Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield, Illinois • 62794-9276 • 217-782-3397

JB Pritzker, Governor **James Jennings**, Acting Director

(217) 782-5544

March 13, 2026

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7012 0470 0001 2970 5168

City of Lawrenceville
700 State Street
Lawrenceville, IL 62439

Re: Notice of Intent to Pursue Legal Action
Violation Notice: W-2025-50218
Facility I.D.: IL0029467 – W1010150002

Dear Facility Owner,

This Notice of Intent to Pursue Legal Action is provided pursuant to Section 31(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(b) (2024). The Illinois Environmental Protection Agency ("Illinois EPA") is providing this notice because the City of Lawrenceville has failed to respond adequately to the Violation Notice dated November 26, 2025, regarding the City's wastewater treatment plant ("WWTP"), which was issued by the Illinois EPA within the time frame required by Section 31 of the Act.

The Illinois EPA is providing this notice because it may pursue legal action for the violations of environmental statutes, regulations, and permits specified in Attachment A. The Notice of Intent to Pursue Legal Action provides the opportunity to schedule a meeting with representatives of the Illinois EPA to attempt to resolve the violations of the Act, regulations, and permits specified in Attachment A. If a meeting is requested, it must be held within thirty (30) days of receipt of this notice unless an extension of time is agreed to by the Illinois EPA.

If you wish to schedule a meeting with representatives of the Illinois EPA or have any questions, please contact me at gabriel.neibergall@illinois.gov (preferred) or (217) 782-5544 within twenty (20) days of your receipt of this notice.

Sincerely,

Gabriel H. Neibergall

2125 S. First Street, Champaign, IL 61820 • 217-278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 • 618-346-5120
595 S. State Street, Elgin, IL 60123 • 847-608-3131
412 SW Washington Street, Suite D, Peoria, IL 61602 • 309-671-3022

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603
9511 Harrison Street, Des Plaines, IL 60016 • 847-294-4000
2309 W. Main Street, Suite 116, Marion, IL 62959 • 618-993-7200
4302 N. Main Street, Rockford, IL 61103 • 815-987-7760

Please print on recycled paper.

ATTACHMENT A

CITY OF LAWRENCEVILLE WWTP – IL0029467
VN W-2025-50218

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits.

Deposit of Contaminants

Violation Date	**Violation Description**
09/16/2025	Deposited contaminants on the ground in such a manner that caused or threatened to cause a water pollution hazard.
Rule/Reg.:	Section 12(d) of the Act, 415 ILCS 5/12(d) (2024)

Effluent Standards – Offensive Discharge

Violation Date	**Violation Description**
09/16/2025 10/09/2025 10/31/2025 11/14/2025	Effluent must not contain settleable solids, floating debris, visible oil, grease, scum or sludge solids. Color, odor and turbidity must be reduced to below obvious levels.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2024), 35 Ill. Adm. Code 304.106

Effluent Violations

Violation Date	**Violation Description**
09/16/2025	Outfall 001 Effluent – BOD, carbonaceous [5 Day, 20 C], Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2024), 35 Ill. Adm. Code 304.141(a), 309.102(a), and NPDES Permit IL0029467

Violation Date	**Violation Description**
09/16/2025	Outfall 001 Effluent – Solids, total suspended, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2024), 35 Ill. Adm. Code 304.141(a), 309.102(a), and NPDES Permit IL0029467

Violation Date	**Violation Description**
09/16/2025	Outfall 001 Effluent – Nitrogen, total ammonia [as N], Effluent Limit

Rule/Reg.: Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2024), 35 Ill. Adm. Code 304.141(a), 309.102(a), and NPDES Permit IL0029467

Discharge of Contaminants

Violation Date	**Violation Description**
09/16/2025 10/09/2025 10/31/2025 11/14/2025	No person shall cause, threaten, or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.

Rule/Reg.: Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2024)

Failure to Comply with NPDES Permit – Duty to Mitigate

Violation Date	**Violation Description**
09/16/2025	The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment; Standard Condition 4.

Rule/Reg.: Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 309.102(a); NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Operation & Maintenance

Violation Date	**Violation Description**
09/16/2025	The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control to achieve compliance with conditions of the NPDES Permit; Standard Condition 5.

Rule/Reg.: Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 309.102(a); NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Monitoring

Violation Date	**Violation Description**
09/16/2025	Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity; Standard Condition 10(a).
Rule/Reg.**:**	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Failure to Calibrate

Violation Date	**Violation Description**
09/16/2025	The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements of the NPDES Permit; Standard Condition 10(d).
Rule/Reg.**:**	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 309.102(a), and NPDES Permit IL0029467

Failure to Comply with NPDES Permit – Failure to Retain Records

Violation Date	**Violation Description**
09/16/2025	The permittee shall retain records of all monitoring information for a period of at least 3 years from the date of the permit, measurement, report or application; Standard Condition 10(b).
Rule/Reg.**:**	Section 12(f) of the Act, 415 ILCS 5/12(f) (2024); 35 Ill. Adm. Code 305.102(b), 309.102(a), and NPDES Permit IL0029467

Untimely Renewal of NPDES Permit

Violation Date	**Violation Description**
08/18/2025	Any permittee who wishes to continue to discharge after the expiration date of the NPDES Permit must timely apply for reissuance of the permit 180 prior to expiration. The NPDES Permit renewal application was due by April 3, 2025, but was not received until August 18, 2025.

Rule/Reg.**:** Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2024), 35 Ill. Adm. Code 309.102(a), 309.104(a)

Unpermitted Discharge: Expired NPDES Permit

Violation Date	**Violation Description**
10/01/2025 To Present	Except as in compliance with the provisions of the Act, Board regulations, the CWA (Clean Water Act), and the provisions and conditions of the NPDES (National Pollutant Discharge Elimination System) permit issued to the discharger, the discharge of any contaminant or pollutant by any person into the waters of the State from a point source shall be unlawful.

Rule/Reg.**:** Section 12(a) and (f) of the Act, 415 ILCS 5/12(a) and (f) (2024), 35 Ill. Adm. Code 309.104(a) & 309.102(a)