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DATE: April 6, 2026

TO: Todd Bennett, Manager, BOW/DWPC/FOS

FROM: Joseph D. Stitely, P.E., BOW/DWPC/FOS – Marion & Collinsville

BOW ID: W1010150002

NPDES Permit No: IL0029467

SUBJECT: City of Lawrenceville  
April 2, 2026 Reconnaissance Inspection

On April 2, 2026, Brian Rodely (BOW/DWPC/FOS) and I conducted a Reconnaissance Inspection at the City of Lawrenceville. The inspection focused on the sewer main that runs just south of the city cemetery and discharges to the North Lift Station and the excess flow lagoon for the wastewater treatment plant.

Initially, we stopped and observed the two elevated manholes just south of Cemetery Road between 20<sup>th</sup> Street and 18<sup>th</sup> Street. The two manholes are known as Manhole #51 and #50. We noted no overflows were observed from either of the two manholes at the time of our visit. At this time, Aaron Tipsword arrived and accompanied us. We crossed 18<sup>th</sup> Street and observed another manhole adjacent to the municipal garage. No overflows were observed. We continued to walk east and observed Manhole #44. No overflows were occurring at the time of the visit; however, a large hole was observed in the concrete collar for the manhole. We also observed an eroded channel from the manhole to the creek with toilet paper and grit in the channel (see attached photograph).

Rodely and I then drove to Manhole #43. Adjacent to the manhole, we observed that the creek was discolored with what appeared to be sewage. The creek also smelled of raw sewage. We noted that there was flow and toilet paper discharging into the creek immediately south of the manhole. We called Tipsword to have him remove the manhole lid. Once removed, we observed that there was a main entering the manhole from the south. We placed green dye tablets into Manhole #43. Within minutes, we observed that there was green dye in the creek (see attached photograph). It was apparent that there was a sewage main break discharging into the creek.

Next, Rodely and I observed the wastewater treatment plant. We observed that the effluent discharging from the plant was light gray in color. We also noted that the city was actively pumping accumulated stormwater from the inactive north Schrieber unit to the sludge lagoon. At the time

of the visit, we estimated that the sludge lagoon only had 3-4 inches of freeboard available. Then we drove to the excess flow lagoon. At the time of the visit, the lagoon had about 10 feet of freeboard. We drove around the south side of the lagoon and observed Outfall 002. The outfall was actively discharging about 50 gpm (see attached photograph). We observed the outfall's cap was laying adjacent to the outfall (see attached photograph). The cap was originally installed to prevent the outfall from discharging. It appeared that the cap had been missing from the outfall for an extended period due to the cap's deteriorated condition. We also observed the outfall's concrete gabion structure. The upper slide gate was broken, allowing effluent to discharge through the outfall. Due to the deteriorated condition of the slide gate, it appeared to have been broken for an extended amount of time. Therefore, we called Tipsword to meet us at the excess flow lagoon. Upon his arrival, we asked that he remove the manhole lid adjacent to gabion structure. We placed green dye tablets into manhole. Within minutes, the discharge from Outfall 002 was green in color (see attached photographs). Tipsword indicated that he was not aware Outfall 002. We also asked how long it had been since he pulled excess flow from the lagoon back to the plant. He indicated that he has never pulled excess flow from the lagoon back to the plant. We explained that when Outfall 002 is discharging, the city has to sample the effluent as required by their expired NPDES Permit. I further explained that their expired NPDES Permit has fecal concentration limits for Outfall 002, but they have no disinfection at the lagoon. We recommended that the broken slide gate be replaced as soon as possible, an inflatable plug be installed at Outfall 002, and initiate pulling excess flow from the lagoon back to the WWTP. We also explained to Tipsword that the sludge lagoon at the wastewater treatment plant needed to be pumped down immediately. We explained that the lagoon only has about 3-4 inches of freeboard but they are still pumping stormwater from the north Schrieber Unit to the lagoon which rain in the forecast. We suggested that the lagoon supernatant and the Scheiber Unit stormwater be pumped to the plant headworks.

Finally, we returned to Manhole #43 as city crews were excavating the area south of the manhole. They built earthen dams immediately upstream and downstream of the sewer main and pumped the water within the dams to expose the sewer main. It was a broken section of 10-inch clay pipe which received flow from a PVC sewer lateral for an apartment complex (see attached photographs).

Based upon the observations made during the Reconnaissance Inspection, the following apparent violations are presented:

1. Section 12(a) of the Act, which provides, in part, that no person shall cause, threaten, or allow the discharge of any contaminant into the environment so as to cause or tend to cause water pollution.

2. Section 12(f) of the Act, which provides, in part, that no person shall cause, threaten, or allow the discharge of a contaminant into the waters of the State from any point source within the State without an NPDES permit for point source discharges.
3. Subtitle C, Section 302.203, which provides, in part, that waters of the State shall be free from unnatural sludge or bottom deposits, floating debris, unnatural color or odor turbidity in concentrations toxic or harmful to human, animal, plant, or aquatic life.
4. Subtitle C, Section 304.106, which provides, in part, that no effluent shall contain settleable solids, floating debris, scum, or sludge solids. Also, color, odor, and turbidity must be reduced below obvious levels.
5. Subtitle C, Section 306.304, provides, in part, that overflows from sanitary sewers are expressly prohibited.
6. Subtitle C, Section 309.102(a), provides, in part, that the discharge of any contaminant or pollutant by any person into the waters of the State from a point source or into a well shall be unlawful.
7. Special Condition 16, of the NPDES Permit, which provides, in part, the permittee shall work towards the goal of achieving no discharge from sanitary sewer overflows or basement back-ups and ensuring that overflows or back-ups, when they do occur do not cause or contribute to violations of applicable standards or cause impairment in any adjacent receiving waters.
8. Standard Condition 4, of the NPDES Permit, which provides, in part, the permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
9. Standard Condition 5, of the NPDES Permit, which provides, in part, the permittee shall at all times properly operate and maintain 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 the permit. Proper Operation and maintenance include effective performance, adequate funding, adequate operating staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.

The following recommendations are offered to assist the facility:

1. Immediately cease all sanitary sewer overflows (SSOs) from the city's collection system. At the time of the visit, a dry weather SSO was occurring from the 10-inch clay main at Manhole #43.
2. Immediately discontinue discharging effluent from Outfall 002 until the main treatment facility is receiving its design maximum flow, which is flow in excess of 1500 gpm.
3. Immediately initiate monitoring Outfall 002 in accordance with your expired NPDES Permit No. IL0029467. The outfall is to be grab sampled daily for BOD<sub>5</sub>, Total Suspended Solids, Ammonia Nitrogen (as N), Fecal Coliform, pH, and Chlorine residual when discharging. In addition, the city must provide continuous flow monitoring for the outfall.
4. Initiate efforts to replace the broken upper slide gate for the excess flow lagoon gabion structure.
5. Initiate efforts to install a cap on the the excess flow lagoon outfall structure (Outfall 002).
6. Immediately initiate pumping supernatant from your sludge lagoon to the headworks of your wastewater treatment plant in order to maintain a minimum of two feet of freeboard in the sludge lagoon at all times. At the time of the visit, the lagoon only had 3-4 inches of freeboard while the city was actively pumping stormwater from the north Schrieber Unit to the sludge lagoon.
7. Permanently repair the broken concrete collar on Manhole #44. At the time of the visit, the concrete collar had a significant hole in its side which could allow SSOs to occur during periods of high flow.

JDS:Lawrenceville Memo 2026-04-02/04-06-26

Attachments (7)

cc: BOW/DWPC/FOS-Marion

BOW/CAS

BOW/DWPC/RU

Gabriel Neibergall, DLC

Photo # 001  
Date: April 2, 2026  
Time: 10:27 a.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732250,-87.688318  
Notes: This is a photograph of  
Manhole #44. Note that  
the large hole in the  
concrete manhole collar.  
There was an eroded  
channel with toilet paper  
and grit adjacent to the  
manhole to the creek.



Photo #: 002  
Date: April 2, 2026  
Time: 10:52 a.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732219,-87.687574  
Notes: This is a photograph of  
creek adjacent to  
Manhole #43. Sewage  
and toilet paper were  
observed discharging into  
the creek.



## DWPC INSPECTION DIGITAL PHOTOGRAPH PHOTOCOPIES

Photo # 003  
Date: April 2, 2026  
Time: 10:55 a.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732219,-87.687574  
Notes: This is a photograph of  
Manhole #43. Note the  
abandoned brick manhole  
adjacent to Manhole #43.



Photo #: 004  
Date: April 2, 2026  
Time: 11:29 a.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732222,-87.687588  
Notes: This is a photograph of  
creek after placing green  
dye tablets into Manhole  
#43.



## DWPC INSPECTION DIGITAL PHOTOGRAPH PHOTOCOPIES

Photo # 005  
Date: April 2, 2026  
Time: 12:53 p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.724310,-87.670582  
Notes: This is a photograph of  
Outfall 002 for the  
WWTP's excess flow  
lagoon. Outfall 002 was  
discharging about 50  
gallons per minute. Note  
the outfall's cap adjacent  
to the outfall.



Photo #: 006  
Date: April 2, 2026  
Time: 12:58 p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.724763,-87.670413  
Notes: This is a photograph of  
Outfall 002 gabion  
structure. The upper slide  
gate was broken, allowing  
lagoon effluent to  
discharge through Outfall  
002.



Photo # 007  
Date: April 2, 2026  
Time: 1:19 p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.724253,-87.670420  
Notes: This is a photograph of the Outfall 002 discharge following after placing the green dye tablets in the manhole for the concrete gabion.



Photo #: 008  
Date: April 2, 2026  
Time: 1:19 p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.724253,-87.670420  
Notes: This is another photograph of the Outfall 002 discharge following after placing the green dye tablets in the manhole for the concrete gabion.



## DWPC INSPECTION DIGITAL PHOTOGRAPH PHOTOCOPIES

Photo # 009  
Date: April 2, 2026  
Time: 1:55 p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732216,-87.687686  
Notes: This is a photograph of the broken clay sewer main that discharged to Manhole #43. Note the clay pipe is broken allowing sewage to discharge to the creek.



Photo #: 010  
Date: April 2, 2026  
Time: 4:07p.m.  
Taken By: Brian Rodely, BOW  
Facility: City of Lawrenceville  
Location: 38.732197,-87.6877  
Notes: This is a photograph of the broken clay sewer main that discharged to Manhole #43. The broken clay sewer main received flow from a PVC sewer lateral for an apartment complex.





City Of Lawrenceville Excess Flow Lagoon – 04/02/2026

