

Sent via email to [mayordanaussem@cityofottawa.org](mailto:mayordanaussem@cityofottawa.org), [dadrian@etch-dutt.com](mailto:dadrian@etch-dutt.com), [tdutt@etch-dutt.com](mailto:tdutt@etch-dutt.com), [npatel@fehrgraham.com](mailto:npatel@fehrgraham.com), and [scott.twait@illinois.gov](mailto:scott.twait@illinois.gov)



February 23, 2023

Mayor Daniel Aussem  
City of Ottawa  
301 W. Madison Street  
Ottawa, IL 61350

Dear Mayor Aussem,

Thank you for reaching out on Ottawa's proposal to build a new wastewater treatment plant on the Fox River. The Fox River Study Group (FRSG) is a diverse coalition of stakeholders using science to guide the region toward a cleaner, safer and more beautiful Fox River. We use research, data and collaboration to support sustainable policies and development across the Fox River watershed.

We offer these comments on your proposed permit.

- We recognize that you are proposing a 0.9 MGD plant. We recommend that the IEPA permit conditions should be consistent with other major wastewater facilities (WWTPs) on Fox River, since this limit would be consistent with the FRSG's findings of what is needed to improve water quality conditions in the Fox River. The FRSG recently completed a 2022 update to our Fox River Implementation Plan (FRIP) that was first developed in 2015. The 2022 FRIP calls for Fox River dischargers to continue to reduce their phosphorus loads to the Fox River by meeting the state's requirement for major WWTPs to meet a 0.5 mg/L annual geometric mean limit by 2030. The full final draft of the 2022 FRIP report, an executive summary and all appendices can be found at <https://tinyurl.com/2z9ksn63>.
- The new Ottawa plant should be required to meet a total phosphorus limit of 0.5 mg/L calculated as an annual rolling geometric mean. Since this is a new plant, the facility should be able to meet that limit from the start. Our understanding is that IEPA is requiring other new plants to meet the 0.5 mg/l limit on startup.
- We recommend that your NPDES permit require you to build and operate this facility as a BNR plant, as you have planned.

We are pleased that the City of Ottawa will plan to join the Fox River Study Group when it becomes a discharger to the Fox River. Annual contributions are calculated at 25¢ per year per capita.

**Board of Directors:**

Karen Clementi, Treasurer,  
Fox Metro Water Reclamation  
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VACANT, City of Elgin

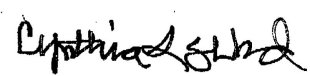
Tim Wilson, Asst Secretary,  
Tri-Cities  
(Batavia, Geneva, St. Charles)  
[twilson@stcharles.gov](mailto:twilson@stcharles.gov)

Brian Witkowski,  
City of Aurora  
[witkowskib@aurora.il.us](mailto:witkowskib@aurora.il.us)

We also understand that the City of Ottawa is working on sewer separation to reduce its CSO discharges to the Fox River which is another step needed to reduce nutrient-related impairments in your reach of the river. The NPDES permit you supplied us indicates that there are currently five CSO outfalls to the Fox River: outfalls 11, 13 14, 17 and 18A. It appears your plans are to close outfall 14 by August 31, 2024. Can you provide more information on your plans for eliminating the other CSO discharges?

Thank you for the opportunity to provide our feedback on your proposal. We appreciate you continuing to keep in touch with us as the development of this project proceeds.

Sincerely,



Cindy Skrukud, Chair  
[foxriverstudygp@gmail.com](mailto:foxriverstudygp@gmail.com)  
630-538-3909

cc:  
Dan Adrian & Tom Duttlinger, Etscheid, Duttlinger & Associates  
Narendra Patel, Fehr Graham  
Scott Twait, Illinois EPA



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/782-0610

March 21, 2023

City of Ottawa

301 W. Madison Street

Ottawa, Illinois 61350

Re: City of Ottawa  
City of Ottawa STP #2  
NPDES Permit No. IL0080244  
BOW ID: W0998290012  
Notice of Initial NPDES Fees Due

FGA Review  
3-28-2023

Dear Applicant:

During the spring 2003 legislative session, the Illinois General Assembly adopted and Governor Rod Blagojevich signed the *FY2004 Budget Implementation (State Finance-Revenue) Act*. This law establishes new or increased fees for many environmental permitting activities administered by the Illinois Environmental Protection Agency, including the National Pollutant Discharge Elimination System (NPDES). Effective July 1, 2003 the initial annual fee for discharges under a new individual NPDES permit, for activity under a new individual sludge generator or sludge user permit must be remitted to the Agency prior to issuance of the permit.

This Notice of Initial NPDES Fees Due serves the function of an invoice. The initial annual fee assessed for the operation of new wastewater facilities described in your Illinois NPDES permit application is \$7,500.00. Your application has been assigned an NPDES number IL0080244. The fee must be remitted to the Agency in order for the NPDES permit to be issued. Please return a copy of this letter and submit your remittance to:

Illinois EPA - DWPC  
Permit Section - Initial NPDES Fee  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Per our e-mail conv. on  
3/24/2023, the City will  
pay for this initial annual  
fee during the upcoming  
design phase.

Additional information is provided in the attached fact sheet and is available via internet at: <http://www.epa.state.il.us/fees/npdes/html>.

If you believe this fee is in error or have other questions regarding this notice, please call Corey Branson at 217/782-0610.

Sincerely,

Brant D. Fleming, P.E.  
Manager, Municipal Unit, Permit Section  
Division of Water Pollution Control

BDF:CWB:22020901.cwb

cc: Fehr Graham Engineering & Environmental  
Billing,  
Records

2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760



NPDES Permit No. IL0080244

Notice No. CWB:22020901.cwb

Public Notice Beginning Date:

Public Notice Ending Date:

National Pollutant Discharge Elimination System (NPDES)  
Permit Program

PUBLIC NOTICE/FACT SHEET  
of  
Draft New NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois EPA  
Division of Water Pollution Control  
Permit Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
217/782-0610

Name and Address of Permittee:

City of Ottawa  
301 W. Madison Street  
Ottawa, Illinois 61350

Name and Address of Facility:

City of Ottawa STP #2  
North of the Intersection of IL Route 71 and US Route 6  
Ottawa, Illinois 61350  
(DeKalb County)

*La Salle*

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES Permit to discharge into the waters of the state and has prepared a draft Permit and associated fact sheet for the above named Permittee. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. All comments on the draft Permit and requests for hearing must be received by the IEPA by U.S. Mail, carrier mail or hand delivered by the Public Notice Ending Date. Interested persons are invited to submit written comments on the draft Permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the Permit applicant. The NPDES Permit and notice numbers must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft Permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft Permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final Permit is issued. For further information, please call Corey Branson at 217/782-0610.

The following water quality and effluent standards and limitations were applied to the discharge:

Title 35: Environmental Protection, Subtitle C: Water Pollution, Chapter I: Pollution Control Board and the Clean Water Act were applied in determining the applicable standards, limitations and conditions contained in the draft Permit.

The applicant is engaged in treating domestic wastewater for the City of Ottawa.

The length of the Permit is approximately 5 years.

The main discharge number is 001. The seven day once in ten year low flow (7Q10) of the receiving stream, Fox River is 251 cfs.

The design average flow (DAF) for the facility is 0.9 million gallons per day (MGD) and the design maximum flow (DMF) for the facility is 2.25 MGD. Treatment consists of screening, grit removal, BNR system including anoxic, anerobic, and aerobic tanks, secondary clarifiers, tertiary filtration, chlorination, and dechlorination.

The stream segment(s), Fox River, Waterbody Segment IL\_DT-01, receiving the discharge from outfall(s) 001 is on the 2020/2022 303(d) List of impaired waters.

The following parameters have been identified as the pollutants causing impairment:

Potential Causes

Algae, alteration in stream-side or littoral vegetative covers, flow regime modification, pH, sedimentation/siltation, and total suspended solids

Algae and total phosphorus

Mercury and polychlorinated biphenyls

Fecal coliform

Uses Impaired

Aquatic life use

Aesthetic quality use

Fish consumption use

Primary contact use

The discharge(s) from the facility is (are) proposed to be monitored and limited at all times as follows:

Discharge Number(s) and Name(s): 001 STP Outfall

Load limits computed based on a design average flow (DAF) of 0.9 MGD (design maximum flow (DMF) of 2.25 MGD).

The effluent of the above discharge(s) shall be monitored and limited at all times as follows:

<u>Parameter</u>	<u>LOAD LIMITS lbs/day</u>			<u>CONCENTRATION</u>			<u>Regulation</u>
	<u>DAF (DMF)*</u>			<u>LIMITS mg/L</u>			
	<u>Monthly Average</u>	<u>Weekly Average</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Weekly Average</u>	<u>Daily Maximum</u>	
CBOD <sub>5</sub> **	75 (188)		150 (375)	10		20	35 IAC 304.120 40 CFR 133.102
Suspended Solids**	90 (225)		180 (450)	12		24	35 IAC 304.120 40 CFR 133.102
pH	Shall be in the range of 6 to 9 Standard Units						35 IAC 304.125
Fecal Coliform	Daily Maximum shall not exceed 400 per 100 mL						35 IAC 304.125
Chlorine Residual							0.05 35 IAC 302.208
Ammonia Nitrogen: (as N)							
March-May/Sept.-Oct.	6.8 (17)	17 (43)	24 (60)	0.9	2.3	3.2	35 IAC 355 and 35 IAC 302
June-August	4.5 (11)	11 (28)	24 (60)	0.6	1.5	3.2	
Nov.-Feb.	17 (43)	--	29 (73)	2.3	--	3.9	
	<u>Annual Average</u>			<u>Annual Average</u>			
Total Phosphorus (as P)	3.8 (9.4)			0.5			35 IAC 304.123
Total Nitrogen (as N)				Monitor Only			35 IAC 309.146

\*Load Limits are calculated by using the formula:  $8.34 \times (\text{Design Average and/or Maximum Flow in MGD}) \times (\text{Applicable Concentration in mg/L})$ .

\*\*BOD<sub>5</sub> and Suspended Solids (85% removal required): In accordance with 40 CFR 133, the 30-day average percent removal shall not be less than 85 percent.

Annual Average is defined as the 12 month rolling average (calculated monthly).

Geometric Mean

geometric mean



Special Conditions

Duty to Mitigate. The Permittee shall take all reasonable steps to minimize any sludge use or disposal in violation of this Permit.

Sludge monitoring must be conducted according to test procedures approved under 40 CFR 136 unless otherwise specified in 40 CFR 503, unless other test procedures have been specified in this Permit.

Planned Changes. The Permittee shall give notice to the IEPA on the semi-annual report of any changes in sludge use and disposal.

The Permittee shall retain records of all sludge monitoring, and reports required by the Sludge Permit as referenced in Standard Condition 25 for a period of at least five (5) years from the date of this Permit.

If the Permittee monitors any pollutant more frequently than required by this permit or the Sludge Permit, the results of this monitoring shall be included in the reporting of data submitted to the IEPA.

The Permittee shall comply with existing federal regulations governing sewage sludge use or disposal and shall comply with all existing applicable regulations in any jurisdiction in which the sewage sludge is actually used or disposed.

The Permittee shall comply with standards for sewage sludge use or disposal established under section 405(d) of the CWA within the time provided in the regulations that establish the standards for sewage sludge use or disposal even if the permit has not been modified to incorporate the requirement.

The Permittee shall ensure that the applicable requirements in 40 CFR Part 503 are met when the sewage sludge is applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator.

Monitoring reports for sludge shall be reported on the form titled "Sludge Management Reports" to the following address:

Illinois Environmental Protection Agency  
Bureau of Water  
Compliance Assurance Section  
Mail Code #19  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

SPECIAL CONDITION 11. The Permittee shall operate the facilities designed for biological nutrient removal (BNR). Monitoring for Total Nitrogen is required to document the actual total nitrogen effluent concentration. The Permittee shall monitor the effluent for total nitrogen once per month. The monitoring shall be a composite sample and the results reported as a daily maximum on the Permittee's Discharge Monitoring Report Forms.

The Permittee shall notify the IEPA in writing of any operational deficiencies and corrective measures to be taken if the treatment plant effluent exceeds a monthly average concentration goal of 10 mg/L of Total Nitrogen. Correspondence shall be directed to:

Illinois Environmental Protection Agency	Illinois Environmental Protection Agency
Bureau of Water	Bureau of Water
Compliance Assurance Section, Mail Code #19	Des Plaines Field Office
1021 North Grand Avenue East	9511 West Harrison Street
Post Office Box 19276	Des Plaines, Illinois 60016
Springfield, Illinois 62794-9275	

SPECIAL CONDITION 12. This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon completion of an alternate Water Quality Study

SPECIAL CONDITION 13. The Permittee shall notify the IEPA in writing once the treatment plant expansion has been completed. A letter stating the date that the expansion was completed shall be sent to the following address within fourteen (14) days of the expansion becoming operational:

*Construction*  
*new plant*  
*Construction*

NPDES Permit No. IL0080244

Notice No. CWB:22020901.cwb

Public Notice Beginning Date: **May 10, 2023**

Public Notice Ending Date: **June 09, 2023**

National Pollutant Discharge Elimination System (NPDES)  
Permit Program

PUBLIC NOTICE/FACT SHEET  
of  
Draft New NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois EPA  
Division of Water Pollution Control  
Permit Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
217/782-0610

Name and Address of Permittee:

City of Ottawa  
301 W. Madison Street  
Ottawa, Illinois 61350

Name and Address of Facility:

City of Ottawa STP #2  
North of the Intersection of IL Route 71 and US Route 6  
Ottawa, Illinois 61350  
(LaSalle County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES Permit to discharge into the waters of the state and has prepared a draft Permit and associated fact sheet for the above named Permittee. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. All comments on the draft Permit and requests for hearing must be received by the IEPA by U.S. Mail, carrier mail or hand delivered by the Public Notice Ending Date. Interested persons are invited to submit written comments on the draft Permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the Permit applicant. The NPDES Permit and notice numbers must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft Permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft Permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final Permit is issued. For further information, please call Corey Branson at 217/782-0610.

The following water quality and effluent standards and limitations were applied to the discharge:

Title 35: Environmental Protection, Subtitle C: Water Pollution, Chapter I: Pollution Control Board and the Clean Water Act were applied in determining the applicable standards, limitations and conditions contained in the draft Permit.

The applicant is engaged in treating domestic wastewater for the City of Ottawa.

The length of the Permit is approximately 5 years.

The main discharge number is 001. The seven day once in ten year low flow (7Q10) of the receiving stream, Fox River is 251 cfs.

The design average flow (DAF) for the facility is 0.9 million gallons per day (MGD) and the design maximum flow (DMF) for the facility is 2.25 MGD. Treatment consists of screening, grit removal, BNR system including anoxic, anaerobic, and aerobic tanks, secondary clarifiers, tertiary filtration, chlorination, and dechlorination.

Pursuant to the waiver provisions authorized by 40 CFR § 123.24, this draft permit is within the class, type, and size for which the Regional Administrator, Region V, has waived his right to review, object, or comment on this draft permit action.

**Subject: Ottawa New Second WWTP -- Antidegradation Assessment**  
**NPDES Permit No. IL0080244 (LaSalle County)**  
**Bureau ID#W0990800003 16A**

The subject facility is proposing to construct a new second WWTP and collection system pump station, sewers, and force main that will provide treatment of the collected flows from the currently unsewered homes and planned future growth. The new proposed treatment plant will have a DAF of 0.9 MGD and a DMF of 2.25 MGD.

The City of Ottawa has a total of 158 unsewered homes and is planning for growth around the intersections of Interstate 80 and route 71. This planned growth has been pursued by the city for some time, and the city installed a 15" diameter sewer at this location to provide service to these future developments. A total of 180 acres is anticipated to be developed at the major intersection and south along Route 71. This new facility will be sized to provide treatment of these unsewered and planned areas. Providing collection and treatment capacity for these regions is the main focus of this proposed project.

The new treatment facility would include a plant influent pump station, screening, grit removal, BNR system including anoxic, anaerobic, and aerobic tanks, secondary clarifiers, tertiary filtration, chlorination, and dechlorination. The NPDES permit will have a permit limit of 0.5 mg/L as a rolling geometric mean for phosphorous and a total nitrogen goal of 10 mg/L. Therefore, phosphorus and total nitrogen loading to the receiving stream will decrease due to the unsewered community's wastewater being treated. The new WWTP has proposed load limits for BOD and TSS at levels of 10 mg/L and 12 mg/L respectively.

Census data and population estimates obtained from the US Census Bureau have indicated a slight decline in population over the last few decades. However, to be conservative it is anticipated that the city could grow at a rate of 0.15% annually. The collection system improvements and new treatment facility will be sized to service the currently unsewered and new planned development areas. Therefore, the proposed design indicates a DAF of 0.9 MGD and a DMF of 2.25 MGD. This will provide enough capacity for that which can be immediately sewered, as well as the growth planned for the area.

The reach of the Fox River where the new plant will be located, falls under the Fox River Watershed Study Group's (FRSG) study area. FRSG is performing a science-based evaluation to reduce the phosphorus discharges into the Fox River. Additionally, IEPA also suggested that it may be beneficial for the City to consult with any local environmental groups to seek their consensus on the discharge limitations to minimize any comments to the draft discharge permit when IEPA public notice it during the future design phase.

The Fox River Study Group recommends that the NPDES permit require Ottawa to build and operate this facility as a BNR plant, as planned in the Facility Planning Report.

This Project is expected to have a net positive impact on the water quality of the Fox River by providing a complete treatment for untreated flows which are currently leached out of aging septic fields. The anti-degradation assessment as included in this report, concludes that the proposed project has no negative impact to the receiving waterway, the Fox River, and that the phosphorous load will not increase to the Fox River from the current estimated loading.

The information in this antidegradation assessment came from the January 2021 engineering report by Fehr Graham Engineering & Environmental titled "New Second Wastewater Treatment Plant (NPDES Permit Application)" and the September 2022 facility planning report "New Second Wastewater Treatment Plant, Pump Station and Forcemain".

#### **Identification and Characterization of the Affected Water Body.**

The subject facility proposes to discharge to the Fox River at a point where 251 cfs of flow exists upstream of the outfall during critical 7Q10 low-flow conditions. The facility has a proposed DAF of 0.9 MGD. The Fox River is classified as a General Use Water. According to the 2008 IDNR document "Integrating Multiple Taxa in a Biological Stream Rating System", the Fox River is not a biologically significant stream at this location; however, it is rated a "C" stream using IDNR's integrity rating system at this location. The Fox River, Waterbody Segment, IL\_DT-01, is listed on the 2020/2022 Illinois Integrated Water Quality Report and Section 303(d) List as impaired for aquatic life use with potential causes given as algae, alteration in stream-side or littoral vegetative covers, flow regime modification, pH, sedimentation/siltation, and total suspended solids, aesthetic quality use with potential causes given as algae and total phosphorus, fish consumption use with potential causes given as mercury and polychlorinated biphenyls, and primary contact use with potential cause given as fecal coliform. This segment of the Fox River is not subject to enhanced dissolved oxygen standards.

#### **Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.**

The treated domestic waste that characterizes this proposed effluent would be similar to other treated effluents of mainly domestic origin. Ammonia limits in the permit will be set at water quality standards. Biochemical oxygen demand (BOD) permit limits will be set at the appropriate effluent standards present in 35 IAC 304.120. Since untreated or poorly treated sewage is currently being discharged to local waterways due to the lack of a centralized sewage treatment system, loadings of BOD and ammonia making their way into streams may be reduced once the treatment plant and collection system is operational.

#### **BOD5 Reduction**



Table 7.2.4.3 from the report shows a reduction of BOD5 into the stream by as much as 23% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out, which is projected to occur in 20 years. Also, the Intermediate loading will reduce the BOD5 into the stream by as much as 95% from the unsewered homes sending flows to the 2<sup>nd</sup> WWTP. It should be noted that the segment (segment IL\_DT-01) of the Fox River is not considered impaired because of BOD5 loading according to the Illinois 2020/2022 303(d) List.

#### Suspended Solids Reductions

Table 7.2.4.4 from the report shows that an increase of TSS into the stream by as much as 50% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out condition, which is projected to occur in 20 years. However, the Intermediate loading will reduce the TSS into the stream by as much as 88% from unsewered homes sending flows to the 2<sup>nd</sup> WWTP. With newer style tertiary filters, the actual TSS removal could be as low as 5 mg/L which would reduce the TSS load increase to the stream.

#### Ammonia Nitrogen Reductions

Table 7.2.4.5 from the report shows a reduction of Ammonia Nitrogen into the stream by as much as 90% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out, which is projected to occur in 20 years. Also, the intermediate loading will reduce the Ammonia Nitrogen into the stream by as much as 99% from the unsewered homes sending flows to the 2<sup>nd</sup> WWTP. The proposed second plant will meet the ammonia limits. It should be noted that the segment (segment IL\_DT-01) of the Fox River is not considered impaired because of Ammonia Nitrogen loading according to the Illinois 2020/2022 303(d) List.

#### Phosphorus Reductions

Table 7.2.4.6 from the report shows a reduction of Phosphorus into the stream by as much as 3.8% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out, which is projected to occur in 20 years. Also, the Intermediate loading will reduce the Phosphorus into the stream by as much as 94% from the unsewered homes sending flows to the 2<sup>nd</sup> WWTP. It should be noted that the segment (segment IL\_DT-01) of the Fox River is considered impaired because of TP loading according to the Illinois 2020/2022 303(d) List.

The FRSG calls for Fox River dischargers to continue to reduce their phosphorus loads to the Fox River by meeting the state's requirement for major WWTPs to meet a 0.5 mg/L annual geometric mean limit by 2030. The FRSG suggests that the new Ottawa plant should be required to meet a total phosphorus limit of 0.5 mg/L calculated as an annual rolling geometric mean. Since this is a new plant, the facility should be able to meet that limit from the start.

#### Total Nitrogen Reductions

Table 7.2.4.7 from the report shows an increase of TN into the stream by as much as 36% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out, which is projected to occur in 20 years. However, the Intermediate loading will reduce the TN into the stream by as much as 90% from the unsewered homes sending flows to the 2<sup>nd</sup> WWTP. The proposed second WWTP limit is planned to meet the goal of 10 mg/L. The actual plant effluent is expected to remove TN to levels below 5-6 mg/L as observed at other BNR plants. It should be noted that the segment of the Fox River is not considered impaired because of TN loading according to the Illinois 2020/2022 303(d) List.

#### Fecal Coliform Reductions

Table 7.2.4.8 from the report shows a reduction of Fecal Coliform into the stream by as much as 92% when the proposed 2<sup>nd</sup> WWTP is loaded to design build-out, which is projected to occur in 20 years. Also, the Intermediate loading will reduce the Fecal Coliform into the stream by as much as 99% from the unsewered homes sending flows to the 2<sup>nd</sup> WWTP. The proposed second WWTP Fecal Coliform limit is projected not to exceed 400 (cfu/100 ml). It should be noted that the segment (segment IL\_DT-01) of the Fox River is considered impaired because of Fecal Coliform loading according to the Illinois 2020/2022 303(d) List.

#### **Fate and Effect of Parameters Proposed for Increased Loading.**

The BOD and ammonia discharged by this facility will decay into simpler and harmless byproducts by naturally occurring organisms in the receiving stream. Some of the nitrogen originating in the ammonia will remain in the stream in the form of nitrates or organic nitrogen. The nutrients discharged will be absorbed by aquatic organisms or riparian terrestrial plants or will remain in the stream. Ammonia and dissolved oxygen standards will be met in the effluent prior to discharge to the receiving stream.

#### **Purpose and Social & Economic Benefits of the Proposed Activity.**

The city of Ottawa will have several local economic benefits. The proposed project will enable the City to provide sanitary sewer service to Retz Mobile Home Improvements, Kings Mobile Home Court, Fields Hill Improvement Association which are currently on individual septic systems and to provide sanitary sewer services for the future residential and commercial development. Without proper sanitary sewer service, commercial developers and residential subdivisions developers might market installing on-site wastewater treatment units on each lot. These units have proven to be problematic since they are often poorly maintained and unable to provide the intended treatment. If sanitary sewer service is not provided by the City, the prospective developers might resort to taking their projects elsewhere.

### **Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.**

- **Alternative #1 New Second WWTP with Pump Station and Force Main**

This alternative includes the construction of a new wastewater treatment plant (WWTP). The new WWTP will be rated for a DAF of 0.9 MGD and a DMF of 2.25 MGD. A new lift station would be constructed at a convenient location to collect flows. A system of gravity sewers would be constructed along the City's unsewered and future growth areas to bring flows into this new lift station. A force main would then transport the flows to the new WWTP for treatment. The new treatment facility would include a plant influent pump station, screening, grit removal, BNR system including anoxic, anerobic, and aerobic tanks, secondary clarifiers, tertiary filtration, chlorination, and dechlorination.

- **Alternative #2 Upgrade Existing WWTP to BNR Plant with New Pump Station and Force Main**

This Second option also includes sanitary sewer to collect unsewered and planned areas, as well as a pump station and force main to the existing WWTP. This alternative would require upgrading the existing WWTP to allow for the biological nutrient removal. To allow for the additional new flows, modifications to the aerobic and anoxic tanks would be constructed to provide BNR treatment. Modifications to the aerobic tanks would be made, including new mixers and air diffusers added. A new tertiary filter building, a third waste activated sludge (WAS) tank, and a sludge thickener would also be constructed. Based on the existing flows and loads, this plant is not currently seeing 80% loading of either flows or biological loads, therefore, these improvements would maintain the existing basis of design flows of 4.0 MGD DAF and 8.0 MGD DMF. These improvements be based on providing biological nutrient removal and a fully compliant solid loading.

- **Alternative #3 - "No Discharge" Land Application Alternative**

The land application, or "no discharge," alternative was evaluated to determine the feasibility of completely eliminating the surface water discharge from the new 2nd WWTP, thereby reducing the pollutant loading to the Fox River. The "Illinois Design Standards for Slow Rate Land Application of Treated Wastewater," Part 372 of the Illinois Administrative Code, Title 35, Subtitle C, Chapter II, was used to determine the parameters and facilities required for land application disposal. In accordance with the Part 372 Design Standards, all land application systems must provide adequate storage for times when effluent cannot be land applied due to inclement weather, and primarily during winter months. For the purposes of this evaluation, 150 days of storage based on the DAF of 0.90 MGD was used, resulting in a total required storage lagoon volume of 135 MG. The storage lagoon volume would be divided into a multiple cell configuration requiring approximately 40 acres. An application rate of 2 inches of water per week over a 31 week application period was used to estimate the land application area required, which resulted into approximately 200 acres. The application rate of 2 inches of water per week assumes that available land is relatively permeable and does not have a high clay content. Should actual soils dictate an application rate of 1 inch per week or lower due to high clay content, the land application area required would need to be doubled.

There are a few golf courses established in the town, however, being small golfing outfits, there irrigation usage is not anticipated to be of such a magnitude that would justify capital investment of installing infrastructure to send the plant effluent to those outfits and be cost effective. Therefore, only using nearby agricultural farmlands for spray irrigation with the proposed plant effluent is considered in this alternative. The total land area required for the installation of storage lagoons and pumping facilities, and spray irrigation infrastructure (piping, spray nozzles, controls, groundwater monitoring wells, etc.) on the farmlands is collectively estimated to be approximately 240 acres. Since the new 2nd WWTP is planned to be located on a 7-acre parcel, additional land would have to be purchased. The land surrounding northwest part of Ottawa is predominately agricultural. For the purposes of this report, it is assumed that available land can be purchased within 2 miles of the new WWTP. A new plant site effluent pump stations and forcemains would need to be constructed to transport treated effluent to the storage lagoons, and there on to the land application sites.

### Evaluation of Alternatives

Proposed Alternative #1, which includes the construction of a second WWTP, Collection pump station, and extending the City's existing sanitary sewer system, is estimated to cost approximately \$29,900,000. The new proposed lift station, gravity sewers, and force main are estimated at approximately 3,925,000. Based on the location of the proposed new second WWTP, the new force main would require one river crossing, crossing the Fox River. The new plant would be located off of Illinois Route 71 on a property currently owned Halterman-Reynolds LLC. The City is already in communication with the owner about purchase of this land. One clear benefit of building on this location is that this plot has significant acreage that would allow for any future additions to this new treatment plant to occur in the future. In addition, this location is set back far enough from the Fox River that no flood walls would be considered necessary.

Proposed Alternative #2, which includes upgrades to the existing WWTP and collection system, is estimated to cost approximately \$74,000,000. The proposed new lift station, gravity sewer, and force main are estimated at approximately \$17,020,000. Based on the location of the existing WWTP, the new force main would require two river crossings, crossing both the Fox and Illinois Rivers. In addition, this force main would require one railroad crossing. All of these complex bored crossings would result in a significantly larger cost for the collection system improvements for this alternative. Additionally, due to relatively longer force main length, pump station would need larger pumps compared to the other alternative. To provide a BNR treatment process at the existing treatment plant, all of the existing available space at the plant site would be occupied by new tanks and buildings. This ultimately leaves no available space for any future upgrades at this treatment plant location. In addition, this plant is provided with flood wall constructed in 2016, while this flood wall does a good job at minimizing risk of WWTP flooding from the Illinois River, alternative #1 would have no risk of flooding at all.

Proposed Alternative #3, the "no discharge" land application alternative, includes costs for new sanitary sewers, pump station and

forcemain, and new 0.9 MGD WWTP facilities, and facilities to store and land spray application of the plant's treated effluent to agricultural fields, etc. Since the proposed land application site would be considered agricultural area with no public access, only secondary treatment without disinfection is required. Therefore, the costs associated with chlorine disinfection and dechlorination systems are excluded from the total project cost of this alternative. The total capital costs for alternative #3 is about \$47,883,000, which is nearly 60% more than that of the recommended alternative #1 (having \$29,900,000 estimate). Also, the net present worth of alternative #3 is about \$48,232,000, which is about 50% greater than that of the recommended alternative #1 (having \$31,958,000 estimate). Therefore, alternative #3 – "no discharge" or land application is not considered as cost effective and that alternative #1 "New Second WWTP with New Pump Station and Forcemain".

#### Selected Alternative

Based on analysis in this report and the cost to implement the alternatives discussed in this section, the most practical and cost-effective alternative is Alternative #1. This alternative is preferred by the City as it also positions a new treatment facility on a strategically beneficial location that can be further expanded with ease as the City grows.

#### **Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities.**

On December 7, 2021, the IDNR EcoCAT web-based tool was used (IDNR Project Number: 2207562) and indicated that there were endangered/threatened species (Pallid Shiner (*Hybopsis amnis*) and River Redhorse (*Moxostoma carinatum*)) present in the vicinity of the discharge. IDNR evaluated the submittal and determined that impacts to the protected resources are unlikely. IDNR terminated the consultation request on December 7, 2021.

The State Historic Preservation Office's (SHPO's) environmental sign-off was received on December 22, 2021.

#### **Agency Conclusion.**

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the draft permit was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all existing uses of the receiving stream will be maintained; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the community at large by providing sewage treatment for the expected population growth. Comments received during the NPDES permit public notice period will be evaluated before a final decision is made by the Agency.

Application is made for the existing discharge(s) which is located in LaSalle County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

<u>Discharge Number</u>	<u>Receiving Stream</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Stream Classification</u>	<u>Integrity Rating</u>
001	Fox River	41° 21' 32" North	88° 48' 16" West	General Use	C

To assist you further in identifying the location of the discharge(s) please see the map below.





The stream segment(s), Fox River, Waterbody Segment IL\_DT-01, receiving the discharge from outfall(s) 001 is on the 2020/2022 303(d) List of impaired waters.

The following parameters have been identified as the pollutants causing impairment:

Potential Causes

Algae, alteration in stream-side or littoral vegetative covers, flow regime modification, pH, sedimentation/siltation, and total suspended solids

Algae and total phosphorus

Mercury and polychlorinated biphenyls

Fecal coliform

Uses Impaired

Aquatic life use

Aesthetic quality use

Fish consumption use

Primary contact use

The discharge(s) from the facility is (are) proposed to be monitored and limited at all times as follows:

Discharge Number(s) and Name(s): 001 STP Outfall

Load limits computed based on a design average flow (DAF) of 0.9 MGD (design maximum flow (DMF) of 2.25 MGD).

The effluent of the above discharge(s) shall be monitored and limited at all times as follows:

<u>Parameter</u>	<u>LOAD LIMITS lbs/day</u> <u>DAF (DMF)*</u>			<u>CONCENTRATION</u> <u>LIMITS mg/L</u>			<u>Regulation</u>
	<u>Monthly</u> <u>Average</u>	<u>Weekly</u> <u>Average</u>	<u>Daily</u> <u>Maximum</u>	<u>Monthly</u> <u>Average</u>	<u>Weekly</u> <u>Average</u>	<u>Daily</u> <u>Maximum</u>	
CBOD <sub>5</sub> **	75 (188)		150 (375)	10		20	35 IAC 304.120 40 CFR 133.102
Suspended Solids**	90 (225)		180 (450)	12		24	35 IAC 304.120 40 CFR 133.102
pH	Shall be in the range of 6 to 9 Standard Units						35 IAC 304.125
Fecal Coliform	Daily Maximum shall not exceed 400 per 100 mL						35 IAC 304.125
Chlorine Residual							0.05 35 IAC 302.208
Ammonia Nitrogen: (as N) March-May/Sept.-Oct.	6.8 (17)	17 (43)	24 (60)	0.9	2.3	3.2	35 IAC 355 and 35 IAC 302
June-August	4.5 (11)	11 (28)	24 (60)	0.6	1.5	3.2	
Nov.-Feb.	17 (43)	--	29 (73)	2.3	--	3.9	
	<u>Annual</u> <u>Average</u>			<u>Annual</u> <u>Average</u>			
Total Phosphorus (as P)	3.8 (9.4)			0.5			35 IAC 304.123
Total Nitrogen (as N)				Monitor Only			35 IAC 309.146

\*Load Limits are calculated by using the formula:  $8.34 \times (\text{Design Average and/or Maximum Flow in MGD}) \times (\text{Applicable Concentration in mg/L})$ .

\*\*BOD<sub>5</sub> and Suspended Solids (85% removal required): In accordance with 40 CFR 133, the 30-day average percent removal shall not be less than 85 percent.

Annual Geometric Mean is defined as the 12 month rolling Geometric Mean (calculated monthly).

This draft Permit also contains the following requirements as special conditions:

1. Reopening of this Permit to include different final effluent limitations.
2. Operation of the facility by or under the supervision of a certified operator.
3. Submission of the operational data in a specified form and at a required frequency at any time during the effective term of this Permit.
4. More frequent monitoring requirement without Public Notice
5. Prohibition against causing or contributing to violations of water quality standards.
6. Recording the monitoring results on Discharge Monitoring Report Forms using one such form for each outfall each month and submitting the forms to IEPA each month.
7. The provisions of 40 CFR Section 122.41(m) & (n) are applicable and are hereby incorporated by reference.
8. Effluent sampling point location.
9. Submission of annual fiscal data.
10. Submission of semi annual reports indicating the quantities of sludge generated and disposed.
11. Total Nitrogen Monitoring.
12. Reopening of this Permit to include revised effluent limitations based on a Total Maximum Daily Load (TMDL) or other water quality study.
13. Notify Agency of Plant Completion



NPDES Permit No. IL0080244

Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

New (NPDES) Permit

Expiration Date:

Issue Date:

Effective Date:

Name and Address of Permittee:

City of Ottawa  
301 W. Madison Street  
Ottawa, Illinois 61350

Facility Name and Address:

City of Ottawa STP #2  
North of the Intersection of IL Route 71 and US Route 6  
Ottawa, Illinois 61350  
(LaSalle County)

Receiving Waters: Fox River

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of the Ill. Adm. Code, Subtitle C, Chapter I, and the Clean Water Act (CWA), the above-named Permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the Effluent Limitations, Monitoring, and Reporting requirements; Special Conditions and Attachment H Standard Conditions attached herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the Permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Brant. D. Fleming, P.E.  
Manager, Municipal Unit, Permit Section  
Division of Water Pollution Control

BDF:CWB:22020901.cwb

Effluent Limitations, Monitoring, and Reporting

## FINAL

Discharge Number(s) and Name(s): 001 STP Outfall

Load limits computed based on a design average flow (DAF) of 0.9 MGD (design maximum flow (DMF) of 2.25 MGD).

Excess flow facilities (if applicable) shall not be utilized until the main treatment facility is receiving its maximum practical flow.

From the start of operation of the new plant until expiration date of this Permit, the effluent of the above discharge(s) shall be monitored and limited at all times as follows:

<u>Parameter</u>	<u>LOAD LIMITS lbs/day</u>			<u>CONCENTRATION</u>			<u>Sample Frequency</u>	<u>Sample Type</u>
	<u>Monthly Average</u>	<u>DAF (DMF)* Weekly Average</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>LIMITS mg/L Weekly Average</u>	<u>Daily Maximum</u>		
Flow (MGD)							Continuous	
CBOD <sub>5</sub> **,**	75 (188)		150 (375)	10		20	2 Days/Week	Composite
Suspended Solids***	90 (225)		180 (450)	12		24	2 Days/Week	Composite
pH	Shall be in the range of 6 to 9 Standard Units						2 Days/Week	Grab
Fecal Coliform	Daily Maximum shall not exceed 400 per 100 mL						2 Days/Week	Grab
Chlorine Residual						0.05	2 Days/Week	Grab
Ammonia Nitrogen: (as N)								
March-May/Sept.-Oct.	6.8 (17)	17 (43)	24 (60)	0.9	2.3	3.2	2 Days/Week	Composite
June-August	4.5 (11)	11 (28)	24 (60)	0.6	1.5	3.2	2 Days/Week	Composite
Nov.-Feb.	17 (43)	--	29 (73)	2.3	--	3.9	2 Days/Week	Composite
	<u>Annual Average</u>			<u>Annual Average</u>				
Total Phosphorus (as P)****	3.8 (9.4)			0.5			2 Days/Week	Composite
Total Nitrogen (as N)****				Monitor Only			2 Days/Month	Composite

\*Load limits based on design maximum flow shall apply only when flow exceeds design average flow.

\*\*Carbonaceous BOD<sub>5</sub> (CBOD<sub>5</sub>) testing shall be in accordance with 40 CFR 136.

\*\*\* BOD<sub>5</sub> and Suspended Solids (85% removal required): In accordance with 40 CFR 133, the 30-day average percent removal shall not be less than 85 percent. The percent removal need not be reported to the IEPA on DMRs but influent and effluent data must be available, as required elsewhere in this Permit, for IEPA inspection and review. For measuring compliance with this requirement, 5 mg/L shall be added to the effluent CBOD<sub>5</sub> concentration to determine the effluent BOD<sub>5</sub> concentration. Percent removal is a percentage expression of the removal efficiency across a treatment plant for a given pollutant parameter, as determined from the 30-day average values of the raw wastewater influent concentrations to the facility and the 30-day average values of the effluent pollutant concentrations for a given time period.

\*\*\*\*See Special Condition 11.

Flow shall be reported on the Discharge Monitoring Report (DMR) as monthly average and daily maximum.

Chlorine residual shall be reported on the DMR as a daily maximum value.

pH shall be reported on the DMR as minimum and maximum value.

Fecal Coliform shall be reported on the DMR as a daily maximum value.

Dissolved oxygen shall be reported on the DMR as a minimum value.

Total Phosphorus and total nitrogen shall be reported on the DMR as a monthly average value.

\*\*\*\*\*The annual rolling geometric mean, 12 month rolling geometric (calculated monthly), total phosphorus limit shall be computed monthly. The annual rolling geometric mean value for total phosphorus shall be reported on the DMR beginning 12 months from operational attainment of the facility. From the operational attainment date, until 12 months after operational attainment, the permittee shall monitor for phosphorus 1 day/month and shall be reported on the DMR as a daily maximum value.

NPDES Permit No. IL0080244

Influent Monitoring, and Reporting

The influent to the plant shall be monitored as follows:

<u>Parameter</u>	<u>Sample Frequency*</u>	<u>Sample Type</u>
Flow (MGD)	Continuous	
BOD <sub>5</sub>	2 Days/Week	Composite
Suspended Solids	2 Days/Week	Composite

Influent samples shall be taken at a point representative of the influent.

Flow (MGD) shall be reported on the Discharge Monitoring Report (DMR) as monthly average and daily maximum.

BOD<sub>5</sub> and Suspended Solids shall be reported on the DMR as a monthly average concentration.



Special Conditions

SPECIAL CONDITION 1. This Permit may be modified to include different final effluent limitations or requirements which are consistent with applicable laws, regulations, or judicial orders. The IEPA will public notice the permit modification.

SPECIAL CONDITION 2. The use or operation of the existing facility shall be by or under the supervision of a Certified Class 2 operator. The expanded plant shall be operated by a Certified Class 2 operator.

SPECIAL CONDITION 3. The IEPA may request in writing submittal of operational information in a specified form and at a required frequency at any time during the effective period of this Permit.

SPECIAL CONDITION 4. The IEPA may request more frequent monitoring by permit modification pursuant to 40 CFR § 122.63 and Without Public Notice.

SPECIAL CONDITION 5. The effluent, alone or in combination with other sources, shall not cause a violation of any applicable water quality standard outlined in 35 Ill. Adm. Code 302 and 303.

SPECIAL CONDITION 6. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) electronic forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee is required to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA unless a waiver has been granted by the Agency. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, <https://www2.illinois.gov/epa/topics/water-quality/surface-water/netdmr/pages/quick-answer-guide.aspx>.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 25<sup>th</sup> day of the following month, unless otherwise specified by the permitting authority.

Permittees that have been granted a waiver shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency  
Division of Water Pollution Control  
Attention: Compliance Assurance Section, Mail Code # 19  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

SPECIAL CONDITION 7. The provisions of 40 CFR Section 122.41(m) & (n) are applicable and are hereby incorporated by reference.

SPECIAL CONDITION 8. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

SPECIAL CONDITION 9. During January of each year the Permittee shall submit annual fiscal data regarding sewerage system operations to the Illinois Environmental Protection Agency/Division of Water Pollution Control/Compliance Assurance Section. The Permittee may use any fiscal year period provided the period ends within twelve (12) months of the submission date.

Submission shall be on forms provided by IEPA titled "Fiscal Report Form For NPDES Permittees".

SPECIAL CONDITION 10. For the duration of this Permit, the Permittee shall determine the quantity of sludge produced by the treatment facility in dry tons or gallons with average percent total solids analysis. The Permittee shall maintain adequate records of the quantities of sludge produced and have said records available for U.S. EPA and IEPA inspection. The Permittee shall submit to the IEPA, at a minimum, a semi-annual summary report of the quantities of sludge generated and disposed of, in units of dry tons or gallons (average total percent solids) by different disposal methods including but not limited to application on farmland, application on reclamation land, landfilling, public distribution, dedicated land disposal, sod farms, storage lagoons or any other specified disposal method. Said reports shall be submitted to the IEPA by January 31 and July 31 of each year reporting the preceding January thru June and July thru December interval of sludge disposal operations.

Special Conditions

**Duty to Mitigate.** The Permittee shall take all reasonable steps to minimize any sludge use or disposal in violation of this Permit.

Sludge monitoring must be conducted according to test procedures approved under 40 CFR 136 unless otherwise specified in 40 CFR 503, unless other test procedures have been specified in this Permit.

**Planned Changes.** The Permittee shall give notice to the IEPA on the semi-annual report of any changes in sludge use and disposal.

The Permittee shall retain records of all sludge monitoring, and reports required by the Sludge Permit as referenced in Standard Condition 25 for a period of at least five (5) years from the date of this Permit.

If the Permittee monitors any pollutant more frequently than required by this permit or the Sludge Permit, the results of this monitoring shall be included in the reporting of data submitted to the IEPA.

The Permittee shall comply with existing federal regulations governing sewage sludge use or disposal and shall comply with all existing applicable regulations in any jurisdiction in which the sewage sludge is actually used or disposed.

The Permittee shall comply with standards for sewage sludge use or disposal established under section 405(d) of the CWA within the time provided in the regulations that establish the standards for sewage sludge use or disposal even if the permit has not been modified to incorporate the requirement.

The Permittee shall ensure that the applicable requirements in 40 CFR Part 503 are met when the sewage sludge is applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator.

Monitoring reports for sludge shall be reported on the form titled "Sludge Management Reports" to the following address:

Illinois Environmental Protection Agency  
Bureau of Water  
Compliance Assurance Section  
Mail Code #19  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

**SPECIAL CONDITION 11.** The Permittee shall operate the facilities designed for biological nutrient removal (BNR). Monitoring for Total Nitrogen is required to document the actual total nitrogen effluent concentration. The Permittee shall monitor the effluent for total nitrogen once per month. The monitoring shall be a composite sample and the results reported as a daily maximum on the Permittee's Discharge Monitoring Report Forms.

The Permittee shall notify the IEPA in writing of any operational deficiencies and corrective measures to be taken if the treatment plant effluent exceeds a monthly average concentration goal of 10 mg/L of Total Nitrogen. Correspondence shall be directed to:

Illinois Environmental Protection Agency	Illinois Environmental Protection Agency
Bureau of Water	Bureau of Water
Compliance Assurance Section, Mail Code #19	Des Plaines Field Office
1021 North Grand Avenue East	9511 West Harrison Street
Post Office Box 19276	Des Plaines, Illinois 60016
Springfield, Illinois 62794-9275	

**SPECIAL CONDITION 12.** This Permit may be modified to include alternative or additional final effluent limitations pursuant to an approved Total Maximum Daily Load (TMDL) Study or upon completion of an alternate Water Quality Study

**SPECIAL CONDITION 13.** The Permittee shall notify the IEPA in writing once the treatment plant construction has been completed. A letter stating the date that the construction was completed shall be sent to the following address within fourteen (14) days of the new plant becoming operational:

Special Conditions

Illinois Environmental Protection Agency  
Bureau of Water  
Compliance Assurance Section, Mail Code #19  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

## Narendra Patel

**From:** Branson, Corey <Corey.Branson@Illinois.gov>  
**Sent:** Thursday, June 15, 2023 10:13 AM  
**To:** Narendra Patel; Fleming, Brant  
**Cc:** dadrian@etch-dutt.com  
**Subject:** RE: City of Ottawa - New Fox River (2nd) WWTP - New NPDES Permit #IL0080244

Narendra,

We received no comments during the Public Notice Period.  
We can hold the permit.  
Please let us know more as the timeframe approaches.

Thank you,

Corey Branson  
IEPA  
Bureau Of Water  
Division of Water Pollution Control  
Municipal Permit Section

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**From:** Narendra Patel <npatel@fehrgraham.com>  
**Sent:** Monday, June 12, 2023 1:50 PM  
**To:** Fleming, Brant <Brant.Fleming@Illinois.gov>; Branson, Corey <Corey.Branson@Illinois.gov>  
**Cc:** dadrian@etch-dutt.com  
**Subject:** [External] City of Ottawa - New Fox River (2nd) WWTP - New NPDES Permit #IL0080244

Hi Brant / Corey –

I just wanted to touch base with you regarding the new Fox River (2<sup>nd</sup>) WWTP's NPDES Permit #IL0080244....Now that the 30-day PNPC period for this new NPDES permit ended last **Friday (June 9<sup>th</sup>)**, we wondered if you received any comments from anyone during this comment period...please let us know.

If all went well and no one commented, could you please hold off on issuing the final permit until towards the end of the upcoming project design phase (likely late 2024 to early 2025; I'll coordinate with you as we get closer to that timeframe) as discussed before?...please confirm.

Thanks as always! – Naren



**NARENDRA PATEL, PE, PMP® | Project Manager**  
**Fehr Graham | Engineering & Environmental**

1610 Broadmoor Drive  
Champaign, Illinois 61821  
P: 217.352.7688

**From:** Narendra Patel

**Sent:** Tuesday, March 28, 2023 2:57 PM

**To:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>; Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>

**Cc:** Mokammel Sanju <[sanju@fehrgraham.com](mailto:sanju@fehrgraham.com)>; [dadrian@etch-dutt.com](mailto:dadrian@etch-dutt.com)

**Subject:** RE: City of Ottawa WWTP Facility Plan / New NPDES Permit Draft Annual Fees Timing Question / FGA Review Comments - 3.28.2023

Hi Brant & Corey,

We did take a look at the draft of Ottawa's New Fox River WWTP's NPDES Permit #IL0080244, and saw a couple minor edits as noted below:

- 1) Under the "Name and Address of Facility" on both 1<sup>st</sup> page of PN Fact sheet and the 1<sup>st</sup> page of new NPDES Permit, please correct the name of county to "**LaSalle**" from "**Decalb**".
- 2) In the last footnote on Page 7 of PN Fact Sheet, please change phrases "**Average**" mentioned in 2-places to say "**Geometric Mean**"...Overall, that foot note would say - "**Annual Geometric Mean is defined as the 12-month rolling geometric mean (calculated monthly)**".
- 3) In Special Condition #13 on page 5 of new NPDES Permit, please change the phrases "**expansion**" in the first 2-places to say "**construction**", and the third place to say "**new plant**".

For your convenience, I have marked-up the above items on the respective phases in the attached scan of the draft permit....Please incorporate these edits and let me know when you post the updated draft for a 30-day PNPC comments.

Secondly, regarding remittance of the initial annual NPDES permit fee, please note that the City will choose option #2 you suggested and pay for this initial annual fee during the future design phase (basically towards the end of the design phase). For now, like you suggested, please begin the 30-day PNPC period as the next step and once the comment period ends, please hold off on the final NPDES permit issuance until towards the end of the design phase. Once we get closer to that milestone (likely in late 2024/early 2025), we'll coordinate with you at that time, and also request the City to mail the Agency a payment for this initial annual fee. That way, you can issue the final NPDES Permit ahead of issuing the construction permit at the end of the design phase.

If you have any questions, please let me know. Thanks as always!

Regards,  
Naren



**NARENDRA PATEL, PE, PMP® | Project Manager**  
**Fehr Graham | Engineering & Environmental**

1610 Broadmoor Drive  
Champaign, Illinois 61821  
P: 217.352.7688  
[fehrgraham.com](http://fehrgraham.com)



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**From:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>  
**Sent:** Friday, March 24, 2023 2:47 PM  
**To:** Narendra Patel <[npatel@fehrgraham.com](mailto:npatel@fehrgraham.com)>  
**Cc:** Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Subject:** RE: City of Ottawa WWTP Facility Plan / New NPDES Permit Draft Annual Fees Timing Question

You're welcome. Just keep us updated!

You have a great weekend too.

Brant

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**From:** Narendra Patel <[npatel@fehrgraham.com](mailto:npatel@fehrgraham.com)>  
**Sent:** Friday, March 24, 2023 2:46 PM  
**To:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>  
**Cc:** Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Subject:** [External] RE: City of Ottawa WWTP Facility Plan / New NPDES Permit Draft Annual Fees Timing Question

Brant,

Great - this info would be very helpful!...I definitely see a lot of merits for the City to choose option #2 you mentioned below. I'll discuss it with the City engineer next week and update you to confirm...

Thanks, and have a great weekend! - Naren

**NARENDRA PATEL, PE, PMP® | Project Manager**  
**Fehr Graham | Engineering & Environmental**

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**From:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>  
**Sent:** Friday, March 24, 2023 2:35 PM  
**To:** Narendra Patel <[npatel@fehrgraham.com](mailto:npatel@fehrgraham.com)>; Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Subject:** RE: City of Ottawa WWTP Facility Plan / New NPDES Permit Draft Annual Fees Timing Question

Hello Naren,

I'm glad you asked. If you were to pay the fee today, you would be subject to the same fee (annual fee) this June and every June thereafter. I would advise, at the very least, wait until the permit is off of public notice before paying the fee. If we receive significant comments, issuance of the permit may be delayed until any comments are resolved.

There are a couple of options as far as timing of the permit fee – more in response to your email below:

1. Submit the fee after the public notice period and soon afterwards we issue the permit. – However, as you stated below, there will be a good amount of time before the permit is actually needed! Which will cost a significant amount of money for the time period the permit is not really needed
2. After public notice, and after any comments received are resolved, we can hold the issuance of the permit for a while – say a year or better. At that time, the permittee can submit the fee. This option may save you a year or two of fees. Keep in mind, the NPDES permit has to be issued prior to issuing the construction permit....but we can time the issuance of the construction permit and NPDES permit on nearly the same day.

Some permittees choose #1 as they just want the permit in their hand!! But those facilities are typically subject to a lower fee! Others go with #2, we can hold the permit for a period of time and issue the permit when necessary. However, we can't hold the permit forever, without the possibility of having to go back out to public notice.

Hope this helps.

Thanks  
Brant Fleming  
Manager, Municipal Unit, Permit section

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**From:** Narendra Patel <[npatel@fehrgraham.com](mailto:npatel@fehrgraham.com)>  
**Sent:** Friday, March 24, 2023 2:15 PM  
**To:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>; Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Subject:** [External] RE: City of Ottawa WWTP Facility Plan / New NPDES Permit Draft Annual Fees Timing Question

Brant / Corey,

We received the attached draft of the new Fox River WWTP NPDES Permit. Thank you for your help getting it...I'll review this draft and get back to you with any comments or edits early next week.

I have one quick question – the cover letter indicates about City needing to remit the Agency the initial annual fee for operation of new WWTP under this NPDES permit. Note that this will be a brand new WWTP, which will go through at least 2-year of upcoming design/permitting and bidding phases, followed by another 2-3 years of construction phase before the new plant will have begun a discharge under this NPDES permit as indicated in the facilities planning...Therefore, exactly at what point does the City needs to remit the Agency with the first annual fee mentioned in the cover letter – now or the upcoming design phase is authorized?

Please advise with the above question when you get a chance, so I can relay that information to the City.

Thanks as always! - Naren



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**From:** Narendra Patel  
**Sent:** Wednesday, March 8, 2023 2:06 PM  
**To:** Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Cc:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>; [dadrian@etch-dutt.com](mailto:dadrian@etch-dutt.com)  
**Subject:** RE: City of Ottawa WWTP Facility Plan

Hi Corey,  
Thanks for this note!...Surething; Please call or email me if you have any questions...If all look good, please shoot me a quick email note when you forward your approval over to the financial section....thank you again, Naren



**NARENDRA PATEL, PE, PMP® | Project Manager**  
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**From:** Branson, Corey <[Corey.Branson@Illinois.gov](mailto:Corey.Branson@Illinois.gov)>  
**Sent:** Wednesday, March 8, 2023 1:53 PM  
**To:** Narendra Patel <[npatel@fehrgraham.com](mailto:npatel@fehrgraham.com)>  
**Cc:** Fleming, Brant <[Brant.Fleming@Illinois.gov](mailto:Brant.Fleming@Illinois.gov)>  
**Subject:** City of Ottawa WWTP Facility Plan

You don't often get email from [corey.branson@illinois.gov](mailto:corey.branson@illinois.gov). [Learn why this is important](#)

Naren,

I have received the Anti-Deg from Scott Twait.  
This project is next in my to-do pile, so I plan on beginning my review tomorrow.  
I will be in contact if I have any questions.

Thank you,

Corey Branson  
IEPA  
Bureau Of Water  
Division of Water Pollution Control  
Municipal Permit Section

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