Message

From: Nicole D. Nelson [nnelson@equitylegalservices.org]
Sent: 5/28/2020 8:34:41 PM
To: Walts, Alan [walts.alan@epa.gov]
CC: Debbie Chizewer [dchizewer@earthjustice.org]; kjackson@ehoc-stl.org; asewell@earthjustice.org; mgeertsma@nrdc.org; nospina@nrdc.org; selbakri@earthjustice.org
Subject: Re: Centreville Follow-up

Thank you for these next steps, Alan. We look forward to hearing from you.

On a related aside, what are the suggested steps for obtaining pest control for the residents since Eastside Health District is indicating they do not spray for mosquitoes? Would Dept. of Ag be willing to do so in this instance? I received another complaint from residents today about the mosquitoes indicating they are large and the bites are burning. Locating an agency that can provide the residents with relief is much needed. If you need to point me in a certain direction, please let me know. Thanks.

-Nicole

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On Thu, May 28, 2020 at 1:10 PM Walts, Alan <walts.alan@epa.gov> wrote:

> Debbie – thank you again for sharing this (and Nicole, thank you as well for the very helpful materials). I don't think we need a meeting at the moment, but wanted to provide you all with a quick update:
>
> 1. We'll continue to look into the enforcement concerns with Illinois EPA and Region 5 programs; and will convene an Illinois EPA/Region 5 EPA meeting to discuss the concerns and identify appropriate next steps for both Agencies.
> 2. We agree with the goal of partnering for regional solutions. Toward that end, I propose to help convene a meeting that includes all the relevant partners, with the goal of advancing a collaborative response to the longstanding and complex challenges facing Centreville and other communities in the region. We'll start legwork on this with our federal & state partners, including the lead for our East St. Louis project; and will bring more thinking and information to the table for further discussion when we meet again.
>
> Hoping to reach back out in the near future for another meeting, once we've made some progress on our next steps. In the meantime, please let us know if you have any questions.
>
> Best,

Alan

Director, Tribal and Multi-media Programs Office (TMPO)
U.S. EPA, Region 5

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From: Debbie Chizewer <dchizewer@earthjustice.org>
Sent: Wednesday, May 27, 2020 8:57 AM
To: Walts, Alan <walts.alan@epa.gov>
Cc: nnelson@equitylegalservices.org; kjackson@ehoc-stl.org; asewell@earthjustice.org; mgeertsma@nrdc.org; nospina@nrdc.org; selbakri@earthjustice.org
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,

Debbie Chizewer

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