

EPA's Receipt of Illinois American Water Co.'s Request to Terminate SDWA Section 1431  
UAO for Illinois American Water Co.

On November 9, 2022, EPA received Illinois American Water Co.'s (IAW) request to terminate the SDWA Section 1431 Unilateral Administrative Order (UAO) for IAW. Pursuant to the UAO, termination is appropriate if the record demonstrates to the satisfaction of EPA, that the terms of the UAO have been satisfactorily completed. EPA is reviewing the records and information collected to date from IAW to determine if it is appropriate to terminate the UAO for IAW and the terms of the UAO have been satisfactorily completed.

Under the UAO, IAW and the City of Cahokia Heights were required, among other things, to submit historical and updated system information, conduct 12 months of continuous pressure monitoring within each distribution system, conduct bacterial sampling within 24 hours after a sanitary sewer overflow, distribute alternate water supplies during boil orders, and repair infrastructure identified in the UAO as a significant deficiency.

From September 2021 to September 2022, IAW completed 12 months of continuous pressure monitoring in its distribution system. On or before July 26, 2022, IAW addressed its significant deficiencies by repairing flaking paint and inoperative equipment at the intake building. On August 31, 2021, IAW submitted system information such as distribution maps and monitoring records. On August 27, 2021, IAW added four new sample sites to their state approved bacterial sampling plan. On June 8, 2022, IAW added one new sample site to their state approved bacterial sampling plan. The sites include areas where repeated SSOs have occurred in order to ensure the entire community is represented. From the effective date of the UAO, IAW has collected bacterial and chlorine samples following low pressure events or SSOs. During this time period, there have been no total coliform violations. On August 17, 2021, IAW submitted an alternative water source plan (AWSP) documenting procedures and a commitment to distribute bottled water to residents when necessary. The AWSP was amended on May 31, 2022 to add another location for bulk distribution of water.

EPA conducted a Safe Drinking Water Act inspection on October 18-19, 2022, and it confirmed IAW was still in compliance with the UAO. In addition, EPA is reviewing IAW's monitoring data, weekly reports, and other records to ensure IAW submitted all required deliverables. Following this review, EPA will be able to determine whether IAW has satisfactorily completed the terms of the UAO. As noted above, on November 9, 2022, IAW formally requested EPA consider releasing IAW from the UAO since it believes it has satisfactorily completed the terms of the UAO.

Additionally, while not required by the UAO, IAW reports it has increased its efforts to improve community outreach and upgraded its infrastructure within Cahokia Heights. IAW issues monthly newsletters for residents and has designated staff to answer any resident questions. IAW also invited residents to an open house on October 26, 2022, to facilitate direct communication

between residents and treatment plant operators. IAW developed a long-term capital improvement plan in which IAW indicates it is committed to ongoing maintenance projects, such as main replacements, throughout Cahokia Heights.

Termination of the UAO for IAW will not affect the requirements for the City of Cahokia Heights. The UAO for the City of Cahokia Heights will remain in place until the terms of the UAO have been met to EPA's satisfaction.