

IEPA Log No.: **C-0027-19**
CoE appl. #: **MVS-2018-291**

Public Notice Beginning Date: **May 21, 2019**
Public Notice Ending Date: **June 11, 2019**

Section 401 of the Federal Water Pollution Control Act
Amendments of 1972

Section 401 Water Quality Certification for Discharge of Dredged or Fill Material

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency
Bureau of Water
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-3362

Name and Address of Discharger: Illinois-American Water Company – 100 North Water Work Drive,
Belleville, IL 62223

Discharge Location: Near East St. Louis in NE 1/4 of Section 11 of Township 2-North, Range 10-West of the West 3rd P.M. in St. Clair County.

Name of Receiving Water: Forested wetlands

Project Description: Proposed installation of an ultraviolet disinfection system, transfer pump station, finished water storage tanks (2), high service pump station, and associated parking lots and driveways south of the existing water treatment plant located at 800 North Front Street in East St. Louis.

The Illinois Environmental Protection Agency (IEPA) has received an application for a Section 401 water quality certification to discharge dredged or fill material into the waters of the State associated with a Section 404 permit application received by the U.S. Army Corps of Engineers. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. The last day comments will be received will be on the Public Notice period ending date unless a commenter demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters shall provide their names and addresses along with comments on the certification application. Commenters may include a request for public hearing. The certification and notice number(s) must appear on each comment page.

The attached Fact Sheet provides a description of the project and the antidegradation assessment.

The application, Public Notice/Fact Sheet, comments received, and other documents are available for inspection and may be copied at the IEPA at the address shown above between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please contact Darren Gove at email darren.gove@illinois.gov or phone no. 217/782-3362.

Fact Sheet for Antidegradation Assessment
For Illinois-American Water Company
IEPA Log No. C-0027-19
COE Log No. MVS-2018-291
Contact: Abby Brokaw 217/558-2012
Public Notice Start Date: May 21, 2019

Illinois-American Water Company (“Applicant”) has applied for a 401 Water Quality Certification for impacts associated with the expansion of the existing East St. Louis Water Treatment Facility (ESLWTF) located at 800 North Front Street, East St. Louis, Illinois. More specifically, the proposed project is located within the northeast ¼ of section 11, township 2 north, and range 10 west in St. Clair County. The ESLWTF provides drinking water to the Cities of Belleville, East St. Louis, Granite City, and Venice; the Villages of Alorton, Brooklyn, Sauget, and Shiloh; sale-for-resale customers in the Cities of Columbia, O’Fallon, Fairview Heights, and Waterloo; sale-for-resale customers in the Villages of Cahokia, Caseyville, Pontoon Beach, and Millstadt; and a sale-for-resale customers serving parts of Bond and Madison Counties.

The subject facility is required to submit water quality testing to the Illinois EPA for determination of the classification of source water supply related to the Long Term 2 Enhanced Surface Water Treatment Rule. As a result of the testing, the facility has been reclassified to a Bin 2 facility requiring an additional 1-log removal credit for Cryptosporidium. The required treatment to comply with the new classification must be implemented by October 1, 2021.

The Applicant proposes to install a new ultraviolet (UV) disinfection system and high service pump building, a transfer pump building, and two 5-million-gallon finished water storage tanks, as well as associated facility parking lots and driveways. The proposed expansion would require clearing trees and raising the ground level at each structure on approximately 17.68 acres immediately south of the existing facility. The tree clearing, grading and construction work is expected to begin as soon as possible. Project construction is projected to continue through 2021. The Applicant has purchased wetland mitigation credits at a ratio of 3:1 for the 5 acres of impacted forested wetlands.

Information used in this review was obtained from the USACE public notice dated December 21, 2018; Final Wetland and Stream Delineation Report dated August 2018; November 21, 2018, memo to provide additional information for the Joint Application for Individual Permit, the Joint Application Form dated March 12, 2019; and supplemental materials.

Identification and Characterization of the Affected Water Body.

The wetland delineation completed for the project assessed approximately 20.91 total acres for wetlands and streams; of which, 17.68 total acres are within the project site boundary. Of the total area assessed, an estimated 16.81 acres were found to be wetlands and of this, 16.60 acres were located within the project boundary.

The USFWS National Wetlands Inventory (NWI) indicated that the majority of the project site consists of a combination of freshwater emergent and freshwater forested/shrub wetlands.

Although a majority of the proposed project site area is observed to be covered in thick, dense forest canopy, both forested wetland and open meadow vegetative areas were identified.

The forested wetland area comprises the largest portion of the project site (13.40 acres) and consists of a dense layer of thick brush surrounding a canopy of tall trees with little to no vegetation on the lower stratum. The tree stratum is the only major vegetated stratum with primarily big-toothed aspen and green ash identified as the major tree species. The only lower stratum species present are saplings of the same species as the large trees. The ground within the forested area is littered with leaves which are water stained from prior inundations. Trees also have high water marks up to a foot from the ground. The NWI identifies the following wetlands within this area:

- a) PSS1C – (P) Palustrine is a non-tidal wetland dominated by trees, shrubs, and persistent emergent herbaceous plants and (SS) Shrub/Scrub areas dominated by saplings and shrubs (1) Broad Leafed Deciduous vegetation (C) Seasonally Flooded
- b) PEM1/SS1A – (P) Palustrine is a non-tidal wetland dominated by trees, shrubs, and (EM1) persistent emergent herbaceous plans and (SS) Shrub/Scrub areas dominated by saplings and shrubs (1) Broad Leafed Deciduous (A) Temporarily Flooded

The emergent wetland area consists of an open meadow which is likely the result of land clearing when the power line was established in the area and not a natural condition. This area covers 3.20 acres of the project site but would not be impacted by the project.

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

Total suspended solids are anticipated to increase because of the proposed tree clearing, grading, and fill activities. This increase is a normal and unavoidable result of the proposed project. Approximately 31,442 cubic yards of clean soil from borrow area (undetermined source) would be placed in the wetland areas, impacting 5 acres of forested wetland. Impacts to the uses of downstream waters due to suspended solids are not anticipated, because the proposed project's discharge loading would be temporary and present only during active construction. Benthic habitat would also be disturbed in the project area, although is anticipated to recover over time.

The Applicant would take appropriate erosion control measures to reduce the potential for unintentional sedimentation and sediment runoff to adjacent, regulated waters and on-site Best Management Practices (BMPs) during construction activities would be consistent with the Illinois Urban Manual.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in suspended solids from the construction activities would be short-term and temporary; however, 5 acres of on-site wetlands would be permanently filled. The Applicant has an executed agreement with Fountain Creek Mitigation Bank, LLC, to purchase 15 wetland mitigation credits (3:1 ratio).

Purpose and Social & Economic Benefits of the Proposed Activity.

Based on results of source water quality testing, the ESLWTF has been reclassified as a Bin 2 facility requiring an additional 1-log removal credit for Cryptosporidium. The facility is now required to implement treatment for Cryptosporidium removal by October 1, 2021. The expansion of the facility is to meet these new treatment needs.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

Do Nothing Alternative: If the proposed treatment improvements are not completed, the ESLWTF would no longer be in compliance with water quality regulations. A non-compliant facility is subject to fines and is at risk of providing unsafe water to customers.

Construct Improvements Off-Site: During the assessment of off-site alternatives, several issues of concern were identified. By locating the expanded facility off-site, water would be pumped back and forth between the two locations, significant additional (redundant) infrastructure, and acquiring additional land may all be necessary. The estimated piping for pumping the water to and from an off-site location, a minimum of 4 parallel 48-inch pipes, would cost approximately \$500 - \$800 per square foot, including property acquisition, design, permitting, excavation, material, fittings, and valves, backfill and restoration. An off-site location (1) mile away could add \$2.6 million to \$4.2 million to the cost of the project. Additionally, expanding the project off-site would delay the construction schedule, which must be completed by October 1, 2021.

Construct Improvements at Existing WTP Property: The proposed expansion location would be south of the existing facility in a large undeveloped area. The site was selected as it allows space for future structures and replacement of current structures, which is all part of a larger improvement plan for the facility.

The least impactful alternative would be to not complete the project. This alternative is not recommended as the facility is required to provide additional treatment to the public water supply by October 1, 2021. The Applicant's preferred plan includes environmental impacts that are unavoidable. Impacts to the site wetlands has been compensated by purchasing wetland mitigation credits. The project would follow conditions set forth by the Agency and USACE.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities.

On March 15, 2018, an IDNR EcoCAT consultation was initiated, Project #1808777, and determined that the Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project area. The consultation was immediately terminated.

The proposed project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the Northern Long-Eared bat (*Myotis septentrionalis*) that is currently a threatened species and is a proposed candidate for endangered status. A preliminary determination, in compliance with the Endangered Species Act, found the proposed activity may affect the habitat of these listed and candidate species. The USACE is coordinating with the USFWS and the Applicant plans to follow recommendations for minimizing potential effects of the project during construction. The Applicant completed a Bat Habitat Assessment Summary, dated February 13, 2019, which found the location suitable for roosting Indiana and northern long-eared bats. Per a letter from USFWS dated February 1, 2019, possible recommendations to reduce impacts may include the minimization of tree clearing be minimized or avoided, if possible, to reduce impacts to potential habitat for the Indiana bat, northern long-eared bat, and migratory birds. If tree clearing is necessary, it should not occur from April 1st through September 30th to avoid impacts. USFWS requested further interagency coordination.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time this assessment was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the local community by providing the required public water supply treatment. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.