

## Director of Compliance and Innovation Report

September 24, 2025

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

#### Plant Influent Report:

Biochemical Oxygen Demand, 5-Day (Avg. 44474 lbs/day)	70 percent of design
Total Suspended Solids (Avg. 97078 lbs/day)	89 percent of design
Average Daily Flow (28.67 million gallons/day)	70 percent of design
Maximum Daily Flow (49.59 million gallons/day)	40 percent of design

Plant Influent Total Monthly Flow (million gallons) for July	1016.66
Estimated Unbilled Total Monthly Flow (million gallons)	305.94
Total Monthly Precipitation (inches)	5.83

#### Plant Effluent Report:

<u>Parameter</u>	<u>Report Frequency</u>	<u>Permit Limits</u>	<u>Reported Values</u>	<u>Violations</u>
CBOD <sub>5</sub> , mg/L	Mo./Wk. Avg	20/40	2/2	0
TSS, mg/L	Mo./Wk. Avg	25/45	3/4	0
NH <sub>3</sub> -N, mg/L	Mo. Avg/Weekly Max/Daily Max	1.1/2.8/3.0	0.42/0.48/0.61	0
DO, mg/L	Mo. Avg/Wk. Avg/Daily Min	6.0/4.5/4.0	7.31/7.18/7.15	0
pH, S.U.	Daily Min/Max	6.0/9.0	7.67/7.93	0
Total Nickel, mg/L	Mo. Avg	0.0381	0.020	0
Cl <sub>2</sub> Residual, mg/L	Daily Max	0.05	<0.011	0
Fecal Coliform CFU/100mL	Daily Max	400	106	0

#### CSO Report:

Location	Events	Est. Total Duration of Discharges (hrs.)	Discharge (million gallons)
Oakland Avenue (Outfall 003)	2	4.06	2.03
Lincoln Park (Outfall 004)	1	2.25	6.0
McKinley Avenue (Outfall 007)	3	6.9	14.1
Seventh Ward (Outfall 008)	2	3.3	6.18

#### Director's Notes:

##### **Administrative Order of Consent:**

With the assistance of HeplerBroom LLC, the District continues to work with the U.S. Environmental Protection Agency (USEPA) on the proposed Administrative Order on Consent (AOC). The objective is to negotiate terms that will allow the District to enter into the AOC and fully comply with all of its requirements.

**Land Application Program:**

District staff have been actively mixing sludge at the Wyckles Storage Lagoons in preparation for land application, scheduled to begin later this month. On August 26th, letters were sent to landowners and neighboring residents to notify them that biosolids application will soon commence in their area.

**Executive Order 25-160001:**

In accordance with Executive Order 25-160001 issued to Primient in April of this year, the company may request that the SDD reduce the total amount of fines for the preceding month by submitting a request no later than the 5th of the following month. Pursuant to this order, Primient submitted a written request for a fine reduction, detailing the preventative and corrective measures already implemented or currently in progress. They also provided the SDD with information on various capital projects designed to improve effluent quality and prevent recurrence of the issues that led to the July violations. Based on this information, the SDD has reduced the fine to \$30,000. There was no reduction in the surcharges that compensate the District for additional operational cost associated with the violation.

**Operations, Laboratory, and Pretreatment Activity Reports – August/September 2025**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-  
Blower demand remains elevated due to sustained industrial loading. The four Neuros blowers have successfully met the aeration requirements for effective treatment.
- 5) Disinfection Process-  
Disinfection operations are progressing well. Operators have demonstrated commendable efficiency in minimizing chemical usage while maintaining treatment standards.
- 6) Primary Clarifier Maintenance-  
Primary Clarifier #6 was dewatered to facilitate the installation of an auto-flush system for the scum trough by Plocher.
- 7) Land Application Preparation-  
Preparations for land application have commenced. The East Lagoon has been thoroughly mixed, and mixing operations are currently underway in the West Lagoon.

- 8) Clarifier Cleaning and Maintenance-  
Operators have been systematically taking clarifiers offline to perform cleaning and scheduled maintenance activities.

### **Laboratory Activities:**

#### **Routine:**

A total of 1,964 analyses were performed in the laboratory during the month of August 2025.

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 the month of August 2025 for the "COVID-19 in Wastewater" study funded by the Illinois Department of Public Health. Levels of COVID, influenza A, influenza B, and RSV were all low in the recent samples.
- 2) The quarterly NPDES sampling of the influent, effluent, and sludge to Wyckles was conducted during the second week of August 2025.
- 3) Keith Richard hosted a meeting of the IWEA Laboratory Committee on August 28, 2025, at the Urbana & Champaign Sanitary District. The purpose of the meeting was to discuss the committee's upcoming activities including WEFTEC, a lab webinar in December, and IWPC 2026. Keith continues to serve as the chair of the committee.
- 4) Lab staff completed all testing for the annual EPA-mandated DMR-QA proficiency test. We submitted results for twenty-nine analytes and will receive our graded results at the end of September. We are required to obtain passing results for all analytes that we report to the EPA.

### **Pretreatment Activities:**

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

- 1) Pretreatment personnel monitored 8 commercial and industrial users (IU) during August 2025. There were no industrial site inspections completed in August of 2025.
- 2) There was one permit issued in August 2025 to **Qualawash Holdings, LLC**, who will be purchasing and operating the former Bulkmatic truck wash in town.
- 3) Local Limits sampling continued in August. Two instances of removal efficiency sampling were able to be completed, and the Country Club pump station was sampled to determine the domestic background level of the local limits pollutants.
- 4) Sampling for **Tillamook** continued in August. They failed two of their four TSS samples, which led them to a monthly average TSS violation, and they also failed on their FOG sample on 8/6. Early in the month they struggled with slugs, however following the EQ tank coming online, the slugs became much less frequent and less impactful. Because of this, **Tillamook** had a total of four escalating violations in the month of August. According to Executive Order 25-105001, **Tillamook** may request an alternate penalty structure if they are able to have four or less BOD, TSS, or Slug violations for three consecutive months. August was the first month that they have achieved the acceptable compliance standard.
- 5) **Primient** had a much better month in August, with only two violations. They also submitted to the SDD the costs of various capital projects that will help to improve effluent quality and prevent

recurrence of the events that caused the July violations. As such, per Executive Order 25-160001, the SDD has decided to reduce the fine amount from \$306,000 to \$30,000.

6) **HR Ewell** had a better month, with only 1 pH violation.

**Pretreatment Ordinance - Verbal Notices:**

SDD issued a total of 9 Verbal Notices to **Caterpillar**, **HR Ewell**, **Tillamook**, and **Primient** in August 2025:

- **Primient (2 Violations):**
  - BOD Daily Max (1): 8/4/2025
  - Low pH: 8/2/2025
- **Tillamook (5 Violations):**
  - TSS Daily Max (2): 8/11/2025 and 8/13/2025
  - TSS Monthly Average
  - Slug load on 8/7/2025
  - FOG-T Daily Max: 8/6/2025
- **HR Ewell (1 Violation)**
  - Low pH: 8/25/2025
- **Caterpillar (1 Violation)**
  - FOG-T Daily Max: 8/6/2025

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

There were no WN's issued during August 2025.

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

There were no NOV's issued during August 2025.

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

There were no EO's issued during August 2025.

**Pretreatment Ordinance - Penalty Assessments:**

The following industrial penalties were assessed for August 2025.

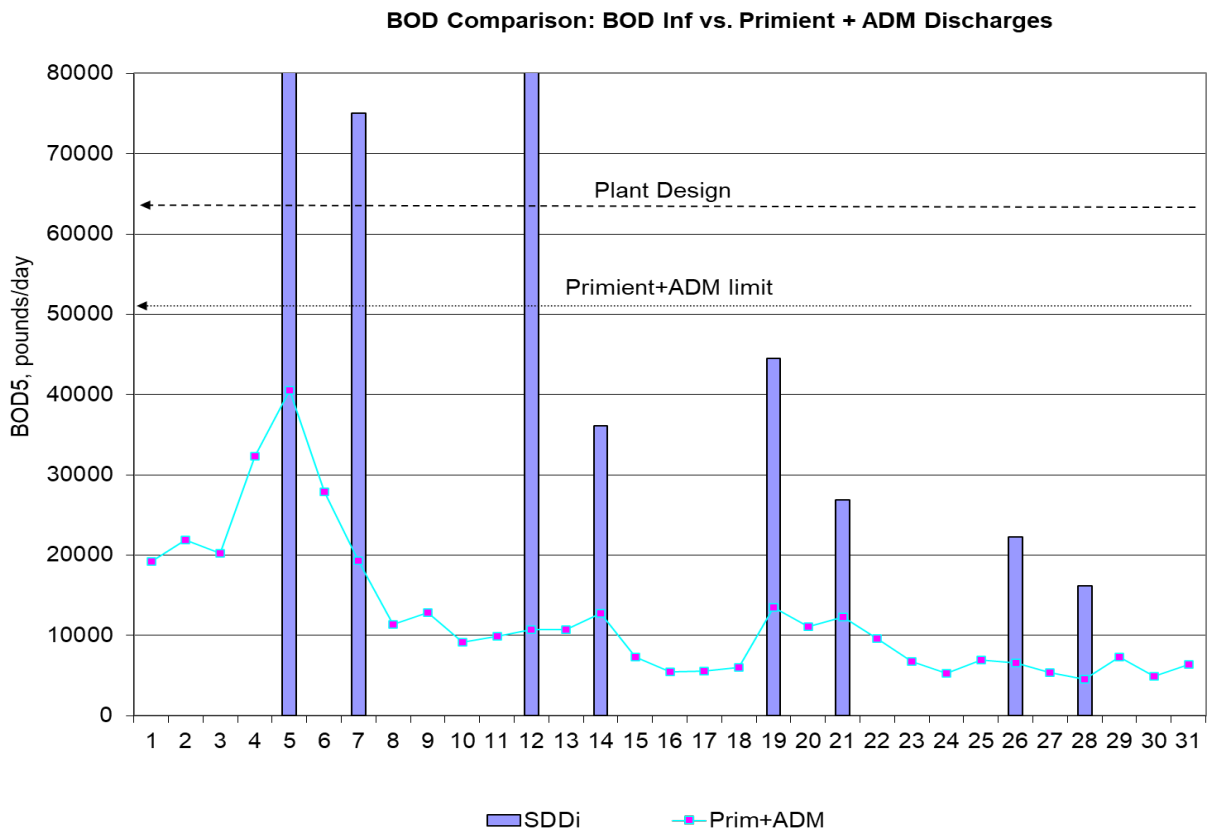
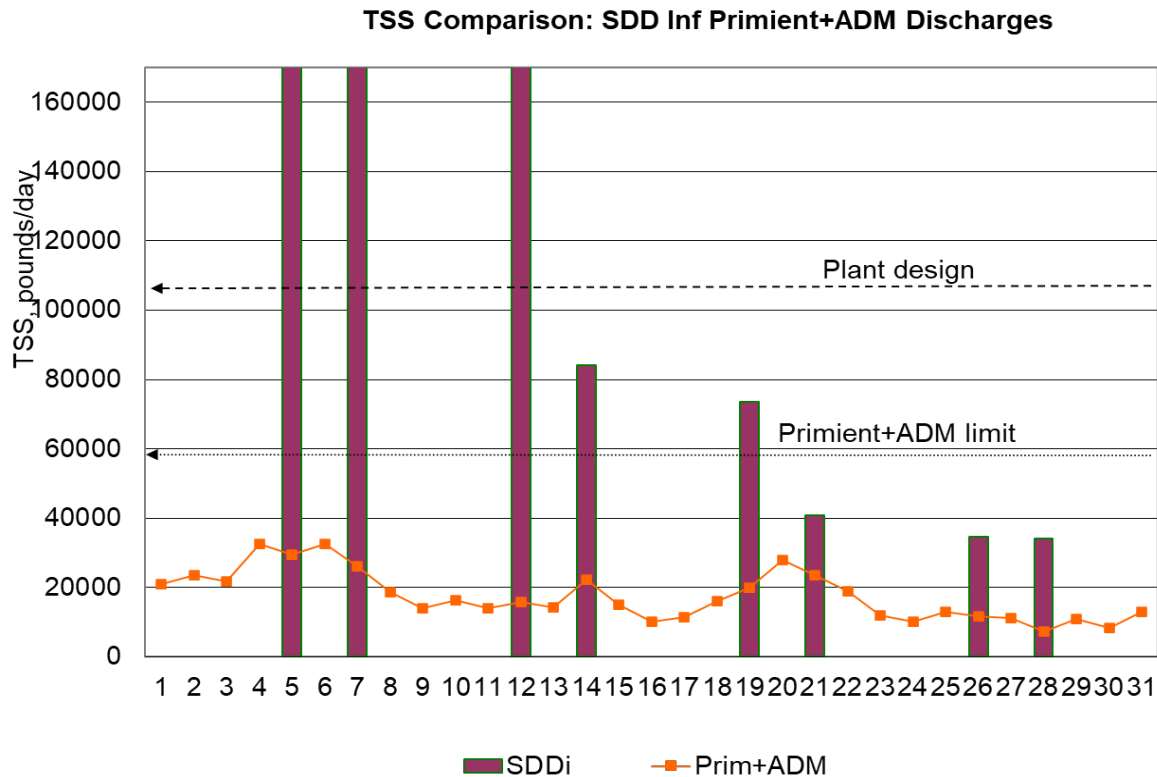
- **Primient** - \$2,000
- **Tillamook** - \$17,000

**Nutrient Program Report:**

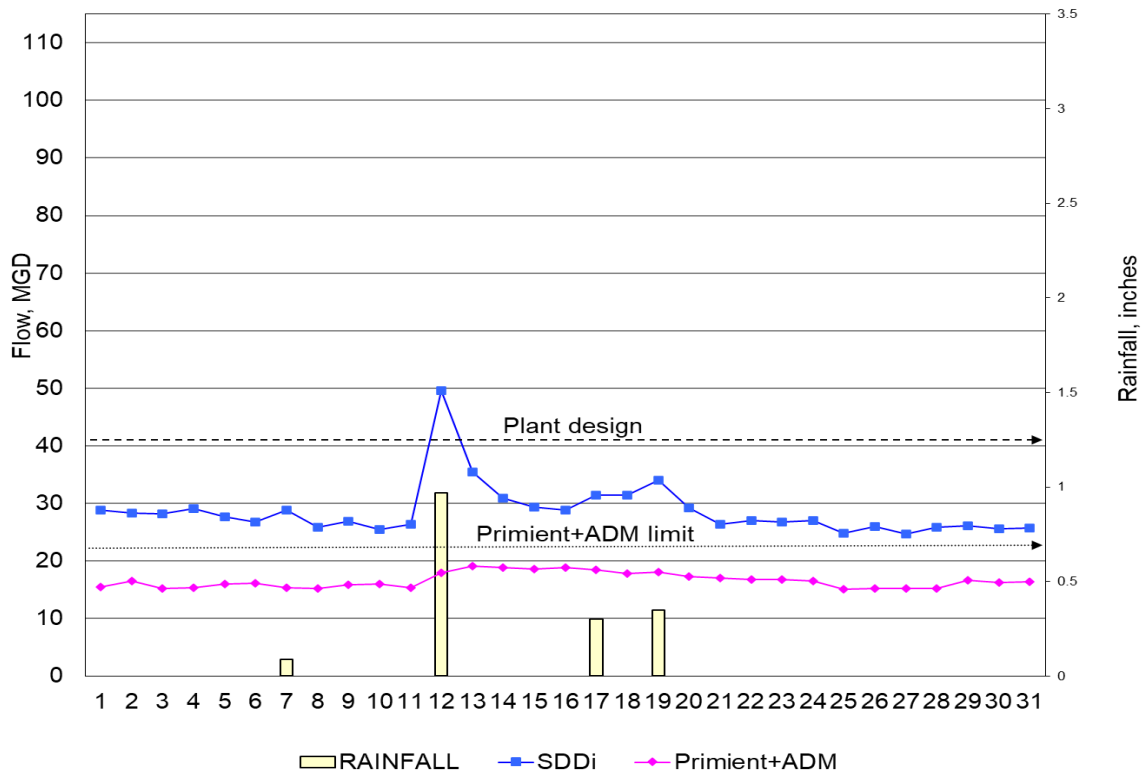
**NARP/Integrated Planning:**

The City and the District have completed further legal reviews of the Memorandum of Understanding (MOU) draft. Once the revised draft is finalized, it will be distributed to stakeholders for their respective legal teams' review. Following this, a meeting will be scheduled to discuss and review the work plan schedule.

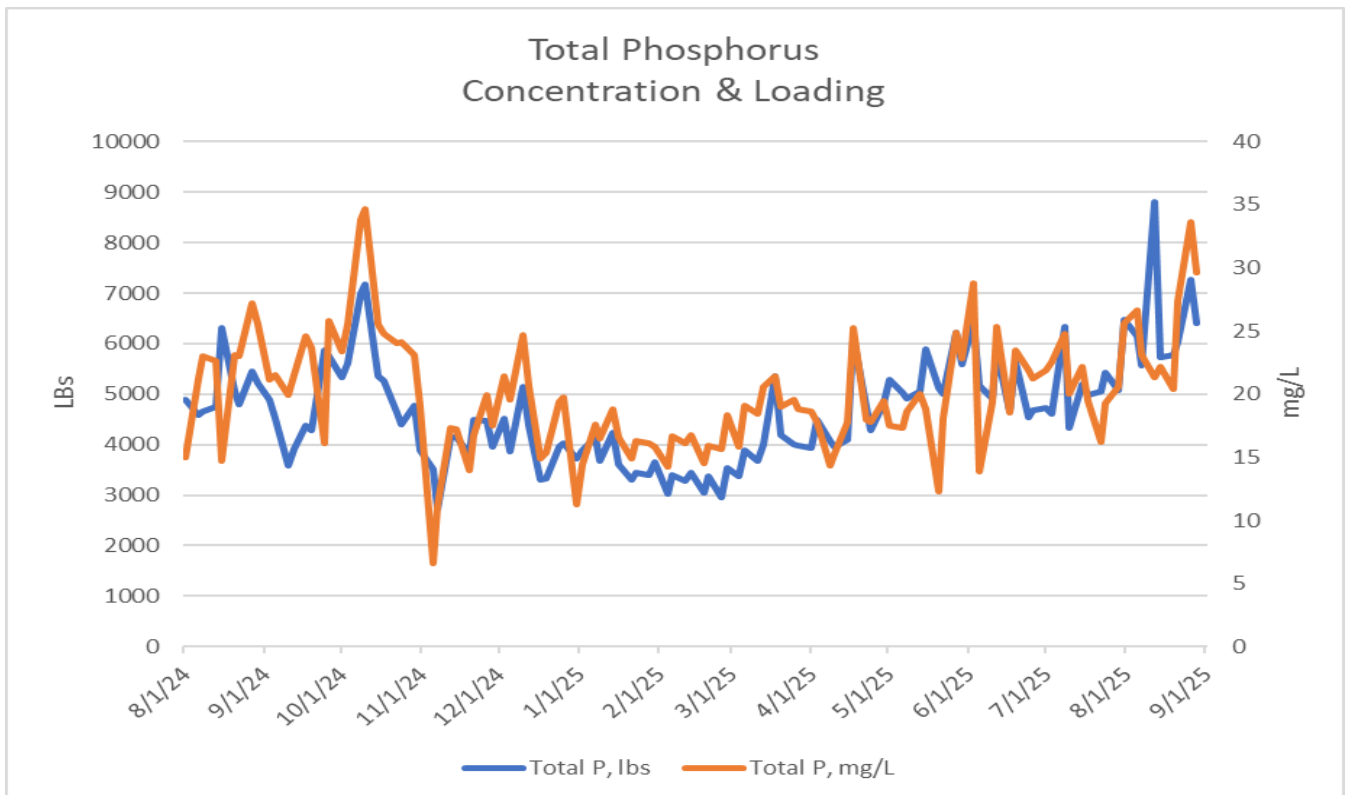
Plant Operating Graphs:



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

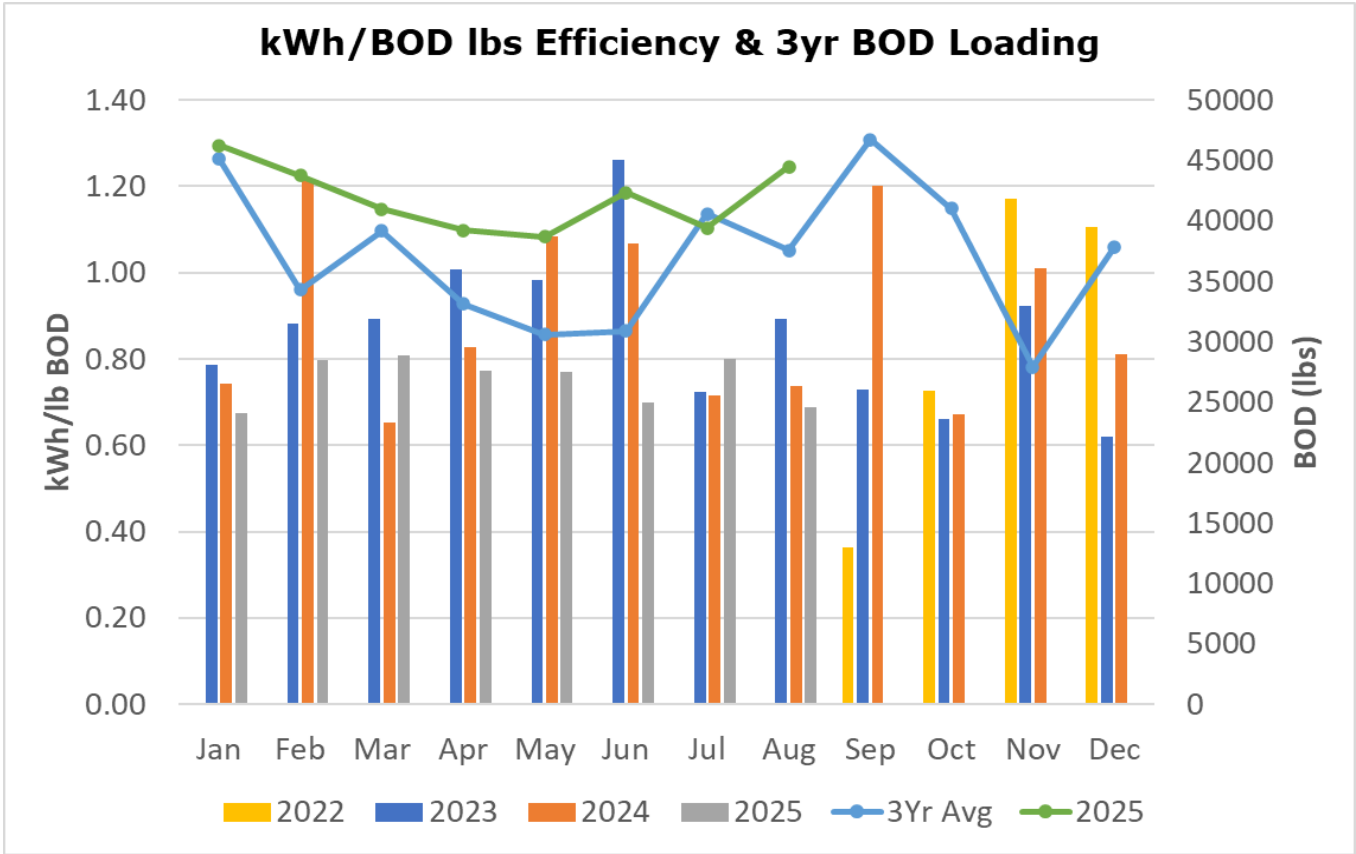
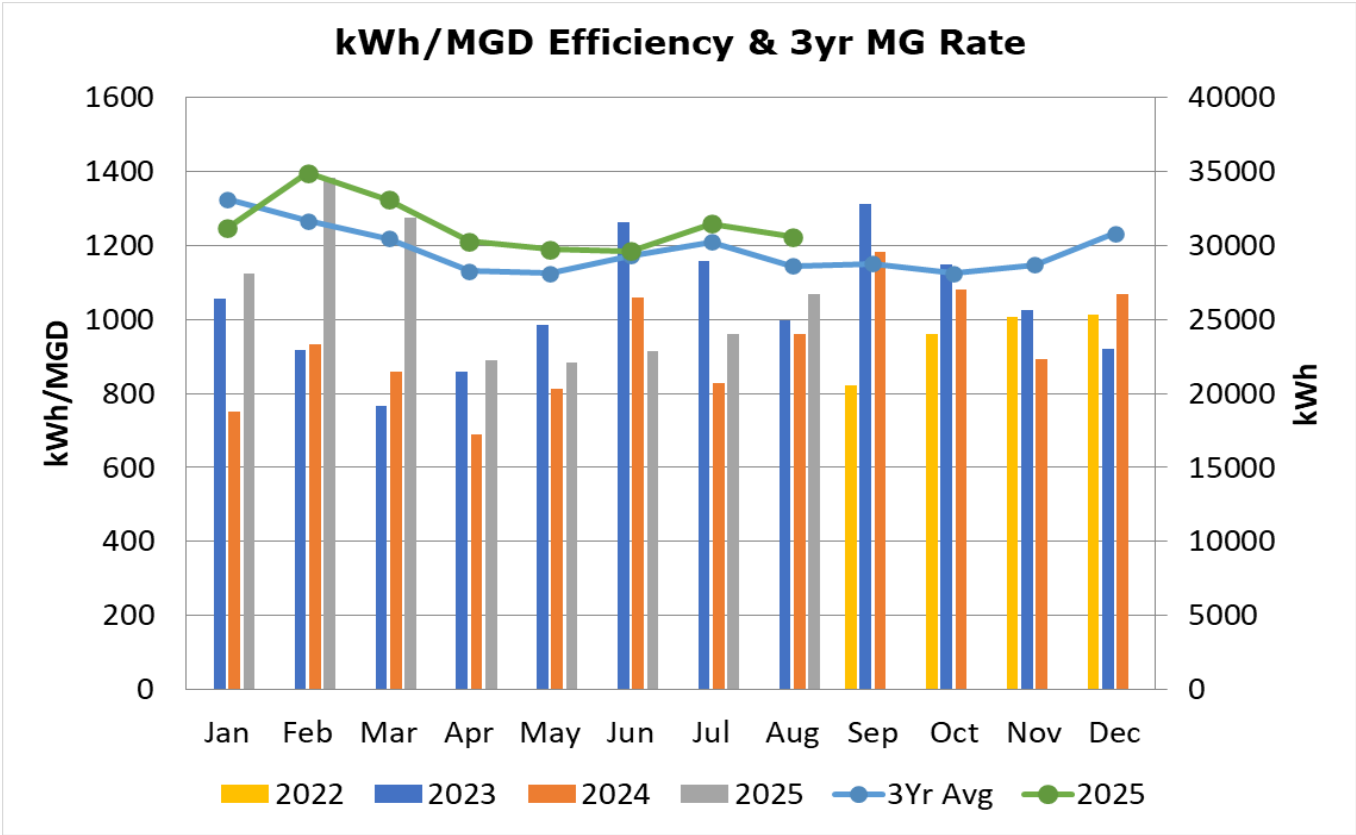


Phosphorus Tracking Graph:



Plant Efficiency Graphs:

August 2025





September 16, 2025

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 (August 9, 2025 – September 5, 2025)

Dear Mr. Miller:

This letter summarizes the work associated to the SDD Nutrient Program Management project for services from August 9, 2025 through September 5, 2025.

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.
  - Initiated development of the semi-annual reports required by the WRRF permit.
2. PowerBI
  - No activities to report during this period.
3. Watershed Support Services
  - Conducted a bi-weekly progress update meeting.
  - Coordinated with SDD and its stakeholders', including the City of Decatur and ADM, regarding revisions to the Memorandum of Understanding for the Integrated Planning effort.
  - Revised schedule and next steps for the Integrated Plan.
4. Detailed Design
  - Coordinated with selected design consultants to finalize agreements with them for detailed design work.
  - Began coordination with subcontractors for surveying and geotechnical services.
  - Reviewed a draft of the Instrumentation and Control framework document with SDD and their application engineer and incorporated revisions to the document.
  - Distributed the BIM execution plan with the three detailed design consultants and scheduled a call to review it on September 11, 2025. Participated in kickoff meetings with two of the design consultants.
  - Evaluated hydraulic alternatives to handle excess stormwater flows through the WRRF.



- Evaluated an alternate mixing strategy for the channel mixing and began drafting a summary of this analysis in a technical memorandum.

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

Permit Effective Date	10/1/21	HIGH IMPORTANCE	Updated 9/16/25					
Approximate Expiration Date (Month)	9/30/26	New app 4/3/26						
Permit Requirement	Reccurence Cycle	Repeats?	Period Covered	Permit Location	Deadline Date(s)	# Months to Comply	Date Reported	Completed
DMR Submissions	25th day / month	Yes - monthly	Previous Month	SC 6	Monthly 25th	0	9/11/25	
Fecal Coliform Testing Submission	25th day / month	Yes - monthly *	May - Oct	SC10	Monthly 25th	0	-	
Quarterly SWPPP Plant Inspection	Quarterly	Yes	Year begins each Oct	NA	3/31, 6/30, 9/30, 12/31		7/24/25	
Annual SWPPP Report	Yearly	Yes	Previous 12 months	SC19, K	9/30/Each Yr	2	9/11/25	
Pretreatment Annual Report	Annual	Yes	Previous Year	SC 11, B, 1, a-e	4/28/Each Yr	3	3/26/25	
Pretreatment Qrtly - DMR Tests	Quarterly	Yes	Calendar Year	SC 11, C, 1	1/25/Each Yr	25 days	1/10/25	
Qrtly Sludge Disposal DMR Report	Quarterly	Yes	Calendar Year	2021-SC-66254	1/25, 4/25, 7/25, 10/25	0	7/2/25	
110 Priority Pollutants Tests	Yearly	Yes	Previous Year	SC 11, C, 2, a-c	4/28/Each Yr		3/26/25	
Annual Fiscal Report	Yearly, email	Yes	Budget Year	SC 13	1/31/Each Yr	1	1/3/25	
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	7/2/25	
Semi-Annual Sludge Report 2nd	Semi-Annual	Yes	Jul - Dec each Yr	SC16	1/31/Each Yr	1		
CSO Monthly Discharge Reports	Monthly, email	Yes	Previous Month	SC17, A, 1	Monthly 25th	0	9/8/25	
CSO PPP Public Meeting	Annual	Yes	NA	SC17, C, 1	4/1 yrly	12	3/19/25	
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	3/19/25	
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			
NARP Progress Report	Semi-Annual	YES	Every 6 months	SC 24	3/31 & 9/30 yrly	Fixed	3/26/25	
Update CMOM	NA	As needed	NA	SC18	As needed			
SWPPP Required Review/Update	As needed	Yes	NA	SC19, B	As needed	1	9/11/25	
PDOP Annual Progress Report	Annual	Yes	Calendar Year	SC21	3/31 yrly	12	3/26/25	
Feasibility Study Reports	Semi-Annual	Yes	March & September	SC20	3/31 & 9/30 yrly	Fixed	3/26/25	
Total P 1.0 mg/L MoAvg Compliance	Final	No	96mos post eff date	SC23, F	9/30/29	Fixed		
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		
Biosolids 503 Annual Report	Annual	Yes	Previous Year	40 CFR Part 503/SC16	2/19 yrly	12	1/9/25	
Tier II Report	Annual	Yes	Previous Year		3/1 yrly	12	1/13/25	
Nonhazardous Special Waste Annual Report	Annual	Yes	Previous Year	Title 35 Ill. 809.501	2/1 yrly	12	1/22/25	

""- scheduled but have not complete as of yet

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

September 16, 2025

During the period of August 9, 2025 through September 5, 2025, District personnel attended meetings with members of the Black & Veatch team to affect progress in nutrient reduction planning and activities.

Black & Veatch continued to negotiate with each design consultant and finalize agreements for detailed design. Additionally, kickoff meetings were held with two of the design consultants and the third was scheduled for September 15, 2025. Black & Veatch distributed the BIM execution plan with the SDD and the three detailed design consultants and scheduled a call to review it on September 11, 2025. Black & Veatch reviewed the draft Instrumentation and Control guidance document with SDD and SDD's 'Application Engineer' and then worked to incorporate revisions based on feedback. Black & Veatch also continued to support the SDD in the migration of PowerBI to the SDD's network.

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 August 9, 2025 through September 5, 2025**

<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 8/13/2025 and 8/27/2025	<i>Objective:</i> Provided Status Update on Program Tasks <ul style="list-style-type: none"><li>• Watershed Services</li><li>• Detailed Design</li><li>• PowerBI</li></ul>
Detailed Design, Donohue, Kickoff Meeting	Meeting held on 9/2/2025	<i>Objective:</i> Review Project Scope and Schedule <ul style="list-style-type: none"><li>• Team Introductions</li><li>• Review Project Scope</li><li>• Review Schedule</li></ul>
Detailed Design, Clark Dietz, Kickoff Meeting	Meeting held on 9/2/2025	<i>Objective:</i> Review Project Scope and Schedule <ul style="list-style-type: none"><li>• Team Introductions</li><li>• Review Project Scope</li><li>• Review Schedule</li></ul>

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

September 16, 2025

During the period of August 9, 2025 through September 5, 2025, 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 additional coordination and revisions to the draft Memorandum of Understanding (MOU) between SDD and key stakeholders, notably the City of Decatur and major industrial customers. Geosyntec team updated the plan for executing the Integrated Plan for the remainder of 2025 and shared that with the Integrated Plan stakeholders.

The following is a list of the meetings 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 August 9, 2025 through September 5, 2025**

<b><u>Subject</u></b>	<b><u>Date</u></b>	<b><u>Agenda Items</u></b>
Watershed Services Bi-weekly Discussions	Meetings held on 8/20/2025 and 9/3/2025	<i>Objective:</i> Geosyntec discussed comments and responses to Nutrient Assessment Reduction Plan and Integrated Planning.