

## Director of Compliance and Innovation Report

June 17, 2026

### Plant Loading, CSO Report, and Director's Notes

#### Plant Influent Report:

Biochemical Oxygen Demand, 5-Day (Avg. 23950 lbs/day)	38 percent of design
Total Suspended Solids (Avg. 29046 lbs/day)	27 percent of design
Average Daily Flow (30.55 million gallons/day)	75 percent of design
Maximum Daily Flow (44.17 million gallons/day)	35 percent of design

Plant Influent Total Monthly Flow (million gallons) for April	1173.65
Estimated Unbilled Total Monthly Flow (million gallons)	524.47
Total Monthly Precipitation (inches)	5.04

#### Plant Effluent Report:

Parameter	Report Frequency	Permit Limits	Reported Values	Violations
CBOD <sub>5</sub> , mg/L	Mo./Wk. Avg	20/40	2/2	0
TSS, mg/L	Mo./Wk. Avg	25/45	3/3	0
NH <sub>3</sub> -N, mg/L	Mo. Avg/Daily Max	1.5/3.0	0.32/0.43	0
DO, mg/L	Mo. Avg/Wk. Avg/Daily Min	6.25/5.0	7.56/7.52	0
pH, S.U.	Daily Min/Max	6.0/9.0	7.69/8.01	0
Total Nickel, mg/L	Mo. Avg	0.0381	0.013	0
Cl <sub>2</sub> Residual, mg/L	Daily Max	0.05	<0.011	0
Fecal Coliform CFU/100mL	Daily Max	400	960	1

#### CSO Report:

Location	Events	Est. Total Duration of Discharges (hrs.)	Discharge (million gallons)
Oakland Avenue (Outfall 003)	3	8.72	4.16
Lincoln Park (Outfall 004)	1	3.21	1.0
McKinley Avenue (Outfall 007)	2	3.1	1.11
Seventh Ward (Outfall 008)	2	2.7	2.93

#### Director's Notes:

##### **Permit Compliance:**

On June 2, 2026, some District staff traveled to Springfield, IL to hold a preliminary permit discussion with the Illinois Environmental Protection Agency (IEPA).

**Permit Exceedance:**

On May 13, 2026, the District exceeded its NPDES permit limit for fecal coliform, which is 400 CFU/100 mL, with a reported result of 960 CFU/100 mL. Following the exceedance, the District conducted an investigation and determined that the most likely cause was a significant biochemical oxygen demand (BOD) load discharged from Primient during upset operating conditions. Operations staff did not note anything unusual with disinfection process or chlorine levels.

The elevated BOD loading adversely affected the District's treatment processes, including nitrification and disinfection, ultimately contributing to the fecal coliform exceedance. The source of the loading was traced to a ruptured process pipe that released high-strength wastewater into a cooling tower, which was subsequently drained to the sanitary sewer system.

This BOD slug impacted the treatment plant differently than previous high-strength loading events. Most notably, there was minimal effect on dissolved oxygen (DO) concentrations within the aeration basins during the event. Additionally, several days after the slug discharge, the District's anaerobic digesters experienced upset conditions characterized by elevated acidity and alkalinity levels. These atypical responses suggest that the discharged process water may have contained a substantial population of anaerobic industrial bacteria. Such bacteria would not be expected to exert a significant oxygen demand in the aeration basins but could contribute to the observed digester's upset conditions. Furthermore, the increased bacterial loading may have overwhelmed the disinfection process, resulting in the elevated fecal coliform result.

It is also possible that the presence of anaerobic industrial bacteria contributed to a false-positive fecal coliform result. The mFC fecal coliform analytical method is selective for thermotolerant bacteria capable of growth at 44.5°C; however, certain non-fecal bacteria commonly associated with industrial processes, including some species of *Klebsiella spp.*, have been documented to produce false-positive results using this method.

As a result of the incident, enforcement action was initiated against the industrial user for causing interference with the District's treatment processes and for failing to report the slug discharge as required. Timely notification from the industrial user would have enabled the District to implement proactive operational adjustments and process control measures to better manage the incoming high-strength waste stream, rather than responding after impacts to the treatment process had already occurred.

**Operations, Laboratory, and Pretreatment Activity Reports – May/June 2026**Operations Activities Summary:

Routine operational activities were carried out in accordance with established procedures and in response to plant conditions. These activities encompassed equipment operation, monitoring and adjustment, process control testing, recordkeeping, and interdepartmental coordination to ensure optimal plant performance.

- 1) Digester Pumping Alternatives-  
Operations and Maintenance personnel have been evaluating alternative methods for transferring material from Primary Digester #2 to the Secondary Digester due to recurring pump blockages.
- 2) Preventive Maintenance (PM)-  
Operations staff continue to address preventive maintenance tasks as permitted by current time constraints, workload demands, and staffing levels.
- 3) Standard Operating Procedures (SOPs)-  
Efforts to develop and refine SOPs are ongoing, with staff actively engaged in documentation and procedural improvements.
- 4) Blower Usage-  
Demand was lower this month. Most of the period, two blowers were sufficient to meet needs.

5) Disinfection Process-

Chlorine (Cl<sub>2</sub>) demand has increased due to reduced flow rates and elevated temperatures.

6) Operator-

Thursday, June 11, 2026, will be Brent Deardorf's final full day with the District. Over the past four years, he has served as Lead Operator and has been a highly valued member of the operations team. Brent consistently demonstrated reliability and a strong commitment to completing tasks, while also mentoring and supporting new operators. He will be greatly missed, and we wish him continued success in his next chapter.

**Laboratory Activities:**

**Routine:**

A total of 1,922 analyses were performed in the laboratory during the month of May 2026.

Monitoring of treatment plant, industrial users, and receiving stream samples for compliance purposes and process monitoring continued. Laboratory personnel continued to perform additional background nutrient monitoring to help fully characterize the nutrient loading on the plant.

**Non-Routine:**

- 1) The SDD laboratory continued to send samples of raw influent weekly throughout May 2026 for the Illinois Wastewater Surveillance System (IWSS). Levels of COVID, Influenza and RSV were all low or not detected in recent samples.
- 2) The quarterly NPDES sampling of the influent, effluent, and sludge was conducted during the second week of May 2026. This also included our annual priority pollutants testing that includes 110 different compounds including pesticides, PCBs, volatile organic compounds, and various other toxic compounds that could be found in our wastewater and sludge.
- 3) The SDD laboratory analyzed eight stormwater samples during May 2026 for the Lake Decatur Watershed monitoring study. The SDD is providing in-kind laboratory analysis of samples collected at the study's monitoring sites after significant storm events.
- 4) Keith Richard attended the monthly virtual meeting of the Executive Board of the Illinois Association of Water Pollution Control Operators (IAWPCO) on May 15, 2026. Keith serves as the Chair of the Central Region for IAWPCO.
- 5) Keith Richard attended the long-range planning meeting of the Executive Board of the Illinois Water Environment Association (IWEA) in Joliet on May 16, 2026. Keith serves as the Second Vice-President of the IWEA.
- 6) Keith Richard virtually attended the quarterly meeting of the IWEA Laboratory Committee on May 21, 2026. Keith serves as the Vice-Chair of the committee.
- 7) Keith Richard was the lead presenter for an all-day Wastewater Laboratory Workshop held at the St. Charles Department of Public Works on May 26, 2026. The workshop was hosted by the Illinois Section of the American Waterworks Association (ISAWWA) and was attended by thirty plant operators from around the state.



## **Pretreatment Activities:**

### **Pretreatment - General Activities:**

- 1) Pretreatment personnel monitored 9 commercial and industrial users (IU) during May 2026. There were 5 industrial site inspections completed.
- 2) There was one industrial discharge permit issued to **Decatur Memorial Hospital (DMH)** in May 2026.
- 3) Sampling for **Tillamook** continued in May. Following **Tillamook's** submission of their flow data for April, there were 2 additional violations for FOG and TSS. **Tillamook** improved their slug management in May, as there was only 1 slug. pH continues to be an issue for **Tillamook**, and they are currently working on establishing the correct concentrations for their tank cleaning.
- 4) The SDD is continuing to work on the AOC issued by the USEPA and agreed upon in January. The procedures for tracking self-monitoring reports from **ADM** and **Primient** were finalized and submitted.
- 5) On May 12th, **Primient** had a process leak that caused them to discharge 58,920 pounds of BOD, more than double their permitted limit. Due to this discharge, the SDD violated its NPDES permit for fecal coliform, which puts **Primient** into Significant Non-Compliance. The SDD is currently awaiting **Primient's** 15-Day response to this event.

### **Pretreatment Ordinance - Verbal Notices:**

SDD issued a total of 8 Verbal Notices to **ADM**, **Tillamook**, and **Primient** in May 2026:

- **Tillamook (3 Violations):**
  - Slug : 5/19
  - pH (2): 5/6, 5/7
- **Primient (8 Violations):**
  - Daily Max. BOD (3): 5/6, 5/12, 5/21
  - 10-Day Moving Average BOD (5): 5/12 through 5/16
- **ADM Railcar Repair**
  - FOG-T: 5/11 and 5/12

### **Pretreatment Ordinance - Warning Notices (WN):**

There were no WN's issued during May 2026.

### **Pretreatment Ordinance - Notices of Violation (NOV):**

There were no NOV's issued May 2026.

### **Pretreatment Ordinance - Executive Orders (EO):**

There were no EO's issued during May 2026.

### **Pretreatment Ordinance - Penalty Assessments:**

The following industrial penalties were assessed for May 2026.

- **Tillamook** - \$3,000
- **Primient** - \$66,000

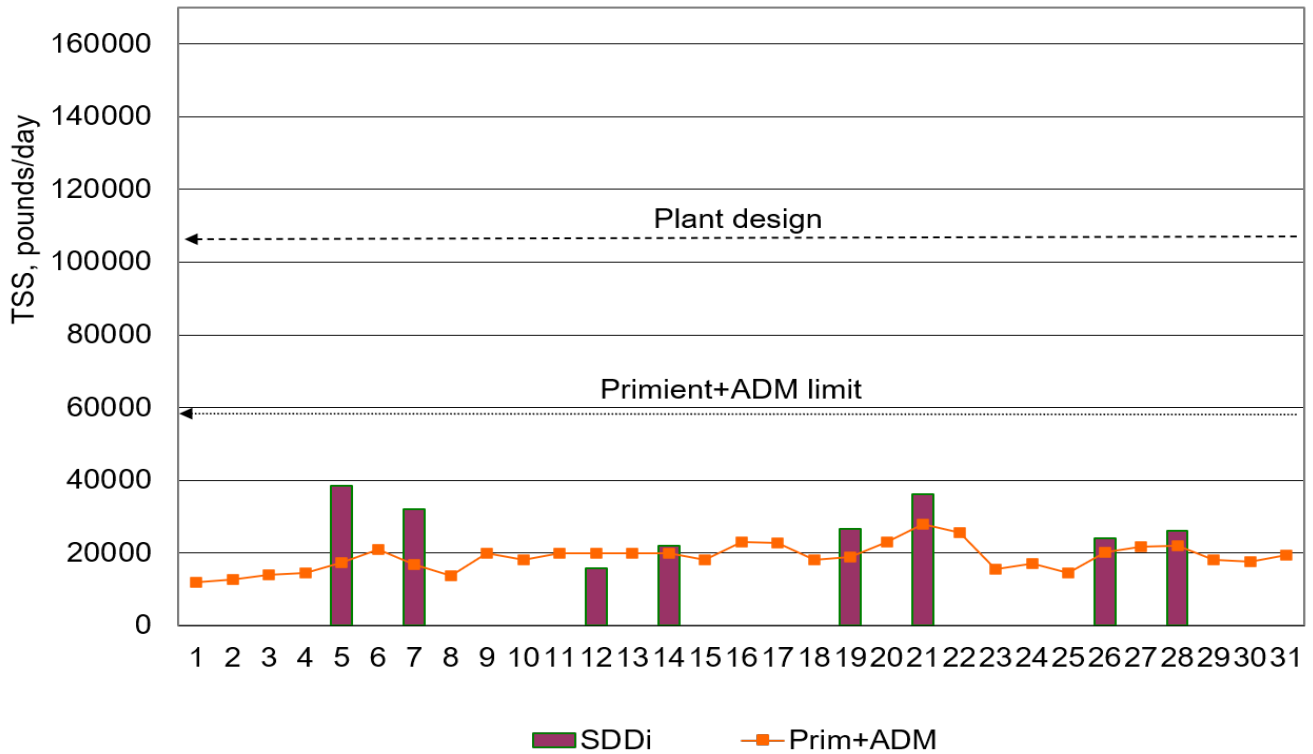
## **Nutrient Program Report:**

### **NARP/Integrated Planning:**

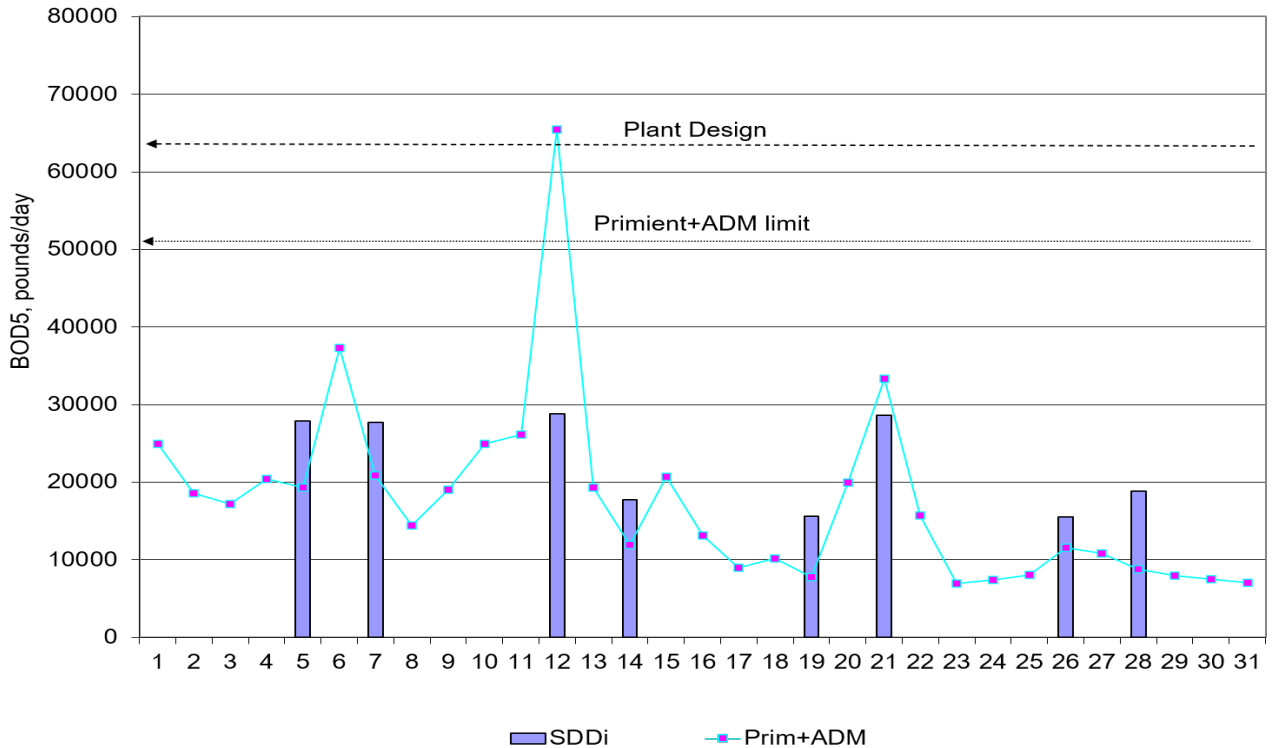
In coordination with Geosyntec, the District has the first draft of the proposed scope of work completed and an outline of "next steps" for the Integrated Planning group's consideration. We are working with the City to get the newest Draft of the MOU signed so the scope of work can begin.

**Plant Operating Graphs:**

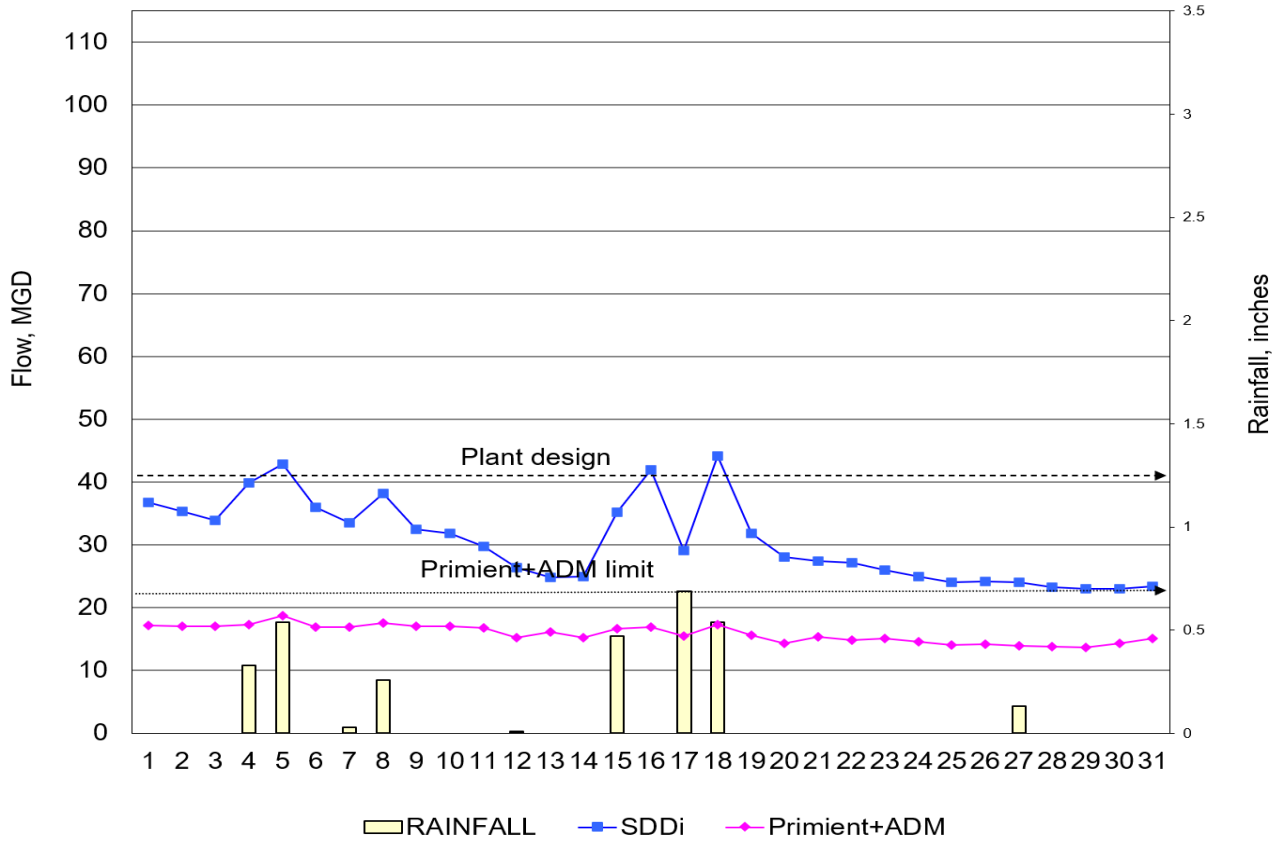
**TSS Comparison: SDD Inf Primient+ADM Discharges**



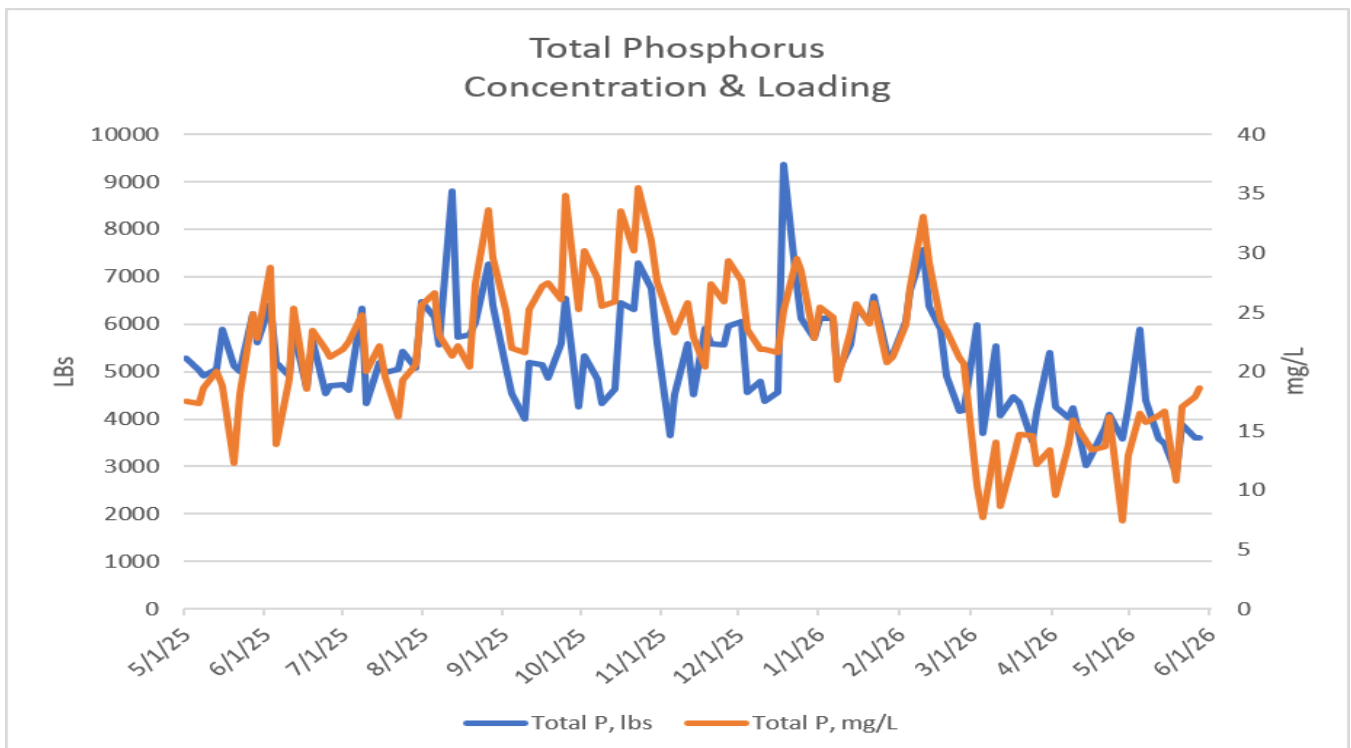
**BOD Comparison: BOD Inf vs. Primient + ADM Discharges**



**Flow Comparison: SDD vs. Primient + ADM Discharges and Rainfall**

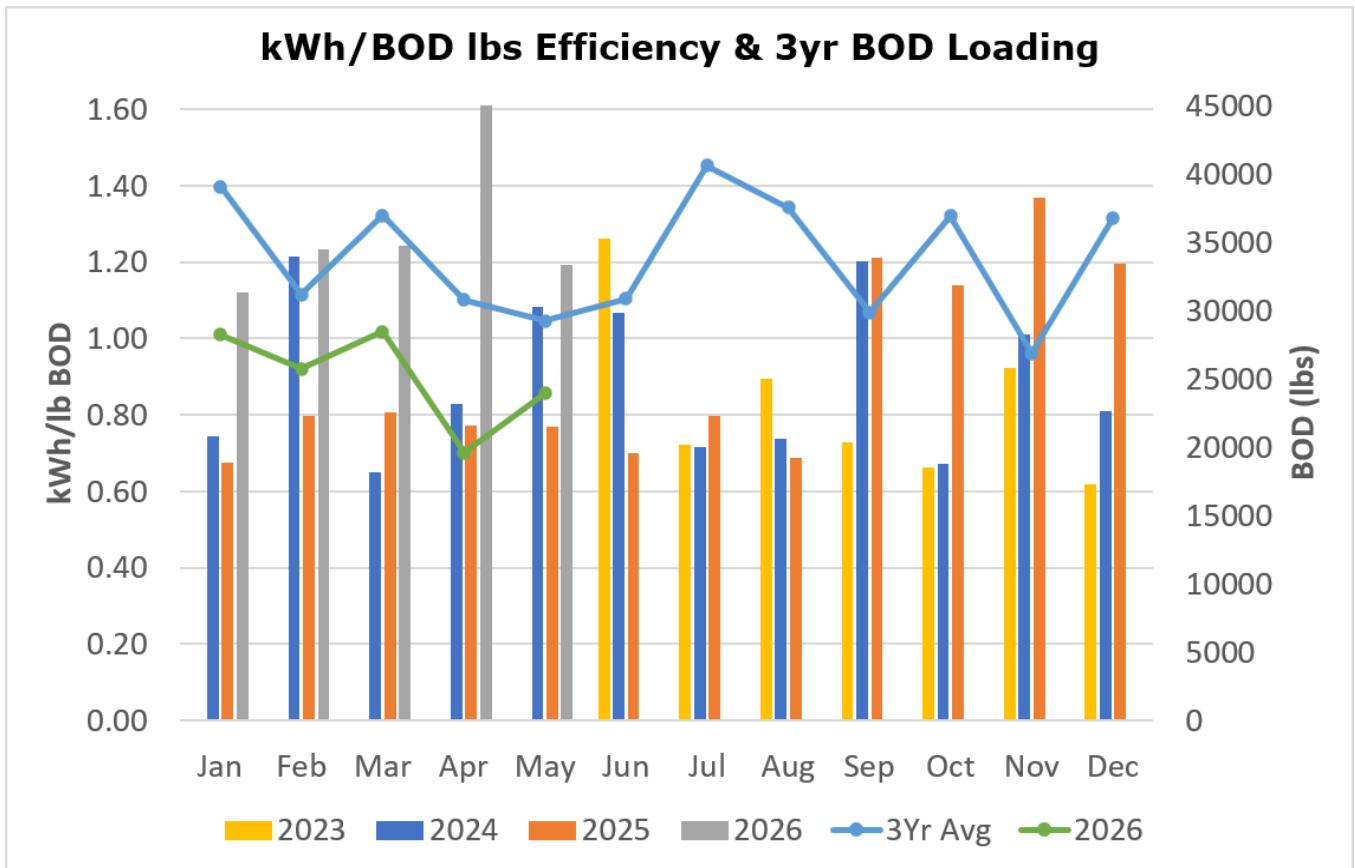
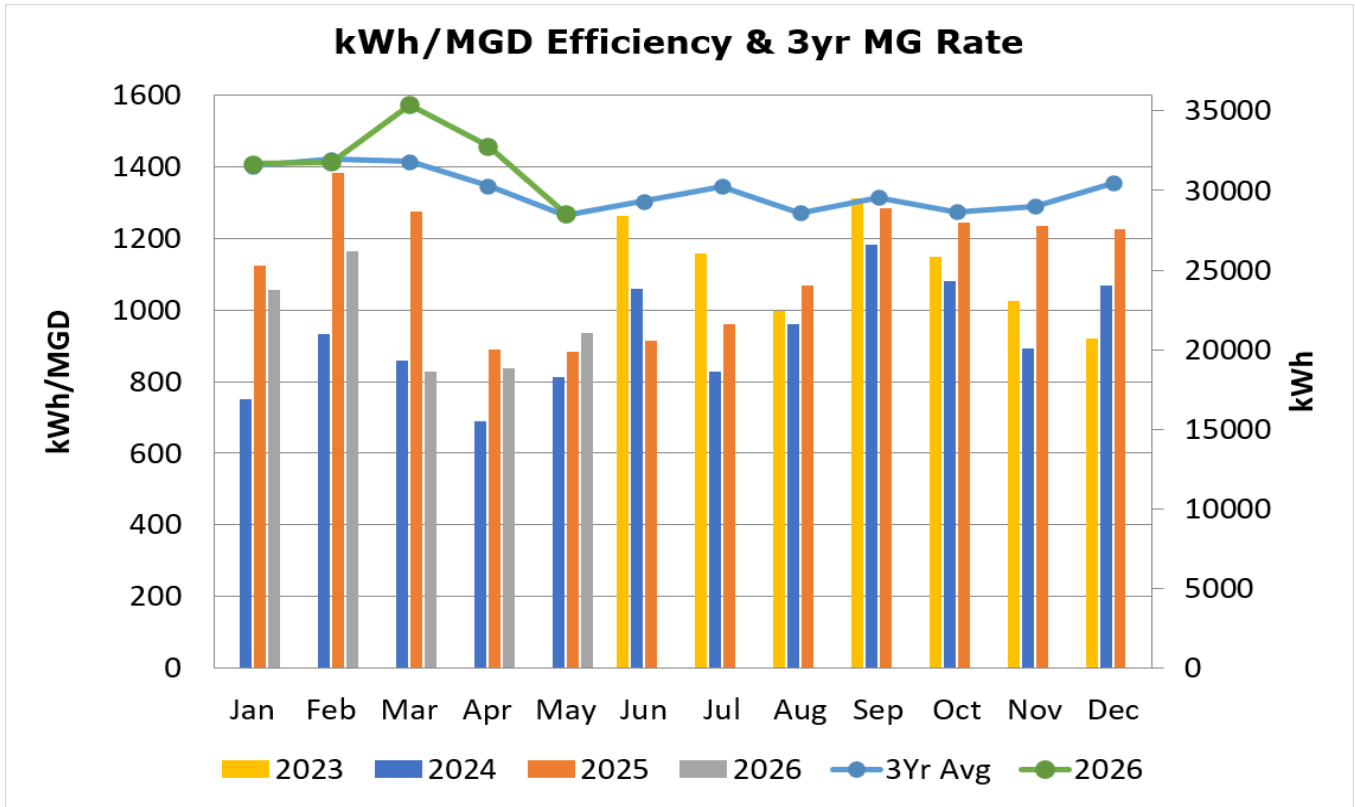


**Phosphorus Tracking Graph:**



**Plant Efficiency Graphs:**

May 2026



Permit Effective Date  
Approximate Expiration Date (Month)

10/1/21  
9/30/26

**HIGH IMPORTANCE**  
Renewal app 4/3/26

Submitted 3/26/2026

Updated 6/8/26

Permit Requirement	Reccurrence Cycle	Repeats?	Period Covered	Permit Location	Deadline Date(s)	# Months to Comply	Date Reported	Completed
<b>DMR Submissions</b>	25th day / month	Yes - monthly	Previous Month	SC 6	<b>Monthly 25th</b>	0	<b>5/11/26</b>	
Fecal Coliform Testing Submission	25th day / month	Yes - monthly *	May - Oct	SC10	<b>Monthly 25th</b>	0	-	
Quarterly SWPPP Plant Inspection	Quarterly	Yes	Year begins each Oct	NA	3/31, 6/30, 9/30, 12/31		5/1/26	
Annual SWPPP Report	Yearly	Yes	Previous 12 months	SC19, K	9/30/Each Yr	2		
Pretreatment Annual Report	Annual	Yes	Previous Year	SC 11, B, 1, a-e	4/28/Each Yr	3	4/27/26	
Pretreatment Qrtly - DMR Tests	Annual	Yes	Calendar Year	SC 11, C, 1	1/25/Each Yr	25 days	1/9/26	
Qrtly Sludge Disposal DMR Report	Quarterly	Yes	Calendar Year	2021-SC-66254	1/25, 4/25, 7/25, 10/25	0	4/8/26	
110 Priority Polutants Tests	Yearly	Yes	Previous Year	SC 11, C, 2, a-c	4/28/Each Yr		4/27/26	
Annual Fiscal Report	Yearly, email	Yes	Budget Year	SC 13	1/31/Each Yr	1		
Discharge 002 Reporting	Special, DMR	As required	When Discharging	SC 15, All	Special	Special		
Semi-Annual Sludge Report 1st	Semi-Annual	Yes	Jan - Jun each Yr	SC 16	7/31/Each Yr	1		
Semi-Annual Sludge Report 2nd	Semi-Annual	Yes	Jul - Dec each Yr	SC16	1/31/Each Yr	1		
<b>CSO Monthly Discharge Reports</b>	Monthly, email	Yes	Previous Month	SC17, A, 1	<b>Monthly 25th</b>	0	<b>6/3/26</b>	
CSO PPP Public Meeting	Annual	Yes	NA	SC17, C, 1	4/1 yrly	12	3/18/26	
CSO PPP Revision & Report	As needed	Yes	NA	SC17, C, 1	1 mon. from revision	1		
CSO O&M Public Meeting	Annual	Yes	NA	SC17, E, 1, h	4/1 yrly	12	3/18/26	
CSO O&M Revision & Report	As needed	Yes	NA	SC17, E, 1, h	1 mon. from revision	1		
Sewer Use Ordinance Revision & Report	As needed	Yes	NA	SC17, F, 2	1 mon. from revision	1		
CSO Long-term Control Plan (LTCP)	9mos post-notification	No	NA	SC17, G, 1, b	NA	9		
CSO LTCP Report	12mos post-notification	No	NA		NA			
<b>NARP Progress Report</b>	<b>Semi-Annual</b>	<b>YES</b>	<b>Every 6 months</b>	<b>SC 24</b>	<b>3/31 &amp; 9/30 yrly</b>	<b>Fixed</b>	<b>3/27/26</b>	
Update CMOM	NA	As needed	NA	SC18	As needed			
SWPPP Required Review/Update	As needed	Yes	NA	SC19, B	As needed	1	5/28/26	
PDOP Annual Progress Report	Annual	Yes	Calendar Year	SC21	3/31 yrly	12	3/27/26	
Feasibility Study Reports	Semi-Annual	Yes	March & September	SC20	3/31 & 9/30 yrly	Fixed	3/27/26	
<b>Total P 1.0 mg/L MoAvg Compliance</b>	<b>Final</b>	<b>No</b>	<b>96mos post eff date</b>	<b>SC23, F</b>	<b>9/30/29</b>	<b>Fixed</b>		
Total P 1.0 mg/L Progress Report	Annual	Yes	Previous Year	SC23, A	12/31 yrly	0		
Plant BNR Design Completed & Report	Final	No	60mos post eff date	SC23, D	9/30/26	Fixed		
Complete Construction & Report	Final	No	90mos post eff date	SC23, E	3/31/29	Fixed		
Total P 0.5 mg/L RGM Compliance	Final	No	NA	SC22, B,1-5	12/31/35	Fixed		
Land Application Permit	5 years	No	4/29/26-3/31/31		1/31/31	Fixed		
Biosolids 503 Annual Report	Annual	Yes	Previous Year	40 CFR Part 503/SC16	2/19 yrly	12	1/21/26	
Tier II Report	Annual	Yes	Previous Year		3/1 yrly	12	1/30/26	
Nonhazardous Special Waste Annual Report	Annual	Yes	Previous Year	Title 35 Ill. 809.501	2/1 yrly	12	1/8/26	

""- scheduled but have not complete as of yet

June 10, 2026

Sanitary District of Decatur (SDD)  
501 Dipper Lane  
Decatur, IL 62522

Nutrient Program Manager  
BV Project No. 411502

Attention: Don Miller, P.E., Director of Engineering

Subject: SDD Nutrient Program Management  
Progress Update (May 9, 2026 through June 5, 2026)

Dear Mr. Miller:

This letter summarizes the work associated to the SDD Nutrient Program Management project for services from May 9, 2026 through June 5, 2026.

1. Program Management, Administration, and Coordination
  - Conducted bi-weekly program conference calls to update progress and discuss key issues.
  - Provided monthly project updates.
  - Provided ongoing management of the project including program management, preparation/monitoring of the program schedule and budget as well as program administrative duties.
2. PowerBI
  - Managed access to PowerBI and design consultants.
3. Watershed Support Services
  - Conducted a bi-weekly progress update meeting.
  - Continued discussions with the SDD and Geosyntec regarding an amendment to continue Integrated Planning efforts.
4. Detailed Design
  - Conducted bi-weekly calls with design consultants on detailed design requirements and BIM/drafting requirements.
  - Continued coordination with the SDD to support the industrial pretreatment program updates.
  - Continued development of front-end bid documents, including review of draft set with SDD.
  - Continued coordination with design consultants towards a consolidated project manual, i.e. technical specifications.
  - Coordinated key aspects of the project specifications with the SDD and design consultants, specifically items related to sequencing and constraints.
  - Finalized drawing with the updated WRRF hydraulic profile.

- Completed review of proposals in response to the SDD Request for Qualifications for Construction Management services.
- Continued to develop a preliminary construction schedule to assess equipment lead-times and construction duration.
- Completed reviews of 90% design documents for Design Packages 3 and 4.
- Started review of 90% design documents for Design Package 5.

Please feel free to contact me with any questions, comments or if you need additional information.

Sincerely,

Todd Archer, P.E.  
Engineering Manager, Black & Veatch

**Sanitary District of Decatur**  
**Nutrient Program Management Report**

June 10, 2026

During the period of May 9, 2026 through June 5, 2026, District personnel attended meetings with members of the Black & Veatch team to affect progress in nutrient reduction planning and activities.

Black & Veatch coordinated with the SDD and the design consultants regarding their respective design package(s). Work consisted of bi-weekly coordination calls to discuss the design packages as shown in the following table, as well as bi-weekly coordination calls to review and discuss BIM/drafting requirements. Black & Veatch completed review of the 90% design submittal for Design Packages 3 and 4 and started review of the 90% design submittal for Design Package 5. Black & Veatch also continued to support efforts for an industrial pretreatment update, continued to coordinate a single project manual for the six design packages, and completed review of proposals for the Construction Manager Request for Qualifications.

The following is a list of meetings conducted. The information provided covers the subject, date, and agenda items of each meeting. Additional information related to any of these meetings or specific agenda items can be supplied to the Board upon request including meeting minutes and documentation used during the meeting as it is all being stored as part of the permanent record.

**Nutrient Reduction Program Meetings conducted from May 9, 2026 through June 5, 2026**

<b><u>Subject</u></b>	<b><u>Date</u></b>	<b><u>Agenda Items</u></b>
Nutrient Program Management Bi-weekly Meetings	Meetings held on 5/20/26 and 6/3/26	<i>Objective:</i> Provide Status Update on Program Tasks <ul style="list-style-type: none"> <li>• Detailed Design</li> <li>• Watershed Services</li> <li>• PowerBI</li> </ul>
Detailed Design, Donohue, Meeting	Meetings held on 5/20/26 and 6/3/26	<i>Objective:</i> Status Update and Discuss Detailed Design <ul style="list-style-type: none"> <li>• Discuss 90% Detailed Design Items</li> <li>• Review Schedule</li> </ul>
Detailed Design, Clark Dietz, Meeting	Meetings held on 5/14/26 and 5/28/26	<i>Objective:</i> Status Update and Discuss Detailed Design <ul style="list-style-type: none"> <li>• Discuss 90% Detailed Design Items</li> <li>• Review Schedule</li> </ul>
Detailed Design, CMT, Meeting	Meeting held on 5/20/26	<i>Objective:</i> Status Update and Discuss Detailed Design <ul style="list-style-type: none"> <li>• Discuss 90% Detailed Design Items</li> <li>• Review Schedule</li> </ul>

**Sanitary District of Decatur**  
**Watershed Management Report**

June 10, 2026

During the period of May 9, 2026 through June 5, 2026, District personnel attended meetings with members of the Black & Veatch and Geosyntec team to coordinate and discuss elements essential to meet the Nutrient Assessment Reduction Plan (NARP) requirements as listed in the NPDES permit.

This month's Integrated Planning activities included reviewing the planned activities and focusing on the SDD's required input to the Integrated Plan. The SDD continued to communicate with the City of Decatur regarding management changes within the City and the City's continued involvement in the Integrated Plan, specifically the Memorandum of Understanding (MOU) between the SDD and the City. At the request of SDD, Black & Veatch and Geosyntec also discussed a contract amendment to provide services for continuation of the Integrated Planning work.

The following is a list of the meeting(s) conducted. The information provided covers the subject, date, and agenda items of each meeting. Black & Veatch provided a written summary. Additional information related to any of these items can be supplied to the Board upon request including meeting minutes and documentation used during the meeting as it is all being stored as part of the permanent record.

**Watershed Management Meetings Conducted from May 9, 2026 through June 5, 2026**

<b><u>Subject</u></b>	<b><u>Date</u></b>	<b><u>Agenda Items</u></b>
Watershed Services Bi-weekly Discussions	Meeting held on 5/27/26	<i>Objective:</i> Geosyntec discussed Integrated Planning.