



# 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

217/785-0561

February 7, 2023

CERTIFIED MAIL #7011 1150 0001 0857 1361  
RETURN RECEIPT REQUESTED

Lawrence County Correctional Center  
c/o Deanna Brookhart  
10940 Lawrence Road  
Sumner, IL 62466

**Re: Violation Notice: LAWRENCE COUNTY CORRECTIONAL CENTER**  
**Facility No.: IL1010010**  
**Violation Notice No.: W-2023-00011**

Dear Ms. Brookhart:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act (“Act”), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency (“Illinois EPA”).

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachment A includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement (“CCA”) pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

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

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IL1010010 LAWRENCE COUNTY CORRECTIONAL CENTER  
VN W-2023-00011

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

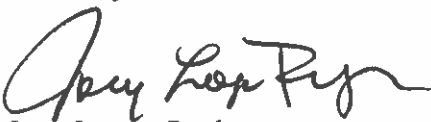
If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Public Water Supplies  
Attn: Mandy Trader, CAS #19  
P.O. BOX 19276  
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, W-2023-00011  
Questions regarding this Violation Notice should be directed to Mandy Trader at 217/785-0561.

Sincerely,



Joey Logan-Pugh  
Manager, Compliance Assurance Section  
Division of Public Water Supplies  
Bureau of Water

Attachments

cc: Jeffrey K. Hawkins  
Jared Brunk  
Rodney Thacker

BOW ID: W1018030010

## ATTACHMENT A

**LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:**

Questions regarding the violations identified in this attachment should be referred to Mandy Trader at (217) 785-0561.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

**Drinking Water Construction Permit**

Public Water Supplies (PWSs) are required to obtain construction permits from Illinois EPA for all construction. Before any deviations from plans and specifications approved by the Agency are made, the public water supply must make a written request for a permit. To meet compliance the supply is expected to submit as-built plans and specifications pursuant to 35 Ill. Adm. Code 602.116.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to obtain a construction permit for the installation of multiple water softeners used to treat water that may be used for consumption.
Rule/Reg.	Sections 15(a) and 18(a)(3) of the Act, 415 ILCS 5/15 and 5/18, and 35 Ill. Adm. Code 602.101 and 602.200(a) and (b).

**Drinking Water Monthly Operating Reports**

All public water supplies are required to submit reports summarizing daily operational activities to the Regional Illinois EPA office each month. Compliance with this is expected within 30 days by submission of the required reports.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to submit Monthly Operating Reports within 30 days of the last day of each month.
Rule/Reg.	Sections 18(a) and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35 Ill. Adm. Code 604.165(a), (c), and (d).

## ATTACHMENT A

LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:**Emergency Operations Plan**

Each community water supply must develop an Emergency Operations Plan for the provision of water under emergency circumstances, including earthquakes, floods, tornados, and other disasters. The Emergency Operations Plan must include a review of the methods and means by which alternative supplies of drinking water could be provided in the event of destruction, impairment, or contamination of a community water supply. Compliance with this is expected to be achieved within 90 days by developing and maintaining an Emergency Operations Plan for the public water supply. This Emergency Operations Plan must be maintained on-site and available to the Agency, upon request, and must be reviewed every three years.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to have an Emergency Operations Plan for the provision of water under emergency circumstances. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101 and 604.135(d).

**Treatment Plant/Distribution System Maintenance**

There are structure/maintenance problems, which threaten the quality of the drinking water provided to customers. Compliance with this is expected within 180 days by obtaining permits and completing the necessary construction.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to develop and maintain a systematic flushing program. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101(a) and 604.1425(c).

## ATTACHMENT A

**LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:****Drinking Water Cross-Connection Control Program**

All public water supplies must have an active cross-connection control program. It is not possible for the Agency to evaluate whether a water system's cross-connection control program is comprehensive without the ability to evaluate an ordinance or service agreement. Compliance is expected to be achieved by submitting your water supply's cross-connection control ordinance or water use agreement within 90 days to the Illinois EPA. Additionally, provide an implementation schedule including when your water system will conduct its cross-connection survey of the distribution system; how your water system will evaluate high risk service connections; and how your water system will track cross connection control devices and their annual inspection.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to have a comprehensive cross-connection control program. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101(a) and 604.1505(a) and (b).

**Drinking Water Cross-Connection Program Device Inventory**

A community water supply must maintain records of all backflow preventers that require annual testing. To achieve compliance, an inventory of all backflow prevention devices in the system must be created, and documentation submitted to the Illinois EPA within 90 days.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
8/11/2022	Failure to maintain records of all backflow preventers that require annual testing.
Rule/Reg.	Section 18 of the Act 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101(a) and 604.1505(b) (5).

## ATTACHMENT A

LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:**Drinking Water Cross-Connection Device Testing**

A community water supply must assure all backflow preventers are tested at least annually. To achieve compliance, each backflow prevention device must be tested, and documentation submitted to the Illinois EPA within 90 days.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
8/11/2022	Failure to perform annual testing of all backflow prevention devices in the system. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101(a) and 604.1510(a).

**Notification of Ownership or Responsible Operational Personnel**

Every community public water supply (PWS) is required to submit a statement of ownership to the Illinois EPA identifying an Owner, Official Custodian, Administrative Contact, Responsible Operator in Charge (ROINC), and Sample Bottle Collector. Compliance with this is expected within 30 days by determining the ownership or responsible personnel and submitting the appropriate form.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
08/11/2022	Failure to submit "Notification of Responsible Operational Personnel" form upon a change in Ownership or Responsible Operator in Charge (ROINC).
Rule/Reg	Section 18(a) of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 603.103(e).

**Responsible/Certified Operator**

Every community public water supply (PWS) is required to employ on its operational staff at least one person certified as competent as a water supply operator. Compliance with this is expected within 15 days by obtaining a certified operator and submitting the appropriate form (enclosed).

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
8/11/2022	Operations of a Class B Water system without a properly certified drinking water operator. An operator with a valid Class B Certification or higher is required.
Rule/Reg	Section 18(a) of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 601.101(a), 603.101(d), 603.103(a) and (b), and 681.215(a) and (b).

## ATTACHMENT A

LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:**Drinking Water Monitoring Site Plan Requirements**

All public water supplies (PWSs) must achieve and maintain compliance with the monitoring and reporting requirements of the Environmental Protection Act. Your supply did not submit required written sample site plans. This written plan must be representative of the water throughout the distribution system and be approved by special exception permit. Compliance with this is expected to be achieved within 30 days by submitting the required written sample site plans to the Illinois EPA.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
8/11/2022	Failure to submit, for Agency approval, a written sample siting plan for coliform that identifies sampling sites representative of water throughout the distribution system. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 611.1053(a) (1).
8/11/2022	Failure to submit, for Agency approval, a written sample siting plan for lead and copper that identifies sampling sites representative of water throughout the distribution system. (on-going violation)
Rule/Reg.	Sections 18 of the Act, 415 ILCS 5/18, and 35 Ill Adm. Code 611.356(a).
8/11/2022	Failure to submit, for Agency approval, a written sample siting plan for disinfection by-product samples. (on-going violation)
Rule/Reg.	Sections 18 of the Act, 415 ILCS 5/18, and 35 Ill Adm. Code 611.972(a).

## ATTACHMENT A

LAWRENCE COUNTY CORRECTIONAL CENTER, IL1010010 VIOLATION NOTICE  
NO. W-2023-00011:**Drinking Water Monitoring**

All Public Water Supplies (PWSs) must achieve and maintain compliance with the monitoring and reporting requirements of the Environmental Protection Act. Your supply did not submit required sample results from a certified laboratory. Sample results are due to the Illinois EPA by the 10<sup>th</sup> of the month following the monitoring period. Compliance with these monitoring and reporting requirements is expected to be achieved within the next monitoring period by submitting sample results for each monitoring program in accordance with your supply's sample site plans.

<b><u>Violation Date</u></b>	<b><u>Violation Description</u></b>
8/11/2022	Failure to collect samples and submit coliform sample results.
Rule/Reg.	Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35 Ill. Adm. Code 611.1053(a) (2) and (3).
8/11/2022	Failure to collect samples and submit lead and copper sample results.
Rule/Reg.	Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35 Ill. Adm. Code 611.350(h) and 611.356(c).
8/11/2022	Failure to collect samples and submit disinfectants and disinfection by-products (DBPs) sample results.
Rule/Reg.	Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35 Ill. Adm. Code 611.382(a) and (c).