

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	:	
On Its Own Motion	:	
	:	
-vs-	:	Docket No. 12-0570
	:	
Nunda Utility Co.	:	
Investigation pursuant to Section	:	
8-102 of the Public Utilities Act.	:	

**STAFF OF THE ILLINOIS COMMERCE COMMISSION VERIFIED
ANSWERS TO QUESTIONS POSED VIA NOTICE ISSUED JANUARY 8, 2013**

Pursuant to the Notice issued on January 8, 2013, the Staff of the Illinois Commerce Commission (“Staff”) does hereby submit the following verified answers to the questions posed:

1. ***The sworn and notarized affidavit filed on October 18, 2012 states, in part, the following:***

[O]n October 18, 2012 a copy of the order of the Illinois Commerce Commission dated October 17, 2012 in Docket No. 12-0570 (Illinois Commerce Commission -vs- Nunda Utility Co.) was served electronically to the following parties:

***Mathew J. Stahl
817 Blakley St.
Woodstock, IL 60098
Fax (815) 338-4430***

Was that order served on Mr. Stahl via electronic mail (email)?

The records of the Commission’s Chief Clerk reflect that the Clerk’s Office served the order to Mr. Stahl via facsimile in accordance with the Clerk’s Office’s standard procedure. A certified copy of the order, the affidavit posted on e-docket in this proceeding, and the fax cover sheet that reflects fax transmission of the order to Mr. Stahl are attached hereto as Attachment 1. The records of the Chief Clerk further reflect that Mr. Stahl did not provide an e-mail address for

Nunda and that, therefore, it does not appear that the order was served via e-mail.

If so, what email address was used, given that none was listed in the affidavit?

The records of the Commission's Chief Clerk reflect that the Clerk's Office provided service to Mr. Stahl via facsimile (See Attachment 1).

Do Mr. Stahl or others working at the Nunda Utility Co. (Nunda) use email?

To Staff's knowledge, Matthew J. and Patricia M. Stahl, owners of Nunda, do not use email. Chris J. Stahl, the Stahl's son and Operator of Nunda, does use email. His email address is tri_waters@yahoo.com.

a. Was there any contact or communication between Staff and Mr. Stahl or others working at Nunda in the days or weeks prior to the November 19, 2012 hearing at which nobody from Nunda made an appearance?

Yes.

b. If so, would you describe that contact or communication?

On October 11, 2012, Commission Staff conducted an investigation of Nunda to examine the issues raised in the Commission Staff Report dated September 19, 2012. During the investigation, Staff found that the specific deficiencies identified in the Staff Report had not been corrected and Nunda did not, as of that date, appear to be in compliance with the Commission regulatory requirements associated with the deficiencies identified in the Staff Report.

The Commission's Consumer Services Division has logged five informal complaints during the period of October 2012 through January 2013. Three of the complaints were related to billing issues, one complaint was regarding water quality, and one complaint was in response to a notice for termination of service due to nonpayment and difficulty reaching the company. The Company responded to the individual complaints and Staff is incorporating this information in its investigation.

2. Has there been any contact or communication between Staff and Mr. Stahl or others working at Nunda since the Initiating Order was issued in this case on October 17, 2012?

Yes.

a. *If so, would you describe that contact or communication?*

On or around October 19, 2012, Patricia Stahl called the case manager inquiring about the order that she received. She was told that it was an Order directing Staff to investigate Nunda.

On October 25, 2012, Commission General Counsel sent Nunda a letter, which is attached hereto as Attachment 2, requesting a response by November 9, 2012 to each of the deficiencies listed in the letter. Nunda has not responded to the letter.

3. *When was the last contact or communication between Staff and Mr. Stahl or others working at Nunda, and what did it entail?*

The October 25, 2012 letter was the last written contact or communication between Staff and Nunda prior to the prehearing conference on November 19, 2012. Commission Staff counsel attempted on two occasions to contact Nunda. On the first of these, Staff counsel called Mr. Stahl on November 14, 2012, at (815) 338-4446, for the purpose of ensuring receipt of the October 25th Nunda letter and to offer assistance in addressing the issues. There was no answer, so Staff counsel left a voice mail message along with a phone number, such that Mr. Stahl or another Nunda representative could return the call. Neither Mr. Stahl, nor any representative of Nunda, returned the call. Commission Staff counsel followed up with an additional call to Mr. Stahl on November 16, 2012, to remind him of the pre-hearing conference scheduled for November 19, 2012, and again, to offer assistance in addressing the issues. There was no answer. Staff counsel left a message on voice mail. Neither Mr. Stahl, nor any representative of Nunda, returned the second call.

At the prehearing conference held on November 19, 2012, the Administrative Law Judge attempted to reach Mr. Stahl via telephone alerting Mr. Stahl to the proceeding taking place. Transcript of November 19, 2012 Prehearing Conference, at 3 (ALJ states for the record that he attempted to contact Nunda representatives during the hearing, but obtained no response).

On November 21, 2012, Commission Staff filed a Motion to Close the Proceeding on e-docket. Mr. Stahl was served a copy of this motion via first class mail. (Staff's Motion was intended to be an administrative exercise to close the docket. The docket in an 8-102 investigation is typically a vehicle for the Commission to find that reasonable grounds exist to conduct an investigation or audit, describe the scope of the investigation, and initiate the investigation. Generally, the investigation is closed upon the Commission voting to commence it, and the investigation begins. Closing the docket in a Section 8-102 case has no impact on the investigation: the investigation continues until a final report is presented to the Commissioners.

There have been no further contacts by Staff with Mr. Stahl to date while we regroup and plan next steps. Staff has certainly not concluded the investigation and will continue to follow up with the company regarding the deficiencies and corrective action plans.

Staff and OGC will develop alternatives for proceeding with the investigation that provide the best opportunity for fully addressing and remediating the system's deficiencies. We will prioritize the list of deficiencies to focus on those that relate directly to the provision of safe and reliable service. The company may be relatively more responsive if the issues are approached on a prioritized basis.

Regarding safety, Staff has followed up with the IEPA regarding the results of testing of Nunda's water that IEPA conducted in October. The IEPA responded that its tests detected no volatile organic compounds (VOCs), there were no water quality standard violations, the water is safe to drink, and the IEPA lab did not have any concerns with the results. The IEPA laboratory results are attached hereto as Attachment 3.

The company's continued failure to respond may result in additional enforcement action by the Commission. Staff will keep the Commissioners informed of our activities and the company's response.

Respectfully submitted,

Staff Counsel
Illinois Commerce Commission

MEGAN C. MCNEILL
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle St., Suite C-800
Chicago, IL 60601-3104
Phone: (312) 793-2877
Fax: (312) 793-1556
mmcneill@icc.illinois.gov

January 16, 2013

Counsel for the Staff of the
Illinois Commerce Commission

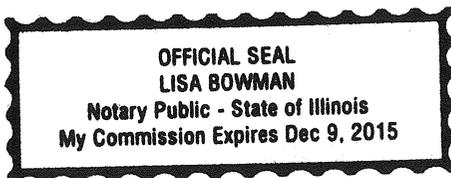
VERIFICATION

I, William D. Marr, being first duly sworn, depose and state that I am a Manager in the Water Engineering Program of the Safety and Reliability Division of the Illinois Commerce Commission; that I have read the foregoing Verified Answers and know the contents thereof; and that the statements contained therein are true, correct to the best of my knowledge, information and belief.

William D Marr
William D. Marr
Illinois Commerce Commission

Subscribed and sworn to before me
This 10th day of January, 2013.

Lisa Bowman
Notary Public



STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	:	
On Its Own Motion	:	
-vs-	:	
Nunda Utility Co.	:	
	:	12-0570
Investigation pursuant to Section 8-	:	
102 of the Public Utilities Act	:	

ORDER

By the Commission:

Nunda Utility Company ("Nunda") is public utility providing or furnishing water for public use in the State of Illinois. Nunda provides water service to 110 metered and 60 unmetered residential customers in the Boulevard Park Subdivision, located south of the Village of Island Lake in Nunda Township, McHenry County, Illinois. On June 27, 2012, the Illinois Commerce Commission ("Commission") directed the Staff of the Commission to prepare a Staff Report recommending that the Commission order an investigation of customer complaints about Nunda pursuant to Section 8-102 of the Public Utilities Act ("Act"). Section 8-102 of the Act states in relevant part:

Audit or investigation. The Commission is authorized to conduct or order a management audit or investigation of any public utility or part thereof. The audit or investigation may examine the reasonableness, prudence, or efficiency of any aspect of the utility's operations, costs, management, decisions or functions that may affect the adequacy, safety, efficiency or reliability of utility service or the reasonableness or prudence of the costs underlying rates or charges for utility service. The Commission may conduct or order a management audit or investigation only when it has reasonable grounds to believe that the audit or investigation is necessary to assure that the utility is providing adequate, efficient, reliable, safe, and least-cost service and charging only just and reasonable rates therefor, or that the audit or investigation is likely to be cost-beneficial in enhancing the quality of service or the reasonableness of rates therefor. The Commission shall, before initiating any such audit or investigation, issue an order describing the grounds for the audit or investigation and the appropriate scope and nature of the audit or investigation. The scope and nature of any such audit or investigation shall be reasonably related to the grounds relied upon by the Commission in its order.

In a Staff Report dated September 19, 2012, the Staff of the Water Engineering

Program in the Safety & Reliability Division of the Bureau of Public Utilities has detailed numerous grounds for an investigation of Nunda under Section 8-102 of the Act. Specific allegations of deficiencies.

1. Nunda does not maintain water meter records as required by 83 Ill. Adm. Code 600.150.
2. Nunda has not established a water meter installation program for all un-metered customers as required by 83 Ill. Adm. Code 600.260.
3. Nunda does not replace inoperable water meters, read water meters, and bill customers based on actual water usage as required by 83 Ill. Adm. Codes 600.260, 600.310, and 280.80(a).
4. Nunda does not inspect and test (or replace) each ¾-inch water meter every 6 years as required by 83 Ill. Adm. Code 600.340.
5. Nunda has not established an annual valve and hydrant inspection and maintenance program as required by 83 Ill. Adm. Code 600.240.
6. Nunda does not have an emergency power supply to insure continuous water service as required by 83 Ill. Adm. Code 600.230(a).
7. Nunda does not provide security lighting at the well house as a security measure as required by Section 8-101 of the Act.
8. Nunda is not a member of the State-Wide One-Call Notice System ("JULIE") as required by the Illinois Underground Utility Facilities Damage Prevention Act, 220 ILCS 50/3.
9. Nunda does not maintain records of interruptions of water service as required by 83 Ill. Adm. Code 600.220(c).
10. During the comment period for the 2011 simplified rate case – March 31, 2011 through May 26, 2011 – the Commission's Consumer Services Division ("CSD") Staff recorded 29 comments wherein customers expressed dissatisfaction with the quality of service, including poor water quality, need to purchase drinking water, low water pressure, water service interruptions, frequent boil orders, lack of water meter reading, billing inaccuracy, and poor customer service (including not being able to reach Nunda by phone).

Based on the information contained in the Staff Report, the Commission is of the opinion that reasonable grounds exist to believe that an investigation is necessary to assure that Nunda is providing adequate service.

The Commission, being fully advised in the premises, is of the opinion and finds that:

- (1) Nunda Utility Co. is a public utility, as defined in Section 3-105 of the Public Utilities Act, that is engaged in the provision of water in the State of Illinois;
- (2) the Commission has jurisdiction over respondent and the subject matter of this proceeding;
- (3) the Staff Report dated September 19, 2012, should be made a part of the record of this proceeding;
- (4) the recitals of fact and law set forth in the prefatory portions of this Order are supported by the evidence and are hereby adopted as findings of fact and conclusions of law;
- (5) the Commission should initiate an investigation and audit pursuant to Section 8-102 of the Public Utilities Act to examine those issues raised in the Staff Report dated September 19, 2012, and recited in the prefatory portion of this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that, pursuant to Section 8-102 of the Public Utilities Act, an audit is initiated to examine issues raised in the Staff Report dated September 19, 2012 and recited in the prefatory portion of this Order.

IT IS FURTHER ORDERED that Nunda Utility Co. is made respondent to this proceeding.

IT IS FURTHER ORDERED that the Staff Report dated September 19, 2012 is made a part of the record of this proceeding.

IT IS FURTHER ORDERED that the Chief Clerk serve a copy of this Order on the designated agent of respondent.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 17th day of October, 2012.

(SIGNED) DOUGLAS P. SCOTT
Chairman

STATE OF ILLINOIS)
COUNTY OF SANGAMON)⁹⁹

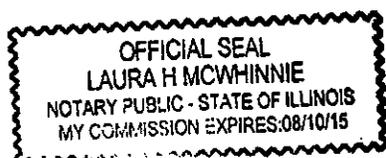
The undersigned, being duly sworn on oath, deposes and says on October 18, 2012 a copy of the order of the Illinois Commerce Commission dated October 17, 2012 in Docket No. 12-0570 (Illinois Commerce Commission -vs- Nunda Utility Co.) was served electronically to the following parties:

Matthew J. Stahl
817 Blakley St.
Woodstock, IL 60098
Fax: (815) 338-4430

Nunda Co

Subscribed and sworn to before me this 18th
day of October A.D. 2012.

Laura H McWhinnie





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Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

To: Matthew Stahl<+1 (815) 338-4430>

Fax number: +1 (815) 338-4430

From: Chief Clerk's Office

Fax number: 217-524-0673

Business phone: 217-782-7434

Date & Time: 10/18/2012 12:20:36 PM

Pages: 5

Re: official commissino order of case or proceeding - 12-0570

Nunda Utility Co.

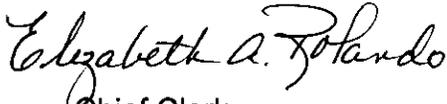
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION
CERTIFICATE

Re: 12-0570

I, ELIZABETH A. ROLANDO, do hereby certify that I am Chief Clerk of the Illinois Commerce Commission of the State of Illinois and keeper of the records and seal of said Commission with respect to all matters except those governed by Chapters 18a and 18c of The Illinois Vehicle Code.

I further certify that the foregoing is a true, correct and complete copy of the Order made and entered of record by said Commission on October 17, 2012; Affidavit and Fax Confirmation Receipt of October 18, 2012.

Given under my hand and seal of said Illinois Commerce Commission at Springfield, Illinois, on January 9, 2013.


Chief Clerk

State of Illinois



ILLINOIS COMMERCE COMMISSION

October 25, 2012

Patricia M. Stahl
Nunda Utility Company
817 Blakley Street
Woodstock, Illinois 60098

Re: Investigation of Nunda Utility Company

Dear Ms. Stahl:

On October 17, 2012, in ICC Docket No. 12-0570, the Illinois Commerce Commission ("ICC" or "Commission") ordered an investigation of Nunda Utility Company ("Nunda") pursuant to Section 8-102 of the Public Utilities Act ("Act") to examine issues raised in the Commission Staff Report dated September 19, 2012, which is attached hereto. In the Order, the Commission found the following alleged deficiencies in meeting Commission regulatory requirements constituted reasonable grounds for initiating an investigation of Nunda:

1. Nunda does not maintain water meter records as required by 83 Ill. Adm. Code 600.150.
2. Nunda has not established a water meter installation program for all un-metered customers as required by 83 Ill. Adm. Code 600.260.
3. Nunda does not replace inoperable water meters, read water meters, and bill customers based on actual water usage as required by 83 Ill. Adm. Codes 600.260, 600.310, and 280.80(a).
4. Nunda does not inspect and test (or replace) each $\frac{3}{4}$ -inch water meter every 6 years as required by 83 Ill. Adm. Code 600.340.
5. Nunda has not established an annual valve and hydrant inspection and maintenance program as required by 83 Ill. Adm. Code 600.240.
6. Nunda does not have an emergency power supply to insure continuous water service as required by 83 Ill. Adm. Code 600.230(a).
7. Nunda does not provide security lighting at the well house as a security

measure as required by Section 8-101 of the Act.

8. Nunda does not maintain records of interruptions of water service as required by 83 Ill. Adm. Code 600.220(c).

On October 11, 2012, Commission Staff conducted an investigation of Nunda to examine the issues raised above. During the investigation, Staff found that the specific deficiencies identified above had not been corrected and Nunda did not, as of that date, appear to be in compliance with the Commission regulatory requirements associated with the deficiencies identified above.

Please respond to each of the deficiencies listed above. The response must include a plan of corrective action to be taken by Nunda for each deficiency, and a schedule upon which such corrective action will take place. The response should be submitted to the Water Engineering Program within fifteen (15) days of the date of this letter. Staff will follow up and recommend priorities to Nunda to achieve compliance with Commission regulatory requirements. Staff will provide periodic reports to the Commission to make certain Commissioners remain informed of the investigation's status.

As a start, Staff recommends that Nunda establish a quarterly hydrant inspection and maintenance program. A quarterly hydrant flushing program will remove discolored water from the water distribution system and improve water quality.

If you have any questions, please contact Bill Marr, Manager of the Water Engineering Program, at 217/524-5017.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Stephenson", with a long horizontal flourish extending to the right.

Mary Stephenson
General Counsel
Illinois Commerce Commission

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION
WATER ENGINEERING PROGRAM STAFF REPORT

12-0570

September 19, 2012

Subject: Staff Report on Investigation of Nunda Utility Company

Capsule Summary

On June 27, 2012, the Commission directed Staff to prepare a Staff Report recommending that the Commission order an investigation of customer complaints about Nunda Utility Company ("Nunda"), pursuant to Section 8-102 of the Illinois Public Utilities Act ("Act"). Section 8-102 of the Act reads as follows:

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CHIEF CLERK'S OFFICE
ILLINOIS COMMERCE
COMMISSION

Audit or investigation. The Commission is authorized to conduct or order a management audit or investigation of any public utility or part thereof. The audit or investigation may examine the reasonableness, prudence, or efficiency of any aspect of the utility's operations, costs, management, decisions or functions that may affect the adequacy, safety, efficiency or reliability of utility service or the reasonableness or prudence of the costs underlying rates or charges for utility service. The Commission may conduct or order a management audit or investigation only when it has reasonable grounds to believe that the audit or investigation is necessary to assure that the utility is providing adequate, efficient, reliable, safe, and least-cost service and charging only just and reasonable rates therefor, or that the audit or investigation is likely to be cost-beneficial in enhancing the quality of service or the reasonableness of rates therefor. The Commission shall, before initiating any such audit or investigation, issue an order describing the grounds for the audit or investigation and the appropriate scope and nature of the audit or investigation. The scope and nature of any such audit or investigation shall be reasonably related to the grounds relied upon by the Commission in its order.

Any audit or investigation authorized pursuant to this Section may be conducted by the Commission, or if the Commission is unable to adequately perform the audit or investigation, the Commission may arrange for it to be conducted by persons independent of the utility and selected by the Commission. The cost of an independent audit shall be borne initially by the utility, but shall be recovered as an expense through normal ratemaking procedures. Any audit or investigation shall be conducted in accordance with generally accepted auditing standards.

Staff recommends the Commission issue the attached Order that presents the grounds for and the appropriate scope and nature of the investigation of Nunda. The Order also includes a recommended schedule for beginning and completing the investigation,

including Nunda's compliance with applicable law, rules and tariffs governing the provision of water service.

Grounds for Investigation

In 2011, following Staff's inspection of Nunda's water facilities in conjunction with a simplified rate case, the Water Department sent a letter to Nunda detailing deficiencies in meeting Commission regulatory requirements. (Attachment A) In March 2012, Nunda responded to Staff's letter indicating that it would comply with the Commission's regulatory requirements when funds become available. On June 28, 2012, Nunda stated during a phone conversation with Staff that it has not corrected any of the deficiencies noted in the letter. The following deficiencies are grounds for initiating an investigation:

1. Nunda does not maintain water meter records as required by 83 Ill. Adm. Code 600.150.
2. Nunda has not established a water meter installation program for all unmetered customers as required by 83 Ill. Adm. Code 600.260.
3. Nunda does not replace inoperable water meters, read water meters, and bill customers based on actual water usage as required by 83 Ill. Adm. Codes 600.260, 600.310, and 280.80(a).
4. Nunda does not inspect and test (or replace) each ¾-inch water meter every 6 years as required by 83 Ill. Adm. Code 600.340.
5. Nunda has not established an annual valve and hydrant inspection and maintenance program as required by 83 Ill. Adm. Code 600.240.
6. Nunda does not have an emergency power supply to insure continuous water service as required by 83 Ill. Adm. Code 600.230(a).
7. Nunda does not provide security lighting at the well house as a security measure as required by Section 8-101 of the Act.
8. Nunda is not a member of the State-Wide One-Call Notice System ("JULIE") as required by the Illinois Underground Utility Facilities Damage Prevention Act, 220 ILCS 50/3.

9. Nunda does not maintain records of interruptions of water service as required by 83 Ill. Adm. Code 600.220(c).
10. During the comment period for the 2011 simplified rate case – March 31, 2011 through May 26, 2011 – the Commission's Consumer Services Division ("CSD") Staff recorded 29 comments wherein customers expressed dissatisfaction with the quality of service, including poor water quality, need to purchase drinking water, low water pressure, water service interruptions, frequent boil orders, lack of water meter reading, billing inaccuracy, and poor customer service (including, not being able to reach Nunda by phone).

Scope and Nature of the Investigation

As provided in Section 8-102 of the Act, Staff will "examine the reasonableness, prudence, or efficiency of any aspect of the utility's operations, costs, management, decisions or functions that may affect the adequacy, safety, efficiency or reliability of utility service or the reasonableness or prudence of the costs underlying rates or charges for utility service." Staff will focus on matters involving previous findings of non-compliance with the law, rules or tariffs and customer complaints regarding water and service quality.

Background

Nunda provides water service to 110 metered and 60 unmetered residential customers in the Boulevard Park Subdivision, located south of the Village of Island Lake in Nunda Township, McHenry County, Illinois. Groundwater from Nunda's two wells is treated with sodium hypochlorite (chlorine) for disinfection, hydrofluosilicic acid (fluoride) to prevent tooth decay, and polyphosphate to sequester iron.

On February 25, 2011, Nunda filed an application for a proposed general increase in water rates through the Commission's simplified rate case procedures.

On June 27, 2011, Water Department Staff conducted an inspection of Nunda's water facilities in conjunction with the simplified rate case. On September 16, 2011, the Water

Department sent Nunda a letter detailing its deficiencies in meeting Commission regulatory requirements found during the inspection of Nunda's water facilities. (Attachment A) The letter requested a response from Nunda within 30 days. After numerous Staff inquiries regarding a response, Nunda finally responded after six months – on March 26, 2012 – indicating that it would comply with the Commission's regulatory requirements when funds become available.

On June 27, 2012, the Commission approved a water rate increase.

On June 28, 2012, Nunda stated during a phone conversation with Staff that it has not corrected any of the deficiencies noted in the letter due to a lack of funds and resources.

Consumer Complaints

In 2010, CSD received 5 complaints from Nunda customers. Four complaints were service-related - water service interruptions, timeliness of service (reconnection) performed, and conduct of utility office personnel - and one complaint was billing-related. There were no water quality complaints reported by customers to CSD during 2010.

As a part of Staff's June 2011 inspection, Staff reviewed consumer complaints and comments received by CSD for the period March 31, 2011 through May 26, 2011. The simplified rate case procedures require a 21-day comment period after a utility sends notice of the rate case to its customers. CSD typically allows for a longer comment period in order to give the customers ample time to comment on the rate increase. During this period, CSD Staff recorded 39 comments. In all 39 comments, customers expressed opposition to the proposed water rate increase. In 29 of those cases, customers also expressed dissatisfaction with the quality of service, including poor water quality, need to purchase drinking water, low water pressure, water service interruptions, frequent boil orders, lack of water meter reading, billing inaccuracy, and poor customer service (including, not being able to reach Nunda by phone). In one

case, the customer included a picture of a bathtub being filled with discolored water. (Attachment B).

After the simplified rate case comment period, CSD received 3 additional complaints from Nunda customers in 2011. All 3 complaints were billing-related.

In 2012, CSD received 4 complaints from Nunda customers. One customer expressed opposition to the proposed water rate increase. One complaint included an allegation of water leaks within the water distribution system and the responsibility for road repairs. Two complaints were billing-related which included not being able to reach Nunda to resolve the customer's issue.

Water Meters

83 III. Adm. Code Section 600.150 Customer Meter Test Records:

Each utility shall keep a record for each meter showing the make, size, style, number, and date of purchase of the meter. Such record shall also reflect at all times the results of the latest test conducted on the meter, the reason for the test, and the testing method used.

During the 2011 inspection, Staff found that Nunda does not maintain any water meter records. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to create water meter records. Further, Staff will recommend that Nunda provide water meter records to the Manager of the Commission's Water Engineering Program to verify that records have been created.

83 III. Adm. Code Section 600.260 Metered Service:

All general water service furnished within the State of Illinois shall be by metered measurement, unless otherwise approved by the Commission.

During the 2011 inspection, Staff determined that out of 170 customers in Nunda's water distribution system, service to 110 customers is metered with 3/4-inch water meters, while 60 Nunda customers receive unmetered water service. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to develop a plan and schedule for a water meter installation program for all

unmetered customers. Further, Staff will recommend that Nunda provide water meter records to the Manager of the Commission's Water Engineering Program to verify that meters have been installed.

83 III. Adm. Code Section 280.80(a) Estimated Bills, in part:

All utilities shall make an actual meter reading at least every second billing period, and no utility may consecutively estimate a customer's service usage

During an April 2012 public meeting held with the owners of Nunda, Staff listened to customer complaints about inoperable water meters, lack of water meter reading, and inaccurate bills based on estimated water usage. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to replace inoperable water meters, read water meters quarterly consistent with its billing cycle stated in its tariffs, and prepare customer bills based on actual water usage from the water meter readings. Further, Staff will recommend that Nunda provide water meter records to the Manager of the Commission's Water Engineering Program to verify that meters have been replaced, and that Nunda provide water bills to the Commission's CSD on a quarterly basis to verify that water meters are read quarterly and that customers are being billed based on actual water usage.

83 III. Adm. Code Section 600.340 Frequency of Tests:

Unless otherwise approved by the Commission, each service water meter shall be periodically inspected and tested in accordance with the following schedule, or as often as the results may warrant, to insure that the meter accuracy is maintained within the limits set out in Section 600.310: ¾-inch meter -- 6 years or for each 300,000 cubic feet registered

During the 2011 inspection, Staff determined that Nunda does not inspect and test each ¾-inch water meter every 6 years. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to replace water meters according to an accelerated schedule approved by Staff, and, thereafter, periodically inspect and test (or replace) each ¾-inch water meter every 6 years. Further, Staff will recommend that Nunda provide water meter records to the Manager of the

Commission's Water Engineering Program after the meters are replaced and every 6 years thereafter to verify that meters have been replaced.

Valves and Hydrants

83 III. Adm. Code Section 600.240 Inspection and Maintenance of Valves and Hydrants:

Each utility shall establish a valve and hydrant inspection program. Valves and hydrants shall be kept in good operating condition and should be inspected at least annually. Valves and hydrants found to be inoperable shall be repaired or replaced. Valve covers shall be maintained at grade level and not paved over. Each inspection and all maintenance performed shall be properly noted on the valve or hydrant record card.

There are 23 valves in Nunda's water distribution system. During the 2011 inspection, Staff learned that the valves are not inspected and exercised annually. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to establish an annual valve inspection and maintenance program. Further, Staff will recommend that Nunda provide records of valve exercises to the Manager of the Commission's Water Engineering Program on an annual basis to verify that the program has been established and that valves are being exercised annually.

There are 22 hydrants in Nunda's water distribution system. Nunda indicated during Staff's June 2011 inspection that hydrants are inspected and flushed when informed by customers of rusty water, or at least every two years. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to establish a quarterly hydrant inspection and maintenance program. A quarterly hydrant flushing program will remove discolored water from the water distribution system and improve water quality. Staff recommends quarterly flushing as opposed to annual flushing as required by rule¹ because experience has shown that quarterly flushing is more effective than annual flushing at maintaining colorless water of good

¹ The rule requires annual inspection and maintenance. The Commission has always interpreted annual maintenance as flushing.

quality in very small water distribution systems. Further, Staff will recommend that Nunda provide records of hydrant flushes to the Manager of the Commission's Water Engineering Program on a quarterly basis to verify that the program has been established and that hydrants are being flushed quarterly.

Emergency Power

83 Ill. Adm. Code Section 600.230(a) Adequacy of Service:

Each utility shall furnish and maintain sufficient facilities to provide a continuous and adequate supply of water at reasonable pressure. Unless other acceptable provisions are made to insure continuous service, the utility should be able to meet the maximum daily demand with its largest well and/or pump out of service.

Nunda has an emergency interconnect agreement with the Village of Island Lake water system in case of loss of water supply for an extended period of time. During the 2011 inspection, however, Staff learned that Nunda does not have an emergency power supply which will allow the water system to maintain water pressure during a brief power outage. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to install an emergency generator to ensure continuous water service. Further, Staff will recommend that Nunda provide an invoice or picture of the emergency generator to the Manager of the Commission's Water Engineering Program to verify that the generator has been installed.

Security

Public Utilities Act Section 8-101. Duties of Public Utilities, in part:

A public utility shall furnish, provide, and maintain such service instrumentalities, equipment, and facilities as shall promote the safety, health, comfort, and convenience of its patrons, employees, and public and as shall be in all respects adequate, efficient, just, and reasonable.

During the 2011 inspection, Staff found Nunda's well house locked, but noted no security lighting or other security measures. Staff will examine Nunda's security measures, and, if necessary, recommend the Commission order Nunda to install security lighting at the well house as an additional security measure to prevent intrusion

and vandalism. Further, Staff will recommend that Nunda provide a picture of the well house to the Manager of the Commission's Water Engineering Program to verify that security lighting has been installed.

State-Wide One-Call Notice System ("JULIE") Membership

Illinois utilities are required to be a member of JULIE, but Nunda is not. Separately from this investigation, the Manager of the Commission's Illinois One-Call Enforcement Program will pursue this matter with Nunda to ensure the utility's compliance with the Illinois Underground Utility Facilities Damage Prevention Act (220 ILCS 50/3).

Water Pressure

83 Ill. Adm. Code Section 600.230(b) Adequacy of Service:

An average pressure of at least 35 pounds per square inch ("psi") is recommended at the customer's service connection. Under normal operating conditions, pressure below 20 psi at the customer's service connection will not be considered reasonable.

During the June 2011 inspection, Staff observed Nunda's water distribution system operating at a pressure of 35 psi. Staff will re-check the pressure gauge at the water treatment plant to verify that the water pressure is at least 35 psi entering the water distribution system.

There are approximately 656 feet of 2-inch, 2,713 feet of 4-inch, and 17,511 feet of 6-inch in diameter water mains in Nunda's water distribution system. The 2-inch water mains are galvanized material and are of inadequate size which could cause low water pressure problems and should be replaced. However, Staff does not recommend replacement of the under-sized water mains because it is not cost-effective for a small utility such as Nunda to spread such a large cost over a customer base of only 170 customers.

Water Service Interruptions

83 Ill. Adm. Code Section 600.220(c) Interruptions of Service:

Each utility shall keep a record of all interruptions affecting service to the entire system and to any major portion of the distribution system. This record shall show the date, time of day, duration, extent and cause of the interruption.

During the 2011 inspection, Staff learned that Nunda does not maintain records of water service interruptions. Staff will review Nunda's compliance with the rule, and, if necessary, recommend the Commission order Nunda to begin maintaining records of interruptions of water service. Further, Staff will recommend that Nunda provide records of water service interruptions to the Manager of the Commission's Water Engineering Program to verify that records are being maintained.

Water Quality

83 Ill. Adm. Code Section 600.210 Quality of Service:

Each utility shall furnish a safe water supply suitable for drinking and free of any hazards to health in adequate quantities to meet the needs of its customers. The water should be free from objectionable odor and taste and should be colorless. It shall conform to the standards for drinking water as established by the State of Illinois, Environmental Protection Agency or any successor agency or organization.

A quarterly hydrant flushing program, referred to above, should help to address water quality issues. Additionally, Staff has contacted the Illinois Environmental Protection Agency ("Illinois EPA") and a joint inspection is planned to support the assessment of Nunda's water quality and its compliance with the rule.

Nunda is a Public Water Supply regulated by the Illinois EPA and it is responsible for compliance with Illinois EPA rules such as those addressing:

- Water quality.
- Construction, modification or extension of water supply, treatment, and distribution facilities.
- Groundwater source protection.
- Drinking water production, treatment, and distribution.

- Periodic self-monitoring, including the use of a certified laboratory to analyze for the presence of microorganisms and chemicals in the finished drinking water.
- Operational reporting to the Illinois EPA demonstrating performance of required sampling and testing.
- Reporting to the public (Consumer Confidence Reports).
- Timely and appropriate response to violations.
- Cross-connection control programs.

The latest Illinois EPA water inspection report indicates that Nunda's water quality meets all applicable primary Illinois EPA drinking water standards and that there were no drinking water standard violations. The Illinois EPA Drinking Water Watch website (<http://www.epa.state.il.us/water/drinking-water-watch/index.html>) shows that Nunda's water samples met all applicable primary Illinois EPA drinking water standards in 2011 and 2012 and that there were no drinking water standard violations.

Staff will conduct a joint inspection with the Illinois EPA to investigate Nunda's water quality. The Illinois EPA will take one or more water samples during the inspection and Staff will provide the sample to a certified laboratory for analysis.

Investigation and Compliance Schedule

Staff recommends the Commission allow 60 days for the following steps:

- Staff follow-up with Nunda on all matters found to be non-compliant with the law, rules and tariffs.
- CSD Staff follow-up with customers regarding water and service quality complaints.
- Coordination with the Illinois EPA on a joint inspection to investigate Nunda's water quality.
- Staff direction to help Nunda prioritize activities and achieve compliance with the law, rules and tariffs.

- Presentation of a final report and compliance schedule to the Commission for review and approval.

Staff will provide periodic reports to keep Commissioners informed of the investigation's status.

Recommendations

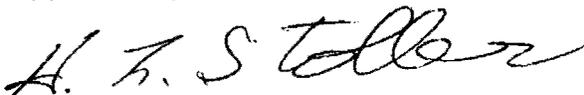
On June 27, 2012, the Commission directed Staff to prepare a Staff Report recommending that the Commission order an investigation of customer complaints about Nunda, pursuant to Section 8-102 of the Act. In addition to customer complaints, Staff recommends the investigation include a follow-up of non-compliant matters identified in the 2011 inspection. Staff recommends the Commission issue the attached Order that presents the grounds for and the appropriate scope and nature of the investigation of Nunda.

Prepared by:



William D. Marr
Manager, Water Engineering Program
Safety & Reliability Division

Approved by:



Harry Stoller
Director, Safety & Reliability Division

Cc: Jeff Peca, Illinois EPA
Dave McMillan, Field Operations Section Manager, Illinois EPA
John J. Kim, Interim Director, Illinois EPA
Tom Smith, Water Engineering Program
Bill Riley, Manager, Illinois One-Call Enforcement Program
Jim Agnew, CSD

Joan Howard, CSD
Peter Muntaner, Director, CSD
Randy Nehrt, Bureau Chief, Bureau of External Affairs
Gene Beyer, Bureau Chief, Bureau of Public Utilities
Conrad Rubinkowski, Office of General Counsel
Jonathan Feipel, Executive Director



Illinois Environmental Protection Agency Laboratory

825 N. Rutledge Springfield, Illinois 62702 217.782.9780

LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Field Parameters--PW33 *

Method: 9911 Prepared: 10/11/12 11:30

Units: SU Analyzed: 10/11/12 11:30

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Pump Rate GPM	100.0			
Specific Conductance	700.0			
Field EH	260.0			
Field pH	6.640			
Field Temperature	11.19			
Run Time min.	25.00			

Volatile Organic Compounds by GC/MS

Method: 524.2 Prepared: 10/17/12 14:31

Units: ug/L Analyzed: 10/17/12 16:24

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Vinyl chloride	ND		0.50	0.5
1,1-Dichloroethene	ND		0.50	0.5
Methylene chloride	ND		0.50	0.5
trans-1,2-Dichloroethene	ND		0.50	0.5
Methyl tert-butyl ether	ND		0.50	0.5
cis-1,2-Dichloroethene	ND		0.50	0.5
1,2-Dichloroethane	ND		0.50	0.5
1,1,1-Trichloroethane	ND		0.50	0.5
Carbon tetrachloride	ND		0.50	0.5
Benzene	ND		0.50	0.5

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received: 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Volatile Organic Compounds by GC/MS

Method: 524.2 Prepared: 10/17/12 14:31

Units: ug/L Analyzed: 10/17/12 16:24

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
1,2-Dichloropropane	ND		0.50	0.5
Trichloroethene	ND		0.50	0.5
1,1,2-Trichloroethane	ND		0.50	0.5
Toluene	ND		0.50	0.5
Tetrachloroethene	ND		0.50	0.5
Chlorobenzene	ND		0.50	0.5
Ethylbenzene	ND		0.50	0.5
Styrene	ND		0.50	0.5
1,4-Dichlorobenzene	ND		0.50	0.5
1,2-Dichlorobenzene	ND		0.50	0.5
1,2,4-Trichlorobenzene	ND		0.50	0.5
Xylenes, total	ND		0.50	0.5

Chlorinated Acids by GC

Method: 515.1 Prepared: 10/24/12 11:20

Units: ug/L Analyzed: 11/01/12 18:31

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Dalapon	ND		5.0	
Dicamba	ND		0.25	
2,4-D	ND		1.0	
Pentachlorophenol	ND		0.40	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Chlorinated Acids by GC

Method: 515.1 Prepared: 10/24/12 11:20

Units: ug/L Analyzed: 11/01/12 18:31

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Silvex	ND		1.0	
Dinoseb	ND		1.0	
Picloram	ND		1.0	
Acifluorfen	ND		0.50	

Organic Compounds by GC/MS

Method: 525.2 Prepared: 10/15/12 15:40

Units: ug/L Analyzed: 10/18/12 23:08

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Hexachlorocyclopentadiene	ND		0.50	
Propachlor	ND		0.50	
Trifluralin	ND		0.050	
Hexachlorobenzene	ND		0.10	
Simazine	ND		0.35	
Atrazine	ND		0.30	
gamma-BHC (Lindane)	ND		0.020	
Acetochlor	ND		1.0	
Metribuzin	ND		0.10	
Alachlor	ND		0.20	
Heptachlor	ND		0.040	
Bromacil	ND		1.0	

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LABORATORY RESULTS

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Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Organic Compounds by GC/MS

Method: 525.2 Prepared: 10/15/12 15:40

Units: ug/L Analyzed: 10/18/12 23:08

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Metolachlor	ND		0.25	
Aldrin	ND		0.050	
Cyanazine	ND		0.50	
Heptachlor epoxide	ND		0.020	
Dieldrin	ND		0.050	
Endrin	ND		0.10	
Di(2-ethylhexyl)adipate	ND		0.60	
Methoxychlor	ND		0.10	
Di(2-ethylhexyl)phthalate	ND		1.8	
Benzo(a)pyrene	ND		0.10	
Toxaphene	ND		1.0	
Chlordane	ND		0.20	
Total DDT	ND		1.0	
Total PCBs	ND		0.40	

Alkalinity by Standard Method 2320B

Method: 2320B Prepared: 10/16/12 16:05

Units: mg/L Analyzed: 10/16/12 16:05

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Alkalinity	350		10.0	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Chloride by Standard Method 4500 Cl-E

Method: 4500-CL E Prepared: 10/25/12 14:35

Units: mg/L Analyzed: 10/25/12 14:35

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Chloride	26.5		1.00	

Cyanide by EPA Method 335.4

Method: 335.4 Prepared: 10/18/12 09:20

Units: mg/L Analyzed: 10/19/12 11:45

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Cyanide	ND		0.20	

Fluoride by Standard Method 4500-F C

Method: 4500F-C Prepared: 10/16/12 13:24

Units: mg/L Analyzed: 10/16/12 13:28

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Fluoride	0.67		0.10	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Mercury by EPA Method 245.1

Method: 245.1 Prepared: 10/16/12 10:45

Units: ug/L Analyzed: 10/24/12 11:50

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Mercury	ND		0.06	

Metals by EPA 200 Series Methods ICP

Method: 200.7 Prepared: 10/19/12 08:14

Units: ug/L Analyzed: 10/19/12 10:58

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Boron	466		10.0	
Calcium	51500		300	
Hardness	261000			
Iron	497		50.0	
Magnesium	32100		300	
Potassium	2180		1400	
Silica *	20500		2500	
Sodium	54500		300	
Strontium	1010		5.00	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Metals by EPA 200 Series Methods ICP/MS

Method: 200.8 Prepared: 10/22/12 14:15

Units: ug/L Analyzed: 10/30/12 17:50

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Aluminum	ND		100	
Antimony	ND		2.00	
Arsenic	ND		0.500	
Barium	80.5		5.00	
Beryllium	ND		1.00	
Cadmium	ND		3.00	
Chromium	ND		5.00	
Cobalt	ND		10.0	
Copper	ND		100	
Lead	ND		5.00	
Manganese	ND		15.0	
Molybdenum	ND		20.0	
Nickel	ND		25.0	
Selenium	ND		2.00	
Silver	ND		10.0	
Thallium	ND		2.00	
Vanadium	ND		5.00	
Zinc	ND		100	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Nitrate-Nitrite, Colorimetric, Automated Cadmium by EPA Method 353.2

Method: 353.2 Prepared: 10/17/12 14:18

Units: mg/L Analyzed: 10/22/12 13:15

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Nitrogen, Nitrite (NO ₂) + Nitrate (NO ₃)	ND		0.100	

Nitrogen, Ammonia, Potentiometric, Ion Selective by EPA Method 350.3

Method: 350.3 Prepared: 10/29/12 08:42

Units: mg/L Analyzed: 10/29/12 12:13

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Ammonia as N	1.02		0.10	

Phenols by EPA Method 420.4

Method: 420.4 Prepared: 10/17/12 10:30

Units: ug/L Analyzed: 10/17/12 12:25

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Phenol *	ND		10.0	

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LABORATORY RESULTS

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Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **WL01415/SOC WELL 2** Lab Sample ID: **SJ20700-01**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:30

Sample Type: Raw Sample Depth: Total Depth: 0

Phosphorus, All Forms, Colorimetric, Ascorbic by EPA Method 365.3

Method: 365.3 Prepared: 10/17/12 13:03

Units: mg/L Analyzed: 10/19/12 10:19

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Phosphorus as P	0.0490		0.0050	

Sulfate by EPA Method 375.2

Method: 375.2 Prepared: 10/30/12 15:18

Units: mg/L Analyzed: 10/30/12 15:18

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Sulfate	ND		40.0	

Total Dissolved Solids, Gravimetric, Dried at 180oC by Std. Method 2540C

Method: 2540C Prepared: 10/17/12 14:12

Units: mg/L Analyzed: 10/17/12 14:12

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Total Dissolved Solids	386		10	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Alkalinity by Standard Method 2320B

Method: 2320B Prepared: 10/16/12 16:05

Units: mg/L Analyzed: 10/16/12 16:05

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Alkalinity	335		10.0	

Chloride by Standard Method 4500 Cl-E

Method: 4500-CL E Prepared: 10/25/12 14:35

Units: mg/L Analyzed: 10/25/12 14:35

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Chloride	35.6		1.00	

Cyanide by EPA Method 335.4

Method: 335.4 Prepared: 10/18/12 09:20

Units: mg/L Analyzed: 10/19/12 11:46

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Cyanide	ND		0.20	

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LABORATORY RESULTS

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Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Fluoride by Standard Method 4500-F C

Method: 4500F-C Prepared: 10/16/12 13:24

Units: mg/L Analyzed: 10/16/12 13:28

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Fluoride	0.76		0.10	

Mercury by EPA Method 245.1

Method: 245.1 Prepared: 10/16/12 10:45

Units: ug/L Analyzed: 10/24/12 11:52

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Mercury	ND		0.06	

Metals by EPA 200 Series Methods ICP

Method: 200.7 Prepared: 10/19/12 08:14

Units: ug/L Analyzed: 10/19/12 11:00

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Boron	443		10.0	
Calcium	ND		300	
Hardness	466			
Iron	450		50.0	
Magnesium	ND		300	
Potassium	ND		1400	
Silica *	18900		2500	

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Illinois Environmental Protection Agency Laboratory

825 N. Rutledge Springfield, Illinois 62702 217.782.9780

LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Metals by EPA 200 Series Methods ICP

Method: 200.7 Prepared: 10/19/12 08:14

Units: ug/L Analyzed: 10/19/12 11:00

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Sodium	167000		300	
Strontium	ND		5.00	

Metals by EPA 200 Series Methods ICP/MS

Method: 200.8 Prepared: 10/22/12 14:15

Units: ug/L Analyzed: 10/30/12 17:54

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Aluminum	ND		100	
Antimony	ND		2.00	
Arsenic	ND		0.500	
Barium	ND		5.00	
Beryllium	ND		1.00	
Cadmium	ND		3.00	
Chromium	ND		5.00	
Cobalt	ND		10.0	
Copper	ND		100	
Lead	ND		5.00	
Manganese	ND		15.0	
Molybdenum	ND		20.0	
Nickel	ND		25.0	
Selenium	ND		2.00	

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Illinois Environmental Protection Agency Laboratory

825 N. Rutledge Springfield, Illinois 62702 217.782.9780

LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Metals by EPA 200 Series Methods ICP/MS

Method: 200.8 Prepared: 10/22/12 14:15

Units: ug/L Analyzed: 10/30/12 17:54

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Silver	ND		10.0	
Thallium	ND		2.00	
Vanadium	ND		5.00	
Zinc	ND		100	

Nitrate-Nitrite, Colorimetric, Automated Cadmium by EPA Method 353.2

Method: 353.2 Prepared: 10/17/12 14:18

Units: mg/L Analyzed: 10/22/12 13:16

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Nitrogen, Nitrite (NO ₂) + Nitrate (NO ₃)	ND		0.100	

Nitrogen, Ammonia, Potentiometric, Ion Selective by EPA Method 350.3

Method: 350.3 Prepared: 10/29/12 08:42

Units: mg/L Analyzed: 10/29/12 12:13

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Ammonia as N	0.49		0.10	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Phenols by EPA Method 420.4

Method: 420.4 Prepared: 10/17/12 10:30

Units: ug/L Analyzed: 10/17/12 12:31

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Phenol *	ND		10.0	

Phosphorus, All Forms, Colorimetric, Ascorbic by EPA Method 365.3

Method: 365.3 Prepared: 10/17/12 13:03

Units: mg/L Analyzed: 10/19/12 10:19

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Phosphorus as P	0.0500		0.0050	

Sulfate by EPA Method 375.2

Method: 375.2 Prepared: 10/30/12 15:18

Units: mg/L Analyzed: 10/30/12 15:18

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Sulfate	ND	J3	10.0	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Client Sample ID: **TP01 FINISHED** Lab Sample ID: **SJ20700-02**

Matrix: Water Collected By: RYAN BENNETT Date/Time Collected: 10/11/12 11:15

Sample Type: Finished Sample Depth: Total Depth: 0

Total Dissolved Solids, Gravimetric, Dried at 180oC by Std. Method 2540C

Method: 2540C Prepared: 10/17/12 14:12

Units: mg/L Analyzed: 10/17/12 14:12

<u>Analyte</u>	<u>Result</u>	<u>Qualifier</u>	<u>Reporting Limit</u>	<u>Regulatory Level</u>
Total Dissolved Solids	452		10	

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LABORATORY RESULTS

Name: **NUNDA UTILITIES COMPANY**

Project/Facility Number: 1115600 Date Received : 10/12/12

Funding Code: PW33 Visit Number:

Trip ID: Temperature C: 0.00

Notes and Definitions

- J3 The reported value failed to meet the established quality control criteria for either precision or accuracy possibly due to matrix effects.
- ND Analyte NOT DETECTED at or above the reporting limit
- * Non-NELAP accredited

Report Authorized by:

Celeste M. Crowley
Acting Laboratory Manager

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