



Aqua Illinois, Inc.
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July 2, 2009

Mr. Al Keller, Permit Section Manager
IEPA Division of Water Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 63794

RE: Engineering Report for the incremental expansion of existing University Park treatment facilities

Dear Mr. Keller:

Aqua Illinois respectfully submits the enclosed Engineering Report titled, "Facilities Plan Update for Aqua Illinois Inc. University Park Wastewater Plant" for the expansion of existing treatment facilities. The proposed expansion is from 2.17 to 2.43 MGD. This Engineering Report has been prepared to allow you and your staff to review the proposed interim improvements prior to the development of plans and specifications.

Previous Facility Plan

In March 2007, Aqua Illinois submitted a Facility Plan to CMAP with the purposes of informing CMAP of the need to expand wastewater system capacity and requesting an amendment of the FPA. The requested amendment, which added nearly five and a half square miles in Will County's Green Garden Township, had a positive recommendation from CMAP issued in June 2007 and was approved by IEPA in September 2007.

The Facility Plan demonstrated the need for expansion based on continued filling in of residential developments already permitted, facilities being added in industrial park, several planned developments not yet permitted and growth projections. In order to meet the obligation of being the designated management agency for wastewater treatment in the FPA, there is a need for Aqua Illinois to increase treatment capacity.

Also in the Facility Plan, Aqua Illinois presented alternatives for expanding total wastewater system capacity from 2.17 MGD to 4.67 MGD or more. Aqua Illinois has continued efforts to determine which of the three alternatives would remain viable. Although there is a need to ultimately expand treatment capacity to 4.67 MGD or more, we feel the investment is not prudent at this time due to the economic conditions and decrease in development since 2008. In the interim, Aqua Illinois is requesting approval of an incremental expansion of the University Park WWTP that is consistent with planning for an ultimate expansion.

Critical Review Status and Reviews Concurrent with this Submittal

In 2006, the IEPA notified Aqua that the facility would be placed on Critical Review Status. The purpose of this project is to present a plan to CMAP and the IEPA demonstrating how Aqua Illinois intends to meet the obligations of being the designated management agency for wastewater treatment in the FPA and to sufficiently expand treatment capacity allowing the facility to be removed from Critical Review Status.

On May 19, 2009, Aqua Illinois submitted a request for an updated NPDES permit for this facility (current permit expires 11-30-09). On June 22, 2009, a CMAP Amendment application for the wastewater plant expansion was submitted to Dawn Thompson for review and Wastewater Committee action is expected in August.

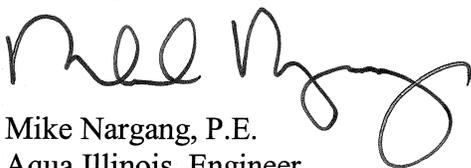
Review of this Engineering Report and Subsequent Schedule

Key aspects of this Engineering Report include increased aeration in the existing oxidation ditch, conversion of existing sludge storage to digestion, addition of sludge transfer and storage facilities. Also the expansion has been designed such that the loadings for the NPDES permit will remain the same and phosphorus will be reduced thru addition of chemical phosphorus removal facilities.

In either late 2009 or early 2010, after addressing comments from your Office, Aqua Illinois intends apply for a permit to construct the facilities needed for the 12% expansion. Aqua Illinois desires to have the construction completed and facilities operational in 2011.

As stated above, this Engineering Report has been prepared to allow you and your staff to review the proposed interim improvements prior to the development of plans and specifications. If there are questions about this Engineering Report please contact me.

Cordially,



Mike Nargang, P.E.
Aqua Illinois, Engineer
815-935-8800 ext 260
815-791-6533 Cell
mnargang@aquaaamerica.com

cc: Amy Dragovich, P.E., IEPA Northern Municipal Unit Manager.
Dennis Duffield, P.E., Rogina & Associates (815-729-0777 Ext 166)



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June 22, 2009

Wastewater Committee
Chicago Metropolitan Agency for Planning
233 S. Wacker Drive, Suite 800
Chicago, Illinois 60606

RE: Amendment Application for the expansion of existing University Park treatment facilities

Dear Committee Members:

Aqua Illinois respectfully submits the enclosed Amendment Application for the expansion of existing treatment facilities and attached Facility Plan Update. The proposed treatment capacity expansion is from 2.17 to 2.43 MGD.

In March 2007, Aqua Illinois submitted a Facility Plan to CMAP with the purposes of informing CMAP of the need to expand wastewater system capacity and requesting an amendment of the FPA. The requested amendment, which added nearly five and a half square miles in Will County's Green Garden Township, had a positive recommendation from CMAP issued in June 2007 and was approved by IEPA in September 2007.

The Facility Plan demonstrated the need for expansion based on facilities being added in industrial park, continued filling in of residential developments already permitted, several planned developments not yet permitted, and growth projections. In order to meet the obligation of being the Designated Management Agency for Wastewater Treatment in the FPA, there is a need for Aqua Illinois to increase treatment capacity.

Also in the Facility Plan, Aqua Illinois presented three alternatives for expanding total wastewater system capacity from 2.17 MGD to 4.67 MGD or more. Aqua Illinois has continued efforts to determine which of the three alternatives would remain viable. Greater detail on those alternatives is presented in this Amendment Application and also another land application alternative is presented. One of the alternatives, where part of the flow to the University Park system would be pumped to the Thorn Creek Basin Sanitary District (TCBSD) treatment plant, has been rejected by TCBSD and is no longer viable. Each of the viable alternatives which are still being considered includes some expansion, at least doubling capacity, of the University Park WWTP.

The current economic situation that started in 2008 has resulted in significant decrease in the rate of population growth and a reduction in amount of development in the service area. Therefore investing in an expansion to 4.67 MGD or more to double capacity is not prudent at this time. Since each of the viable alternatives includes some expansion of the University Park WWTP, Aqua Illinois is requesting approval of an incremental expansion of the University Park WWTP that is consistent with each remaining alternative.

This proposed expansion of 12% is an economically efficient solution that also has a minimum environmental impact. The economic efficiency is possible because this expansion takes advantage of modifying existing waste treatment equipment to increase capacity rather than building new equipment. Because of the small increment, Aqua will be able to design the expansion such that the loadings for the NPDES permit will remain the same and phosphorus will be reduced thru addition of chemical phosphorus removal facilities.

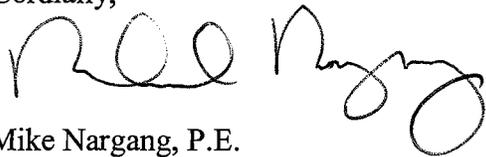
In 2006, the IEPA notified Aqua that the facility would be placed on Critical Review Status. Critical Review Status means that the Agency may issue permits but the loading on the subject treatment works is approaching the load for which it was designed and proposed sewer projects exceeding plant capacity will be denied. The IEPA has informed Aqua Illinois that the University Park wastewater treatment capacity needs to be increased to allow the facility to no longer be on Critical Review Status.

The purpose of this project is to present a plan to CMAP and the IEPA demonstrating how Aqua Illinois intends to meet the obligations of being the designated management agency for wastewater treatment in the FPA and to sufficiently expand treatment capacity allowing the facility to be removed from the IEPA's Critical Review Status.

Concurrent with CMAP review, Aqua Illinois will be requesting an updated NPDES permit for this facility. In either late 2009 or early 2010, Aqua Illinois will apply for a permit to construct the facilities needed for the 12% expansion. Aqua Illinois desires to have the construction completed and facilities operational in 2011.

If there are questions about this application or attached documents, please contact me at either number below.

Cordially,



Mike Nargang, P.E.
Aqua Illinois, Engineer
815-935-8800 ext 260
815-791-6533 Cell

Attachment C

UP Wastewater Treatment Plant (“WWTP”) Expansion Permitting Timeline

<i>Date</i>	<i>Action/ Event</i>	<i>Status</i>	<i>Comments regarding schedule or issues</i>
CURRENT:			
May 19, 2009	Aqua Illinois submitted to IEPA a request for an updated NPDES permit for this facility (current permit expires 11-30-09).	IEPA reviewing	New Permit expected between December 2009 to February 2010. Will not be issued without CMAP review and approval of Engineering Report. Subject to public hearing.
June 22, 2009	Aqua Illinois submitted to CMAP an Amendment application for the wastewater plant expansion	CMAP reviewing	WW Committee Mtg. scheduled for 9/9/09. “Recommendation” could come as early as September but if public hearing required, could delay to Jan 2010
July 2, 2009	Aqua Illinois submitted Updated Facility Plan to IEPA justifying increase in WWTP capacity from 2.17 MGD to 2.43 MGD.	IEPA reviewing	Expect comments to come from IEPA in late summer.
FUTURE:			
Aug. 2009	Begin detailed design of plant modifications.		Design will start with aspects that are more likely to be a part of the plan IEPA will approve. Detailed engineering could take 4 to 6 months.
Sept. 2009	IEPA to issue public notice for updated NPDES permit		Draft Permit will be issued by IEPA requesting public comments on the Draft Permit. Likely that public comments will be received which will cause a public hearing process to start that takes 90 days.
Jan. 2010	After Detailed Engineering complete, if/when CMAP recommends and IEPA approves Engineering Report/Facility Plan, then Aqua submits Application to IEPA for Construction Permit		Aqua hopes that IEPA will review the Construction Permit Application before the NPDES permit is issued, but they won’t approve it until permit is issued. Review by IEPA takes at least 90 days.
Feb. 2010	NPDES permit can be issued by IEPA.		If there are significant issues, there could be other public comment periods and hearings.
Apr. 2010	Construction Permit Issued		Aqua will get contractor bids between Feb and April 2010
June. 2010	Start Construction and Procure major equipment		
Before end of 2011	Complete construction and put in service		