

COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: NPDES Compliance Evaluation Inspection

Facility: Effingham Wastewater Treatment Plant
901 East Eiche Avenue
Effingham, Illinois 62401

NPDES Permit: IL0028622

Date of Inspection: January 24-26, 2023

EPA Inspectors:

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Ray Cullen, Environmental Engineer, (312) 886-0538

Facility Representatives:

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Michael G. French, Engineering Technician, (217) 342-5300
Joe Williams, Lead Operator, (217) 342-5300

Report Prepared By:

Val Dooling, Environmental Engineer

EPA Inspector Signature and Date:

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Approver Name and Title:

Ryan J. Bahr, Section 2 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date:

Ryan Bahr

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SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency conducted a federal pretreatment compliance inspection of the City of Effingham, Illinois (“City” or “Effingham”) from January 24 – 26, 2023. The purpose of the inspection was to evaluate the procedures and implementation of Effingham’s Pretreatment Program. Special Condition 11 of the National Pollutant Discharge Elimination System (NPDES) Permit IL0028622 issued to Effingham required it to implement and enforce its approved Pretreatment Program which was approved on September 10, 1985. EPA’s inspection consisted of:

1. Interviews and discussion with Jeremy Heuerman, Director of Public Works, Michael G. French, Engineering Technician, II and Joe Williamson, Lead Operator
2. Industrial User (IU) file reviews;
3. IU site visits at Blue Beacon Evergreen and St. Anthony’s Memorial Hospital.

On January 24, 2023 at 1:42pm, EPA inspectors Val Dooling and Ray Cullen arrived at the Effingham City Hall and met with Mr. Heuerman. Inspectors presented their credentials and began the inspection. After reviewing the information presented in Sections 2 and 3 inspectors left the Effingham City Hall at 2:36 pm.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

Effingham is a publicly-owned treatment works (POTW) with one wastewater treatment plant. The NPDES permit, issued May 9, 2019 with an effective date of June 1, 2019 and expiration date of May 31, 2024, allows effluent discharge from one outfall at 001 STP Outfall. The Effingham wastewater treatment plant has a design average flow of 3.75 million gallons per day (MGD) and maximum flow of 9.0 MGD. According to the Local Limits Revaluation Report of 2019 the actual flow measured at the head of the POTW is approximately 2.26 MGD.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

A. Pretreatment Program Modification and Legal Authority:

Effingham’s legal authority rests in two sections of its Ordinance, the Pollution Discharge Control Ordinance (Ordinance No. 4-2011) regulating general sewer use and the Pretreatment Ordinance (Ordinance No. 006-2022) regulating the Industrial Pretreatment Program. A Local Limits Revaluation was finalized in November 2019 and new revisions to the Pretreatment Ordinance and Industrial Pretreatment Enforcement Response Plan (ERP) were formally approved on March 1, 2022. Effingham has an agreement for sewage transportation treatment and disposal with Innovative Wastewater Treatment Cooperative, located in Dieterich, Illinois. Mr. Heuerman stated that only domestic wastewater is collected under this agreement. No SIU’s are located outside of Effingham.

B. IU Characterization:

Effingham Pretreatment Ordinance defines SIU with the same definition as 40 CFR 403.3(v)(1)(ii) except that Effingham defines an SIU as an Industrial User (IU) that discharges an average of 10,000 gallons of process wastewater to the POTW, different from the federal

regulation of an IU that discharges an average of 25,000 gallons per day of process wastewater to the POTW.

Effingham does not send out industrial waste surveys. To identify new IUs, Mr. Heuerman stated that Effingham uses a review of water billing records and review of plumbing permits. He added that a new manufacturing industry would only be located in a certain zoned area of the city and the POTW would be aware, through word of mouth, when any new business opens. The NPDES Permit Special Condition 11.d requires the POTW to update its inventory of IUs at least annually to ensure that all SIUs are properly identified, characterized and categorized. The protocol when a new company discharges to the sewer is to do a full pollutant analysis. Effingham recently did just this with a new industry that manufactures dry foods, Centennial Mills, that opened in Effingham most recently, but was determined to not have any process wastewater discharges. Pace Laboratories is used to analyze for all parameters.

C. Hauled Waste:

According to Mr. Heuerman, most hauled waste is domestic. Any non-domestic is denied or sampled prior to discharging at the wastewater treatment plant.

D. Control Mechanism Evaluation:

Individual IU permits are issued to each of its IUs that use over 10,000 gallons per day of water, according to the SUO definition of a SIC. The three SIUs that currently discharge to Effingham have had permits with the POTW for many years.

On December 2, 2019, the Effingham POTW was notified of an effluent NPDES permit violation by the IEPA for exceeding for Bis(2-ethylhexyl)phthalate (DEHP) limits, a chemical used to add flexibility to plastics. Effingham sampled to determine the source of DEHP and submitted the report to IEPA on September 21, 2020. The POTW achieved compliance with its NPDES Permit DEHP effluent limits by December 31, 2020. Subsequently, the SIU permits for both Blue Beacon locations were amended and reissued following the Ordinance approval and include testing and limits for DEHP, according to the 2021 annual report submitted to US EPA.

E. Application of Pretreatment Standards and Requirements

Mr. Heuerman stated that the POTW stays abreast of current regulation through professional organizations and consultants.

F. Compliance Monitoring:

Mr. Heuerman stated that inspections of each SIU are performed each year, towards the end of the year (Oct – Dec) and are used to identify any changes of practice at the IU. In previous years, Mr. Heuerman or Mr. French would lead the inspection. Going forward inspections are to be done by Mr. French. Samples at the IUs are collected randomly by Mr. Williamson, during the second half of the year (Jul – Dec) at a time separate from the inspection.

G. Enforcement:

Effingham's definition of significant noncompliance (SNC written in section 67 of the 2022 Pretreatment Ordinance) is similar to the definition written in 40 CFR 403.8(f)(2)(vii)(A) – (H). According to Mr. Heuerman, Effingham has not had to take any enforcement against IU's. There

have been investigations into mercury over 5 years ago and more recently, DEHP. For each instance, the POTW has had to determine where the sources originated, but no formal enforcement against an IU has taken place due to either pollutants. No IUs are currently in SNC or are under a compliance plan.

H. Data Management/Public Participation:

Mr. Heuerman stated that any requests by the public to review files are handled through the City's staff and through a legal review, if required. Effingham ensures public participation through public meetings and local publication. Pretreatment records are retained indefinitely, and all records are kept electronically instead of in hard copy.

I. Resources:

Effingham dedicates one Full Time Equivalent (FTE) to implementing the pretreatment program.

SECTION 4.0: FILE REVIEWS

Inspectors returned to the Effingham City Hall on January 25, 2023 at 8:20 am.

4.1 IU Identification

There are three SIUs in Effingham, summarized in Table A. Average flow for each is determined from the annual water usage for 1/1/2023 through 12/31/2021 provided in the 2021 annual report. None of the SIUs have categorical pretreatment standards.

Table A.

IU Name	IU Type	Visited During PCI?	Average Flow (MGY)	Permit Number	Effective Permit Date:	Reviewer
St. Anthony's Memorial Hospital	Non-categorical SIU	Yes	5.2	SA10162024	10/16/2019 – 10/16/2024	Val Dooling
Blue Beacon - Evergreen	Non-categorical SIU	Yes	11.4	BBE05092026	5/9/2022 – 5/9/2026	Ray Cullen
Blue Beacon - Fayette	Non-categorical SIU	No	6.36	BBF05092026	5/9/2022 – 5/9/2026	Val Dooling and Ray Cullen

4.2 Facility Information

St. Anthony's Memorial Hospital
503 North Maple Street
Effingham, IL 62401

St Anthony's Memorial Hospital is considered a SIU since it uses over 10,000 gallons per day. In the past it had laundry facilities onsite, but it was not using those facilities at the time of the inspection and instead it ships out laundry to a different facility. According to Mr. Holste, Maintenance Facilitator of St. Anthony's Memorial Hospital, the wastewater discharged to the sewer is almost entirely domestic waste. One exception is steam discharge resulting from the sterilization autoclave center. The IU is not classified under the any categorical effluent standards. The facility discharges approximately 14,000 gallons per day of domestic and steam wastewater.

Blue Beacon – Evergreen
1703 West Evergreen Avenue
Effingham, Illinois 62401

Blue Beacon - Evergreen is a truck wash that cleans the exterior of trucks and occasionally the interior of solid hauling trailers. The interior of petroleum tankers are not cleaned at this site and therefore it does not have any effluent discharge which is classified under the transportation equipment cleaning category, 40 CFR 442.

Blue Beacon - Fayette
1806 West Fayette Avenue
Effingham, Illinois 62401

Blue Beacon – Fayette has the same effluent as the Evergreen site.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

Individual Control Mechanism

- Effingham has issued permits to each of its SIUs. Each Permit is titled “General Discharge Permit”, but each permit has individual terms specific to that IU.

Statement of Duration

- All three permits are valid for the duration of five years.

Statement of Non-transferability

- All three permits have statements of non-transferability that match the language in the regulations.

Applicable Effluent Limits and Self-Monitoring Requirements

- All three permits have effluent limits for some pollutants, but do not list all the pollutant parameters listed in Section 3 of the 2022 Pretreatment Ordinance and Article 4, Section 4 of the 2011 Pollution Discharge Control Ordinance; therefore, do not include all the local limits. (Appendices C – D)
- The maximum daily concentration for fluoride is listed as 12.41mg/L for a new user, (there is no listed limit for existing users) in the 2022 Pretreatment Ordinance, but both

Blue Beacon permits have numeric reporting limits that exceed 12.41mg/L and state that Blue Beacon will be allowed to discharge fluoride at the current production rate until the NPDES Permit required that the City reduce its effluent fluoride level. (Appendix C)

- The 2011 Pollution Discharge Control Ordinance document lists surcharge limits for biochemical oxygen demand (BOD) at 200mg/L and suspended solids at 250 mg/L. St. Anthony's Memorial Hospital IU permit limits for BOD are 500 mg/L and for suspended solids are 500 mg/L. Since the 2011 Ordinance lists these pollutant parameters as surcharge limits and not effluent limits neither is considered a local limit. (Appendix C) Also, the local limit analysis from November 2019 did not recommend limitations for BOD or TSS.
- Each of the three permits accurately contain sampling frequency of every six months.
- Each of the three permits lists location of sample collection.
- Each of the three permits state that the sample types must be grab samples for pH and fats, oils and grease and all other sample types must be 24-hour flow or time proportional composite samples. 40 C.F.R. 412(g)(3) specifies that samples (other than pH and fats, oils and grease) must be 24 hour composite flow proportional unless the Control Authority has authorized time-proportional sampling when it is representative of the discharge and has been documented in the IU's file. Effingham did not have documentation to allow alternative sampling types.
- Each of the three permits lists reporting requirements that are consistent with the Ordinances and federal pretreatment regulations.
- Each of the three permits lists record keeping requirement that are consistent with the federal pretreatment regulations in which they are to be maintained for a minimum of three years.

Notification Requirements

- Each of the three permits has a requirement to notify the POTW in the event of slug loading.
- Each of the three permits does not have a requirement to notify the control authority if there are significant changes, although in each permit there is requirement that the IU must provide in its the semi-annual reporting, a report on any significant process changes planned that may result in a change in flow or quality.
- The permit requires each of the IUs to maintain copies of a Spill Prevention and Slug Control Plan according to the 2022 Pretreatment Ordinance.

Statement of applicable civil and criminal penalties

- Each of the permit have statements of civil and criminal penalties

B. Application of IU Pretreatment Standards:

- There are no categorical industrial users.
- Application of local limits are consistent with the Ordinances.

C. CA Compliance Monitoring

Sampling, frequency and documentation

- There are documented inspection records of annual inspection at each of the three SIU facilities each year, according to the required frequency.
- Effingham has performed compliance sampling at least once per year, as required for the approved program, for all SIUs.

Analysis for all regulated parameters

- Effingham does not sample for all the local limits that are listed in the ordinance, but it did sample for all the limits in each of the IU permits.

Appropriate sampling techniques and analytical methods

- Compliance monitoring for St. Anthony's Memorial Hospital samples collected on 9/4/19, 7/14/20, 8/17/22 indicated that pH was analyzed at a lab via composite sample after the hold time had been exceeded.
- BOD hold time had lapsed in some of the samples (2019 and 2020 Blue Beacon Evergreen and 2020 St Anthony's Memorial Hospital), but BOD is not a local limit but a surcharge limit.
- Other than the previously listed instances, all other samples were collected and analyzed according to the sampling techniques and analytical methods in 40 CFR 136.

Inspection

- Each facility had been inspected once a year according to the frequency specified in the regulations and there was a documentation of the inspection activities.

D. CA Enforcement Activities

Identification of discharge, monitoring, reporting and compliance schedule violations

- There is no indication that Effingham identified each of the following permit violations.
 - The CA sampling of Blue Beacon Evergreen for DEHP on 8/17/2022 was 0.062 mg/L which exceeded the 0.045 mg/L permit limit. DEPH was not listed as an effluent limit until the IU permit was reissued on May 9, 2022.
 - The CA sampling of Blue Beacon Fayette for DEHP on 8/17/2022 was 0.085 mg/L which exceeded the 0.045 mg/L permit limit. DEPH was not listed as an effluent limit until the IU permit was reissued on May 9, 2022.

- In CA sampling for Blue Beacon Fayette, the permit surcharge limits of 250mg/L of suspended solids were exceeded on 9/4/2019 at 280mg/L and 12/18/2019 at 460 mg/L.
- No pH results were listed in any of the Blue Beacon Fayette self-monitoring reports.

Calculation and Publication of Significant Non-Compliance

- None of the IUs are in significant non-compliance and none have been published.

Escalation and Adherence to Enforcement Response Plan

- According to the 2022 Enforcement Response Plan, failure to notify for isolated or infrequent effluent limits violations should result in a verbal telephone notice, site visit or letter of violation. There is no record of enforcement for each of the permit violations listed above.

E. IU Compliance Status

Sampling at IU at frequency specified in permit and regulations

- On the self-monitoring reports in years 2018 – 2022 submitted by Blue Beacon Fayette, pH was not measured on any report.
- Other than the instance mentioned above, for the time period reviewed, all other required sampling from Blue Beacon Fayette was performed at the frequency required.

Analysis by IU of all required pollutants in accordance with appropriate sample techniques and analytical methods

- Hold time for pH was exceeded for St. Anthony's Memorial Hospital's self-monitoring samples collected on 3/21/18, 9/17/2019, 3/31/20, 4/20/21, 9/28/21, 3/29/22 and 10/11/22.
- On St. Anthony's Memorial Hospital's May 2021, October 2021 and March 2022 self-monitoring reporting, sample temperature exceeded 6° Celsius.
- Other than the instances mentioned above, for the time period reviewed, all other samples from St. Anthony's Memorial Hospital were analyzed for all the required pollutants in accordance and with the appropriate sample techniques.

Periodic Self-Monitoring Reports submitted by IU

- Effingham was not able to provide a copy of the sample reports from St. Anthony's for the second half of 2020, but Effingham stated that it was submitted by the IU.
- All other sample reports from St. Anthony's Memorial Hospital are available and were submitted at the required frequency.

Notification and resampling of discharge violations

- No effluent permit exceedances were identified in the IU's self-monitoring reports. Notification or resampling following a permit limit exceedance is not applicable.

IU Submission/ Implementation of Slug Discharge Control Plan

- The 2022 Pretreatment Ordinance requires that each IU have a Slug Discharge Control Plan; however, Effingham does not have a slug discharge control plan from any IU.

Slug discharge control plan contains procedures for immediately notifying the POTW of slug discharges

- The document entitled 0-1302: Chemical Spill dated 5/9/2022 contains procedures for spill cleanup and notification and was provided from Blue Beacon to review and was not maintained by Effingham. In the document, there are no procedures for immediately notifying the POTW, instead the notification and reporting procedures are to call Blue Beacon's Director of Environmental Compliance who is responsible for local ordinance notifications.
- St. Anthony's Memorial Hospital did not have a Slug Discharge Control Plan available to review.

Noncompliance with discharge limits and reporting requirement (not SNC)

- Blue Beacon facility have had exceedances of DEHP during control authority's sampling; however, the most recent samples submitted through the self-monitoring reports are within permit limits.
- Blue Beacon – Fayette has not submitted any pH sampling during the years 2018 – 2022.
- St. Anthony's Memorial Hospital's self-monitoring reports do not contain the required elements required by its permit, such as cover letter, effluent changes, and signature.

Significant Noncompliance

- No IUs are in significant noncompliance

SECTION 5.0: INDUSTRIAL USER SITE VISITS

Blue Beacon – Evergreen

I, along with Inspector Cullen, left Effingham City Hall and joined Mr. French to conduct an industrial user site visit at Blue Beacon – Evergreen at 3:25 pm. We were joined by Zach Liss, General Manager of Blue Beacon – Evergreen. I showed my inspector credentials to Mr. Liss. Tina Price, Director of Environmental Compliance for Blue Beacon also joined us via phone while I introduced ourselves and stated the objectives of the site visit.

Mr. French identified the sample point, which is a manhole located outside of the facility (Photo 1). Mr. Liss explained that the facility had been in operation since 1981. It can clean the outside of semitrucks and it could clean the inside of dry or refrigerated trailers but it does not clean the inside of tankers or livestock trailers. The facility consists of two identical truck bays (Photo 3) and each bay has four wastewater pits that are approximately six feet deep. Wastewater is

collected and transferred to the pit prior to entering the pipe, where the samples are collected. The facility adds a softener to city water prior to use, and it can also add various cleaners, brighteners or other chemicals to the water prior to use. Blue Beacon does not have any pretreatment of its wastewater prior to it entering Effingham's sewer system. Mr. Liss told us that Blue Beacon is planning on replacing one of its chemicals that contains 15% hydrofluoric acid to another that has 3% hydrofluoric acid in order to reduce the fluoride content of its wastewater.

The IU permit for Blue Beacon Evergreen requires that the specific documents are maintained in an accessible location on the premises and are available for the inspection. Mr. Liss was able to provide copies of facility layout, correspondence and permits from Effingham, and sample results required by the permit. After the inspection, Ms. Price provided me an electronic copy of their spill control plan, which is also kept onsite in hardcopy.

At 4:17 pm, EPA Inspectors left Blue Beacon – Evergreen.

St. Anthony's Memorial Hospital

I, along with Inspector Cullen, met with Mr. French on January 26, 2023 at 8:30 am at St. Anthony's Memorial Hospital. At the hospital, we viewed the sample collection point which is located under a manhole on the street. (Photo 1) We met with Tim Holste, Maintenance Facilitator of St. Anthony's and I showed my inspector credentials to him. Mr. Holste explained that the vast majority of its wastewater is domestic, and that the IU does not have any industrial processes that contribute. According to him, about five years ago the laundry process was discontinued and laundry is done at a different facility. (Photo 3) The other source of wastewater aside from domestic is from the central sterilizer, which are steam autoclaves and do not have any added chemicals. (Photos 4-5) There is no pretreatment of wastewater at the IU prior to discharging it to the Effingham sewer system.

We viewed the hospital central sterilizing equipment and the laundry equipment and the autosampler that is used to collect its self-monitoring composite samples. According to Mr. Holste, St. Anthony's Memorial Hospital has held a permit with Effingham for over 20 years and has been sampling for at least as long as he has worked at the facility.

The IU permit for St. Anthony's Memorial Hospital requires that the specific documents are maintained in an accessible location on the premises and available for the inspection. Hospital staff had original blueprints of the hospital, sampling records from 2021 and 2022 and the permit. It was not able to obtain a Spill Prevention and Slug Control Plan.

Effingham Wastewater Treatment Plant

EPA Inspectors also met with Joe Williamson, Lead Operator at the Effingham Wastewater Treatment Plant and discussed control authority sampling collection and analysis. Mr. Williamson will collect a sample at each of the IUs before the end of each year. He will set up the autosampler at each sample point, except for the sample point at St. Anthony's Memorial Hospital. Since the sample point is on the roadway and the autosampler could be stolen or damaged, he will collect a sample each hour to make a time composite sample. Mr. Williamson confirmed that pH is tested during the analysis at the lab and is not tested within a 15-minute hold time.

SECTION 6.0: SUMMARY OF FINDINGS

Table B

40 C.F.R. Part	Area of Concern	Report Section
403.8(f)(1)(iii)B(3)	Permits for St. Anthony's, Blue Beacon Evergreen and Blue Beacon Fayette do not include all the local limits. A list all the pollutant parameters listed in Section 3 of the 2022 Pretreatment Ordinance and Article 4, Section 4 of the 2011 Pollution Discharge Control Ordinance are not listed in each permits.	4.3 A Applicable Effluent Limits
403.8(f)(1)(iii)B(3)	Permits for Blue Beacon Evergreen and Blue Beacon Fayette list the fluoride reporting limit as much higher than the limit in the 2022 Pretreatment Ordinance which lists the new user limit as 12.41mg/L.	4.3 A Applicable Effluent Limits
403.12(g)(3)	Permits for St. Anthony's, Blue Beacon Evergreen and Blue Beacon Fayette state that time proportional or flow proportional 24-hour composite sampling may be used, but there is no documentation in the IU files of alternative sample types being authorized.	4.3 A Applicable Effluent Limits
403.12(j)	Permits for St. Anthony's, Blue Beacon Evergreen and Blue Beacon Fayette do not have a requirement to notify the control authority if there are significant changes.	4.3 A Notification Requirements
403.8(f)(2)(v)	Effingham does not sample for all the local limits that are listed in the ordinance, but it did sample for all the limits in each of the IU permits.	4.3 C Analysis for all regulated parameters
403.8(f)(2)(vii) 403.12(g)(5)	Compliance monitoring for St. Anthony's indicated that pH was analyzed at a lab via composite sample after the hold time had been exceeded. Mr. Williamson confirmed that pH is tested during the analysis at the lab and is not tested within a 15-minute hold time.	4.3 C and 5.0 Appropriate sampling techniques and analytical methods
403.8(f)(2)(vii)	Effingham did not identify the following permit violations: - The CA sampling of Blue Beacon Evergreen of DEHP 8/17/2022 as 0.062 mg/L exceeded the 0.045 mg/L permit limits. - The CA sampling of Blue Beacon Fayette of DEHP on 8/17/2022 for 0.085mg/L exceeded the 0.045 mg/L permit limits. - No Blue Beacon Fayette self-monitoring reports have pH results.	4.3 D Identification of discharge, monitoring, reporting and compliance schedule violations
403.8(f)(5)	There is no record of enforcement for each of the permit violations listed above.	4.3 D Escalation and

		Adherence to Enforcement Response Plan
403.12(e) & 403.12(h)	The sample reports from St. Anthony's are missing the report for the second half of 2020.	4.3 E Periodic Self-Monitoring Reports submitted by IU
403.12(e) 403.12 (g)(1) 403.12(g)(5) 403.12(h)	St Anthony's self-monitoring reports indicated sample hold time of 15 minutes for pH analysis using EPASM4500-H⁺B was exceeded for samples collected on 3/21/18, 9/17/2019, 3/31/20, 4/20/21, 9/28/21, 3/29/22 and 10/11/22. St Anthony's self-monitoring reports indicated sample temperature exceeded the preservation temperature of 6° Celsius required for Oil and Grease analysis using EPA1664A and ammonia analysis using EPA350.1 for samples collected on 4/20/21, 9/28/21 and 3/29/22.	4.3 E Analysis by IU in accordance with appropriate sample techniques and analytical methods
403.8(f)(2)(vii)/ (C)	The POTW does not have a slug discharge control plan submitted by any of the three SIUs. St Anthony's Memorial Hospital does not have a Slug Discharge Control Plan available onsite.	4.3 E IU Submission of Slug Discharge Control Plan
403.8(f)(2)(vii)/ (C)	The chemical spill plan submitted by Blue Beacon for both Evergreen and Fayette sites does not contain procedures for immediately notifying the POTW.	4.3 E Slug discharge control plan contains procedures for immediately notifying the POTW of slug discharges
IU permit: SA10162024 Section II.A (6)	The IU permit requires St. Anthony's Memorial Hospital to maintain copies of its Spill Prevention and Slug Control plan and have available for review during inspection, St. Anthony's could not provide documentation of this plan.	5.0 St. Anthony's Memorial Hospital site visit

Documents received during the inspection:

- Pretreatment Program Profile completed dated 1/16/2023
- Pretreatment Program Status Update dated 1/16/2023
- Supplemental Data Review/Interview dated 1/16/2023
- NPDES Permit IL0028622
- Blue Beacon Evergreen Permit BBE05092026; Revised May 9, 2022
- Blue Beacon Fayette Permit BBF05092026; Revised May 9, 2022

- St Anthony's Memorial Hospital Permit SA10162024; Revised October 16, 2019
- Ordinance No 4-2011 Pollution Discharge Control Ordinance
- Ordinance No. 006-2022 Pretreatment Ordinance
- Certification of Sewer User Ordinance Review
- Final Approval of the City of Effingham Sewer Use and Pretreatment Ordinance and Enforcement Response Plan Modification from U.S. EPA dated April 1, 2022
- Agreement for Sewage Transport, Treatment and Disposal between City of Effingham and Innovative Wastewater Treatment Cooperative, LLC dated July 3, 2018
- Resolution No. 003-2022 Enforcement Response Plan
- Sludge Land Permit 2022-SC-67192 issued by Illinois EPA issued June 8, 2022.
- City of Effingham Legal Authority to Implement a Pretreatment Program Letter to U.S. EPA Permits Branch dated July 18, 2019
- Pretreatment Annual Reports submitted to U.S. EPA for 2019, 2020, 2021
- IU Inspections: 2018 - 2022
- Control Authority Sampling 2018 – 2022
- Self – Monitoring Reports submitted by the IUs 2018 - 2022

Appendix A: Blue Beacon Evergreen Inspection Photo Log

EPA Inspection January 25, 2023

All photos taken by Ray Cullen, Environmental Engineer, U.S. EPA

Camera: Canon PowerShot SX230 HS



1: IMG_0305

Description: View downward into the open pipe, with lid removed, where the Blue Beacon – Evergreen samples are collected.

Location: Blue Beacon Evergreen outside of the facility

Date/Time: January 25, 2023 5:29 PM



2: IMG_0306

Description: View of the open sample point from Photo 1. Lid has been opened for the photo.

Location: Outside of the Blue Beacon Evergreen facility

Date/Time: January 25, 2023 3:29 PM



3: IMG_0307

Description: One of two identical truck wash bays. Four wastewater pits are located under the center grates along the floor. Hoses are located along the walls and ceiling of the truck wash bay.

Location: Eastern bay, facing northwards.

Date/Time: January 26, 2023 4:02 PM

Appendix B: St. Anthony's Memorial Hospital Inspection Photo Log
EPA Inspection January 26, 2023
All photos taken by Ray Cullen, Environmental Engineer, U.S. EPA
Camera: RICOH WG-4 GPS



1: APOL0359

Description: Sample collection point outside of St. Anthony's Memorial Hospital. The manhole cover has been removed for this photo and is normally closed.

Location: Roadway near the Emergency parking lot of St. Anthony's Memorial Hospital

Date/Time: January 26, 2023 8:31 AM (Photo timestamp one hour ahead)



2: APOL0360

Description: Closed manhole on bottom of photo is the sample point for St. Anthony's Memorial Hospital. The sample location is on the side of a street and the Emergency parking lot in rear.

Location: Roadway near the Emergency parking lot of St. Anthony's Memorial Hospital

Date/Time: January 26, 2023 8:32 AM (Photo timestamp one hour ahead)



3: APOL0361

Description: Washing facility at St. Anthony's Memorial Hospital are not used at the time of the inspection. A sign located on the washer machine indicates that it should not be used.

Location: Laundry Room at St. Anthony's Memorial Hospital

Date/Time: January 26, 2023 8:46 AM (Photo timestamp one hour ahead)



4: APOL0362

Description: Front of steam sterilizer autoclave that produces steam condensate wastewater.

Location: Central Sterilizing Department in St. Anthony's Memorial Hospital

Date/Time: January 26, 2023 8:57 AM (Photo timestamp one hour ahead)



5: APOL0363

Description: Rear of steam sterilizer autoclave. Steam condensate is discharged to the floor drain located under the sterilizer.

Location: Central Sterilizing Department in St. Anthony's Memorial Hospital

Date/Time: January 26, 2023 8:58 AM (Photo timestamp one hour ahead)

Appendix C: Local Limits listed within the Effingham Ordinance 006-2022 Pretreatment Ordinance Section 3

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SECTION 3: SPECIFIC LIMITATIONS ON DISCHARGE

- A. Discharges from each separate discharge of a user, as measured under the provisions of this Ordinance, shall not contain in excess of the following concentrations based upon a 24-hour composite sample.

<u>Pollutant</u>	<u>Max. Daily Concentration</u> <u>(mg/l)</u>
Arsenic	1.28
Barium	38.40
Benzene	0.05
Total BEXT	0.75
Bis(2-ethylhexyl phthalate)	0.045
Cadmium	0.24
Chromium (hexavalent)	0.06
Chromium (total)	2.19
Copper	0.43
Cyanide	0.44
Fluoride	12.41*
Iron	50.00
Lead	0.48
Manganese	10.15
Molybdenum	15.59
Nickel	1.65
Phenols	2.959
Selenium	10.00
Silver	0.230
Zinc	1.11
Mercury	0.0005

**Maximum concentration for new user. The Illinois Pollution Control Board has set specific limits for specific users in their opinion and final order of the board dated December 18, 2003 (Exhibit A). If the flow at Station No. 03379500 (located approximately 14 miles downstream from the City of Flora water supply intake on the Little Wabash River) is less than 2.7 cfs and sampling yields a concentration of 2.0 mg/L or greater, then those industrial users controlled by the Illinois Pollution Control Board will be required to lower their discharge to 65.20 mg/L until further notice by the City of Effingham.*

SECTION 4: INCORPORATION OF NATIONAL CATEGORICAL PRETREATMENT STANDARDS

- A. Upon the promulgation of the National Categorical Pretreatment Standard (NCPS) for a particular User, the said standard, if more stringent than the limitations imposed under this ordinance for sources in that category, shall, when effective, immediately supersede the limitations and conditions imposed under this Ordinance.

Appendix D: Local Limits listed in Effingham Ordinance 4-2011 Pollution Discharge Control Ordinance Chapter B Article IV

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SECTION 80: "Upset" shall mean an exceptional incident in which there is unintentional and temporary noncompliance with applicable Categorical Pretreatment Standards because of factors beyond the reasonable control of the Industrial User. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

SECTION 81: "User" shall mean any person who contributes causes or permits the contribution of wastewater into the City POTW.

SECTION 82: "Wastewater" shall mean the combination of the liquid and water carried wastes from residences, commercial buildings, industrial plants and institutions including polluted cooling water.

- A. Sanitary Wastewater shall mean the combination of liquid and water carried wastes discharged from toilet and other sanitary plumbing facilities.
- B. Industrial Wastewater shall mean a combination of liquid and water carried waste, discharged from any industrial establishment and resulting from any trade or process carried on in that establishment including the wastewater from pretreatment facilities and polluted cooling water.
- C. Combined Wastewater shall mean wastewater including sanitary wastewater, industrial wastewater, storm water, infiltration and inflow carried to the POTW treatment facilities by a sewer.

SECTION 83: "Wastewater Discharge Permit" shall mean the document or documents allowing discharge to the POTW issued to a User by the City in accordance with the terms of Ordinance 4-2011.

SECTION 84: "Waters of the State of Illinois" shall mean all streams, lakes, ponds, marshes, water courses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the State of Illinois or any portion thereof.

ARTICLE IV

WASTEWATER TREATMENT AND PRETREATMENT REGULATIONS

SECTION 1: CONDITIONS FOR DISCHARGE TO THE SYSTEM

- A. Public wastewater collection facilities are required to be used for deposit of human waste, garbage or wastes that do not meet IEPA NPDES standards.
- B. Except as provided in City Ordinance no person shall connect or cause to be connected any building or facility on property or any part thereof to any sewer unless the entire property shall first be situated within the corporate limits of the City.

- C. It shall be unlawful for any person to deposit or discharge, or to cause to be deposited or discharged, to any wastewater collection facilities, any solid, liquid or gaseous waste unless through a connection approved by the City.
- D. Any person owning improved property within the City, which abuts any street, alleyway, or right-of-way in which a sewer is located, shall if the improvements are used or are intended to be used for any type of human use or employment and if the sewer is within one hundred (100) feet of the nearest property line of the property, at his expense, install therein, suitable toilet and waste disposal facilities and within ninety (90) days after such sewer is in service connect such facilities of the sewer in accordance with City ordinances; provided, however, that in the event compliance with this section causes severe economic hardship to said person, he may apply to the City Council for exemption from this section. Such applications shall state in detail the circumstances that are claimed to cause such economic hardship. Such exemptions shall only be granted to residential Users, shall not apply to other Users, and shall be granted only for such time as the demonstrated hardship exists.
- E. Such person as described in this Article IV, Section 1(C) and 1(D) shall not avoid connection to such sewer by reason of actual distance from building or structure to the connection point of such sewer.
- F. Except as provided in this Ordinance, it shall be unlawful to construct or maintain any privy, privy vault, septic tank, cesspool, or other facilities intended or used for the disposal of wastewater.
- G. It shall be unlawful to discharge, without an NPDES permit to any natural outlet within the City or in any area under its jurisdiction.

SECTION 2: PROHIBITIVE DISCHARGE STANDARDS

- A. No User shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the POTW, or pass through the POTW. The following general prohibitions shall apply to all Users of the City POTW whether or not a User is subject to National Categorical Pretreatment Standards or any other National, State or Local Pretreatment Standards or Requirements. A User may not contribute the following substances to the City POTW.
1. Any liquids, solids or gases which by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious or hazardous in any other way to the POTW or to the operation of the POTW. At no time, shall two successive readings on a meter capable of reading L.E.L. (lower explosive limit) at a point at the nearest accessible point to the POTW in a sanitary sewer, at the point of discharge into the POTW, or at any point in the POTW be more than five percent (5%) nor any single reading greater than ten percent (10%). Materials in this subsection include, but are not limited to, gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketone, aldehydes, peroxides, chlorates, perchlorates, bromates, polychlorinated biphenyls, polybrominated biphenyls, carbides, hydrides, stoddard solvents, and sulfides.

2. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to: grease, garbage with particles greater than one-half inch (1/2") in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, tar, asphalt residues from refining or processing of fuel or lubricating oil, mud or glass grinding or polishing wastes, or tumbling and de-burring stones.
3. Any wastewater which will cause corrosive structural damage to the POTW, but in no case wastewater having pH less than 5.0, unless more strictly limited elsewhere in this ordinance.
4. Any wastewater containing incompatible pollutants in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create an incompatible effect in the receiving water of the POTW, exceed the limitation set forth in a National Categorical Pretreatment Standard (when effective), or in Section 3 of this Article IV or create a public nuisance. An incompatible pollutant shall include, but not be limited to, any pollutant identified pursuant to Section 307(a) of the Act.
5. Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastewaters are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into sewers for their maintenance and repair.
6. In no case shall a substance discharged to the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the Act; any criteria guidelines or regulations affecting sludge use or disposal developed pursuant to the RCRA, SWDA, the Clean Water Act, the Toxic Substances Control Act, or State criteria applicable to the sludge management method being used.
7. Any substance which will cause the POTW to violate its NPDES Permit or the receiving water quality standards.
8. Any wastewater having a temperature at the point of discharge to the POTW which will inhibit biological activity in the POTW treatment plant resulting in interference; in no case shall wastewater be introduced to the POTW which exceeds 65°C (149°F) or which exceeds 40°C (104°F) at the POTW treatment plant.
9. Any pollutants, including oxygen demanding pollutants released in a Discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW. In no case shall a slug measured at the point of discharge to the POTW have a flow rate or contain concentrations of pollutants that exceed, more than five (5) times the average twenty-four (24) hour concentrations, or 24-hour flow during normal operation; provided, however, that a User subject to

National Categorical Pretreatment Standards shall comply with such standards in addition to this subsection B (9).

10. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by State or Federal regulations.
 11. Any wastewater which may contain more than 100 mg/l concentration of fat, oil, grease (FOG) or Freon extractable material.
 12. Any wastewater containing BOD, total solids, or suspended solids of such character and quantity that unusual attention or expense is required to handle such materials at the sewage treatment plant; provided, however, that a User may be permitted by specific, written agreement with the City, which agreement to discharge such BOD or TSS may provide special charges, payments or provisions for treating and testing equipment.
 13. Ammonia nitrogen in amounts that would cause the City to fail to comply with regulations of IEPA.
 14. Mercury in amounts that would exceed the requirements of Section 304.126 of Title 35: Environmental Pollution, Subtitle C, Water Pollution, Chapter 1, Pollution Control Board, as amended.
 15. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.
 16. Any trucked or hauled pollutants, except at discharge points designated by the POTW.
 17. Any toxic gases, vapors or fumes.
 18. Any wastewater generated and discharged by a dental discharger through the practice of dentistry that may contain dental amalgam.
 19. The discharge of pharmaceuticals, either listed or exhibiting hazardous waste characteristics, as defined in Subparts C, D and Appendices in 40 CFR 261 generated from healthcare facilities or reverse distributors is prohibited.
- B. No person shall discharge or cause to be discharged any waste without being in compliance with the provisions of the Pollution Discharge Control Ordinance of the City of Effingham, Ordinance No. 94-2004.