Message

From: Walts, Alan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9D1C6FCAE9AD45DB9F123817D2FB7011-AWALTS]
Sent: 5/27/2020 3:57:50 PM
To: Debbie Chizewer [dchizewer@earthjustice.org]
CC: nnelson@equitylegalservices.org; kjackson@ehoc-stl.org; asewell@earthjustice.org; mgeertsma@nrdc.org; nospina@nrdc.org; selbakri@earthjustice.org
Subject: RE: Centreville Follow-up

Thanks for this information Debbie, will follow up with all of you soon.

Director, Tribal and Multi-media Programs Office (TMPO)
U.S. EPA, Region 5
Phone: (312) 353-8894

From: Debbie Chizewer <dchizewer@earthjustice.org>
Sent: Wednesday, May 27, 2020 8:57 AM
To: Walts, Alan <walts.alan@epa.gov>
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Subject: Centreville Follow-up

Hi Alan,

Thanks again for bringing the Centreville concerns to the attention of the leadership team at Region 5. Urgent action is needed.

As we discussed, please find below a thumbnail sketch of some of the potential topics that Region 5 could pursue related to enforcement and/or regional solutions. These are designed as conversation starters. We are happy to explore any of these topics in greater depth.

Stronger Enforcement:

1. **Sanitary Sewage Overflows: Opportunity to rectify inequitable IEPA enforcement and promote environmental justice in Centreville:** Centreville is a low-income community of color that has suffered a disproportionate amount of environmental harm, particularly from its failing sewage infrastructure that regularly leads to flooding and sewage backups into residents' homes and yard. We are concerned that enforcement has not been even between communities with higher percentages of white residents and communities with higher percentages of black residents.

    - IEPA has brought enforcement actions against utilities in areas near Centreville with greater numbers of white residents, including other communities within the Commonfields of Cahokia Public Water System [See attached IEPA NOV, Commonfields--Hazel Avenue, Belleville, IL (2012)], and in adjacent Cahokia (See attached IEPA Complaint and Consent Decree)
    - Investigate whether and to what extent IEPA has been aware of parallel, persistent sewage problems in Centreville but not initiated or followed through on enforcement actions. [See attached work orders documents revealing frequent sewage backups.]

2. **Stormwater Permits—Potentially inadequate enforcement:** While we have seen at least one violation notice issued to Centreville Township for failure to comply with its stormwater permits, it is unclear what steps have been taken to rectify the problems.

[See attached IEPA Violation Notice Centreville, August 2018]

3. **Unauthorized Discharges of Sewage to Land and Navigable Waters?** From what we have learned from the Centreville residents and observed, there is sewage flowing in ditches through people's yards. We suspect that the sewage is flowing to nearby navigable waters and deserves further investigation. [See attached IEPA Complaint and Consent Decree; see linked video of sewage problems in Centreville]

4. **Drinking Water:** Residents currently lack security in the safety of their drinking water due to concerns with taste, odors, and appearance; they are paying large sums of money to buy bottled water instead. Miguel del Toral was a helpful resource in exploring possible contamination, including from harmful coliform bacteria. In addition, our team and residents helped uncover concerning chlorination issues at homes served by Illinois American Water. Residents need more effective monitoring and sampling of drinking water to better assess health risks and/or non-compliance, and appropriate corrective action.

Partnering for Regional Solutions: We have seen Region 5 engage in communities in a variety of ways to strive for environmental justice—ranging from enhanced monitoring and enforcement to partnerships designed to foster regional solutions. Region 5 should consider both approaches and employ both as needed or appropriate.

1. **Can EPA include Centreville as a focus environmental justice community, building on lessons learned from its experience in East St. Louis?** Can the East St. Louis effort either (1) be expanded to cover Centreville or (2) be adopted and tailored to the risks and opportunities presented in Centreville? We appreciate that Region 5 has entered into creative partnerships to solve local problems. We hope that something similar can be done in Centreville. We recognize that there are barriers here—e.g., Centreville's Mayor may be unwilling to collaborate on this type of project—but perhaps a partnership at the county level or with community partners could be more fruitful.

2. **Engage with IL Congressional Delegation:** The issues in Centreville are a priority for Senators Duckworth and Durbin. We see an opportunity to think broadly and regionally with their support. Convening a meeting with resident leaders, their legal and technical advocates, Region 5, and the IL delegation would be a first step.

We look forward to hearing back and continuing the conversation with you after you meet with Region 5 leadership.

Thanks,

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