Attachment 1

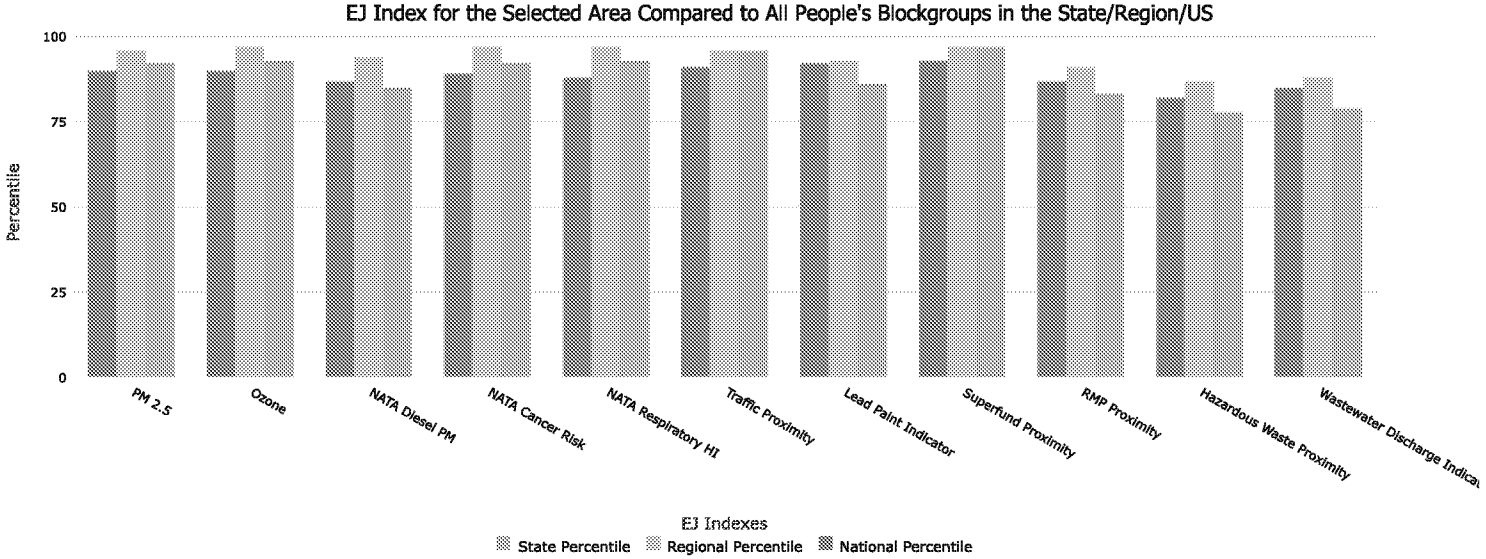
Save as PDF

EJSCREEN Report (Version 2019)

1 miles Ring Centered at 38.572770,-90.109370
ILLINOIS, EPA Region 5
Approximate Population: 4,152
Input Area (sq. miles): 3.14

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	92	96	90
EJ Index for Ozone	93	97	90
EJ Index for NATA* Diesel PM	85	94	87
EJ Index for NATA* Air Toxics Cancer Risk	92	97	89
EJ Index for NATA* Respiratory Hazard Index	93	97	88
EJ Index for Traffic Proximity and Volume	96	96	91
EJ Index for Lead Paint Indicator	86	93	92
EJ Index for Superfund Proximity	97	97	93
EJ Index for RMP Proximity	83	91	87
EJ Index for Hazardous Waste Proximity	78	87	82
EJ Index for Wastewater Discharge Indicator	79	88	85

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

July 9, 2020

Search Result (point)

1:144,448

0 1.25 2.5 5 mi

0 2.25 4.5 9 km

Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	9.19	9.25	42	8.63	65	8.3	75
Ozone (ppb)	46	44.8	93	43.4	85	43	73
NATA* Diesel PM (µg/m³)	0.521	0.669	42	0.446	60-70th	0.479	60-70th
NATA* Air Toxics Cancer Risk (risk per MM)	35	33	66	26	90-95th	32	60-70th
NATA* Respiratory Hazard Index	0.48	0.42	74	0.34	90-95th	0.44	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	1000	630	87	530	87	750	81
Lead Paint Indicator (% pre-1960s housing)	0.42	0.41	52	0.38	60	0.28	71
Superfund Proximity (site count/km distance)	0.19	0.095	93	0.13	86	0.13	85
RMP Proximity (facility count/km distance)	0.85	1.2	55	0.82	68	0.74	72
Hazardous Waste Proximity (facility count/km distance)	0.84	2	44	1.5	55	4	61
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.00094	1.7	42	0.82	57	14	66
Demographic Indicators							
Demographic Index	89%	34%	99	28%	99	36%	99
Minority Population	98%	38%	94	25%	97	39%	96
Low Income Population	81%	30%	98	31%	97	33%	97
Linguistically Isolated Population	0%	5%	44	2%	58	4%	45
Population with Less Than High School Education	20%	11%	80	10%	86	13%	77
Population under Age 5	11%	6%	89	6%	90	6%	88
Population over Age 64	12%	14%	41	15%	35	15%	40

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

For additional information, see: www.epa.gov/environmentaljustice (http://www.epa.gov/environmentaljustice)

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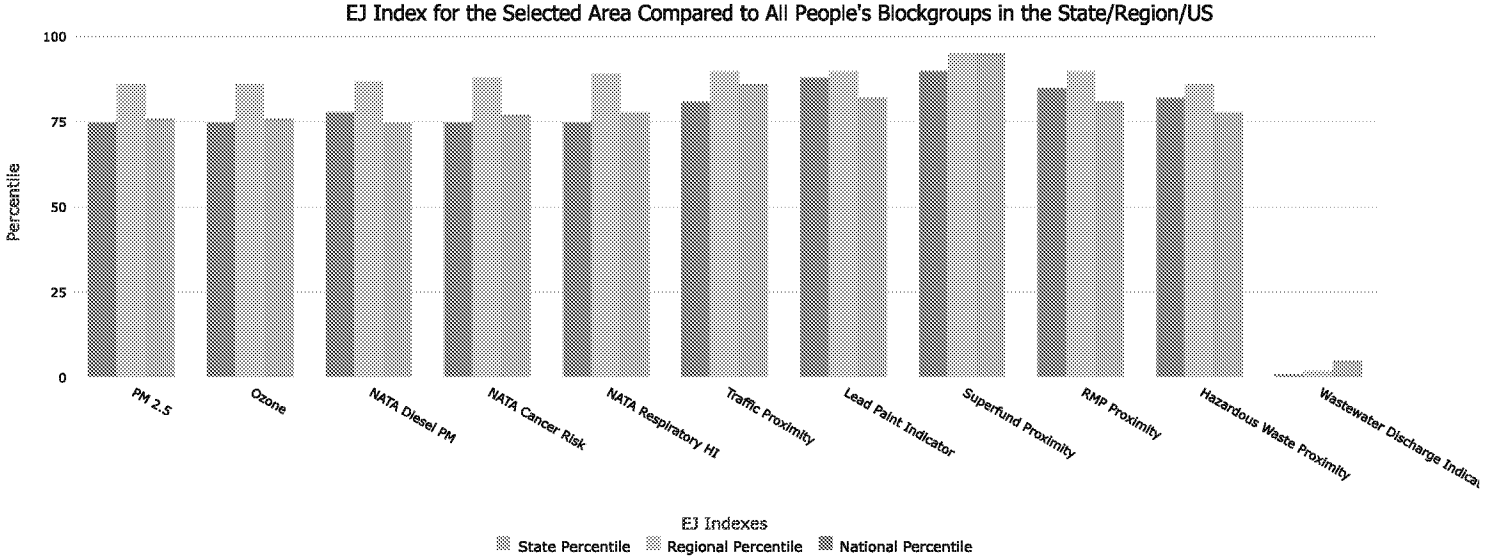
Save as PDF

EJSCREEN Report (Version 2019)

3 miles Ring Centered at 38.572770,-90.109370
ILLINOIS, EPA Region 5
Approximate Population: 25,411
Input Area (sq. miles): 28.27

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	76	86	75
EJ Index for Ozone	76	86	75
EJ Index for NATA* Diesel PM	75	87	78
EJ Index for NATA* Air Toxics Cancer Risk	77	88	75
EJ Index for NATA* Respiratory Hazard Index	78	89	75
EJ Index for Traffic Proximity and Volume	86	90	81
EJ Index for Lead Paint Indicator	82	90	88
EJ Index for Superfund Proximity	95	95	90
EJ Index for RMP Proximity	81	90	85
EJ Index for Hazardous Waste Proximity	78	86	82
EJ Index for Wastewater Discharge Indicator	5	2	1

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



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Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	3

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	9.18	9.25	42	8.63	65	8.3	75
Ozone (ppb)	46.1	44.8	93	43.4	85	43	73
NATA* Diesel PM (µg/m³)	0.542	0.669	44	0.446	70-80th	0.479	60-70th
NATA* Air Toxics Cancer Risk (risk per MM)	35	33	67	26	90-95th	32	60-70th
NATA* Respiratory Hazard Index	0.48	0.42	74	0.34	90-95th	0.44	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	350	630	64	530	66	750	60
Lead Paint Indicator (% pre-1960s housing)	0.54	0.41	62	0.38	70	0.28	78
Superfund Proximity (site count/km distance)	0.23	0.095	94	0.13	89	0.13	88
RMP Proximity (facility count/km distance)	0.91	1.2	58	0.82	70	0.74	74
Hazardous Waste Proximity (facility count/km distance)	1.2	2	53	1.5	63	4	67
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	1.2	1.7	85	0.82	94	14	95
Demographic Indicators							
Demographic Index	66%	34%	85	28%	91	36%	86
Minority Population	76%	38%	81	25%	90	39%	82
Low Income Population	55%	30%	85	31%	85	33%	83
Linguistically Isolated Population	0%	5%	44	2%	58	4%	45
Population with Less Than High School Education	15%	11%	71	10%	77	13%	67
Population under Age 5	5%	6%	43	6%	44	6%	43
Population over Age 64	17%	14%	67	15%	63	15%	66

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

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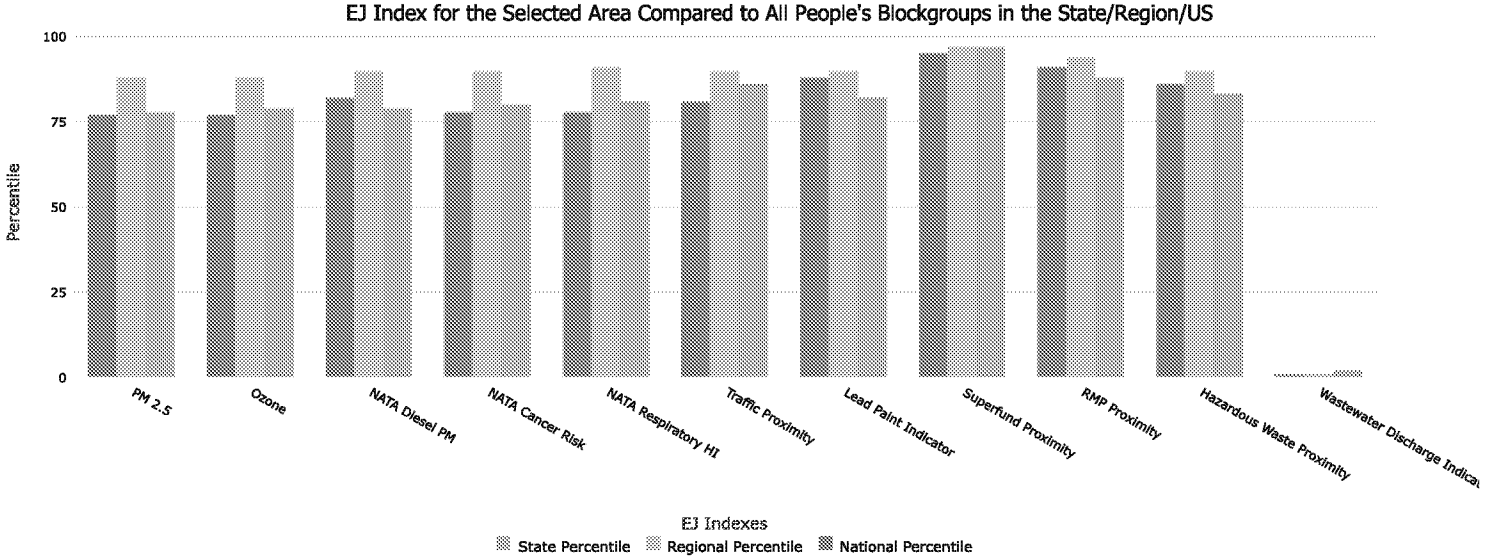
Save as PDF

EJSCREEN Report (Version 2019)

5 miles Ring Centered at 38.572770,-90.109370
ILLINOIS, EPA Region 5
Approximate Population: 74,765
Input Area (sq. miles): 78.53

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	78	88	77
EJ Index for Ozone	79	88	77
EJ Index for NATA* Diesel PM	79	90	82
EJ Index for NATA* Air Toxics Cancer Risk	80	90	78
EJ Index for NATA* Respiratory Hazard Index	81	91	78
EJ Index for Traffic Proximity and Volume	86	90	81
EJ Index for Lead Paint Indicator	82	90	88
EJ Index for Superfund Proximity	97	97	95
EJ Index for RMP Proximity	88	94	91
EJ Index for Hazardous Waste Proximity	83	90	86
EJ Index for Wastewater Discharge Indicator	2	1	1

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



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July 9, 2020

Search Result (point)

1:144,448

0 1.25 2.5 5 mi

0 2.25 4.5 9 km

Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA	
Superfund NPL	2
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	9

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	9.2	9.25	43	8.63	66	8.3	75
Ozone (ppb)	46.1	44.8	94	43.4	85	43	73
NATA* Diesel PM (µg/m³)	0.602	0.669	49	0.446	70-80th	0.479	70-80th
NATA* Air Toxics Cancer Risk (risk per MM)	35	33	69	26	90-95th	32	60-70th
NATA* Respiratory Hazard Index	0.49	0.42	76	0.34	90-95th	0.44	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	400	630	68	530	69	750	63
Lead Paint Indicator (% pre-1960s housing)	0.55	0.41	63	0.38	71	0.28	79
Superfund Proximity (site count/km distance)	0.38	0.095	96	0.13	93	0.13	93
RMP Proximity (facility count/km distance)	1.5	1.2	75	0.82	82	0.74	85
Hazardous Waste Proximity (facility count/km distance)	1.8	2	64	1.5	73	4	75
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	8.1	1.7	95	0.82	98	14	98
Demographic Indicators							
Demographic Index	63%	34%	83	28%	90	36%	84
Minority Population	71%	38%	79	25%	89	39%	79
Low Income Population	56%	30%	86	31%	86	33%	84
Linguistically Isolated Population	1%	5%	46	2%	63	4%	48
Population with Less Than High School Education	16%	11%	74	10%	79	13%	69
Population under Age 5	7%	6%	59	6%	60	6%	58
Population over Age 64	15%	14%	57	15%	52	15%	56

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

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Attachment 2

Gov. Pritzker.

I writing this letter to
inform you I'm having
a my problems due to
standing water in my
yard, this is caused by
poor drainage system.
I have sewer problems
foul smells coming into my
home, ~~3~~ 3 walls cracking
foundation sinking and
cracking, My floors are
buckling. ~~Our~~ Our water
is ~~Costiam~~ Contaminated
We cant drink the water,
have to boil befor using
it. I feel that, Commonfield

of Cahoka, Water Co.
America Bottoms should
be accounted for these
problem. We are not
getting service c these
problem. Some of these
Companies are Increasing
our bills.

Thank You

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

P.S Pls. Help

5/31

Dear Governor Pritzker:
I'm writing this letter to you about some concerns I'm having around my house, on both sides of me the yards are over-runned with weeds and I'm right in the middle, ~~which~~, which makes my situation dire. The ditches in front are filled with sewer water, so when it rains the water use to come to my porch, the city cleaned the out a couple years ago, with made the situation much better, now it just come half way the yard. I hope you're willing to discuss this issue as soon as possible, If you have any questions or concerns, please contact me at Ex. 6 Personal Privacy (PP)

Thankyou

Ex. 6 Personal Privacy (PP)

DEAR HONORABLE GOVERNOR PRITZKER

I AM a Resident of the GREAT STATE of ILLINOIS, AND the POOR city of Centreville. I'VE LIVED IN my HOME FOR 20 YEARS, FOR the LAST 15-16 YEARS, I have BEEN dealing with flooding IN my home, YARD, and the STREET IN FRONT of my home. The WATER COMES IN my basement MANY times, I CAN HEAR the WATER Rushing IN my Basement, but I JUST dont LOOK down there because I'm afraid of what I will find, I've had to Replace the FURNACE, Hotwater tank several Times, WASHER + DRYER. You CAN smell SEWAGE ODOR IN my home, The ODOR comes through the SINK. A lot of time I CANT have guest over because of the smell.

I CANT have Family over FOR events IN the YARD because the YARD is so Saturated with WATER, the Ditches around my house stay full of Raunchy water and mosquitoes are very very BAD.

I have Many Health issues, Some of which I Believe are Related To the conditions surrounding my Home!!!

YOUR HELP AN INTERVENTION with the ISSUES WE ARE FACING IN CENTREVILLE WOULD BE APPRECIATED

Ex. 6 Personal Privacy (PP)

Attachment 3

W1630300005

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397

JB PRITZKER, GOVERNOR JOHN J. KIM, DIRECTOR

January 24, 2020

Village of Centreville
LaMar Gentry
5800 Bond Avenue
Centreville, IL 62207

RE: Village of Centreville, IL – St. Clair County
NPDES General Storm Water Permit for Municipal Separate Storm Sewer Systems (MS4)
Log No. ILR400312 – WPC ID#: W1630300005

Dear Mr. Gentry:

We have received your MS4 Notice of Intent (NOI) renewal application concerning the above referenced project on January 21, 2020. Your application, as submitted, has been reviewed by the Permit Section staff, and based upon that review, the following items are offered for your consideration and appropriate action:

The Notice of Intent you submitted is incomplete. You may complete and resubmit the attached form or you can go to our website and access the electronic version of the NOI at: https://www2.illinois.gov/epa/topics/forms/water-permits/storm-water/Pages/ms4.aspx

Please refer to Part II. Notice of Intent (NOI) Requirements of the General NPDES Permit for Discharges from Small Municipal Separate Storm Sewer Systems. Part II, Paragraphs B.1. through B.5. explain the necessary requirements that shall be provided on the NOI.

Upon receipt of a satisfactory submittal of the information required, we shall finalize our review of this subject. Should you have any questions regarding the above, please contact Terri LeMasters at 217/782-0610 or at the above address.

Sincerely,

Sanjay Sobat /JAR
Bureau Chief
Bureau of Water

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

MAR 20 2020

REVIEWER: MED

cc: Records Unit, Collinsville Regional Office, Jim Miles, Mike Roubitchek-IEPA

Attachment 4

W1630300005/St Clair
Centreville/Centreville, City of
FOS

Miles, Jim

From: Caughman, Wayne
Sent: Thursday, January 23, 2020 8:41 AM
To: Miles, Jim
Cc: Stitely, Joe; Sanders, Gregg
Subject: FW: Situational Awareness

Jim,
In our work yesterday on Centerville, ended up calling Myla Blandford of the East Side Health District as I knew she is involved quite heavily in health issues for the residents of Centerville. Her office covers 4 contiguous townships in that area. The ESHD is a part of IDPH even though there is a St. Clair County Public Health District as well. As shown below, found out she has been involved in discussions with representatives of Sen. Duckworth's office as well as a representative of US EPA as shown below.
I'm sure we can call on her as we work through Centerville issues.
Wayne

From: Copeland, Mark (Duckworth) <Mark_Copeland@duckworth.senate.gov>
Sent: Wednesday, January 22, 2020 5:08 PM
To: Marceillars, Rochelle <Marceillars.Rochelle@epa.gov>; Myla Oliver-Blandford <MBlandford@eshd.org>
Cc: Curtis McCall <rwilliams@centownil.com>; Caughman, Wayne <Wayne.Caughman@Illinois.gov>; Sanders, Gregg <Gregg.Sanders@Illinois.gov>; Callahan, Adrianne <callahan.adrianne@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Newman, Erin <newman.erin@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>
Subject: [External] RE: Situational Awareness

RM – Let me discuss some dates/times with my colleagues and get back to you with options. Thanks in advance for reaching out. MC

Mark A. Copeland | Senior Policy Advisor | Office of Senator Tammy Duckworth | (202) 224-2854 | Hart 524

From: Marceillars, Rochelle <Marceillars.Rochelle@epa.gov>
Sent: Wednesday, January 22, 2020 6:01 PM
To: Myla Oliver-Blandford <MBlandford@eshd.org>; Copeland, Mark (Duckworth) <Mark_Copeland@duckworth.senate.gov>
Cc: Curtis McCall <rwilliams@centownil.com>; Caughman, Wayne <Wayne.Caughman@Illinois.gov>; gregg.sanders@illinois.gov; Callahan, Adrianne <callahan.adrianne@epa.gov>; Siegel, Kathryn <siegel.kathryn@epa.gov>; Newman, Erin <newman.erin@epa.gov>; Furey, Eileen <furey.eileen@epa.gov>
Subject: RE: Situational Awareness

Myla,

Thanks so much for sharing this information. I'm awaiting a call from Mark Copeland to further discuss the flooding issues in the Metro East area. I spoke with Dennis Traiteur, Commonfields of Cahokia, Public Water District, today and we had a good discussion.

Please keep EPA in the loop on any complaints you received from residents on flooding.

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE

MAR 20 2020

REVIEWER: MED

Rochelle A. Marceillars
Community Lead, City of East St. Louis
EJ and Community Revitalization Council

ED_005451A_00030419-00019

Illinois EPA FOIA Exemption Reference Sheet

SID: 35850

Agency ID: 170002064986
Bureau ID: W1630300005
Site Name: Centreville City of
Site Address1: 5800 Bond Ave
Site Address2:
Site City: Centreville

Media File Type: WATER

State: IL Zip: 62207-

This record has been determined to be partially or wholly exempt from public disclosure

Exemption Type:

Redaction

Exempt Doc #: 23 **Document Date:** 1 /23/2020 **Staff:** MED

Document Description: EMAIL THREAD: CAUGHMAN TO MILES PAGE 2

Category ID: 01 **Category Description:** FIELD OPERATIONS/INSPECTIONS **Exempt Type:** Redaction

Permit ID: **Date of Determination:** 3 /20/2020

Community Initiative
Planning and Administration Section
Enforcement and Compliance Assurance Division
U.S. EPA Region 5
(312) 353-4370 (312) 385-5487 (fax)
marceillars.rochelle@epa.gov

From: Myla Oliver-Blandford <MBlandford@eshd.org>
Sent: Wednesday, January 22, 2020 4:48 PM
To: Mark_Copeland@Duckworth.senate.gov; Marceillars, Rochelle <Marceillars.Rochelle@epa.gov>
Cc: Curtis McCall <rwilliams@centownil.com>; Caughman, Wayne <Wayne.Caughman@illinois.gov>; gregg.sanders@illinois.gov
Subject: Situational Awareness

Hello,

This email is in reference to our recent phone conversations regarding flooding and sewage concerns in Centreville and surrounding areas. As I shared with Mark Copeland yesterday, I had two complaints on Saturday of flooding. The individuals who contacted me gave permission to share their information.

1) [redacted]

*Resident complained of continued flooding in the area, which has previously resulted in structural damage to his home.

2) [redacted]

*Resident complained of flooding in area of [redacted] residence. [redacted] mentioned previously having concerns about a sewage smell in the area and in [redacted] drinking water after similar flooding events.

I indicated to both residents that I had recently been approached by Senator Duckworth's office and the EPA regarding the identified issues and that I would share their information with the representatives (& the Township Supervisor).

Myla Blandford

Myla Oliver-Blandford, MPH, REHS, LEHP
East Side Health District
650 N 20th St.
East St. Louis, IL. 62205
mblandford@eshd.org
(O): 618-271-9177
Cell: 618-409-7855
Fax: 618-875-5038

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RELEASABLE

MAR 20 2020

REVIEWER: MED

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MED

Attachment 5

USEPA order Pretreatment, Environmental Justice Community Revitalization Council

W/1630300005/St Clair Centreville/Centreville Agg
Kate
FOS

IEPA - DIVISION OF RECORDS MANAGEMENT
RELEASABLE
MAR 20 2020
REVIEWER: MED

Miles, Jim

From: Stitely, Joe
Sent: Tuesday, January 28, 2020 5:47 PM
To: Miles, Jim
Cc: Sanders, Gregg; Caughman, Wayne; Rosenblum, Fred
Subject: Commonfield of Cahokia & Centerville/Alorton Collection System Meeting

Yesterday (01/27/20), Wayne Caughman, Gregg Sanders, and I met with Dennis Traiteur, Manager for Commonfield of Cahokia Water & Sewer District, and La Mar Gentry, Administrator for the Village of Alorton and Centerville. The purpose of the meeting was to discuss issues related to the collection system problems, including SSO's, in their communities.

Commonfield of Cahokia Collection System - The system currently has 27 lift stations in the collection system. According to Traiteur, the system has at least 12 lift stations that are desperately in need renovation. Multiple stations only have one pump operational and seven of the stations are operated by a single temporary submersible pump (original pumps are non-operational). The collection system is mostly 8-inch concrete main with severe infiltration and inflow (I & I) issues. We discussed the need to reduce I & I in the collection system. I asked about possibly raising or sealing manholes. Traiteur indicated sealing manholes would possibly cause flooding issues. The area has significant issues with the management of stormwater.

Currently, sewage from 732 Commonfield customers discharge into the East St. Louis collection system while 976 customers discharge to Cahokia. There are not any main interceptors conveying wastewater into the East St. Louis collection system. There are seven entry points from the Commonfield collection system into the East St. Louis collection system. According to Traiteur, most of the sewer backup issues are related to the areas that report to East St. Louis. It should be noted that the East St. Louis collection system has three CSO outfalls. He indicated that when the East St. Louis collection system becomes charged during precipitation events, wastewater flows from Commonfield cannot be discharged to East St. Louis. Therefore, they are forced to shut their pump stations down. He also indicated that it common for residents to remove their clean out caps to avoid sewer being backed up in their homes. We discussed their inspection and routine maintenance of their collection system. Currently, the system does not have a program due to staffing issues. In addition, we explained that all SSOs are to be reported to the Agency and a 5-day written report sent to CAS.

Centerville/Alorton: The Centerville/Alorton collection system currently has 10 lift stations. According to the information provided by Gentry, Centerville owns eight. Of the eight, four stations are not operational. Three of them are being pumped via bypass pumping and the other station is going out for bid for new pumps and control panel. The collection system is mostly 8-inch and 10-inch PVC main with severe infiltration and inflow (I & I) issues. Sewage from Alorton is discharged to the Centerville collection system. Part of the sewage from Centerville is discharged to the East St. Louis collection system and part of the sewage does to the Cahokia Lift station. Gentry estimated that there are 4-5 entry points into the East St. Louis collection system. He indicated that most of the backup issues are related to the areas that report to East St. Louis system. He indicated that when the East St. Louis collection system becomes charged during precipitation events, wastewater flows from Centerville cannot be discharged to East St. Louis. He also indicated that it common for residents to remove their clean out caps to avoid sewer being backed up in their homes. The collection system area has significant issues with the management of stormwater. In addition, we explained that all SSOs are to be reported to the Agency and a 5-day written report sent to CAS.

We also stopped by Hurst-Roushe, Inc., engineering consultant for Commonfield of Cahokia, Alorton, Centerville, and East St. Louis. We requested a map identifying the specific locations where for Commonfield

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Illinois EPA FOIA Exemption Reference Sheet

SID: 35850

Agency ID: 170002064986
Bureau ID: W1630300005
Site Name: Centreville City of
Site Address1: 5800 Bond Ave
Site Address2:
Site City: Centreville

Media File Type: WATER

State: IL Zip: 62207-

This record has been determined to be partially or wholly exempt from public disclosure

Exemption Type:

Redaction

Exempt Doc #: 24 **Document Date:** 1 /28/2020 **Staff:** MED

Document Description: EMAIL: STITELY TO MILES PAGE 2

Category ID: 01 **Category Description:** FIELD OPERATIONS/INSPECTIONS **Exempt Type:** Redaction

Permit ID: **Date of Determination:** 3 /20/2020

of Cahokia, Alorton, and Centerville discharge into the East St. Louis collection system. They indicated that they would work on it and send it to us when it is completed.

[redacted]

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MAR 2 0 2020

REVIEWER: MED

Attachment 6

INFORMAL COMPLAINT

Request for Informal Investigation by the Illinois Environmental Protection Agency (IEPA)

1. Your Contact Information

Name:	On behalf of Centreville Citizens for Change: Equity Legal Services, Metropolitan St. Louis Equal Housing and Opportunity Council, and Earthjustice
	Point of Contact:
	Anna Sewell, asewell@earthjustice.org
Street Address:	1001 G Street NW, Suite 1000
County:	
State:	Washington, DC 20001
Phone Number:	(202) 797-5233

2. Place where you can be contacted during normal business hours (if different from above)

Name:	
Street Address:	
County:	
State:	
Phone Number:	( ) -

3. Name and address of alleged polluter

Name:	Commonfields of Cahokia Public Water District
Street Address:	2525 Mousette Ln, Cahokia, IL 62206
County:	St. Clair
State:	Illinois
Phone Number:	(618) 332-6620

Name:	City of Centreville
Street Address:	5800 Bond Ave., Centreville, IL 62207
County:	St. Clair
State:	Illinois
Phone Number:	(618) 332-1021

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Name:	Township of Centreville
Street Address:	N/A
County:	St. Clair
State:	Illinois
Phone Number:	N/A

4. Type of pollution (check one or more):

_____	Air (including odors)	_____	Hazardous waste
X	Water	_____	Drinking water
_____	Garbage	X	Sewer back-ups
_____	Other (please describe)		

5. Describe in detail the source and location of pollution:

For decades, the residents of Centreville, Illinois have lived with raw sewage that often bubbles out of manholes, spews out of pipes, or backs up into bathtubs and toilets. The sewage pools in roadside ditches, as well as in residents' yards. Recent sampling of standing water in Centreville neighborhoods confirms the water contains extremely high levels of bacteria, specifically total and fecal coliform. Due to the recurring sewage pollution and its overwhelming odor, families have been forced to stay indoors, unable to use their yards for recreation. Parents and grandparents warn children not to play outside, and gardeners have stopped growing food in the contaminated soils. The standing water has attracted large numbers of mosquitos, which may spread diseases. Many of these areas also severely flood during typical rain events, spreading and exacerbating the contamination. During severe flooding, some residents have been forced to wade through the sewage-contaminated floodwaters in order to escape their homes.

The frequent sewage discharges in Centreville are a result of years of neglect and mismanagement of Centreville's sanitary sewer system. The system is operated by two primary entities: the City of Centreville ("Centreville") and the Commonfields of Cahokia Public Water District ("Commonfields"). By allowing these ongoing discharges, Commonfields and Centreville are violating the Illinois Environmental Protection Act's prohibitions against discharges of pollution to land or water that could create a water pollution hazard. *See* 415 ILCS 5/12(a) (prohibiting any person from allowing "the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois"); *id*. § 5/12(d) (prohibiting the deposit of "any contaminants upon the land in such place and manner so as to create a water pollution hazard"); *id*. § 5/12(f) (prohibiting discharges of any contaminant into a water of the state without a permit); *see also* 35 Ill. Adm. Code 306.304 ("Overflows from sanitary sewers are expressly prohibited"); 35 Ill. Adm. Code 306.303 ("Excess infiltration into

sewers shall be eliminated, and the maximum practicable flow shall be conveyed to treatment facilities"); *Allaert Rendering, Inc. v. Illinois Pollution Control Bd.*, 91 Ill. App. 3d 153, 156 (1980) (affirming the Board's finding of a threat of pollution to surface water because "the combination of highly contaminated water sitting in a lagoon which has in fact flooded twice in six years demonstrates a definite danger of pollution"). Sewage is a "contaminant," as it is broadly defined in the Act to mean "any solid, liquid, or gaseous matter, any odor, or any form of energy, from whatever source." 415 ILCS 5/3.165. As further explained below, Commonfields and Centreville are allowing this contaminant to cause water pollution or create a water pollution hazard because their sewage systems have repeatedly discharged sewage to land and to water-filled ditches from manholes, cleanout pipes, and failing lift stations. These discharges threaten groundwater as well as nearby surface waters. For example, small fish have been reported in some of the sewage-filled ditches in Centreville, indicating a connection to surface waters. The Illinois Environmental Protection Agency ("IEPA") has a duty to investigate these violations of the Act and ensure compliance with the law, including eliminating the human health hazard posed by these sewage discharges.

a. Source of Pollution

The sewage pollution in Centreville is being discharged from systems operated by Commonfields and Centreville, neither of which operates under a National Pollution Discharge Elimination System ("NPDES") permit under the Clean Water Act.[1] Centreville operates a municipal sanitary sewer system[2] made up of mostly 8-inch and 10-inch PVC main lines, with severe inflow and infiltration problems.[3] Of eight lift stations owned by Centreville, four are not operational.[4]

Commonfields operates a municipal sanitary sewer system (as well as a community water system for drinking water) in portions of the following municipalities: the City of Centreville, the Village of Alorton, Centreville Township, and the Village of Cahokia.[5] In its 2014 Capacity, Management, Operations and Maintenance ("CMOM") program, Commonfields describes the system as serving approximately 8,100 residents in a roughly 5 square-mile service area.[6] The CMOM also includes the following description of the system:

- Average annual precipitation of 42"

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[1] Entities that control or allow pollution within the meaning of 415 ILCS 5/12(a) or that discharge without a permit are liable under Illinois law. *See Meadowlark Farms, Inc. v. Illinois Pollution Control Bd.*, 17 Ill. App. 3d 851, 860-61 (1974).
[2] Intergovernmental Agreement By and Between the City of Centreville, Illinois and Commonfields of Cahokia Public Water District, St. Clair County, Illinois (July 9, 2003), p. 1 (attached as Ex. 1).
[3] Email from Joe Stitely, Agricultural Engineer, Illinois Environmental Protection Agency, to Jim Miles, Illinois Environmental Protection Agency (Jan. 28, 2020) (hereinafter "IEPA Email") (attached as Ex. 2).
[4] *Id.*
[5] Commonfields of Cahokia Public Water District "Final Official Statement" prepared by Bernardi Securities, Inc., at "District Information" (Nov. 15, 1992) (attached as Ex. 3).
[6] Commonfields of Cahokia Public Water District Capacity, Management, Operations and Maintenance Program at 3 (Aug. 2014) (attached as Ex. 4).

- More than 40 miles of gravity sewers ranging from in size from 8" to 18" in diameter
- More than 3,000 feet of force mains
- More than 900 manholes
- 27 pump stations
- No piped overflow points within the system
- No combined sewers within the District limits[7]

According to IEPA, the sanitary sewer system operates with severe inflow and infiltration problems.[8] IEPA has also noted that Commonfields recently described almost half of its lift stations as desperately in need of renovation.[9] Some of the lift stations have only one functioning pump, while others have two non-functioning pumps and are using temporary submersible pumps.[10] The Commonfields system discharges into the East St. Louis system at seven locations.[11] When the East St. Louis system becomes "charged" during rain events, Commonfields will shut down its lift stations at these locations, leading to backups and overflows.[12] In its own work orders, Commonfields has documented various instances of sewage overflows related to failing lift stations, including strong odors due to bypass pumping[13] or from clogged lift stations;[14] sewage running down streets;[15] and customer complaints about backups.[16]

The pollution and human health hazards caused by ongoing sewage discharges in Centreville are compounded by frequent stormwater flooding. Under the NPDES Municipal Separate Storm Sewer Systems Phase II requirements of the Clean Water Act, St. Clair County and several communities including Centreville Township—known as "Co-Permittee Groups"—have committed to work together for purposes of complying with stormwater management requirements.[17]

b. Location of Pollution

Centreville is a city of approximately 5,000 residents adjacent to East St. Louis. The population is 96.6% African American, and approximately 48% of the residents live below the poverty line.[18] Centreville can be identified as an environmental justice

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[7] *Id.* at 3-4.
[8] IEPA Email, *supra* note 3.
[9] *Id.*
[10] *Id.*
[11] *Id.*
[12] *Id.*
[13] Work order at 82nd and Belleview lift station on August 1, 2017 (attached as Ex. 5).
[14] Work order at the 53rd and Market lift station on August 29, 2016 (attached as Ex. 6).
[15] Work order at 54th and Market lift station on November 25, 2013 (attached as Ex. 7).
[16] Work order at the Mary Ryans lift station on May 15, 2013 (attached as Ex. 8).
[17] Illinois Environmental Protection Agency, Division of Water Pollution Control, Annual Facility Inspection Report for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4) for Centreville Township (attached as Ex. 9).
[18] U.S. Census Bureau, American FactFinder, 2010 Demographic Profile Data for Centreville City, Illinois; U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates for Centreville City, Illinois.

community.[19] The sewage overflows and backups occur in various locations throughout Centreville, including but not limited to the specific areas known as "Ping Pong" and "Parkside."

IEPA has previously found sanitary sewer overflow violations by Commonfields at the following locations throughout its system: Illinois Route 157 and Calvin Blvd., Lakewood Place, 221 Elm Street, 45 Dora Drive, Judith and Amelia Streets, Lauralee and Violet Drive, 6320 Church Road, and 219 N. 82nd Street.[20] Commonfields itself has reported to IEPA many instances of large discharges, including two discharges within a single week when approximately 65,000 gallons of effluent was discharged due to a broken circuit breaker in the 82nd and Belleville pump station (located in Ping Pong) and 2,000 gallons was discharged due to an inoperative pump at the lift station on 75th and Clinton.[21]

IEPA has also previously documented sewage discharges in areas under Centreville's jurisdiction. Specifically, IEPA has identified overflows due to failing lift stations at South 34th Street and 37th and Market Streets, sewage discharges at homes near the Grand Marais Golf Club, and leaking manholes at 201 and 303 Park Drive and other unidentified residences.[22]

The East Side Health District has also reported manhole discharges and related problems to IEPA at multiple locations in Centreville. In 2018, East Side Health District informed IEPA that there were "several manholes" near 80th and 82nd Streets "with visible seeping water," and one manhole on 82nd Street "shooting water with surfactant-like foam surfacing" because "underground pressure [was] causing [the] manhole to rise with water shooting action."[23] In the same notice, East Side Health District reported that residents in that area and in the North 73rd Street area could not flush their toilets for days on end, and that a manhole on North 73rd was "filled to [the] top with water/liquid."[24]

During recent severe flooding on June 30, 2020, Centreville residents reported and photographed rushing water in various neighborhoods that overwhelmed both the streets and sewer system. The below photograph shows the conditions that day near the intersections of 80th and 82nd Streets, and Belleview Avenue.

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[19] EJ Screen report, showing 1, 3, and 5 mile radii of EJ Environmental, and Demographic Indexes (attached as Ex. 10).
[20] IEPA Violation Notice No. W-2013-50145 (July 29, 2013) (attached as Ex. 11).
[21] Sanitary Sewer Overflow or Bypass Notification Summary Reports reported by Dennis Traiteur on behalf of Commonfields to Wayne Caughman, from the IEPA Collinsville regional office on April 29, 2015 (attached as Ex. 12), April 27th, 2015 (attached as Ex. 13) and April 23, 2015 (attached as Ex. 14).
[22] Letter from Bud Bridgewater to Mayor Marius Jackson, July 14, 2015 (attached as Ex. 15) (South 34th Street); Letter from James Miles to Thomas Hill, Jan. 4, 2018 (attached as Ex. 16) (37th and Market Streets); Letter from Bud Bridgewater to Mayor Marius Jackson, Sept. 15, 2015 (attached as Ex. 17) (homes near the Grand Marais Golf Club); Letter from Jim L. Miles to Mayor Marius Jackson, undated (attached as Ex. 18) (manholes at 201 and 303 Park Drive); Letter from Jim L. Miles to Mayor Marius Jackson, undated (attached as Ex. 19) (manholes near unidentified residences).
[23] Email from Myla Oliver-Blandford, East Side Health District, to Wayne Caughman, IEPA (May 23, 2018) (attached as Ex. 20).
[24] *Id.*

The below photograph depicts water spewing out of a manhole near 73rd Street on the same date.

As the frequent complaints and reports reveal, the overflows and discharges in Centreville routinely occur in multiple neighborhoods and are not limited to one or two locations.

6. Describe the duration of pollution, including when you first noticed the pollution, how frequently it occurs, and what season or time of day it occurs:

The sewage overflows and discharges in Centreville have been occurring for many years, as IEPA's own records demonstrate. Formal complaint records range from 2003 through 2019,[25] and residents continue to report overflows this year.

IEPA has previously acknowledged some of these earlier discharges in formal violation notices to Commonfields. For example, in 2013 IEPA issued a violation notice to

[25] Complaint Listing (attached as Ex. 21); IEPA Water Pollution Control Local Complaints (attached as Ex. 22).

Commonfields for sanitary sewer overflows at several locations.[26] In the violation request form, IEPA noted that the overflows, bypasses, and complaints had been occurring "with regularity" in 2012 and 2013.[27] In 2015, Commonfields submitted an update to IEPA regarding the status of each of the sewage overflow locations that were the subject of the 2013 violation, and reported that there were remaining tasks to complete at all of the locations, including some where the nature of the problem had not even been identified.[28] Although Commonfields work orders and invoices indicate some limited repairs have seemingly been completed at two of the 2013 violation locations, the current status of repairs at most of these particular locations is unknown.[29] Complainants are aware of the status of the overflow from the N. 82nd Street "cleanout" pipe identified in the 2013 violation notice. This discharge has been ongoing since at least 2007 or 2008 and continues today, as noted by IEPA staff as recently as 2019.[30] IEPA has known about this alarming and hazardous fountain of sewage since at least 2010, when the agency collected a water sample from the discharge.[31] A decade later, IEPA and Commonfields have both failed to take action to halt this stream of raw sewage, depicted in the below photograph taken by Complainants in 2019.

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[26] 2013 IEPA Violation Notice, *supra* note 20 (identifying overflows at Illinois Route 157 and Calvin Blvd., Lakewood Place, 221 Elm Street, 45 Dora Drive, Judith and Amelia Streets, Lauralee and Violet Drive, 6320 Church Road, and 219 N. 82nd Street).

[27] IEPA VN Request Form (attached as Ex. 23).

[28] Letter from Dennis Traiteur to Bud Bridgewater re: Violation N. W-2013-50145 (Aug. 13, 2015) (attached as Ex. 24).

[29] Work orders and invoices at the Lauralee and Violet lift station in 2015, 2016, and 2018 (noting some limited spending for parts and pump repair, but not indicating whether the lift station repairs are complete) (attached as Ex. 25); Work orders and invoices at I.C. Track pump station at Rt.157 and Church and near 6320 Church Road (noting some limited spending for parts, but not indicating whether the lift station repairs are complete) (attached as Ex. 26).

[30] Sanitary Sewer Overflow or Bypass Notification Summary Report (May 8, 2013) (attached as Ex. 27) (noting an "ongoing overflow" at 82nd St. because the East St. Louis system was full and not accepting Commonfields wastewater); IEPA Water Pollution Control Local Complaints (July 26, 2010) (attached as Ex. 28) (2010 complaint noting that sewage had been spewing periodically to a ditch at 82nd Street and had been over the last two or three years); Email from T. James Blessman to Joe Stitely and Gregg Sanders (Aug. 23, 2019) (attached as Ex. 29) (noting the ongoing nature of the 82nd Street discharge).

[31] IEPA Water Pollution Control Local Complaints (July 26, 2010), *supra* note 30.

Similarly, IEPA has been corresponding with Centreville about sewage backup complaints within Centreville's jurisdiction since at least 2014.[32] IEPA has specifically documented sewage overflows to ditches due to failing lift stations and leaking manholes from 2015 through 2018.[33] Residents report that these discharges have been occurring for far longer, and continue periodically today.

Residents throughout Centreville continue to experience sewage overflows every year, with the most numerous discharges typically occurring during rainy spring months.

7. Provide any additional information that might help IEPA in any investigation:

In addition to the previously cited complaints, letters, email communications, and other documents, Complainants submit a collection of Commonfields work orders from 2010 to

[32] *See, e.g.*, Letter from Mayor Marius Jackson to Bud Bridgewater (Oct. 21, 2014) (attached as Ex. 30).
[33] *See, e.g.*, Letter from Bud Bridgewater to Mayor Marius Jackson (July 14, 2015), *supra* note 22; Letter from Bud Bridgewater to Mayor Marius Jackson (Sept. 15, 2015), *supra* note 22; Letter from Jim L. Miles to Mayor Marius Jackson (undated), *supra* note 22; Letter from Jim L. Miles to Mayor Marius Jackson (undated), *supra* note 22; Letter from James Miles to Thomas Hill (Jan. 4, 2018), *supra* note 22.

2019,[34] as well as many IEPA sanitary sewer overflow reports from Commonfields ranging from 2011 to 2015.[35] Complainants also submit three letters from individual residents to Governor Pritzker[36] and a letter from Centreville Citizens for Change to the mayor of Centreville.[37]

Complainants request that IEPA take immediate action to investigate this pollution, issue formal violation notices to Centreville and Commonfields, and require Commonfields and Centreville to take all necessary corrective action to halt all overflows and discharges of wastewater, including discharges from manholes, cleanout pipes, and failing lift stations. IEPA should arrange for an independent, credentialed party to conduct a complete diagnostic review of the system that identifies the causes of all discharges, as well as the acknowledged infiltration and inflow problems, and recommends solutions. IEPA should further require and oversee the completion of all repairs recommended in the independent review. Finally, as an immediate emergency action, IEPA should require replacement of all non-functioning or temporary pumps at Commonfields and Centreville lift stations within thirty days of receipt of this complaint.

Note: The Board will forward this request to IEPA with a copy to the person requesting the informal investigation. IEPA must send the Board an acknowledgment that it received this request. The Board will take no further action on your request. *See* 35 Ill. Adm. Code 103.208. **IEPA does not have an active noise control program.**

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[34] Commonfields Service Orders and Work Orders (attached as Exs. 31-39).
[35] IEPA Sanitary Sewer Overflow and Bypass Summary Reports from Commonfields of Cahokia Public Water District from 2011 through 2015 (attached as Exs. 40-52).
[36] Letters from residents Olivia Dunn, Barbara Eiland, and Valerie Marion to Gov. Pritzker (2020) (attached as Exs. 53-55).
[37] Letter from Centreville Citizens for Change to Mayor Marius Jackson (Feb. 10, 2020) (attached as Ex. 56).

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Attachment 7

W 163 045 00 01
water district – manage sewage system

Miles, Jim

From: Stitely, Joe
Sent: Thursday, January 30, 2020 2:10 PM
To: Miles, Jim
Cc: Sanders, Gregg; Caughman, Wayne; Rosenblum, Fred
Subject: City of East St. Louis - 01/30/20 Meeting

Today (01/30/20), Gregg Sanders and I met with Sam Swanson, Interim Superintendent for the City of East St. Louis. The purpose of the meeting was to discuss issues related to the collection system problems, including SSO's, in their community. According to 2010 Census data, East St. Louis has a population of 27,006.

The City of East St. Louis is a combined sewer community. About 2/3 of the collection system is combined and 1/3 is separate sanitary sewer. The collection system has three CSO outfalls. CSO Outfalls 001 and 002 are located at the Mississippi River. CSO Outfall 003 is located near Frank Holten State Park. Swanson indicated that the City does have drainage issues during heavy precipitations events. We reminded Swanson that the City should be completing and submitting monthly CSO discharge monitoring reports to the Agency.

The East St. Louis collection system currently has 17 lift stations. According to Swanson, all pump stations are currently operational. The lift stations are equipped with an OMNI monitoring system so that they are continuously monitored should any malfunctions occur. According to Swanson, the City spent about $180,000 last year replacing pumps. The City has a contractual agreement with Vandevanter Engineering to do semi-annual preventative maintenance on the pump stations. Swanson was only aware of aware of four locations where the Commonfield of Cahokia and Centerville/Alorton collection systems discharge into the East St. Louis collection system. They include: 82nd Street, 73rd Street, 69th Street, and 63rd Street. The downtown area is mostly large brick lined combined sewers as large as 6-7 feet in diameter. Most of the collection system is clay sewers. However, they have begun replacing the clay sewer with PVC this past year. When they are replacing with PVC, the sewers are being separated. Swanson indicated that no issues exist with backups except during extreme precipitation events. The collection system has inherent infiltration and inflow (I & I) problems. The city does maintain a written log of complaints received regarding backups. The City does not currently have a I & I reduction program. The City has not smoke tested or televised the collection system. We explained that all SSOs and backups must be reported to the Agency and a 5-day written report sent to CAS.

Based upon the meeting, the following recommendations are offered:

1. Immediately initiate efforts to reduce inflow and infiltration into their wastewater collection systems to minimize operation and maintenance problems as well as hydraulic loading during periods of significant rainfall. Smoke testing and television of the sewer mains should be conducted to determine the areas in need of repair or replacement.

2. Continue your efforts to replace the existing clay sewer mains with PVC and to separate the combined sewers.

3. Initiate submittal monthly CSO discharge monitoring reports as required by Special Condition 7 of their NPDES Permit.

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SSD