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May 6, 2008

Ms. Marcia Willhite
Director, Bureau of Water
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62794-9276

RE: Wasco Sanitary District

Dear Ms. Willhite:

The Village of Campton Hills, newly incorporated in April of 2007, largely encompasses the Wasco Sanitary District (WSD) and its Facilities Planning Area. In order for our Plan Commission and Village Board to make informed decisions on proposed housing developments, commercial buildings and commercial re-development of our historic town center, we need to establish the availability of wastewater treatment capacity before approving any additional development or building permits. The Village had engaged Baxter & Woodman, Inc. (B&W) to analyze the capacity and infrastructure of the WSD in preparation for a possible take-over of the district under the Illinois Sanitary District Act. Although a take-over is not currently under consideration, the Village still requires confirmation of the capacity of the WSD especially in light of the B&W study (attached) that indicates significant shortfall between the currently permitted developments and the design capacity of the treatment plant. There are currently several developments already submitted to the Village and others that will be under consideration that will require connection to the WSD for both drinking water and wastewater treatment. Without sufficient plant and irrigation capacity, the Village should not approve these additions to our community.

In order to make appropriate and informed development decisions, the Village is requesting the IEPA for:

1. Verification of the PE allocated in the connection permits and comparison to the actual design and permitted capacity of the WSD, as stated in the Baxter & Woodman report.
2. Resolution of the discrepancies between the reported and permitted acreage available for irrigation as identified in the permits issued to the WSD.
3. A hydraulic and organic loading analysis to determine if the WSD has the capacity to handle the apparent load that has been connected or has been permitted to be connected.
4. An IEPA inspection of monitoring well locations, level measurement and effluent flow instrumentation, and verification of all instrument calibration.
5. An IEPA-reviewed inflow and infiltration study to determine the integrity of the collection system and a review of all flow metering records to verify that the flows submitted in the WSD monthly reports are accurate.
6. Any conditions under which permitted connection recalculation (to less than 3.5 PE per household) would be considered acceptable in order to accommodate additional development and, if possible, how such a process would proceed.
7. An explanation of the Critical Review and Restricted Status evaluation process that is required by the Illinois Pollution Control Board under Illinois statutes (35 Ill Adm. Code 392) in order to avoid unintentional overcapacity of treatment systems.

In addition to the recommendations from the B&W study, the following issues have been brought to the Village's attention:

1. Complaints from residents of effluent spray beyond WSD property and sheet flow off of irrigation fields due to improperly adjusted and/or malfunctioning spray equipment and continued irrigation upon over-saturated grounds.
2. Reports that heavy metals, sodium, and radium deposition on the spray fields will reduce the effectiveness and/or suitability for long term irrigation, significantly reducing the expected life of spray fields. If so, this would result in the need for additional land for irrigation or an alternative means of disposition.

The Village also desires to know if there is any capability to expand the facilities to serve the balance of the district and its larger FPA. This would include parcels already in service areas but not permitted as well as subdivisions or annexations and central business district redevelopment. What other waste water treatment options are available to the WSD to increase capacity?

Village officials would like the opportunity to meet with you and your staff at the earliest possible date to review the B&W report and discuss the discrepancies and information requested above. Thank you for your consideration of this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Patsy J. Smith".

Patsy Smith
Village President

Enclosure

cc: Steve Zehner, Baxter & Woodman, Inc.
Wasco Sanitary District
Hon. Pat Lindner, State Representative
Hon. Chris Lauzen, State Senator