preservation and storage shall conform to approved USEPA procedures and requirements.

- 3. In addition, the Permittee shall monitor any new toxic substances as defined by the Clean Water Act, as amended, following notification by the IEPA.

- 4. Permittee shall report any noncompliance with effluent or water quality standards in accordance with Standard Condition 12(e) of this Permit.

- 5. Analytical detection limits shall be in accordance with 40 CFR 136. Minimum detection limits for sludge analyses shall be in accordance with 40 CFR 503.

SPECIAL CONDITION 10. The Permittee has undergone a Monitoring Reduction review and the influent and effluent sample frequency has been reduced for BOD₅, CBOD₅, Suspended Solids, pH, dissolved oxygen and Ammonia Nitrogen due to sustained compliance. The IEPA will require that the influent and effluent sampling frequency for these parameters be increased to 3 days/week if effluent deterioration occurs due to increased wasteload, operational, maintenance or other problems. The increased monitoring will be required Without Public Notice when a permit modification is received by the Permittee from the IEPA.

SPECIAL CONDITION 11. During January of each year the Permittee shall submit annual fiscal data regarding sewerage system operations to the Illinois Environmental Protection Agency/Division of Water Pollution Control/Compliance Assurance Section. The Permittee may use any fiscal year period provided the period ends within twelve (12) months of the submission date.

Submission shall be on forms provided by IEPA titled "Fiscal Report Form For NPDES Permittees".

SPECIAL CONDITION 12. The Permittee shall conduct biomonitoring of the effluent from Discharge Number(s) 001.

Biomonitoring

- 1. Acute Toxicity - Standard definitive acute toxicity tests shall be run on at least two trophic levels of aquatic species (fish, invertebrate) representative of the aquatic community of the receiving stream. Testing must be consistent with Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms (Fifth Ed.) EPA/821-R-02-012. Unless substitute tests are pre-approved; the following tests are required:

- a. Fish - 96 hour static LC₅₀ Bioassay using fathead minnows (*Pimephales promelas*).
- b. Invertebrate 48-hour static LC₅₀ Bioassay using *Ceriodaphnia*.

- 2. Testing Frequency - The above tests shall be conducted using 24-hour composite samples unless otherwise authorized by the IEPA. Samples must be collected in the 18th, 15th, 12th, and 9th month prior to the expiration date of this Permit.

- 3. Reporting - Results shall be reported according to EPA/821-R-02-012, Section 12, Report Preparation, and shall be submitted to IEPA, Bureau of Water, Compliance Assurance Section within one week of receipt from the laboratory. Reports are due to the IEPA no later than the 16th, 13th, 10th, and 7th month prior to the expiration date of this Permit.

- 4. Toxicity - Should a bioassay result in toxicity to >20% of organisms test in the 100% effluent treatment, the IEPA may require,

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upon notification, six (6) additional rounds of monthly testing on the affected organism(s) to be initiated within 30 days of the toxic bioassay. Results shall be submitted to IEPA within (1) week of becoming available to the Permittee. Should any of the additional bioassays result in toxicity to $\geq 50\%$ of organisms tested in the 100% effluent treatments, the Permittee may wish to contact the IEPA to request the discontinuance of further sampling at which time the IEPA may require the Permittee to begin the toxicity reduction evaluation and identification as outlined below.

5. Toxicity Reduction Evaluation - Should the results of the biomonitoring program identify toxicity, the IEPA may require that the Permittee prepare a plan for toxicity reduction evaluation and identification. This plan shall be developed in accordance with Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants, EPA/833B-99/002, and shall include an evaluation to determine which chemicals have a potential for being discharged in the plant wastewater, a monitoring program to determine their presence or absence and to identify other compounds which are not being removed by treatment, and other measures as appropriate. The Permittee shall submit to the IEPA its plan for toxicity reduction evaluation within ninety (90) days following notification by the IEPA. The Permittee shall implement the plan within ninety (90) days or other such date as contained in a notification letter received from the IEPA.

The IEPA may modify this Permit during its term to incorporate additional requirements or limitations based on the results of the biomonitoring. In addition, after review of the monitoring results, the IEPA may modify this Permit to include numerical limitations for specific toxic pollutants. Modifications under this condition shall follow public notice and opportunity for hearing.

SPECIAL CONDITION 13. For the duration of this Permit, the Permittee shall determine the quantity of sludge produced by the treatment facility in dry tons or gallons with average percent total solids analysis. The Permittee shall maintain adequate records of the quantities of sludge produced and have said records available for IEPA inspection. The Permittee shall submit to the IEPA, at a minimum, a semi-annual summary report of the quantities of sludge generated and disposed of, in units of dry tons or gallons (average total percent solids) by different disposal methods including but not limited to application on farmland, application on reclamation land, landfilling, public distribution, dedicated land disposal, sod farms, storage lagoons or any other specified disposal method. Said reports shall be submitted to the IEPA by January 31 and July 31 of each year reporting the preceding January thru June and July thru December interval of sludge disposal operations.

Duty to Mitigate. The Permittee shall take all reasonable steps to minimize any sludge use or disposal in violation of this Permit.

Sludge monitoring must be conducted according to test procedures approved under 40 CFR 136 unless otherwise specified in 40 CFR 503, unless other test procedures have been specified in this Permit.

Planned Changes. The Permittee shall give notice to the IEPA on the semi-annual report of any changes in sludge use and disposal.

The Permittee shall retain records of all sludge monitoring, and reports required by the Sludge Permit as referenced in Standard Condition 25 for a period of at least five (5) years from the date of this Permit.

If the Permittee monitors any pollutant more frequently than required by the Sludge Permit, the results of this monitoring shall be included in the reporting of data submitted to the IEPA.

Monitoring reports for sludge shall be reported on the form titled "Sludge Management Reports" to the following address:

Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Mail Code #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

SPECIAL CONDITION 14. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) Forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (eDMRs) instead of mailing paper DMRs to the IEPA. More information, including

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registration information for the eDMR program, can be obtained on the IEPA website, <http://www.epa.state.il.us/water/edmr/index.html>.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using eDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

SPECIAL CONDITION 15. This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon completion of an alternate Water Quality Study.

SPECIAL CONDITION 16. The Permittee shall work towards the goals of achieving no discharges from sanitary sewer overflows or basement backups and ensuring that overflows or backups, when they do occur do not cause or contribute to violations of applicable standards or cause impairment in any adjacent receiving water. In order to accomplish these goals, the Permittee shall develop and submit to the IEPA a Capacity, Management, Operations, and Maintenance (CMOM) plan December 31, 2011. The Permittee may be required to construct additional sewage transport and/or treatment facilities in future permits or other enforceable documents.

The CMOM plan shall include the following elements:

- A. Measures and Activities:
 - 1. A complete map of the collection system;
 - 2. Schedules, checklists, and mechanisms to ensure that preventative maintenance is performed on equipment;
 - 3. An assessment of the capacity of the collection and treatment system at critical junctions and immediately upstream of locations where overflows and backups occur or are likely to occur; and
 - 4. Identification and prioritization of structural deficiencies in the system.
- B. Design and Performance Provisions:
 - 1. Monitor the effectiveness of CMOM;
 - 2. Upgrade the elements of the CMOM plan as necessary; and,
 - 3. Maintain a summary of CMOM activities.
- C. Overflow Response Plan:
 - 1. Know where overflows and backups occur; and,
 - 2. Respond to each overflow or backup to determine additional actions such as clean up.
- D. System Evaluation Plan.
- E. Reporting and Monitoring Requirements.

SPECIAL CONDITION 17. Discharge Number A01 is an emergency high level bypass. Discharges from this overflow and other discharges not receiving a minimum of secondary treatment are subject to the following conditions:

- (1) Definitions
 - (i) "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.
 - (ii) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

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- (2) Bypass not exceeding limitations. The Permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (3) and (4) of this section.
- (3) Notice
 - (i) Anticipated bypass. If the Permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.
 - (ii) Unanticipated bypass. The Permittee shall submit notice of an unanticipated bypass as required in Standard Condition 12(e) of this Permit (24-hour notice).
- (4) Prohibition of bypass. Bypass is prohibited, and the IEPA may take enforcement action against a Permittee for bypass, unless:
 - (i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - (ii) There was no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - (iii) The Permittee submitted notices as required under Standard Condition 12(e) of this Permit.
- (5) Emergency Bypass when discharging, shall be monitored daily by grab sample for BOD₅ and Suspended Solids. The Permittee shall submit the monitoring results on Discharge Monitoring Report forms using one such form for each month in which bypassing occurs. The Permittee shall specify the number of discharges per month that occur and shall report this number in the quantity daily maximum column. The Permittee shall report the highest concentration value of BOD₅ and Suspended Solids discharged in the concentration daily maximum column.

SPECIAL CONDITION 18. The provisions of 40 CFR Section 122.41 (n) are applicable and are hereby incorporated by reference.

SPECIAL CONDITION 19. The Permittee shall sample for Mercury and Bis(2-ethylhexyl)phthalate 1 Day/Month for ten (10) months starting no later than three (3) months from the effective date of this Permit. The sample shall be a composite sample and the results shall be submitted to the Agency within fifteen (15) months from the effective date of this permit. If the data demonstrates that the Permittee does have a reasonable potential to exceed the water quality standard based on the data collected for Mercury and Bis(2-ethylhexyl)phthalate the permit may be modified to include water quality limits.

PARAMETER

Bis(2-ethylhexyl)phthalate
 Mercury (effluent grab using USEPA Method 1631 or equivalent)**

Minimum
reporting limit
 0.006 mg/L
 1.0 ng/L*

*1 ng/L = 1 part per trillion.

**Utilize USEPA Method 1631E and the digestion procedure described in Section 11.1.1.2 of 1631E.

SPECIAL CONDITION 20. The Permittee shall prepare and implement an evaluation plan to evaluate and eliminate discharges from the A02 Excess Flow or provide an economic analysis demonstrating that no feasible alternative exists. The evaluation plan elements shall include identification and development of an elimination schedule of infiltration and inflow sources and the evaluation of a storage basin, equalization basin and additional wastewater treatment. The plan shall be developed within two (2) years from the effective date of this permit and submitted to the IEPA to the below address for approval. The plan shall include a project implementation schedule, project completion dates and expected results of project completion.

The Permittee shall submit the analysis described above in accordance with the following schedule:

- | | |
|---|---|
| 1. Progress Report | 6 months from effective date of permit |
| 2. Interim Report on System Characterization permit | 12 months from effective date of permit |
| 3. Interim Report Evaluating Potential Measures | 18 months from effective date of permit |

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to Reduce Diversions

4. Submit No Feasible Alternative Analysis 24 months from effective date of permit

All reports shall be submitted to IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attention: Compliance Assurance Section, Mail Code #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276