

DOWNERS GROVE SANITARY DISTRICT
GENERAL MANAGER'S REPORT
October 16, 2026

October Board Meeting

Copies of documentation for the following agenda items are enclosed for the October 20, 2026, meeting:

- 1) Proposed Agenda
- 2) Minutes of the September 22, 2026, regular meeting
- 3) Claim Ordinance 1966
- 4) 2026 Open House Report
- 5) Resolution No. R2026-01 – Enforcement Response Plan
- 6) Memo re: Investment Strategy
- 7) Memo re: 2026 Project Assessment Payment to DRSCW

BOLI Meeting

A BOLI meeting is scheduled for 6:30 p.m. on October 20, 2026. The meeting will be at the District Admin Center in the Board Room. The packet for that meeting is enclosed.

Operations Reports

Copies of the following are enclosed for September operations:

- 1) Progress Report from Carly on Administrative Services activities.
- 2) The WWTC Operations Report from Marc.
- 3) The WWTC/Lift Station Maintenance Report from Nick.
- 4) Progress Report from Todd on Sewer System Maintenance activities.
- 5) Progress Report from Keith on Sewer System Construction and Code Enforcement activities.
- 6) Progress Report from Reese on Laboratory activities.
- 7) Engineering Report

Financial

Copies of the following are enclosed for September financials:

- 1) Investment Schedule
- 2) Treasurer's Report with a cover memo.

Safety

The Safety Committee met on September 29. One incident report was closed out. The new lockout tagout (LOTO) program was discussed.

Meetings

I attended the following meetings since the September 18th General Manager's report:

- September 18 – DGEDC Board meeting at Village Hall
- October 2 – IWSS Monthly Engagement meeting
- October 8 – Hosted DRSCW Executive Board meeting
- October 12 – DRSCW/LDRWC Permit Negotiations Team meeting

Miscellaneous

I took vacation on October 9.

Copies of the following items are enclosed:

- 1) Sewer Overflow and Bypass Event Report for September 22 manhole overflow
- 2) General Manager's Report to the Employees dated October 2 and 16
- 3) September 2026 DGSD WWTC wastewater reports of SARS-CoV-2, influenza A & B and RSV levels
- 4) October 2026 DGSD WWTC wastewater reports of SARS-CoV-2, influenza A & B and RSV levels
- 5) Memo re: National Power Rodding apology and offer, including September 23 letter to NPR re: 2025 Sanitary Sewer Televising Services
- 6) Board of Local Improvements (BOLI) guidelines

On September 23, I sent a Request for Proposals to every Alternative Retail Electric Supplier (ARES) certified in Illinois for electricity supplier at the District's nine lift stations. As with previous RFPs, the suppliers were asked to propose their cost for two supply components with all other components passed through at cost. The two components to be fixed by contract are the ancillary rate and the supplier adder. Other costs, including transmission; capacity; line losses and PJM day ahead LMP energy, are to be passed through at cost and are expected to be the same for each supplier. In response to the RFP, we received four proposals from suppliers on October 14. AEP Energy, who is our current supplier, was the low bidder with a total rate (i.e., ancillary rate plus supplier adder) of \$0.00239/kWh. This is a 139% increase from the current rate of \$0.001/kWh. It should be noted that the supplier's rate is a small component of our overall electricity bills.

cc: AES, JMW, ME, BOLI, DM, CS

**DOWNERS GROVE SANITARY DISTRICT
BOARD OF TRUSTEES MEETING
OCTOBER 20, 2026 – 5:00 PM
BOARD ROOM**

PROPOSED AGENDA

- I. APPROVAL OF MINUTES
 - A. REGULAR MEETING – SEPTEMBER 22, 2026
- II. APPROVAL OF CLAIM ORDINANCE NO. 1966
- III. PUBLIC COMMENT
- IV. OLD BUSINESS
- V. NEW BUSINESS
 - A. OPEN HOUSE REPORT
 - B. RESOLUTION NO. R2026-01 - ENFORCEMENT RESPONSE PLAN
 - C. INVESTMENT STRATEGY DISCUSSION
 - D. DUPAGE RIVER SALT CREEK WORKGROUP – 2026 PROJECT ASSESSMENT
- VI. BOARD PACKET QUESTIONS AND COMMENTS
 - A. ADMINISTRATIVE REPORT – INTERGOVERNMENTAL AGREEMENTS FOR WATER SHUTOFF
- VII. 6:30 P.M. BOARD OF LOCAL IMPROVEMENTS MEETING

PUBLIC COMMENT:

The District has an online form for the Public who cannot attend the meeting to submit public comment. District staff shall read aloud any received public comments during the Public Comment portion of the meeting. Public comments for Public not attending the meeting in person need to be submitted before 4:00 p.m. on the day of the Board meeting. The form can be found here:
<https://www.dgsd.org/government/public-comment/>



MINUTES

The monthly meeting of the Downers Grove Sanitary District Board of Trustees was held on Tuesday, September 22, 2026, convening at 5:00 p.m. The meeting was held at the District's Administration Center, 2710 Curtiss Street, Downers Grove. Present were Trustees Amy E. Sejnost, Jeremy M. Wang and Mark Eddington, General Manager Amy R. Underwood, Administrative Supervisor Carly S. Shaw, Information Coordinator Alyssa J. Caballero, and Attorney Dan McCormick. Also in attendance were Courtney Mohr from Lauterbach & Amen, LLP, Sue Testin, District employee and Amanda Streicher from Baxter & Woodman.

Minutes of Regular Meeting – August 18, 2026

A motion was made by Trustee Eddington seconded by Trustee Wang approving the minutes of the regular meeting held on August 18, 2026, and authorizing the President and Clerk to sign same. The motion carried.

Change Order No. 2 – 2025 Sanitary Sewer Televising Services

A motion was made by Trustee Wang seconded by Trustee Eddington approving Change Order No. 2 for the 2025 Sanitary Sewer Televising Services agreement with National Power Rodding Corp. for a net decrease in the contract price of \$20,155.22 and authorizing the General Manager to sign the same. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

The Board directed Staff to write a letter to National Power Rodding Corp. expressing the District's disappointment with the quality of the work.

Claim Ordinance No. 1965

A motion was made by Trustee Eddington seconded by Trustee Wang adopting Claim Ordinance No. 1965 in the total amount of \$947,842.27 as presented and authorizing the President and Clerk to sign same. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

Public Comment – none

New Business

Audit Report for Fiscal Year 2025-2026

Courtney Mohr, auditor with the firm Lauterbach & Amen, LLP, presented the Annual Financial Report for Fiscal Year 2025-2026. She reviewed the report, the notes on the financial statements and the supplemental information. A motion was made by Trustee Eddington seconded by Trustee Wang accepting the Annual Financial Report for Fiscal Year 2025-2026 as presented. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

2026 Tax Levy Ordinance

Administrative Supervisor Shaw presented the proposed Levy Ordinance for Fiscal Year 26-27 in the amount of \$1,657,548 for general corporate purposes, disinfection, and repayments of loans under the American Recovery and Reinvestment Act of 2009 / Illinois Environmental Protection Agency's Water Pollution Control Loan Program. This levy will be reflected in real estate tax bills owed for 2026 (due in 2027). This year, the Board has decided to levy less than allowed by PTELL and limit the levy to approximately a 2% increase over the previous year's total aggregate extension. A motion was made by Trustee Eddington seconded by Trustee Wang adopting the Levy Ordinance for Fiscal Year 2026-2027 in the amount of \$1,657,548 for general corporate purposes, disinfection, and repayments of loans under the American Recovery and Reinvestment Act of 2009 / Illinois Environmental Protection Agency's Water Pollution Control Loan Program and authorizing the President and Clerk to sign same, adopting the Certificate of Levy and authorizing the Clerk to sign same, and authorizing Assistant Clerk Shaw to sign the Certificate of Inapplicability. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

Intergovernmental Agreement with Village of Oak Brook

Administrative Supervisor Shaw presented the intergovernmental agreement with the Village of Oak Brook for the disconnection of water services for delinquent accounts. A motion was made by Trustee Wang seconded by Trustee Eddington to approve the Intergovernmental Agreement with the Village of Oak Brook as presented and authorizing the President and Clerk sign the same. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

Annexation Ordinance AO 2026-06 – 1114 Adelia Street, Downers Grove

Staff presented Annexation Ordinance No. AO 2026-06 for the annexation of single-family home septic conversion located at 1114 Adelia Street, Downers Grove. A motion was made by Trustee Eddington seconded by Trustee Wang accepting the Petition for Annexation, adopting Annexation Ordinance No. AO 2026-06 as presented and authorizing the President and Clerk to sign same. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

Annexation Ordinance AO 2026-07 – 4227 Venard Road, Downers Grove

Staff presented Annexation Ordinance No. AO 2026-07 for the annexation of a single-family home located at 4227 Venard Road, Downers Grove. A motion was made by Trustee Eddington seconded by Trustee Wang accepting the Petition for Annexation, adopting Annexation Ordinance No. AO 2026-07 as presented and authorizing the President and Clerk to sign same. The motion carried. (Votes recorded: Ayes-Sejnost, Wang and Eddington.)

Annexation Ordinance AO 2026-08 – 300 60th Street, Downers Grove

Staff presented Annexation Ordinance No. AO 2026-08 for the annexation of one lot located at 300 60th Street, Downers Grove that is being divided into two single-family lots to have new addresses of 302 and 306 60th Street, Downers Grove. A motion was made by Trustee Eddington seconded by Trustee Wang accepting the Petition for Annexation, adopting Annexation Ordinance

No. AO 2026-08 as presented and authorizing the President and Clerk to sign same. The motion carried. (Votes recorded: Ayes–Sejnost, Wang and Eddington.)

Filter Building Dehumidifier Rebuild

Staff withdrew this item from the agenda.

Questions and Comments

Trustee Eddington congratulated Jason Herrell for receiving his Class 1 wastewater treatment works operator certificate. He also congratulated Angel Lozada for his 10 years of service with the District and Marc Majewski for his 20 years. He thanked Maintenance Supervisor Whitefleet and his staff for the Northwest lift station valve replacement project.

Trustee Wang noted he enjoyed attending the recent IAWA conference. He expressed his appreciation for the IGA with the Village of Oak Brook, noted the employee outing to Top Golf and that the number of delinquent accounts has decreased. Trustee Wang noted the CHP 1 and 2 operations for the month, as summarized in Maintenance Supervisor Whitefleet's report. He also noted the update for the high-speed turbo-blower replacement project. He noted there was no detection of SARS-CoV-2 or RSV in the most recent wastewater sampling results. He thanked staff for the annual audit. Lastly, Trustee Wang expressed that he is looking forward to the upcoming open house.

Trustee Sejnost congratulated Jason Herrell for receiving his Class 1 wastewater treatment works operator certificate. She also congratulated Angel Lozada for his 10 years of service with the District and Marc Majewski for his 20 years. She thanked Cooper Merrinette for his work with the sewer system maintenance department this summer. She noted the purchase of new gas meters and interviews for the electrical technician job opening. She noted the storm debris cleanup and building repairs done and CHP 1 and 2 operations for the month, as summarized in Maintenance Supervisor Whitefleet's report. Trustee Sejnost noted the six excess flow sampling events and one permit excursion, noted in Laboratory Supervisor Berry's report. She congratulated the District for earning the Silver Award from NACWA. Lastly, she noted the memo from Baxter & Woodman regarding manhole 2D-001.

A motion was made by Trustee Eddington seconded by Trustee Wang adjourn the regular meeting at 6:04 p.m. The motion carried.

Approved: October 20, 2026

President

Attest: _____
Clerk

Downers Grove, Illinois

Date: October 20, 2026

Claim Ordinance No. 1966

An Ordinance Providing for the Payment of Certain Claims.

WHEREAS, it appears to the Board of Trustees of the Downers Grove Sanitary District that there are certain claims against said District which would be allowed and paid therefore,

BE IT ORDAINED, by the Board of Trustees of the Downers Grove Sanitary District

That the following claims be and they are hereby approved and ordered paid and that an order be drawn on the Treasurer of said District out of the funds shown below. Said claims, totaling **\$1,003,268.08** being in words and figures as follows:

Trustee Approval

President _____

Clerk _____

Date _____

CHECK DISBURSEMENT REPORT FOR DOWNERS GROVE SANITARY DISTRICT

CHECK DATE 09/23/2026 - 10/20/2026

BANK CODE: DISB - DISBURSEMENTS CHECKING FUNDS: 01, 02, 03

Check Date	Bank Account	Check #	Payee	Description	GL Number	Amount
10/02/2026	DISB	1055(E)	HEALTH CARE SERVICE CORP.	BLUECROS EMPLOYEE HEALTH INSURANCE	01-017-E455	64,810.93
10/02/2026	DISB	1056(E)	IRS	FEDERAL/SS TAXES WITHHELD	01-000-2000	12,470.55
				FEDERAL/SS TAXES WITHHELD	01-000-2002	8,036.09
				FEDERAL/SS TAXES WITHHELD	01-000-2002	8,036.09
				FEDERAL/SS TAXES WITHHELD	01-000-2002	1,879.37
				FEDERAL/SS TAXES WITHHELD	01-000-2002	1,879.37
						32,301.47
10/02/2026	DISB	1057(E)	ILLINOIS DEPARTMENT OF REVENUE	P.O. STATE TAX WITHHELD	01-000-2001	5,990.25
10/02/2026	DISB	1058(A)	TRANSAMERICA RETIREMENT SOLUTIONS	IPPFA 457 PLAN	01-000-2028	365.02
				IPPFA 457 PLAN	01-000-2026	600.00
				IPPFA 457 PLAN	01-000-2026	711.45
				IPPFA 457 PLAN	01-000-2027	1,490.00
				IPPFA 457 PLAN	01-000-2027	270.88
						3,437.35
10/02/2026	DISB	1059(A)	MISSION SQUARE	MISSION SQUARE 457 PLAN	01-000-2020	150.00
10/08/2026	DISB	1060(A)	CHEM-WISE ECOLOGICAL	PEST CONTROL SERVICES	01-011-B118	95.00
				PEST CONTROL SERVICES	01-012-B812	210.00
						305.00
10/06/2026	DISB	1061(E)	IMRF	SEPTEMBER 2026 RETIREMENT CONTRIBUTIONS	01-000-2003	10,393.75
				SEPTEMBER 2026 RETIREMENT CONTRIBUTIONS	01-000-2014	9,988.09
				SEPTEMBER 2026 RETIREMENT CONTRIBUTIONS	01-017-E460	16,329.62
						36,711.46
10/07/2026	DISB	1062(E)	INVOICE CLOUD	CUSTOMER BILLING PORTAL	01-011-B121	3,133.85
10/06/2026	DISB	1063(A)	MIDAMERICA ADMIN HRA ACCOUNT	HRA ACCOUNT	01-017-E455	400.00
10/06/2026	DISB	1064(E)	U.S. POSTAL SERVICE NEOPOST	POSTAG POSTAGE METER REFILL	01-011-B119	1,000.00
10/14/2026	DISB	1065(E)	WEX BANK	SEPTEMBER 2026 FUEL	01-011-C222	188.05
				SEPTEMBER 2026 FUEL	01-012-C222	1,241.05
				SEPTEMBER 2026 FUEL	01-013-C222	99.87
				SEPTEMBER 2026 FUEL	01-014-C222	2,038.99
				SEPTEMBER 2026 FUEL	01-011-C222	(69.72)
						3,498.24
10/16/2026	DISB	1066(E)	IRS	FEDERAL/SS TAXES WITHHELD	01-000-2000	13,035.15
				FEDERAL/SS TAXES WITHHELD	01-000-2002	8,372.06
				FEDERAL/SS TAXES WITHHELD	01-000-2002	8,372.06
				FEDERAL/SS TAXES WITHHELD	01-000-2002	1,957.96
				FEDERAL/SS TAXES WITHHELD	01-000-2002	1,957.96
						33,695.19
10/16/2026	DISB	1067(E)	ILLINOIS DEPARTMENT OF REVENUE	P.O. STATE TAX WITHHELD	01-000-2001	6,245.04
10/16/2026	DISB	1068(A)	TRANSAMERICA RETIREMENT SOLUTIONS	IPPFA 457 PLAN	01-000-2028	365.02
				IPPFA 457 PLAN	01-000-2026	600.00
				IPPFA 457 PLAN	01-000-2026	736.05
				IPPFA 457 PLAN	01-000-2027	1,490.00
				IPPFA 457 PLAN	01-000-2027	293.74

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CHECK DATE 09/23/2026 - 10/20/2026

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Check Date	Bank Account	Check #	Payee	Description	GL Number	Amount
						3,484.81
10/16/2026	DISB	1069(A)	MISSION SQUARE	MISSION SQUARE 457 PLAN	01-000-2020	150.00
10/15/2026	DISB	1070(E)	JP MORGAN CHASE BANK	CREDIT CARD STATEMENT	01-012-B513	75.21
				CREDIT CARD STATEMENT	01-012-B117	277.40
				CREDIT CARD STATEMENT	01-012-B116	469.66
				CREDIT CARD STATEMENT	01-011-B117	65.31
				CREDIT CARD STATEMENT	01-011-B137	65.00
				CREDIT CARD STATEMENT	01-011-B116	1,806.00
						2,758.58
10/20/2026	DISB	1071(E)	D.G. SANIT DIST #XXXXXXXXX1112	PETT PETTY CASH CHECKING REIMBURSEMENT	01-000-1002	1,698.52
10/20/2026	DISB	1072(E)	D.G. SANIT DIST #XXXXXXXXX1114	USER USER REFUNDS	01-000-1011	2,174.92
10/20/2026	DISB	1073(E)	D.G. SANIT DIST #XXXXXXXXX1117	PAYR PAYROLL REIMBURSEMENT	01-000-1001	176,658.25
10/20/2026	DISB	1074(A)	A-FORMULA MECHANICAL CORP	JTS CHILLER, TROUBLESHOOT & 5LB. REFRIGERANT - CHP GAS CLE	01-012-B513	856.25
10/20/2026	DISB	1075(A)	ALEXANDER CHEMICAL CORPORATION1693	CALCIUM HYPOCHLORITE	01-012-B403	4,560.00
10/20/2026	DISB	1076(A)	AMAZON BUSINESS	OPEN HOUSE SUPPLIES	01-012-B116	269.80
				SAFETY SHOES - BM	01-014-B117	119.95
				SAFETY SHOES - AL	01-014-B117	109.95
				OPS TOOLS	01-012-B116	94.78
				COFFEE/SUGAR/CREAMER/DISH SOAP	01-012-B116	140.68
				HEAVY DUTY CLEANING WIPES	01-012-B116	112.87
				PAPER TOWELS/GREASE COLLECTION CUPS	01-013-B116	311.08
				ADMIN CTR MATS/COUNTERFEIT BUSTER PENS FOR BILLING	01-011-B116	19.20
				ADMIN CTR MATS/COUNTERFEIT BUSTER PENS FOR BILLING	01-011-B118	74.87
						1,253.18
10/20/2026	DISB	1077(A)	AWARDING YOU A NATIONAL ENGRAVERS	EMPLOYEE BADGE	01-011-B120	19.00
10/20/2026	DISB	1078(A)	CARLY SHAW	BREAKFAST PIZZAS	01-012-B116	115.77
10/20/2026	DISB	1079(A)	CLOUDMELLOW	OCT 2026 MONTHLY WEB HOSTING	01-011-B115	95.00
10/20/2026	DISB	1080(A)	CONCENTRIC INTEGRATION, LLC	T&M IT SERVICES	01-011-B115	47.12
				IT & SCADA T&M SUPPORT	01-011-B115	2,640.00
				IT & SCADA T&M SUPPORT	01-012-B513	5,093.57
				SEPT 2026 MANAGED IT SUPPORT	01-011-B115	3,625.00
				SEPT 2026 MANAGED IT SUPPORT	01-012-B513	3,625.00
				BLOWER REPLACEMENT INTEGRATION	01-712-0506	1,518.75
						16,549.44
10/20/2026	DISB	1081(A)	COVERALL NORTH AMERICA, INC	OCT 2026 ADMIN CTR CLEANING	01-011-B118	489.00
10/20/2026	DISB	1082(A)	CURTIS MARTIN GROUP, INC.	ANNUAL RENEWAL - PREV SOFTWARE SUPPORT	01-011-B115	70.00
10/20/2026	DISB	1083(A)	DAHME MECHANICAL INDUSTRIES	TURBO-BLOWER INSTALLATION & MECHANICAL WORK	01-712-0506	100,222.00
10/20/2026	DISB	1084(A)	DELTA INDUSTRIES, INC.	PM SERVICE - WWTC ODS PUMP AIR COMPRESSOR	01-012-B513	1,811.28
10/20/2026	DISB	1085(A)	DELTA SONIC	CAR WASHES	01-011-C225	8.33
				CAR WASHES	01-012-C225	8.33
				CAR WASHES	01-014-C225	49.98

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CHECK DATE 09/23/2026 - 10/20/2026

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Check Date	Bank Account	Check #	Payee	Description	GL Number	Amount
						66.64
10/20/2026	DISB	1086(A)	DOWNERS GROVE ECONOMIC DEVELOPMENT	ANNUAL DUES	01-011-B137	500.00
10/20/2026	DISB	1087(A)	ENERGY CHOICE, INC	ENGINE AIR FILTER (6), SPARK PLUG GASKET (192) - CHP 1&2 M	01-012-B513	790.44
10/20/2026	DISB	1088(A)	FIRST ENVIRONMENTAL LAB	NPDES MONTHLY SEPT 2026	01-013-B123	117.60
				FALL 2026 SEMI-ANNUAL NPDES	01-013-B123	1,477.80
				SEPT 2026 BIOSOLIDS	01-013-B123	322.80
				4TH QUARTER 2026 BIOSOLIDS	01-013-B123	322.80
						2,241.00
10/20/2026	DISB	1089(A)	GALCO INDUSTRIAL ELECTRONICS,	CONTROL RELAY (2) - FILTER 1 & STOCK	01-012-B511	895.60
				PROTECTION RELAY/PHASE MONITOR - HOBSON LS - SPARE	01-015-B524	330.07
						1,225.67
10/20/2026	DISB	1090(A)	GEORGE'S LANDSCAPING JORGE PIMENTE	LAWN MAINTENANCE	01-015-B820	163.32
				LAWN MAINTENANCE	01-015-B821	163.32
				LAWN MAINTENANCE	01-015-B823	163.32
				LAWN MAINTENANCE	01-015-B824	163.32
				LAWN MAINTENANCE	01-015-B825	163.32
				LAWN MAINTENANCE	01-015-B826	163.32
				LAWN MAINTENANCE	01-015-B827	163.32
				LAWN MAINTENANCE	01-015-B828	163.32
				LAWN MAINTENANCE	01-011-B118	495.60
				LAWN MAINTENANCE	01-012-B812	3,650.40
				LAWN MAINTENANCE	01-015-B829	410.88
						5,863.44
10/20/2026	DISB	1091(A)	HARBOR FREIGHT TOOLS	COMPLETE PUMP ASSY & OIL - INTERMEDIATE BLDG. AIR COMPRESS	01-012-B511	209.96
				SYNTHETIC OIL 32OZ (4) INTERMEDIATE BLDG. COMPRESSOR REPAI	01-012-B511	59.96
						269.92
10/20/2026	DISB	1092(A)	IL ENV PROTECTION AGENCY AMALGAMAT	LOAN PAYMENT	01-714-0515	90,795.58
				LOAN PAYMENT	01-715-0515	46,595.52
				LOAN PAYMENT	01-712-0515	14,403.65
						151,794.75
10/20/2026	DISB	1093(A)	INFOSEND, INC.	SEPT 2026 CUSTOMER BILLING	01-011-B121	4,781.54
10/20/2026	DISB	1094(A)	KANSAS CITY LIFE INSURANCE CO	NOVEMBER 2026 LIFE INSURANCE	01-017-E455	408.13
10/20/2026	DISB	1095(A)	KARA COMPANY INC.	GREEN MARKING FLAGS	01-014-B116	128.47
10/20/2026	DISB	1096(A)	LAI, LTD	ROTORK ACTUATOR & MACHINED ADAPTER BUSHING - MANHOLE 2 SOU	01-012-B512	12,858.62
10/20/2026	DISB	1097(A)	LAUTERBACH & AMEN, LLP	AUDIT SERVICES - FINAL BILLING	01-011-B124	2,000.00
10/20/2026	DISB	1098(A)	MCMASTER-CARR SUPPLY COMPANY	FUEL GAUGE ASSEMBLY - COLLEGE LS STATIONARY GENERATOR	01-015-B522	81.93
10/20/2026	DISB	1099(A)	MIDAMERICA ADMINISTRATIVE & RETIRE	HRA FUNDING ADMIN FEES	01-017-E455	201.00
10/20/2026	DISB	1100(A)	NALCO WATER PRETREATMENT SOLUTIONS	SERVICE FEE	01-013-B115	125.00
				MAIN LAB DI WATER FILTRATION SYSTEMS SERVICE	01-013-B115	744.48
						869.48
10/20/2026	DISB	1101(A)	NCPERS GROUP LIFE INSURANCE	NOVEMBER 2026 VOLUNTARY LIFE INSURANCE	01-000-2017	160.00

CHECK DISBURSEMENT REPORT FOR DOWNERS GROVE SANITARY DISTRICT

CHECK DATE 09/23/2026 - 10/20/2026

BANK CODE: DISB - DISBURSEMENTS CHECKING FUNDS: 01, 02, 03

Check Date	Bank Account	Check #	Payee	Description	GL Number	Amount
10/20/2026	DISB	1102(A)	NISSEN ENERGY CONSULATE GEN OF DEN	TROUBLESHOOT & REPAIR THROTTLE (2-SITE VISITS) - CHP 2	01-012-B513	2,636.00
10/20/2026	DISB	1103(A)	POLYDYNE INC.	BELT PRESS POLYMER	01-012-B402	3,074.04
10/20/2026	DISB	1104(A)	PORTABLE JOHN, INC	NOVEMBER 2026 PORTABLE JOHN RENTAL	01-012-B812	173.89
				ADMIN CTR PORTABLE JOHN RENTAL	01-011-B118	275.00
						448.89
10/20/2026	DISB	1105(A)	RED WING SHOE STORE	BOOTS - EB	01-012-B117	237.99
10/20/2026	DISB	1106(A)	ROWELL CHEMICAL CORPORATION	SODIUM HYPOCHLORITE	01-012-B401	6,406.42
				SODIUM HYPOCHLORITE	01-012-B401	6,417.80
				SODIUM HYPOCHLORITE	01-012-B401	6,417.80
						19,242.02
10/20/2026	DISB	1107(A)	STAPLES INC.	WATER FOR OPEN HOUSE	01-012-B116	30.21
				JUICE FOR OPEN HOUSE	01-012-B116	239.94
				WATER/CANDY FOR OPEN HOUSE	01-012-B116	50.20
				PAPER TOWELS/COFFEE CUPS/CUTLERY	01-011-B116	163.80
				CREDIT FOR RETURN OF JUICE	01-012-B116	(159.96)
						324.19
10/20/2026	DISB	1108(A)	TBC COMMUNICATIONS/SOURCE INC. TBC COMMUNICATIONS/SOURCE INC.	ELEVATOR PHONES	01-012-B112	40.98
10/20/2026	DISB	1109(A)	TERRACE SUPPLY COMPANY	CYLINDER RENTAL	01-012-B116	45.60
10/20/2026	DISB	1110(A)	TRI-K, INC.	LIQUID DEODORIZER	01-012-B103	649.00
10/20/2026	DISB	1111(A)	UNITED PARCEL SERVICE	SHIPPING SERVICE - DUPAGE CO RECORDER	01-011-B119	18.78
				SHIPPING SERVICES - FLOW METER REPAIR	01-014-B115	372.00
				SHIPPING SERVICE - LAB	01-013-B123	116.54
				SHIPPING SERVICE - LAB	01-013-B116	125.95
						633.27
10/20/2026	DISB	1112(A)	UNO CONSTRUCTION CO., INC.	BSSRAP PROGRAM	01-014-B910	80,424.47
				BSSRAP PROGRAM	01-000-2016	23,746.29
				BSSRAP PROGRAM	01-000-2016	(296.61)
						103,874.15
10/20/2026	DISB	1113(A)	W. W. GRAINGER, INC.	20 AMP FUSES FOR STOCK	01-012-B512	187.08
				PACK OF TYVEK COVERALLS - SAFETY SUPPLIES	01-012-B113	68.61
				GREEN FACE SHIELD, WELDING - SAFETY SUPPLIES	01-012-B113	96.62
				REPLACEMENT SHOES - RB	01-013-B117	102.61
				DISINFECTING WIPES	01-013-B116	91.08
				EATON SOFT START - LIBERTY PARK PUMP 2	01-015-B525	5,777.36
				GARBAGE BAGS, PAPER TOWELS, BUG SPRAY	01-012-B116	325.53
				48" LIGHT BULB, 30 PACK	01-012-B512	165.60
				1 AMP FUSES, QTY. 10 - 2 FOR LP PMP. 2, 8 FOR STOCK	01-015-B525	99.20
				1 AMP FUSES, QTY. 10 - 2 FOR LP PMP. 2, 8 FOR STOCK	01-012-B512	396.80
				24 VOLT POWER SUPPLY, LIBERTY PK. PUMP 2	01-015-B525	393.95
				20 AMP FUSE (6) - WWTC ODS PUMP COMPRESSOR REPAIR & STOCK	01-012-B504	85.38
				DISPOSABLE BLACK GLOVES	01-012-B113	140.70
				VEHICLE WASH	01-012-B116	76.45
				SAFETY GLASSES	01-012-B113	19.96
				V-BELT -50", INTERMEDIATE BLDG. COMPRESSOR REPAIR	01-012-B511	11.46

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				36" FLEX AIR HOSE, MSB COMPRESSED AIR SYSTEM	01-012-B512	16.83
				V-BELT AND CHECK VALVE - INTERMEDIATE BLDG. COMPRESSOR REP	01-012-B511	32.94
				PALLET JACK - MSB	01-012-B512	531.17
				BUILDING VENTILATION FILTERS (12) - CHP 1&2	01-012-B513	361.92
				HYDRAULIC SEAL REBUILD KIT - MSB PALLET JACK	01-012-B512	20.47
				VARIETY OF CRIMP CONNECTORS - MAINTENANCE ELECTRICAL SUPPL	01-012-B512	19.13
				MINERAL OIL 5-GAL. & MEASURING CONTAINER - NWLS HF PUMPS 1	01-015-B526	235.71
				RETURNED V-BELT	01-012-B511	(16.07)
						9,240.49
10/20/2026	DISB	1114(A)	WAGNER COMMUNICATIONS, INC	ANSWERING SERVICE	01-011-B112	511.84
10/20/2026	DISB	1115(A)	WESTFAX	FAXING SERVICE	01-011-B112	8.99
10/20/2026	DISB	1116(A)	KONICA MINOLTA	SEPT 26 MAINTENANCE AGREEMENT	01-011-B115	71.05
10/20/2026	DISB	1117(A)	APGN INC. APG NEUROS	DELIVERY OF SECOND TURBOBLOWER	01-712-0506	47,382.00
10/20/2026	DISB	1118(A)	MADDOX INDUSTRIAL TRANSFORMER, LLC	ISOLATION TRANSFORMER - TURBO BLOWER 3	01-712-0506	10,353.60
10/20/2026	DISB	1119(A)	CLOSED CIRCUIT INNOVATIONS INC.	BAR SCREEN 1 COMPACTOR SCREEN MODIFICATION	01-012-B505	2,000.00
10/20/2026	DISB	1120(A)	DONOHUE & ASSOCIATES, INC. DONOHUE & ASSOCIATES, INC.	REGIONALIZATION STUDY	01-011-B124	12,606.65
10/20/2026	DISB	1121(A)	NATIONAL BUSINESS FURNITURE	ADMIN CHAIR REPLACEMENT	01-011-B118	1,985.28
10/20/2026	DISB	1122(A)	THOMAS SCIENTIFIC HOLDINGS, LLC	COMPOUND MICROSCOPE CAMERA	01-013-B115	1,500.00
10/02/2026	DISB	66513	GLENN STEARNS CHAPTER 13 TRUSTEE	WAGE GARNISHMENT ORDER	01-000-2012	200.00
10/16/2026	DISB	66514	GLENN STEARNS CHAPTER 13 TRUSTEE	WAGE GARNISHMENT ORDER	01-000-2012	200.00
10/20/2026	DISB	66515	ADVOCATE OCCUPATIONAL HEALTH	DRUG TEST	01-012-B117	35.00
10/20/2026	DISB	66516	ATLAS FORMS & GRAPHICS	USER REFUND CHECKS	01-011-B120	391.24
10/20/2026	DISB	66517	AUTOZONE - AZ COMMERCIAL	VEHICLE BATTERY - #325	01-012-C225	228.99
				AUTOMOTIVE LIGHT BULB (2), REAR TAILLIGHT BULB REPLACEMENT	01-012-C225	13.29
				CABIN AIR & OIL FILTERS - 2019 F150 #350	01-014-C225	27.81
				VEHICLE BATTERY CORE RETURN	01-012-C225	(22.00)
						248.09
10/20/2026	DISB	66518	BUTTREY RENTAL SERVICE, INC.	CONCRETE VIBRATOR 1-DAY RENTAL - BLOWER PROJ. CONC. PAD PO	01-712-0506	65.00
10/20/2026	DISB	66519	CINTAS #344	PLANT/SS UNIFORMS	01-012-B117	126.49
				PLANT/SS UNIFORMS	01-014-B117	49.07
				PLANT/SS UNIFORMS	01-014-B117	49.07
				PLANT/SS UNIFORMS	01-012-B117	143.50
				PLANT/SS UNIFORMS	01-012-B117	131.13
				PLANT/SS UNIFORMS	01-014-B117	49.07
				PLANT/SS UNIFORMS	01-012-B117	133.19
				PLANT/SS UNIFORMS	01-014-B117	49.07
						730.59
10/20/2026	DISB	66520	COMCAST	OCTOBER 2026 INTERNET SERVICE	01-011-B112	867.83
10/20/2026	DISB	66521	COMCAST	BACK UP INTERNET SERVICE	01-011-B112	156.60

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10/20/2026	DISB	66522	COMED	BUTTERFIELD LS ELECTRIC	01-015-B100	151.75
				CENTEX LS ELECTRIC	01-015-B100	116.21
				COLLEGE LS ELECTRIC	01-015-B100	224.10
				EARLSTON LS ELECTRIC	01-015-B100	179.69
				HOBSON LS ELECTRIC	01-015-B100	1,370.25
				LIBERTY PARK LS ELECTRIC	01-015-B100	270.89
				NORTHWEST LS ELECTRIC	01-015-B100	1,087.31
				WROBLE LS ELECTRIC	01-015-B100	548.92
				VENARD LS ELECTRIC	01-015-B100	531.17
				WALNUT HSE ELECTRIC	01-000-2016	296.61
				WALNUT HSE ELECTRIC	01-012-B100	95.44
				BIG TOP ELECTRIC	01-012-B100	43.71
				PLANT/ADMIN ELECTRIC	01-005-3016	(1,029.18)
				PLANT/ADMIN ELECTRIC	01-011-B100	890.63
				PLANT/ADMIN ELECTRIC	01-012-B100	23,554.80
						28,332.30
10/20/2026	DISB	66523	DANIEL MCCORMICK, P. C.	LEGAL SERVICES	01-011-B124	1,005.00
10/20/2026	DISB	66524	DUPAGE COUNTY RECORDER	LIEN RELEASES	01-011-B121	1,072.00
10/20/2026	DISB	66525	EXODUS TECHNOLOGY SERVICE	SEPT 2026 IT SERVICES	01-011-B124	2,906.25
10/20/2026	DISB	66526	EYE MED VISION CARE FIDELITY SECUR	VISION INSURANCE OCTOBER 2026	01-017-E455	467.63
10/20/2026	DISB	66527	FIRSTCOMM	PHONE SERVICE OCTOBER 2026	01-011-B112	270.68
				PHONE SERVICE OCTOBER 2026	01-012-B112	280.34
				PHONE SERVICE OCTOBER 2026	01-013-B112	48.95
				PHONE SERVICE OCTOBER 2026	01-014-B112	173.74
						773.71
10/20/2026	DISB	66528	GASVODA & ASSOCIATES INC.	AIR RELIEF VALVE MAINTENANCE PARTS - LS FORCE MAINS	01-015-B529	993.75
10/20/2026	DISB	66529	HOME DEPOT	SUMP PUMP - MAINT. SERVICES BLDG	01-012-B812	309.00
				DOOR HARDWARE - TEMPORARY DOOR FOR TURBO BLOWER PROJECT	01-012-B507	96.30
				PUTTY KNIFE, SANDING SPONGE (2) & SPACKLE - MSB INTERIOR W	01-012-B812	34.42
				1/2" COMP. FITTINGS - BAR SCREEN RAG COMPACTOR 1 OVERHAUL	01-012-B505	36.58
				1/4" EYEBOLT - FILTER BUILDING CHAIN RAILING REPAIR	01-012-B811	1.13
				DUCT TAPE ROLL - 3 PACK - MAINTENANCE REPAIR SUPPLIES	01-012-B512	11.98
				TUBE CLEAR SILICONE CAULK - OPEN HOUSE MODEL REPAIR	01-012-B116	13.98
				WATER WELD EPOXY PUTTY & WIRE BRUSHES - COLLEGE PMP 1 PIPE	01-015-B522	20.45
				WOODEN STAKES & HI-VIZ SAFETY TAPE ROLL	01-012-B113	33.93
				ROOFING CAULK (5), PAINTERS TAPE - LAB ROOF, SKYLIGHT SEAL	01-012-B812	97.30
				CONCRETE RELEASE AGENT & CORNER TROWEL - TRANS. PAD	01-012-B507	41.94
				SUMP PUMP & PVC FITTING - BLOWER BLDG. BSMT.	01-012-B807	260.31
						957.32
10/20/2026	DISB	66530	IAWA	2026 ANNUAL CONFERENCE - AU	01-011-B117	400.00
				2026 ANNUAL CONFERENCE - CS	01-011-B117	381.00
				2026 TRUSTEE ROUNDTABLE - JW	01-011-B117	100.00
				2026 TRUSTEE ROUNDTABLE - AS	01-011-B117	100.00
				2026-2027 MEMBER DUES	01-011-B137	4,274.00
						5,255.00
10/20/2026	DISB	66531	ISTHA	JULY TO SEPT 2026 TOLLS	01-011-C225	19.65

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				JULY TO SEPT 2026 TOLLS	01-012-C225	217.05
				JULY TO SEPT 2026 TOLLS	01-013-C225	5.20
				JULY TO SEPT 2026 TOLLS	01-014-C225	32.35
						<u>274.25</u>
10/20/2026	DISB	66532	JOHN CRANE INC.	SHAFT SLEEVE - RAW SEWAGE PUMP 8	01-012-B505	2,075.92
10/20/2026	DISB	66533	JSN CONTRACTORS SUPPLY	GREEN MARKING PAINT	01-014-B116	436.80
10/20/2026	DISB	66534	MCCROMETER INC.	FLOW METER REPAIR	01-014-B115	2,413.00
				FLOW METER REPAIR	01-014-B115	2,413.00
				FLOW METER REPAIR	01-014-B115	2,413.00
						<u>7,239.00</u>
10/20/2026	DISB	66535	MENARDS - BOLINGBROOK	LUMBER, PLYWOOD, REBAR, EPOXY, & HARDWARE - TRANSFRMR CONC	01-712-0506	204.26
10/20/2026	DISB	66536	NICOR GAS	PLANT NATURAL GAS	01-012-B101	217.15
				PLANT 2 NATURAL GAS	01-012-B101	76.21
				CHEM FEED NATURAL GAS	01-012-B101	64.21
				ADMIN CTR NATURAL GAS	01-011-B101	66.82
				WALNUT HSE NATURAL GAS	01-012-B101	64.09
						<u>488.48</u>
10/20/2026	DISB	66537	NORTHWEST ELECTRIC MOTOR CO.	SPARE DEMAG MOTOR - EXCESS TANKS 1-4	01-012-B503	13,942.22
10/20/2026	DISB	66538	PETTY CASH	PETTY CASH REIMBURSEMENT	01-013-B114	13.11
				PETTY CASH REIMBURSEMENT	01-011-B119	13.85
				PETTY CASH REIMBURSEMENT	01-011-B116	65.24
				PETTY CASH REIMBURSEMENT	01-011-B117	100.00
				PETTY CASH REIMBURSEMENT	01-012-B117	30.00
						<u>222.20</u>
10/20/2026	DISB	66539	PHENOVA	46 STANDARDS - DMR QA	01-013-B114	764.69
10/20/2026	DISB	66540	PREMIUM CUSTOM PRODUCTS	SANITARY DISTRICT BASEBALL HATS	01-012-B117	1,050.00
10/20/2026	DISB	66541	ROBERT EGAN PLUMBING	SHEAR REPAIR - 1070 BLACK OAK DR	01-014-B910	650.00
				SHEAR REPAIR - 1701 HALL ST	01-014-B910	650.00
						<u>1,300.00</u>
10/20/2026	DISB	66542	SPRING GREEN LAWN CARE	ADMIN CTR EARLY FALL ENHANCER SERVICE	01-011-B118	71.18
				BUTTERFIELD LS EARLY FALL ENHANCER SERVICE	01-015-B820	39.04
				CENTEX LS EARLY FALL ENHANCER SERVICE	01-015-B821	46.82
				EARLSTON LS EARLY FALL ENHANCER SERVICE	01-015-B823	33.33
				HOBSON LS EARLY FALL ENHANCER	01-015-B824	61.96
				LIBERTY PARK LS EARLY FALL ENHANCER	01-015-B825	56.24
				VENARD LS EARLY FALL ENHANCER	01-015-B827	48.26
				WROBLE LS EARLY FALL ENHANCER	01-015-B828	56.24
				WWTC EARLY FALL ENHANCER	01-012-B812	1,042.98
						<u>1,456.05</u>
10/20/2026	DISB	66543	SUNBELT RENTALS	FORKLIFT PROPANE	01-012-B116	37.00
10/20/2026	DISB	66544	USA BLUEBOOK	SODIUM HYDROXIDE	01-013-B114	27.84
				NITRILE GLOVES	01-013-B116	387.68
				LAB SUPPLIES & CHEMICALS	01-013-B114	1,085.64

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				LAB SUPPLIES & CHEMICALS	01-014-B116	473.78
						<u>1,974.94</u>
10/20/2026	DISB	66545	VERIZON WIRELESS	CELL PHONE SERVICE SEPTEMBER 2026	01-011-B112	123.35
				CELL PHONE SERVICE SEPTEMBER 2026	01-012-B112	801.63
				CELL PHONE SERVICE SEPTEMBER 2026	01-013-B112	125.91
				CELL PHONE SERVICE SEPTEMBER 2026	01-014-B112	377.73
				RAIN GAUGE/LS COMMUNICATIONS	01-012-B112	56.97
				RAIN GAUGE/LS COMMUNICATIONS	01-015-B112	287.55
				PLANT/SS/LS TABLETS	01-012-B112	60.06
				PLANT/SS/LS TABLETS	01-014-B112	100.10
				PLANT/SS/LS TABLETS	01-015-B112	20.02
						<u>1,953.32</u>
10/20/2026	DISB	66546	VILLAGE OF DOWNERS GROVE CIVIC CEN	SEPTEMBER 2026 METER READINGS	01-011-B121	523.78
				OCTOBER 2026 METER READING	01-011-B121	523.78
						<u>1,047.56</u>
10/20/2026	DISB	66547	VILLAGE OF WESTMONT	AUGUST 2026 METER READINGS	01-011-B121	370.01
10/20/2026	DISB	66548	GROOT, INC.	OCT 2026 GARBAGE & RECYCLING	01-012-B102	178.75
				GRIT & SCREENING DISPOSAL SEPT 2026	01-012-B102	1,769.95
						<u>1,948.70</u>
10/20/2026	DISB	66549	BATTERIES PLUS BULBS #486	REPLACEMENT UPS BATTERIES - CHP GAS CLEANING - UNISON CONT	01-012-B513	275.23
10/20/2026	DISB	66550	AEP ENERGY	BUTTERFIELD LS ELECTRIC	01-015-B100	251.79
				CENTEX LS ELECTRIC	01-015-B100	141.05
				COLLEGE LS ELECTRIC	01-015-B100	359.55
				EARLSTON LS ELECTRIC	01-015-B100	233.46
				HOBSON LS ELECTRIC	01-015-B100	2,475.06
				LIBERTY PARK LS ELECTRIC	01-015-B100	322.26
				NORTHWEST LS ELECTRIC	01-015-B100	1,560.19
				WROBLE LS ELECTRIC	01-015-B100	940.34
				VENARD LS ELECTRIC	01-015-B100	601.43
						<u>6,885.13</u>
10/20/2026	DISB	66551	METLIFE METLIFE	DENTAL INSURANCE	01-017-E455	2,883.64
10/20/2026	DISB	66552	MIDWEST CHEMICAL & EQUIPMENT	TWAS POLYMER	01-012-B402	3,351.60
10/20/2026	DISB	66553	VILLAGE OF LISLE	DIESEL FUEL	01-014-C222	902.24
				DIESEL FUEL	01-012-C222	1,775.69
						<u>2,677.93</u>
Report Total:						<u>1,003,268.08</u>
				--- TOTALS BY GL DISTRIBUTION ---		
			CASH - PAYROLL ACCOUNT		01-000-1001	176,658.25
			PETTY CASH		01-000-1002	1,698.52
			CASH - USER ACCOUNTS		01-000-1011	2,174.92
			FEDERAL TAX WITHHELD		01-000-2000	25,505.70
			STATE TAX WITHHELD		01-000-2001	12,235.29
			SOCIAL SECURITY WITHHELD		01-000-2002	40,490.96
			IMRF WITHHELD		01-000-2003	10,393.75

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			WAGE DEDUCTION ORDER		01-000-2012	400.00
			VOLUNTARY ADDITIONAL PENSION CONTR		01-000-2014	9,988.09
			SEWER SYSTEM CLEARING		01-000-2016	23,746.29
			VOLUNTARY GROUP LIFE		01-000-2017	160.00
			DEFERRED COMPENSATION WITHHELD - I		01-000-2020	300.00
			DEFERRED COMPENSATION WITHHELD - I		01-000-2026	2,647.50
			DEFERRED COMPENSATION WITHHELD - I		01-000-2027	3,544.62
			DC PLAN LOAN REPAYMENT WITHHELD		01-000-2028	730.04
			SALE OF ELECTRICITY		01-005-3016	(1,029.18)
			ELECTRICITY		01-011-B100	890.63
			NATURAL GAS		01-011-B101	66.82
			COMMUNICATION		01-011-B112	1,939.29
			EQUIPMENT/EQUIPMENT REPAIR		01-011-B115	6,548.17
			SUPPLIES		01-011-B116	2,054.24
			EMPLOYEE/DUTY COSTS		01-011-B117	1,146.31
			BUILDING AND GROUNDS		01-011-B118	3,485.93
			POSTAGE		01-011-B119	1,032.63
			PRINTING/PHOTOGRAPHY		01-011-B120	410.24
			USER BILLING MATERIALS		01-011-B121	10,404.96
			CONTRACT SERVICES		01-011-B124	18,517.90
			MEMBERSHIPS/SUBSCRIPTIONS		01-011-B137	4,839.00
			GAS/FUEL		01-011-C222	118.33
			OPERATION/REPAIR		01-011-C225	27.98
			ELECTRICITY		01-012-B100	23,693.95
			NATURAL GAS		01-012-B101	421.66
			WATER, GARBAGE AND OTHER UTILITIES		01-012-B102	1,948.70
			ODOR CONTROL		01-012-B103	649.00
			COMMUNICATION		01-012-B112	1,239.98
			EMERGENCY/SAFETY EQUIPMENT		01-012-B113	359.82
			SUPPLIES		01-012-B116	1,862.51
			EMPLOYEE/DUTY COSTS		01-012-B117	2,164.70
			CHEMICALS - DISINFECTION		01-012-B401	19,242.02
			CHEMICALS - SLUDGE DEWATERING		01-012-B402	6,425.64
			CHEMICALS - TERTIARY TREATMENT		01-012-B403	4,560.00
			EQPT/EQPT REPAIR - EXCESS FLOW		01-012-B503	13,942.22
			EQPT/EQPT REPAIR - GRIT REMOVAL		01-012-B504	85.38
			EQPT/EQPT REPAIR - INFLUENT PUMPIN		01-012-B505	4,112.50
			EQPT/EQPT REPAIR - SECONDARY TREAT		01-012-B507	138.24
			EQPT/EQPT REPAIR - TERTIARY TREATM		01-012-B511	1,193.85
			EQPT/EQPT REPAIR - WWTC GENERAL		01-012-B512	14,207.68
			EQPT/EQPT REPAIR - WWTC UTILITIES		01-012-B513	15,524.90
			BLDG AND GROUNDS - SECONDARY TREAT		01-012-B807	260.31
			BLDG AND GROUNDS - TERTIARY TREATM		01-012-B811	1.13
			BLDG AND GROUNDS - WWTC GENERAL		01-012-B812	5,517.99
			GAS/FUEL		01-012-C222	3,016.74
			OPERATION/REPAIR		01-012-C225	445.66
			COMMUNICATION		01-013-B112	174.86
			CHEMICALS		01-013-B114	1,891.28
			EQUIPMENT/EQUIPMENT REPAIR		01-013-B115	2,369.48
			SUPPLIES		01-013-B116	915.79
			EMPLOYEE/DUTY COSTS		01-013-B117	102.61

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			OUTSIDE LAB SERVICES		01-013-B123	2,357.54
			GAS/FUEL		01-013-C222	99.87
			OPERATION/REPAIR		01-013-C225	5.20
			COMMUNICATION		01-014-B112	651.57
			EQUIPMENT/EQUIPMENT REPAIR		01-014-B115	7,611.00
			SUPPLIES		01-014-B116	1,039.05
			EMPLOYEE/DUTY COSTS		01-014-B117	426.18
			SEWER SYSTEM REPAIRS - BSSRAP PROG		01-014-B910	81,724.47
			GAS/FUEL		01-014-C222	2,941.23
			OPERATION/REPAIR		01-014-C225	110.14
			ELECTRICITY		01-015-B100	11,365.42
			COMMUNICATION		01-015-B112	307.57
			EQPT/EQPT REPAIR - COLLEGE		01-015-B522	102.38
			EQPT/EQPT REPAIR - HOBSON		01-015-B524	330.07
			EQPT/EQPT REPAIR - LIBERTY PARK		01-015-B525	6,270.51
			EQPT/EQPT REPAIR - NORTHWEST		01-015-B526	235.71
			EQPT/EQPT REPAIR - LIFT STATIONS G		01-015-B529	993.75
			BLDG AND GROUNDS - BUTTERFIELD		01-015-B820	202.36
			BLDG AND GROUNDS - CENTEX		01-015-B821	210.14
			BLDG AND GROUNDS - EARLSTON		01-015-B823	196.65
			BLDG AND GROUNDS - HOBSON		01-015-B824	225.28
			BLDG AND GROUNDS - LIBERTY PARK		01-015-B825	219.56
			BLDG AND GROUNDS - NORTHWEST		01-015-B826	163.32
			BLDG AND GROUNDS - VENARD		01-015-B827	211.58
			BLDG AND GROUNDS - WROBLE		01-015-B828	219.56
			BLDG AND GROUNDS - LIFT STATIONS G		01-015-B829	410.88
			EMPLOYEE GROUP HEALTH		01-017-E455	69,171.33
			IMRF		01-017-E460	16,329.62
			CONSTRUCTION CONTRACTS AND PURCHAS		01-712-0506	159,745.61
			LOAN/BOND PAYMENT		01-712-0515	14,403.65
			LOAN/BOND PAYMENT		01-714-0515	90,795.58
			LOAN/BOND PAYMENT		01-715-0515	46,595.52

PAYROLL JOURNAL PROOFING REPORT FOR DOWNERS GROVE SANITARY DISTRICT
For Payroll: 00000042 Check Post Date: 10/02/2026 Period End Date: 09/26/2026

Post Date	Journal	Description	GL Number	Grant	GL Description	DR Amount	CR Amount
Totals For Payroll Checks							
			01-000-1001		CASH - PAYROLL ACCOUN		86,357.49
			01-000-2000		FEDERAL TAX WITHHELD		12,470.55
			01-000-2001		STATE TAX WITHHELD		5,990.25
			01-000-2002		SOCIAL SECURITY WITHH		19,830.92
			01-000-2003		IMRF WITHHELD		5,424.74
			01-000-2012		WAGE DEDUCTION ORDER		200.00
			01-000-2014		VOLUNTARY ADDITIONAL		5,274.33
			01-000-2017		VOLUNTARY GROUP LIFE		160.00
			01-000-2020		DEFERRED COMPENSATION		150.00
			01-000-2021		FLEXIBLE ACCOUNT WITH		505.12
			01-000-2022		FLEXIBLE ACCOUNT WITH		467.69
			01-000-2024		FLEXIBLE ACCOUNT WITH		2,585.14
			01-000-2025		EMPLOYEE INS PREM CON		120.13
			01-000-2026		DEFERRED COMPENSATION		1,311.45
			01-000-2027		DEFERRED COMPENSATION		1,760.88
			01-000-2028		DC PLAN LOAN REPAYMEN		365.02
			01-011-A003		GENERAL MANAGEMENT	13,525.09	
			01-011-A004		FINANCIAL RECORDS	9,484.46	
			01-011-A005		ADMINISTRATIVE RECORD	2,188.80	
			01-011-A007		CODE ENFORCEMENT	14,618.15	
			01-012-A009		OPERATIONS MANAGEMENT	5,209.08	
			01-012-A011		MAINTENANCE - WWTC	20,205.61	
			01-012-A013		MAINTENANCE - ENERGY	21.94	
			01-012-A014		MAINTENANCE - ELECTRI	3,245.43	
			01-012-A021		WWTC - OPERATIONS	20,112.36	
			01-012-A022		WWTC - SLUDGE HANDLIN	7,632.84	
			01-013-A009		OPERATIONS MANAGEMENT	3,985.22	
			01-013-A041		LAB - WWTC	7,049.40	
			01-013-A042		LAB - PRETREATMENT	747.24	
			01-013-A048		LAB - ENERGY RECOVERY	258.00	
			01-014-A051		SEWER MAINTENANCE	16,103.43	
			01-014-A054		SEWER MAINTENANCE - B	400.00	
			01-014-A066		INSPECTION - CODE ENF	7,369.38	
			01-015-A080		LIFT STATION MAINTENA	901.82	
			01-017-E461		SOCIAL SECURITY	9,915.46	
						142,973.71	142,973.71

TOTAL: \$176,658.25

PAYROLL JOURNAL REPORT FOR DOWNERS GROVE SANITARY DISTRICT
For Payroll: 00000043 Check Post Date: 10/16/2026 Period End Date: 10/10/2026

Post Date	Journal	Description	GL Number	Grant	GL Description	DR Amount	CR Amount
Totals For Payroll Checks							
			01-000-1001		CASH - PAYROLL ACCOUNT		90,300.76
			01-000-2000		FEDERAL TAX WITHHELD		13,035.15
			01-000-2001		STATE TAX WITHHELD		6,245.04
			01-000-2002		SOCIAL SECURITY WITHH		20,660.04
			01-000-2003		IMRF WITHHELD		5,671.42
			01-000-2012		WAGE DEDUCTION ORDER		200.00
			01-000-2014		VOLUNTARY ADDITIONAL		5,329.51
			01-000-2020		DEFERRED COMPENSATION		150.00
			01-000-2021		FLEXIBLE ACCOUNT WITH		470.53
			01-000-2022		FLEXIBLE ACCOUNT WITH		467.69
			01-000-2024		FLEXIBLE ACCOUNT WITH		2,585.14
			01-000-2025		EMPLOYEE INS PREM CON		120.13
			01-000-2026		DEFERRED COMPENSATION		1,336.05
			01-000-2027		DEFERRED COMPENSATION		1,783.74
			01-000-2028		DC PLAN LOAN REPAYMEN		365.02
			01-011-A003		GENERAL MANAGEMENT	13,450.92	
			01-011-A004		FINANCIAL RECORDS	10,667.85	
			01-011-A005		ADMINISTRATIVE RECORD	2,414.52	
			01-011-A007		CODE ENFORCEMENT	16,133.91	
			01-012-A009		OPERATIONS MANAGEMENT	5,209.08	
			01-012-A011		MAINTENANCE - WWTC	19,349.08	
			01-012-A013		MAINTENANCE - ENERGY	784.36	
			01-012-A014		MAINTENANCE - ELECTRI	2,849.64	
			01-012-A021		WWTC - OPERATIONS	19,882.05	
			01-012-A022		WWTC - SLUDGE HANDLIN	8,103.73	
			01-013-A009		OPERATIONS MANAGEMENT	2,833.22	
			01-013-A041		LAB - WWTC	7,372.01	
			01-013-A042		LAB - PRETREATMENT	62.27	
			01-013-A043		LAB - SURCHARGE PROGR	1,846.02	
			01-013-A048		LAB - ENERGY RECOVERY	347.01	
			01-014-A051		SEWER MAINTENANCE	17,560.91	
			01-014-A066		INSPECTION - CODE ENF	6,723.88	
			01-015-A080		LIFT STATION MAINTENA	2,799.74	
			01-017-E461		SOCIAL SECURITY	10,330.02	
						148,720.22	148,720.22

Transaction		Transaction				
Date	Merchant Name	Amount	GL Code		Receipt Description	Post Date
09/01/2026	SIPTRUNK	75.21	012 B513		SCADA Alarm Dialer	09/02/2026
09/02/2026	INDEED USI26-07313950	78.40	012 B117		Electrical Tech Job Posting	09/03/2026
09/12/2026	MAILCHIMP	26.50	012 B116		Open House Invites	09/14/2026
09/21/2026	VISTAPRINT	45.96	012 B116		JH & VD Business Cards	09/22/2026
09/22/2026	JETSPIZZA.COM (IL-004)	65.31	011 B117		Board Meeting Dinner	09/23/2026
09/22/2026	WWW COSTCO COM	65.00	011 B137		Membership Renewal CS	09/23/2026
09/23/2026	EVERYTHING BRANDED	1,806.00	011 B116		Poop Squishies	09/24/2026
09/24/2026	WWW COSTCO COM	50.00	012 B116		Juice for Open House	09/25/2026
09/24/2026	WWW COSTCO COM	32.60	012 B116		Juice for Open House	09/25/2026
09/25/2026	NEOGOV	199.00	012 B117		Electrical Tech Job Posting	09/28/2026
09/29/2026	DUNKIN #343913 Q35	279.86	012 B116		Open House Donuts & Coffee	09/30/2026
09/29/2026	WALGREENS #7212	34.74	012 B116		Open House TV Truck Posters	09/30/2026

September Total	2,758.58
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CHECK DISBURSEMENT REPORT FOR DOWNERS GROVE SANITARY DISTRICT

CHECK DATE 10/01/2026 - 10/06/2026

BANK CODE: PC - PETTY CASH FUNDS: 01, 02, 03

Check Date	Bank Account	Check #	Payee	Description	GL Number	Amount
10/01/2026	PC	4031	JEWEL	DONUTS	01-012-B116	143.82
10/02/2026	PC	4032	C & K RAKERS	RODDING FEE REFUND	01-000-2016	474.08
10/03/2026	PC	4033	JEWEL	OPEN HOUSE SUPPLIES	01-012-B116	73.12
10/04/2026	PC	4034	RUBEN PORTER	RODDING FEE REFUND	01-000-2016	474.08
10/05/2026	PC	4035	PATRICIA HARM	RODDING FEE REFUND	01-000-2016	474.08
10/06/2026	PC	4036	BEST DRIVE	TIRE LEAK REPAIR - 2016 TOYOTA FORKLIFT	01-012-B512	59.34
Report Total:						1,698.52
--- TOTALS BY GL DISTRIBUTION ---</td <td data-kind="ghost"></td> <td data-kind="ghost"></td> <td data-kind="ghost"></td> <td data-kind="ghost"></td> <td data-kind="ghost"></td> <td data-kind="ghost"></td>						
SEWER SYSTEM CLEARING					01-000-2016	1,422.24
SUPPLIES					01-012-B116	216.94
EQPT/EQPT REPAIR - WWTC GENERAL					01-012-B512	59.34

P - 350

Invoice #: Cash Box

Date	Purchased From	Reimbursed To	Description	Code	Amount
09.09.26	7 ELEVEN	R. BERRY	ICE FOR LAB	13B114	13.11
09.18.26	IL SEC STATE	S. TATULLI	CDL RENEWAL	12B117	30.00
10.02.26	BP	MAINTENANCE	ICE FOR OPEN HOUSE	11B116	26.82
10.03.26	CASEYS	C. SHAW	ICE FOR OPEN HOUSE	11B116	25.01
10.07.26	BP	MAINTENANCE	ICE FOR EMPLOYEE LUNCH	11B116	13.41
10.07.26	BUONA	M. JASSO	TIP FOR DELIVERY DRIVER FOR EE LUNCH	11B117	100.00
10.07.26	USPS	K. JUSTUS	POSTAGE	11B119	13.85
			Total Receipts		222.20

Expense by code

13B114	13.11
11B119	13.85
11B116	65.24
11B117	100.00
12B117	30.00

TOTAL:	222.20
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DOWNERS GROVE SANITARY DISTRICT

M E M O

TO: Board of Trustees

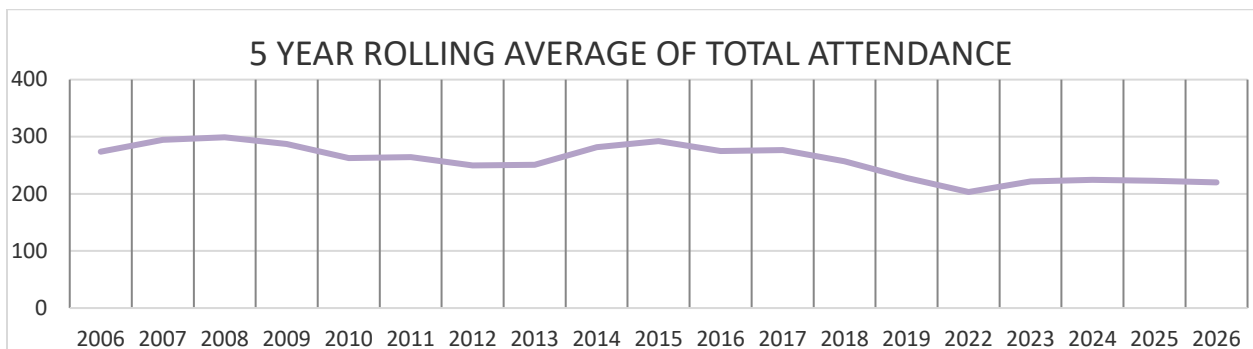
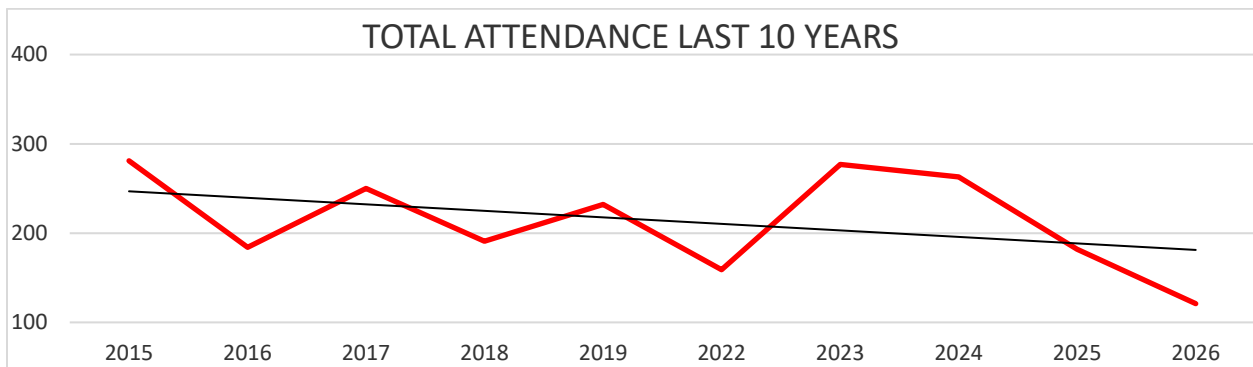
FROM: Carly Shaw
Administrative Supervisor

DATE: October 5, 2026

RE: Open House – October 3, 2026

The Open House was held on October 3, 2026. We had 121 people in attendance. Nine tours were given to 75 people. Of the total 75 attendees that took a tour, 12 were with a scheduled group and 63 were from the general public. The makeup of the 75 attendees who took the tour is as follows: 43 adults, 32 scouts or children. The tours began at 9:15 a.m. and continued approximately every 15 minutes until 11:45 a.m. We will mail questionnaires to those individuals who brought a group to the Open House as well as to those individuals who signed the guestbook. We also plan to have this questionnaire available as a form fillable PDF if they prefer to respond that way.

For a historical perspective, below are two charts, one displaying total attendance (with trendline) over the last 10 years and another displaying five-year rolling averages of attendance from the last twenty years of District open houses. Do note that we did not have an in person Open House in years 2020 and 2021 due to COVID.



cc: KJR, RTJ, MJS, ARU, DM

DOWNERS GROVE SANITARY DISTRICT

M E M O

TO: Board of Trustees

FROM: Amy R. Underwood
General Manager

DATE: October 16, 2026

RE: Proposed Resolution No. R2026-01 – Enforcement Response Plan

The Downers Grove Sanitary District Ordinance No. ORD 26-01, which was passed by the Board of Trustees in February 2026, was an extensive update to the District's Pretreatment Ordinance. The District's existing Enforcement Response Plan (ERP), which was last updated in July 2008, was based on the previous Pretreatment Ordinance. The District hired Baxter & Woodman (B&W) to write a new ERP based on the current Pretreatment Ordinance.

U.S. Environmental Protection Agency (EPA) reviewed the draft ERP, and their comments have been incorporated. EPA provided tentative approval pending adoption by the Board of Trustees.

Enclosed please the following items:

1. Proposed Resolution No. R2026-01 which will adopt and ratify the proposed Downers Grove Sanitary District Enforcement Response Plan.
2. October 14, 2026, review letter from EPA providing tentative approval of the ERP.

I will request the Board pass Resolution No. R2026-01 at the October 20 Board meeting. If approved, the ERP will become effective immediately.

cc: BOLI, CS, DRB, DM

**A RESOLUTION ADOPTING AND RATIFYING THE ENFORCEMENT RESPONSE
PLAN OF THE DOWNERS GROVE SANITARY DISTRICT
RESOLUTION NO. R2026-01**

WHEREAS, the DOWNER GROVE SANITARY DISTRICT (DISTRICT) owns, operates and maintains a wastewater treatment center (WWTC) and the collection systems serving the WWTC, including nine lift stations; and

WHEREAS, the DISTRICT has a Pretreatment Program which was originally approved by United States Environmental Protection Agency (EPA) on June 28, 1985; and

WHEREAS, DISTRICT Ordinance No. ORD 26-01 became effective on February 20, 2026, amending the DISTRICT Pretreatment Ordinance, which is Article IIA of An Ordinance Regulating the Use of Sanitary Sewers; and

WHEREAS, the EPA requires publicly owned treatment works (POTWs) that have approved pretreatment programs to develop and implement an Enforcement Response Plan (ERP) to identify how the POTW will ensure compliance and deal with noncompliance; and

WHEREAS, the DISTRICT has an ERP which was adopted in July 2008; and

WHEREAS, DISTRICT staff arranged for the development of a comprehensive ERP consistent with the amended Pretreatment Ordinance to replace the existing ERP; and

WHEREAS, the Board of Trustees of the DOWNERS GROVE SANITARY DISTRICT finds that adopting and ratifying this ERP is in the best interest of public health, safety, and welfare of the customers of the DISTRICT and is necessary to maintain regulatory compliance;

THEREFORE, NOW BE IT RESOLVED that the Board of Trustees of the DOWNERS GROVE SANITARY DISTRICT hereby adopts and ratifies the Downers Grove Sanitary District Enforcement Response Plan, a copy of which is attached hereto and incorporated herein by reference.

PASSED AND APPROVED at a regular meeting held on the 20th day of October 2026.

Amy E. Sejnost
President

Mark Eddington
Clerk

Downers Grove Sanitary District, Illinois

Enforcement Response Plan 2026

Prepared by:

BAXTER & WOODMAN
Consulting Engineers

www.baxterwoodman.com

September 2026



Downers Grove Sanitary District, Illinois
Enforcement Response Plan 2026
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LIST OF ATTACHMENTS

A	IU Monitoring Frequency & Enforcement Criteria Plan
B	POTW Unusual Event Form
C	Accidental Discharge, Slug Load & Operational Difficulties Form
D	Site Inspection Report Form
E	Semi-Annual Self-Monitoring Report (SASMR) Review Form
F	Confidential Business Information Procedures
G	Accidental Discharge and Slug Control Plan Instructions & Form
H	USEPA Non-Compliance Evaluation Memos
I	Enforcement Response Guide and Timeframes
J	Enforcement Tracking Log Template – Notice of Violations
K	USEPA Significant Non-Compliance Memos
L	Notice of Violation (NOV) Template
M	USEPA Show Cause Order Template
N	USEPA Administrative Order Template
O	USEPA Cease and Desist Order Template

1. INTRODUCTION

This document is the Enforcement Response Plan (ERP) of the Downers Grove Sanitary District (District) to effectively enforce the terms and conditions of the District's Pretreatment Sewer Use Ordinance, codified as Article IIA, referred to collectively as Ordinance in this ERP, in conformance with the requirements found in 40 CFR §403.8(f)(5). The District Pretreatment Program was originally approved by USEPA on June 28, 1985.

The ERP outlines how the District will obtain and evaluate information on User compliance and identify and respond to instances of User non-compliance with federal, state, and local pretreatment regulations. The ERP establishes a framework in which the District will assess the degree of non-compliance by a User and select an appropriate enforcement action to resolve non-compliance in a timely, fair, and consistent manner. Although the ERP identifies a range of enforcement options over a variety of pretreatment violations, it is not intended to cover all types of violations. Types of appropriate enforcement responses are identified based on the nature of a violation taking into account: the duration of the violation; the frequency of the violation; the potential impact of the violation to the District employees and POTW works, the public and the environment; and the historical response of the User.

The ERP includes the type of escalating enforcement responses to be used by the District, the time periods within which responses will take place, and the officials responsible for each type of response. The ERP does not define a required action, nor does it restrict the District to only the options listed. If the nature of the violation requires it, the District can, and will, pursue more severe penalties, including citations, revocation of Wastewater Discharge Permits and/or disconnection of service. Repeated violations, which are not eliminated by one level of response, will receive more severe penalties.

Ordinance Article IIA, Section 3.8, in accordance with 40 CFR §403.8(f)(2)(vi), requires that all permitted non-residential users and certain unpermitted non-residential users meeting the criteria listed in Ordinance Section 3.8(A) develop, implement, and maintain an Accidental Discharge and Slug Control Plan (Spill Plan). See Appendix G for Spill Plan evaluation checklist and instructions.

The District has developed the ERP for guidance and it is not intended to create legal rights or obligations, or to limit the enforcement discretion of the District.

2. COMPLIANCE INVESTIGATIONS

In order to assess the compliance of a Non-Residential User, the District must first collect data to evaluate or screen for compliance. Central to these requirements, the District identifies, classifies, inspects and samples Non-Residential Users thus providing the ability to inform other District staff as well as the users of its findings, which will define what pretreatment standards and requirements are applicable. Following is a description of the methods used to investigate compliance.

2.1 Non-Residential User Inventory Data

When the Pretreatment Program was formally established in 1985, the District conducted an initial survey to develop its Significant Industrial User (SIU) Master List as required by 40 CFR §403.8(f)(2)(i). District staff reviewed the surveys and classified industrial users according to the manufacturing operation and composition of industrial wastes identified in their industrial wastewater discharge.

The General Manager or designee maintains a Non-Residential User inventory annually as required by the District's current NPDES Permit. The General Manager or designee will drive through the industrial and business park areas at least annually, typically a couple times per year, to determine if there are any new businesses. The General Manager or designee will make a determination if an industrial user screening survey needs to be sent to the new business.

In addition to the annual drive through, the General Manager and designee are informed of new businesses in the District service area by the Billing Department and Code Enforcement whom approves plans and applications for Users. Industrial user water usage is reviewed annually and compared to the year prior to determine if there were any significant changes to water usage. This review will determine which industrial users need to be sent a screening survey to collect information on changes that have occurred that resulted in the increased water usage.

Upon receipt of the survey and any required additional information from site inspection classifications visits, the Pretreatment Coordinator will classify the user. All SIUs are notified of applicable pretreatment standards and required to submit a wastewater discharge permit application that requires submittal of the character and volume of pollutants being discharged to the POTW. Notification of classification will be documented by sending a letter by Certified Mail – Return Receipt Requested, FedEx, or UPS. The District will issue a wastewater discharge permit to all SIUs and Non-Significant CIUs. The District's SIU List is updated as additional SIUs are added or removed from the Pretreatment Program. These changes will be provided to EPA in the annual Pretreatment Program Report.

In the event that new pretreatment standards are promulgated, the District will notify industrial users as advised by USEPA Region 5 and will be documented by sending a letter by Certified Mail – Return Receipt Requested, FedEx, or UPS.

2.2 Sampling of Users

The SIUs perform their own sampling and analysis as outlined in their wastewater discharge permit. The minimum sampling frequency is twice a year, however, the District can require sampling more frequently consistent with the IU Monitoring Frequency & Enforcement Criteria Plan in Attachment A.

The District samples each SIU once a year, at minimum. This sampling is done without notice to the industry in order to obtain a representative sample of their discharge.

The District has the ability to confirm occasional noncompliance by scheduling additional sampling and analyses based on impacts identified at the POTW by District staff or in the event that the SIU notified the District of operational difficulties, spill and/or slug load. These events will be documented by the District on the POTW Unusual Event Form in Attachment B.

For CIUs that have been granted a categorical monitoring waiver, the District will sample the CIU for the waived categorical pollutant at least once during the term of the CIU's wastewater discharge permit. If the District determines that the waived pollutant is present or expected to be present in the CIU's discharge based on the sampling results and/or changes to the CIU's operation, the District will require the CIU to immediately begin annual monitoring of the waived pollutant until notified otherwise. Based on the results, the District may increase the monitoring frequency to align with the frequency for the other routinely monitored pollutants.

2.3 Inspection of Users

The annual SIU site inspections are conducted by the General Manager or designee. A checklist is completed during each site inspection that identifies key elements that need to be audited and summarizes deficiencies that need to be addressed by the SIU. Additional information and site layouts are added to the site inspection documentation as needed. All parties that participate in the site inspection sign the checklist, a copy of which is included as Attachment D.

The General Manager or designee will evaluate all identified Non-Significant CIUs annually to verify they continue to meet the non-Significant CIU criteria in 40 CFR §403.3(v)(2). The evaluation will include conducting a site inspection and reviewing water/discharge records plus the annual certification submitted by the non-Significant CIU.

In addition to routine sampling, monitoring and site inspections, the General Manager or designee may conduct additional non-routine investigations in response to violations, technical problems or support for permit modification. In the event that access is denied or the investigation is specialized, a warrant may need to be obtained. In this type of case, the District will consult its legal counsel (also referred to DGSD attorney in the District's ordinance) to seek assistance.

3. RECORDS, COMPLIANCE SCREENING/REVIEW

3.1 General Compliance Screening of SIU Submitted Reports

3.1.1 Records in General

There are IU specific records that are maintained in each IU file that are the result of the classification and discharge permit process. These records may be referred to in the review of reports and data. These records include (* issued by District):

- Classification documentation*
- Permit*
- Original and modified application and fact sheet*, to include diagrams made with the submittal or a page directing a person to where diagrams are located
- Signatory authorizations and certification statements, and
- Other plans as applicable, [e.g., Accidental Discharge and Slug Control (Spill Plan), Toxic Organic Management Plan (TOMP), Solvent Management Plan, Best Management Practices Plan (BMP Plan), and Dental Office Compliance Reports]

3.1.2 Reports in General

The General Manager or designee will review and screen reports and data for incidents of non-compliance with applicable standards and requirements within 45 calendar days of due date. Screening will occur for:

- Permit Application/Baseline Monitoring Reports,
- 90-Day Compliance Reports,
- Accidental Discharge and Slug Control Plans and checklist (see Appendix G),
- All SIU Self-Monitoring Reports (SMR),
- All reports required by the SIU's wastewater discharge permit,
- All instances of non-compliance for failure to report,
- Responses of Non-Compliance,
- Accidental Discharge, Slug Load and Operational Difficulties (see Attachment C), and/or
- Special investigations conducted as a result of an impact to the POTW works.

The District will use the Industrial User Self Monitoring Report Review form in Attachment E during the SIU SMR screening process that will verify that the report is submitted on schedule, cover the proper time period, include all information required, and are properly signed and certified where appropriate. In addition, all reports will be screened to determine if the SIU made a claim of confidential business information. The procedure for this evaluation is also found in Attachment F.

The 40 CFR §403.12(e) regulation requires Semi-Annual Self-Monitoring reports to be submitted in the months June and December; however, this regulation also allows the control authority to modify these deadlines. Ordinance Article IIA, Section 6.4 requires the SIU's Semi-Annual Self-Monitoring Report to be submitted in the months of July and January, which is also reflected in their wastewater discharge permit.

All reports are date stamped and initialed when they are received and reviewed.

The 40 CFR §403.8(f)(2)(vi) regulation requires the District to evaluate all SIUs to determine whether a Spill Plan is required within one year of being designated a SIU. All existing SIUs were required to develop and maintain a Spill Plan. Every two years, the District will evaluate whether an update is needed. New SIUs are required to submit a Spill Plan within 90 days of issuance of a new wastewater discharge permit. Instructions and checklist to assist the SIUs with preparing or updating their Spill Plan are provided in Attachment G.

3.1.3 Record Retention and Confidential Business Claims

All IU records are maintained for a minimum of three years in accordance with 40 CFR §403.12 (o)(3) and the District Ordinance. Some one-time records/reports such as BMR and 90-Day Compliance Reports will be maintained for longer periods as appropriate. Record retention shall be extended during the course of any unresolved litigation regarding the IU or District or when requested by the Regional EPA Administrator.

For any grant of a categorical monitoring waiver provided in 40 CFR §403.12 (e)(2) and Ordinance Article IIA, Section 4.5(D)(3), the records containing the reasons for the waiver and the revision to the wastewater discharge permit will be maintained for 3 years after the expiration of the permit.

In addition, all reports will be screened to determine if the SIU made a claim of confidential business information. The procedure for this evaluation and record retention is found in Attachment F.

3.1.4 Reports with Data

Reports containing sampling and analysis require confirmation of the use of procedures outlined in 40 CFR §136 and Ordinance Article IIA, Sections 6.10 and 6.11. The analyses screening process will be conducted by the General Manager or designee to confirm that following items are complete and correct:

- Sampling procedure custody, sampling interval, sample type;
- Bottle handling custody, bottle type, preservation technique;
- Parameters reported;
- Number of analyses, method of analyses;
- Compliance with standard; and
- Whether SIU notified District within 24 hours of receipt of violation from their laboratory.

The following USEPA memos are included in Attachment H to be used as a guidance resource for compliance determination. These procedures may not be used as part of the District's current pretreatment program, however these memos are being provided as a resource in the event that they do:

- January 21, 1992 & April, 12, 1993 – Determining Industrial User Noncompliance Using Split Samples
- October 1, 1992 – Use of Grab Samples to Detect Violations of Pretreatment Standards
- May 13, 1993 – Compliance with Continuous Monitoring

3.2 General Compliance Screening of District SIU Inspection and Sampling Data

3.2.1 District Inspection Reports

The General Manager or designee will review all SIU inspection reports within 45 calendar days of inspection to determine if enforcement actions are needed.

3.2.2 District Sampling

Within 24 hours of receipt from the District's contract laboratory, the District will review the data and notify the SIU of any violations. A resample of the pollutant in violation is required to be taken by the SIU and results submitted to the District within 30 days of the District notification to the SIU.

4. ENFORCEMENT EVALUATION

4.1 Enforcement Actions by General Manager and/or Designee

Once a violation has been identified, the Enforcement Response Guide (see Attachment I) will be consulted for enforcement options based on the violation's impact (magnitude and duration) on the receiving waters and environment, the violation's impact on the POTW staff and works, the compliance history of the user, previous enforcement actions taken against the particular user, and the good faith of the user. All of the enforcement actions designated in the matrix are considered appropriate but the General Manager or designee will weigh each of the above factors in deciding whether to use a more or less stringent response.

Formal enforcement, including the issuance of Notices of Violation (NOV), for violations reported to the District by the User will be initiated within a 30 calendar day period from the receipt of all of the analyses from the sampling period. The exception to this procedure is when a Categorical Industrial User (CIU) is sampled multiple periods within the same month and has monthly standards. In this case, the formal enforcement for the monthly violations will be initiated within a 30 calendar day period from the receipt of all of the analyses in the month. The violations from the individual sampling events may be issued separately or held and issued with the monthly violations dependent on the specific circumstances of the sampling dates and violations.

Formal enforcement for violations from Self-Monitoring Reports or other non-data reports will be initiated within a 30 calendar day period from the receipt of said report.

Notifying the User by email, phone call and in-person visit are considered non-formal enforcement actions but one of these is normally the first action when a violation is identified.

4.2 Significant Non-Compliance Assessment

The General Manager or designee will evaluate the compliance status of each SIU on a quarterly basis. The enforcement tracking spreadsheet template is provided in Attachment J. The evaluation will determine if the violations meet the definition of Significant Non-Compliance found in Ordinance Article IIA, Section 9.1(A) for the most recent rolling six (6) month period ending on the calendar quarter. Screening will be completed normally within 30 calendar days of the summarization of all the SIU data from the period assessed but no later than 60 calendar days. The General Manager or designee will make a determination within 30 calendar days, but no later than 60 calendar days of receipt of the screening results if further enforcement action other than annual publication should take place based on the circumstances of the non-compliance and the provisions found in the Enforcement Response Guide (see Attachment I).

The following USEPA memos are included in Attachment K to be used as a guidance resource for calculating SNC:

- September 9, 1991 – Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users
- January 17, 1992 – Determining Industrial User Significant Noncompliance, One Page Summary

4.3 Escalated Sampling Due to Continued Non-Compliance

Escalated enforcement including those actions needing the District's legal counsel will proceed in the event that the issue is not resolved in an appropriate timeframe. Violations recurring with impact or harm are likely those that will trigger this escalated enforcement action.

All enforcement responses which require action by the District's legal counsel will be recommended by the General Manager or designee within the time periods indicated in Attachment I. However, these deadlines will not prevent the District from proceeding with the enforcement actions.

5. TYPES OF ENFORCEMENT RESPONSES

Users found in non-compliance with any of the terms or conditions of the Ordinance are subject to enforcement under this ERP. The General Manager or designee issues enforcement documents. The following types of enforcement responses are available to the District in response to incidences of non-compliance within the District's Ordinance.

5.1 Informal Notification

For District sampling of the User, an email or a phone call notification is used to inform the User of a violation, so that voluntary actions by the User can resolve the situation preventing more serious violations. The informal notification will be made by the General Manager or designee within 24 working hours of receipt of the data from the laboratory.

5.2 Notice of Violation (NOV)

An NOV is a written notification that is sent via Certified Mail - Return Receipt Requested, FedEx, or UPS and by email with a return receipt requested, which is directed to an authorized representative of a User found to be in non-compliance of the conditions of the Ordinance or the User's Wastewater Discharge Permit (Ordinance Article IIA, Section 9.2(B)). The NOV advises the User of the nature of the non-compliance, requires the User to investigate the incident and take measures to correct the non-compliance and to respond to the NOV within 10 working days of receipt of the NOV. The NOV is issued by the General Manager normally within 30 calendar days of discovery of the non-compliance but no later than 60 calendar days. The NOV template is provided in Attachment L.

5.3 Pre-Enforcement Conference

A pre-enforcement conference is a formal meeting attended by the General Manager and/or designee with an authorized representative of the User. The General Manager may call a pre-enforcement conference when a User's violation is considered significant or where past enforcement actions have not resulted in compliance. The pre-enforcement conference shall be conducted in accordance with the procedures contained in Ordinance Article IIA, Section 9.2(C).

The conference will be used to advise the User of its non-compliance, establish a timetable required to correct the non-compliance, and identify the next step of enforcement if non-compliance continues. The meeting should be held normally within 30 calendar days of the District determination that a meeting is required but no later than 60 calendar days. The User may be notified of the conference date by mail or email.

5.4 Consent Order

A consent order is a written agreement between the District and User who has violated, or continues to violate, any provision of the Ordinance, Wastewater Discharge Permit or order issued to the User (Ordinance Article IIA, Section 9.2(D)). The consent order includes timeframes agreed to by both parties within which the User will come into compliance and may include penalties that will be incurred by the User for failure to meet compliance commitment dates. The written consent order may be a stand-alone document or become part of the User's Wastewater Discharge Permit. The written consent order shall normally be documented by the General Manager within 30 calendar days of the Agreement but no later than 60 calendar days. Normally a consent order would not be issued for those schedules established that are less than 90 calendar days in length.

5.5 Show Cause Order

A Show Cause Order is a written notification, served personally, by Certified Mail - Return Receipt Requested, FedEx, or UPS no less than 10 nor more than 21 working days prior to the Show Cause Hearing (Ordinance Article IIA, Section 9.2(F)). The Order shall require attendance at a Show Cause Hearing before representatives of the District by an authorized agent of a User that has violated, or continues to violate, any provision of the Ordinance, Wastewater Discharge Permit, or Order issued to the User. The User is offered the opportunity to show cause why the proposed enforcement action should not be taken. The Notice, issued by the General Manager, shall specify the time and place for the hearing, the proposed enforcement action, the reasons for such action and a request that the User show cause why the proposed enforcement action should not be taken. The Show Cause Order shall normally be issued within 30 calendar days of the District determination that a Show Cause Hearing is necessary but no later than 60 calendar days.

USEPA's Show Cause Order template is provided in Attachment M.

5.6 Administrative Order

An Administrative Order is a written notification, sent via Certified Mail - Return Receipt Requested, FedEx, or UPS that is directed to an authorized agent of a User that has violated, or continues to violate, any provision of the Ordinance, Wastewater Discharge Permit, or Order issued to the User (Ordinance Article IIA, Section 9.2(E)). The Administrative Order, issued by the General Manager, shall include a schedule to direct the non-compliant User to come into compliance within a specified time. The Administrative Order shall be issued normally within 30 calendar days of the District determination that an order is necessary but no later than 60 calendar days. An Administrative Order may be issued as a result of a pre-enforcement conference and include a schedule with milestone activities and dates. Normally an Administrative Order would not be issued for those schedules established that are less than 90 calendar days in length.

USEPA's Administrative Order template is provided in Attachment N.

5.7 Civil Penalties

The District has the authority to issue a fine for a violation (Ordinance Article IIA, Section 10.2) when a User has violated, or continues to violate any provision of the Ordinance, a Wastewater Discharge Permit, Order issued to the IU, or any other pretreatment standard or requirement. Fines will be issued by the General Manager in an amount of no less than \$100 or more than \$1,000 for each violation within 30 calendar days of the District determination that fines are appropriate.

When determining the fine amount, the General Manager and/or Court may take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factors as justice requires.

In addition to fines, the General Manager may recover reasonable costs, including but not limited to, filing fees, witness fees, attorney's fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the District.

5.8 Cease and Desist Orders

A Cease and Desist Order is a written notification, sent via Certified Mail - Return Receipt Requested, FedEx, or UPS and by email with a return receipt requested that is issued by the General Manager when a User violated or continues to violate any provision of the Ordinance, Wastewater Discharge Permit or Order issued to the User (Ordinance Article IIA, Section 9.2(G)). When issued, the General Manager may require the User to cease and desist discharge or halt operations that are causing the violations.

USEPA's Cease and Desist Order template is provided in Attachment O.

5.9 Termination of Discharge

The General Manager may terminate the discharge of a User if they violate one of the following conditions (Ordinance Article IIA, Section 9.5):

- Any discharge of pollutants which reasonably appears to the General Manager to present imminent danger to the environment or the health and welfare of persons or which threatens to interfere with operations of the District's wastewater treatment plant;
- Wastewater Discharge Permit is revoked;

Once the General Manager receives concurrence from the District's legal counsel, the General Manager or designee will issue a verbal order, followed immediately by a written order, to the User stating the problem and requiring immediate cessation of the discharge. The General Manager may also require disconnection of the wastewater collection service. The verbal order shall include, but not be limited to, personal conversation between User and General Manager or designee or telephone calls. The written order shall include, but not limited to, emails, letters, hand delivered

messages or notices posted at the User's premises or point of discharge. The User may be offered the opportunity to present their case at a Show Cause Hearing (Ordinance Section 9.4).

5.10 Criminal Prosecution

In the event that the District believes there is a potential case for criminal prosecution, it will request assistance from the IEPA and USEPA Criminal Investigation Division for potential action. The State of Illinois does not provide for criminal prosecution by municipalities.

6. PUBLICATION OF USERS IN SIGNIFICANT NON-COMPLIANCE

The General Manager or designee will prepare a list of SIUs that are in significant non-compliance for the District. The District will annually publish a notification in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the District, a list of SIUs who, during the previous 12 months, were in significant non-compliance with Applicable Pretreatment Standards per Section 9.1 of the District's Ordinance. The notification shall also summarize any enforcement actions taken against those Users during the same twelve months.

The term significant noncompliance shall mean:

- Chronic violations of Wastewater Discharge limits, defined here as those in which sixty-six percent (66 percent) or more of all of the measurements taken for the same Pollutant parameter during a six-(6-) month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement including instantaneous limits as Defined in Ordinance Section 3;
- Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33 percent) or more of Wastewater measurements taken for each Pollutant parameter during a six-(6-) month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits, as defined in Ordinance Section 3 multiplied by the applicable criteria (1.4 for BOD, TSS, Fats, Oils and Grease, and 1.2 for all other Pollutants except pH);
- Any other violation of a Pretreatment Standard or Requirement as defined by Ordinance Section 3 (Daily Maximum, long-term average, Instantaneous Limit, or narrative Standard) that the General Manager has determined caused, alone or in combination with other Discharges, Interference or Pass Through, including endangering the health of District personnel or the general public;
- Any Discharge of Pollutants that has caused imminent endangerment to the public or to the environment or has resulted in the General Manager exercising of his or her emergency authority to halt or prevent such a Discharge;
- Failure to meet, within 90 days of the scheduled date, a compliance schedule milestone contained in an individual or general Wastewater Discharge Permit or enforcement order for starting construction, completing construction, or attaining final compliance: Failure to provide within 45 calendar days after the due date, any required reports, including baseline monitoring reports, reports on compliance with Categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- Failure to accurately report noncompliance;

- Reporting false information;
- Failure to install monitoring facilities;
- Discharging without permit or approval when such discharge causes interference, pass through, adversely effects sludge disposal options, or when continuing violations occur resulting in environmental damage;
- Any violation of permit conditions if evidenced by intent or neglect;
- Refusal by a significant industrial user to allow access by District employees for the purposes of inspection or monitoring activities;
- Violation of orders. Any violation of an order is SNC, or
- Any other violation(s), which may include a violation of Best Management Practices, that the General Manager determines will adversely affect the operation or implementation of the local Pretreatment program.

7. APPEAL

Users found in non-compliance may, in the case of dispute as to the fairness of orders issued herein, seek an appeal. The User must notify the District within 30 calendar days of receipt of said order of their intention to appeal and type of appeal desired. In no case shall a matter be appealed that presents or threatens an imminent or substantial danger to the health, safety, and welfare of the public, District employees, POTW works and environment. The following types of appeal are available to the User:

7.1 Appeal to the District Board of Trustees

The appeal shall be determined by the District Board. The District Board or its designee shall at their convenience but not more than 45 calendar days from receipt of appeal notification, schedule a 30-minute period during a regularly scheduled District Board meeting or hold a special meeting to hear the User's appeal and an additional 30-minute period to allow the General Manager and/or other District staff or designee an opportunity to rebut statements made by the User. A decision of the District Board shall then be binding to both parties.

7.2 Appeal to the DuPage County Circuit Court

The appeal shall be determined by a judge appointed by the DuPage County Circuit Court. The User shall petition the Court within 60 calendar days of appeal notification to appoint a judge. The User shall be responsible for the cost of the services of the DuPage County Circuit Court

The District shall provide written notification to USEPA, Region 5, R5NPDES@epa.gov and 77 West Jackson Blvd., Chicago, Illinois 60604, Attention NPDES Programs Branch and to Deputy Counsel for the Division of Water Pollution Control, IEPA, 1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 within five days of receiving notice that any Industrial User in the service area of its POTW is appealing to the Circuit Court any condition imposed by the District in any permit issued by the District. A copy of the Industrial User's appeal and all other pleading filed by all parties shall be mailed to the Deputy Counsel within five days of the pleadings being filed in Circuit Court

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX A

IU MONITORING FREQUENCY & ENFORCEMENT CRITERIA PLAN

DOWNERS GROVE SANITARY DISTRICT

PRETREATMENT PROGRAM SAMPLING PLAN

IU MONITORING FREQUENCY & ENFORCEMENT CRITERIA

PROGRAM REQUIREMENT: USEPA requires all Publicly Owned Treatment Works (POTW) with a design flow greater than 5 MGD and receiving from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW or are otherwise subject to Pretreatment Standards to establish an Approved USEPA Pretreatment Program for Significant Industrial Users (SIU) by federal regulation in the General Pretreatment Regulations - 40 CFR §403.8 (a). The regulations require POTW Pretreatment Programs to issue a wastewater discharge permit to the SIU that includes both Federal and local limits. The Federal limits include prohibitive discharge limitations and, if applicable, unique regulations promulgated for 57 categories and approximately 450 subcategories of industries that can discharge toxic pollutants to a POTW that could cause Interference and Pass Through to its operations.

The Downers Grove Sanitary District (District) is required to operate an approved Industrial Waste Program by its NPDES Permit issued by IEPA with review and concurrence of USEPA for the Wastewater Treatment Plant (WWTP) in the Special Condition #12 (2022 permit). The program was first approved by USEPA Region V (the approval authority in Illinois) on June 28, 1985.

ROUTINE MONITORING: The Pretreatment Program requires that an IU self-monitor its discharge permit pollutants a minimum of twice per year (40 CFR §403.12(g)(1)) with the POTW sampling an additional one time per year.

The wastewater discharge permits for each IU outline their monitoring requirements. The monitoring frequency is typically on a semi-annual basis however, there may be IUs with increased monitoring frequencies. IUs may be monitored at a higher frequency as a result of compliance issues or for more accurate and equitable surcharge determinations. Sampling will be increased to quarterly, monthly, bi-weekly, or weekly if the data is variable as a result of production scheduling and cleaning operations.

ENFORCEMENT REQUIREMENTS:

IDENTIFY VIOLATIONS AND RESAMPLING: The General Pretreatment Regulations in 40 CFR §403.8 (g)(2) require that an IU identify violations to a Publicly Owned Treatment Works (POTW) within 24 hours of becoming aware of a violation (i.e. receiving a lab report, by telephone, email or mail). Likewise, the District as the Control Authority will notify the IU within 24 hours of becoming aware of a violation during District sampling of the IU. The IU is required to repeat the sampling and

analyses and submit it to the POTW (the District) within 30 days after becoming aware of a violation. The exception to the repeat sampling occurs if:

1. The Control Authority (District) samples the IU at a frequency of once per month, or
2. The Control Authority (District) has already performed additional sampling at the IU between the time when the initial sampling was conducted and the time when the IU or the Control Authority received the results of the sampling.

Failure to notify the District of a violation or repeat the sampling and analyses in a timely manner will result in the issuance of a Reporting Notice of Violation to the IU by the District.

ROUTINE ENFORCEMENT ESCALATION:

Data Violation Evaluation: In the event that an IU has a violation of one of the parameters, the District prepares and sends a notice of the violation to the IU by mail. If the violation has not been corrected within the time limit in the initial notice, then a conference date will be established. The IU and any other appropriate parties may be notified by mail of the conference date. The notice will require the IU to appear at a scheduled pre-enforcement conference, explain the potential violation in enough detail for the user to begin corrective action, and state the time, date, and location of the conference.

Pre-enforcement conferences shall be scheduled between 7 and 21 days after the notice of the conference is sent, unless an emergency requires a shorter timeframe. If the respondent wants a continuance beyond 21 days, they must submit an affidavit or verified statement explaining the specific reasons for the delay. The General Manager will approve or deny the request in writing and send the decision to the user. The General Manager may grant continuances on conference dates for good cause shown.

Any user that is found to have violated, or continues to violate, an order of the District or who has failed to comply with the provisions of this ordinance and the orders, rules and regulations, individual or general wastewater discharge permits issued hereunder, or any other Pretreatment Standard or Requirement, shall be liable to the District for a fine fined in an amount of no less than \$100, or more than \$1,000 for each violation. Each day in which any such violation occurs shall be deemed a separate violation, and a separate violation shall be deemed to have occurred for each constituent.

SIGNIFICANT NON-COMPLIANCE (SNC) STATUS:

As previously identified EPA requires that a compliance evaluation be performed on a rolling 6-month basis to determine if an IU violation has achieved SNC status. The definition of SNC is contained in 403.8(f)(2)(viii)(A) for Chronic SNC status and (B) for Technical Review Criteria SNC status as well being contained in the District's Pretreatment Ordinance Article IIA, Section 9.1. Following are the definitions:

- Chronic violations are defined as those that exceed the daily maximum limit or average limit by any amount. Chronic SNC is defined as those in which sixty-six percent (66%) or more of all the wastewater measurements taken during a 6-month period exceed the daily maximum or average limit by any amount.
- Technical Review Criteria (TRC) violations are defined as those in which thirty-three percent (33 percent) or more of all of the wastewater measurements taken for each pollutant parameter during a six-(6-) month period equal or exceed the product of the daily maximum limit or average limit multiplied by the applicable criteria (1.4 for BOD, TSS and FOG and 1.2 for all other pollutants except pH). For pH, the District has set the TRC level at less than 4.5 pH units or greater than 10 pH units.

The identity of IUs that exhibit SNC status during one of the four rolling six-month calendar year evaluations are required to be published in a newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served. Please note that there are other reasons that could result in publication that do not deal with the above chronic and TRC assessments. These include:

- IU discharged a pollutant that caused interference or pass through at POTW;
- IU discharged a pollutant that endangered the health of POTW personnel or the general public;
- IU missed compliance schedule milestone by 90 days;
- IU submitted report was more than 45 days late;
- IU failed to accurately report non-compliance;
- IU reported false information;
- IU failed to install monitoring facilities;
- IU discharged without a permit or approval when such discharge causes interference, pass through, adversely effects sludge disposal options, or when continuing violations occur resulting in environmental damage;
- IU violation of permit conditions when there is evidence of intent or neglect;
- IU refused to allow District employees access for inspection or monitoring activities;
- IU violates an order;
- IU violated best management practice; or
- Any other violation which the District considers significant.

A memo from EPA that includes a visual summary of rolling SNC calculations is provided as Attachment K of the Enforcement Response Plan.

MONITORING MODIFICATIONS BASED ON COMPLIANCE:

The Pretreatment Staff is responsible for reviewing and evaluating data for changes in monitoring frequencies which are contained in the IU wastewater discharge permits. These permits are issued

every five years per the District ordinance. Some permits may be issued to an IU more frequently based on their production volume and discharge. Parameters are chosen on the basis of industrial processes and categorical monitoring requirements. The base frequencies are discussed and approved by the District staff responsible for wastewater treatment.

During the course of a monitoring year, sample frequencies may be modified and increased, including but not limited to, the following circumstances:

- IU requests increase in sampling and analyses to help identify compliance issues or more accurately assess surcharge;
- SNC status occurred for one pollutant but other pollutants are trending or were in violation that has yet to cause SNC status;
- SNC status occurred for multiple pollutants;
- SNC status occurred in multiple rolling 6-month periods (50% or more) in a calendar year or over a two year cycle (pattern of non-compliance);
- Pattern of violations followed by short term compliance over multiple sampling periods;
- Pattern of violations occur on a certain day of the week or at a specific time of day (grab samples required) routinely that would cause non-representative sampling;
- Addition of Chronic SNC status at an IU with TRC SNC;
- Increase of TRC SNC status to a range of 33-66%;
- FOG violations of 200 mg/l or more; or
- Defined interference or upset seen at POTW.

Sampling will follow the routine resample schedule initially. If violations continue or extend past a six-month timeframe and reach SNC status for multiple 6 month periods, sampling may be increased to a higher frequency.

Monitoring decreases will occur in conjunction with renewed compliance. The decrease in sampling is dependent on the modifications made and a demonstration that the compliant results are sustainable. Monitoring will not be reduced until the IU has achieved complete compliance for three separate sampling events. The District may take a phased approach to returning the IU back to its original routine sampling frequency. Reasons for monitoring reductions include:

- Return to complete compliance as a result of major equipment change coupled with voluntary interim measures that prevented violations during the modification;
- SNC status eliminated for 6-month period and overall violation rate (chronic violation) rate is less than 25% and TRC violations are less than 10%.

A memo from EPA that includes a visual summary of rolling SNC calculations is provided as Attachment H of the Enforcement Response Plan.

Prepared by: Baxter & Woodman, Inc.

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX B

POTW UNUSUAL EVENT FORM

POTW UNUSUAL EVENT FORM

Date:_____Time:_____

District Rep Completing Report:_____

Title:_____

NPDES No. IL0028380

Telephone:_____

I. Event Location:_____

II. Event Identified:_____Date:_____Time:_____

III. Source **N/A - Unknown:**_____

or Source Name:_____

Site Address:_____

Contact Name:_____

Title:_____

Telephone: _____

IV. Observations by District Staff (Define specifics, where located and duration of impact.)

____ pH Shift ____ Odor ____ Temperature

____ Color ____ LEL ____ Physical objects

____ Other:_____

V. Plant Conditions (Define the symptoms, location and duration of impact.)

_____ Oil sheen on tank top	_____ Odor of stage changes
_____ Foam (change in color or amount)	_____ Evacuate building
_____ Shift in DO levels	_____ Sludge changes
_____ Shift in MLSS	_____ Other _____

VI. Samples Taken (Obtain the most concentrated phase.)

Yes

No

Plastic bottle (for observations, conventionals or metals)	_____	_____
Glass bottle (for FOG)	_____	_____
Organics (using special prepped organic bottles)	_____	_____
Other _____	_____	_____

VII. Outcome

District Rep (if different than event initiator) _____

1. What was plant flow at time of event? _____

2. How long did event impact plant? _____

Describe: _____

3. Where there changes that you could observe in the final effluent that correspond to the treatment resonance time of the event? Yes ☐ No ☐

Describe: _____

4. Do you recognize this event as part of a cyclical pattern? Yes ☐ No ☐

Why? _____

Did the plant exceed a final effluent standard as a result of the event? Yes ☐ No ☐

Describe: _____

VIII. Event Source Determination
☐ Industrial User
 ☐ Other
 ☐ Maintenance
 ☐ Unknown

Prepared by: Baxter & Woodman, Inc., 2026

P:\DGSD1\2325513-DGSD Pretreatment Assistance\00-PCI and PT Assist\08 ERP\5 - FINAL ERP\Attachments\Attachment B - POTW Unusual Event Form.docx

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX C

**ACCIDENTAL DISCHARGE, SLUG LOAD, & OPERATIONAL
DIFFICULTIES NOTIFICATION FORM**

2710 Curtiss Street
Downers Grove, IL 60515
(630) 969-0664

Other Municipalities: _____

Material(s) Spilled: _____

Estimated Volume Spilled (provide units): _____

*The user should notify the District General Manager at:
(630) 969-0664*

Detailed report due 5 days after the incident sent to:

*Downers Grove Sanitary District
Attn: Reese Berry
Pretreatment/Lab Supervisor
2710 Curtiss Street
P.O. Box 1412
Downers Grove, Illinois 60515-0703
rberry@dgsd.org*

SECTION II: INCIDENT SPECIFICS

Chemical analysis of a representative sample of the spilled material. Show concentration of all compounds in the spilled material. If a sample of the spilled material is not available, list all known contents present in the discharged material. Attach additional sheets or MSDS if needed.

CAS Concentration Number	Compound Name	(mg/l)
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Location of incident:

Plant Process Area: _____

In-Plant Transfer Area: _____

Shipping/Receiving Area: _____ **(circle):** Inside or Outside **(circle):** Drum or BulkMaterial Storage Area: _____ **(circle):** Inside or Outside **(circle) :** Drum or Bulk

Other: _____

Explain the incident:

Describe what actions were taken at the time to control the spill (e.g. sealed floor drain, use of sorbents or foams, etc.)

Was the spill treated in a pretreatment system? (Circle): Yes ☐ No ☐

If yes, describe:

Was part of the spill discharged to the sanitary sewer? Yes ☐ No ☐ If yes, describe:

Was any part of the spill discharged to the storm sewer? Yes ☐ No ☐ If yes, describe:

SECTION III: INCIDENT FOLLOW-UP

Disposal: Was any part of the spill contained and prevented from discharge to either a sanitary or storm sewer? Yes ☐ No ☐

If yes, describe:

Corrective Actions: Describe what measures will be taken to prevent similar future incidents:

Schedule: Anticipated date by which the above-stated measures will be completed:

Progress report: One or more reports to be submitted by the date below that confirm completion of modification.

Final report: Report that will be submitted that confirm completion of modification.

For District Use only:

Reviewer:_____ **Date:**_____

Comments:_____

Prepared by: Baxter & Woodman, Inc., 2026

P:\DGSD1\2325513-DGSD Pretreatment Assistance\00-PCI and PT Assist\08 ERP\5 - FINAL ERP\Attachments\Attachment C - Accidental Discharge, Slug Load, Operational Difficulties Notification Form.docx

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX D

SITE INSPECTION REPORT FORM

**Classification Site Inspection Report**

Inspection date: _____ Inspection time: _____

Business Name _____

Site Address: _____

City, State, Zip: _____

Phone: _____ Fax: _____

Parent Company (if applicable) _____

Mailing Address: _____

Address: _____

City, State, Zip: _____

Phone: _____ Fax: _____

Site Representative: _____

Name: _____

Title: _____

Phone: _____ Email: _____

Business representative(s) in attendance: _____

Municipal representative(s): _____

SECTION A - GENERAL SITE INFORMATION

1. Date of Facility Startup: _____

2. Building Type: Single building _____ Multi-unit building _____ Units in Building _____

3. Number of employees

Monday - Friday Daytime Shift _____ Evening Shift _____ Night Shift _____ Total _____

Saturday/Sunday Daytime Shift _____ Evening Shift _____ Night Shift _____ Total _____

4. Hours of operation

Monday - Friday Daytime Shift _____ Evening Shift _____ Night Shift _____

Saturday/Sunday Daytime Shift _____ Evening Shift _____ Night Shift _____

5. Does this business have scheduled shutdown periods? Yes _____ No _____

If yes, when? _____

6. Does facility have an on-site cafeteria? Yes _____ No _____

If yes, do they have a Grease Interceptor? Yes _____ No _____

Type _____

Cleaning Frequency _____

7. Check all applicable processes and sub-processes on-site:

☐ Manufacturing	☐ Food Production	☐ Wholesale Distributor	☐ Assembly/Fabrication
☐ Office	☐ Retail	☐ Packaging	☐ Warehouse
☐ Laundry	☐ R & D Lab	☐ Auto/Truck Repair	☐ Vehicle Wash
☐ Printing	☐ Other _____		

8. What are the SIC and NAICS codes associated for this facility?

SECTION B - PRODUCTION PROCESS AND WASTE PRODUCTION

9. What service, business process or manufacturing is performed at this site? What is the product(s) are produced at this site?

10. What raw materials are used?

11. Are inks or dyes used in production? Yes ☐ No ☐

If yes, how is used ink or dyes disposed? _____

12. Process Flow Diagram:

SECTION C – SANITARY DISCHARGE

13. Is process wastewater produced at this facility? Yes _____ No _____

14. Is process wastewater discharged? Yes _____ No _____

If yes, type of discharge: Continuous _____ Batch _____ Frequency _____

Average Daily Discharge Volume: _____

15. Check all sources of sanitary waste:

____ Domestic _____ Process wastewater _____ Parts washing

____ Equipment cleaning _____ Facility cleaning _____ Air Pollution Control Unit

____ Cooling water, non-contact _____ Cooling water, contact _____ Boiler blowdown

____ Cooling tower blowdown – if yes, what bacterial control chemicals are used? _____

____ Other, describe _____

16. What shift(s) is the facility cleaned? At what frequency? What is cleaned (floors, equipment, etc.)?

17. Does this facility have an outside inspection manhole? Yes _____ No _____

If yes, location of inspection manhole: _____

18. Is there an inside sampling location? Yes _____ No _____

If yes, description of location: _____

19. Does this facility have a pretreatment system? Yes _____ No _____

Is the pretreatment system operated by a Class K operator? Yes _____ No _____

Name: _____

Does the business have an IEPA permit for the pretreatment system? Yes _____ No _____

Process flow of pretreatment system:

20. Does this facility have waste hauled off-site? Yes _____ No _____

If yes, type of waste hauled: _____

Hauling company _____

Frequency of hauling _____

Are hauling records kept for a minimum of three years? Yes _____ No _____

SECTION D – STORAGE AND MATERIALS

21. Does this facility store liquids in drums/totes on-site? Yes _____ No _____

If yes, substance(s) stored: _____ Number of drums _____

_____ Number of drums _____

_____ Number of drums _____

_____ Number of drums _____

22. Does this facility store liquids in bulk tanks on-site? Yes _____ No _____

If yes, do they have any outside tanks? Yes _____ No _____

Do outside tanks have spill protection? Yes _____ No _____

Describe: _____

Substance(s) Stored: _____ Number of gallons _____

_____ Number of gallons _____

_____ Number of gallons _____

_____ Number of gallons _____

23. Is spill containment provided around liquid storage area(s)?

If yes, type of containment: _____

24. Are there floor drains in the production areas? Yes _____ No _____

If yes, are floor drains in production areas open or capped? Open _____ Capped _____

If open, where do the floor drains discharge? _____

If open, are floor drains used regularly? _____

25. Does facility have an Accidental Discharge/Slug Control Plan? Yes _____ No _____

If yes, date last updated: _____

26. Are employees trained on proper spill clean-up procedures? Yes _____ No _____

If yes, frequency of training: _____

27. Additional Notes:

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX E

SEMI-ANNUAL SELF-MONITORING REPORT (SASMR) REVIEW FORM

Industry Name:
Site Address: Downers Grove, IL 60515
Permit Number:

Monitoring Period: _____
Sample Date: _____
Monitoring Location: _____

Report Due Date: _____
Date Data Received: _____
Date of Review: _____
Reviewed by: _____

Chain of Custody (COC) / Field Sheet Review

☐ COC for each sampling day submitted with SMR?	☐ pH analyzed in the field & COC/field sheet documents: result, sample AND analysis times, & method.
☐ Samples collected within the required monitoring period?	☐ Proper containers used?
☐ Proper sample type for each pollutant (composite/grab)?	☐ Proper preservation used?
☐ Sampling done at permitted location?	☐ Was temperature of sample cooler recorded?
☐ Start & end times for composite sampling reported?	☐ Was COC relinquished with signatures, dates, and times?
☐ Composite samples taken over 24 hrs or noted otherwise?	☐ Do relinquished & received dates/times match?
☐ Sample time for each grab sample reported discretely?	☐ If carrier used, documented on received side of relinquishing table?
☐ Sample date entered for each sample?	

Laboratory Report Review

☐ All lab reports submitted with SMR?	☐ All permitted pollutants sampled and analyzed?
☐ Pollutants analyzed within required holding time?	☐ Correct sampling frequency done for each pollutant?
☐ 40 CFR 136 analysis performed?	☐ For CIUs w/o TOMP, all TTO results provided in SASMR?
☐ Did the lab measure temperature upon receipt?	☐ All TTO MDLs <0.10 mg/l?
☐ Were required pollutants cooled to <6°C upon receipt?	

Self Monitoring Report (SMR) Review

☐ SMR form filled out?	☐ For CIUs with TOMP, TTO/Cyanide statement in SASMR?
☐ Do lab report results match SMR form entries?	☐ Hauling Manifests provided?
☐ Sample collection date included on SMR (not analysis date)?	☐ Annual Effluent Flow Meter Calibration Records submitted?
☐ Result reported in the proper units?	☐ Annual Sampler Calibration Records submitted?
☐ Certification Statement provided and signed by AR or Duly AR?	☐ GI Cleaning/Inspection records submitted?
☐ Flows reported?	☐ Batch Discharge Log submitted?
☐ Did the IU notify the CA of any significant changes in flow?	

QA/QC

☐ QA/QC results submitted with laboratory report?	
☐ Did all QA/QC results pass (no qualifiers)?	
If not--> ☐ Further investigation to determine source and correct failure?	
Or --> ☐ Results are reportable without further investigation	
Date of last MS run on IU FOG sample: _____ [Add Date]	<i>MS should be run on 1 of every 20 IU FOG samples</i>
IU FOG sample count since date above: _____ [Add #]	<i>or at least once per permit cycle</i>
Date of last MS run on IU Organics sample: _____ [Add Date]	<i>MS should be run on 1 of every 10 IU Organics</i>
IU Organics sample count since date above: _____ [Add #]	<i>samples or at least once per permit cycle</i>
☐ If matrix spikes were run on IU sample, were there any interferences?	
If yes--> ☐ Narrative documentation included on the lab report?	<i>MS = Matrix Spike</i>

Violations - Follow ERP

☐ Is the data valid? If no --> Pretreatment Review Meeting.
☐ Was all required SMR data reported? If no --> Reporting NOV.
☐ Was any required monitoring data not included? If yes --> Reporting NOV
☐ Were there any DAILY data violations? If yes --> NOV
☐ Were there any MONTHLY data violations? If yes --> NOV
☐ Was the City notified within 24 hours of the IU receiving data that was in violation? If no --> Reporting NOV.
☐ For pollutants with a violation, was a resample done within 30 days of IU receiving the data? If no --> Reporting NOV.
☐ Was report submitted on time? If no --> Reporting NOV

Comments

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX F

CONFIDENTIAL BUSINESS INFORMATION PROCEDURES

PRETREATMENT PROGRAM CONFIDENTIAL BUSINESS INFORMATION

PROGRAM REQUIREMENT:

The Downers Grove Sanitary District's pretreatment program is required to follow Confidential Business Requirements per 40 CFR §403.14 Confidentiality that incorporates by reference 40 CFR §2.302 as well as state code 35 IAC 310.105, 310.105 and 130 and in Ordinance Article IIA, Section 6.4B.11 of the District.

CLAIMS FOR REQUEST PER 40 CFR §2.302:

A claim of "Confidential Information" may be made for information that would divulge information, processes, or methods of production entitled to protection as trade secrets under applicable State law. The request must be asserted at the time of submission of the information or data. Specific instructions to mark documents/information may be found in 35 IAC 130.

Notwithstanding any procedures or exemptions of the Freedom of Information Act, all such information and data shall be made available immediately upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report.

DETERMINATIONS:

The claim of "Confidential Information" will be determined by the Pretreatment Coordinator and the District attorney within the timeframe provided in 35 IAC 130.

FILES - SEGREGATION OF ARTICLES:

Any article, or any page or portion thereof, that is claimed or determined to represent a trade secret or other non-disclosable information, shall be kept segregated from articles that are open to public inspection, and shall be kept secure from unauthorized access. Secure access for Industrial Records will be maintained in the Laboratory Supervisor/Pretreatment Coordinator's Office which is locked and secured. Routine Industrial Records will be flagged to indicate that "Confidential Records" exist for the IU.

AVAILABILITY TO THE PUBLIC:

Information not determined to be “Confidential” which is submitted to the State or the District shall be available to the public at least to the extent provided by 40 CFR §2.302. Wastewater constituents and characteristics and other “effluent data” as defined by 40 CFR §2.302 will not be recognized as confidential information and will be available to the public without restriction. Requests for IU information will be filed consistent with District procedures for the Illinois Freedom of Information Act.

AVAILABILITY TO GOVERNMENTAL AGENCIES:

Notwithstanding any procedures or exemptions of the Freedom of Information Act, all such information and data shall be made available immediately upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report.

DISPOSAL OF INFORMATION:

Once an article is no longer required to be maintained for the Pretreatment Program per Ordinance Article IIA, Section 8.1, the District must dispose of the article that is claimed or determined to represent a trade secret or other non-disclosable information, and any copies made of that article, according to its application for authority to dispose of District records approved by the State Records Commission.

Prepared by: Baxter & Woodman, Inc., 2026

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX G

**ACCIDENTAL DISCHARGE & SLUG CONTROL PLAN INSTRUCTIONS
AND FORM**

ACCIDENTAL DISCHARGE AND SLUG LOAD CONTROL PLAN EVALUATION INSTRUCTIONS

The attached form is used to establish what items should be addressed and included in an Accidental Discharge and Slug Load Control Plan, normally referred to as a Spill Plan. A Spill Plan is required of all Significant Industrial Users and other users as determined by District Pretreatment Ordinance Section 3.8.

Note before you start your assessment that Spill Control and Slug Control are not necessarily the same. A slug load can occur as a result of a spill but slug loads can also occur as a result of production discharges that are not spills. Spill Plans traditionally protect worker health and safety and minimize material loss. The District Accidental Discharge and Slug Control Plan also requires slug control planning to protect the Sewage Treatment Plants, sanitary collection system, and the District staff.

If a section of the evaluation for your plan is not applicable – **print or type N/A in the section** so that it is clear that the item has been evaluated. **The evaluation checklist should be submitted with the Spill Plan.** The following information contains some common-sense, good-housekeeping, and/or best management practices for spill and slug loading control. This information is not meant to be all-inclusive and you may make additions and deletions to these practices based on your experience or recommendations from management, consultants, suppliers, etc.

I. Site History:

A. Identify History of Spill Events at the site during the last two years.

Attach a copy of the spill report or summary for each event. You will need to be able to answer the following questions to effectively complete a Spill Plan for your site:

- What materials were involved?
- Where did the spill occur?
- Why did the spill occur?
- Was notification followed correctly?
- What was required to physically cleanup spill?
- Was waste hauled off-site classified as special or hazardous? Effect on cleanup costs?
- Were measures taken to prevent re-occurrence such as making site modifications or modifying operator training?
- Were the measures successful?

B. Identify History of Slug Loading Events at the site during the last two years.

Attach a copy of the spill report or summary for each event. You will need to be able to answer the following questions for the event to effectively complete a Spill Plan for your site for slug loading control:

- Was slug caused by a non-routine batch or is it an on-going problem?
- Is slug a result of highly variable production?
- Can slug be controlled through equalization?
- Did the slug cause the pretreatment system to overload?
- Did the slug interfere or upset a biological pretreatment system?
- Did the slug cause the pretreatment system to be bypassed?
- Was the slug a foreign waste that accidentally entered the pretreatment system and upset it?
- Did the slug impact the user's compliance?

II. Current Site Assessment

A. Material Storage

The spill plan requires a description of stored chemicals. Identify those chemicals that are stored in containers described in Sections II A 1-5 below. Include the name, concentration of the chemical and the CAS number if established.

No container should be used for the storage of raw or waste liquids unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature. The key evaluation for material storage after container integrity is whether there are any open floor drains in the area connected to the sanitary sewer. The next evaluation will then normally center on whether there is secondary containment for the largest tank volume plus 15% in the area. Identify and evaluate the spill potential in the following areas:

1. Drum storage in areas containing more than five 55-gallon drums
 - a. Drums used for storing small volumes of liquids (such as oil, chemicals or cleaning solvents) shall be inspected on a regular basis, and
 - b. Any storage area shall be protected from spills using items referenced in II.D. 2.
2. Totes – capa District of 300 gallons or more
 - a. Totes used for storing liquids shall be inspected on a regular basis, and
 - b. Totes with values used in everyday operations shall have a means of secondary containment that holds a minimum of the volume of the tote plus 15 %.
3. Bulk storage either inside or outside plant, i.e. tank farms.
 - a. All bulk storage installations should be constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus 15 % in all locations, plus additional freeboard to allow for precipitation if the tank is outside.
 - b. Above ground tanks should be subject to periodic integrity testing using such techniques as hydro-static testing, or a system of non-destruction shell thickness testing.

- c. Underground storage tanks should be protected from corrosion, and pressure tested on a regular basis.
- d. Consider the following control measures and tank check points;
 - High liquid level alarms with an audible or visual signal at a constantly manned operation or high liquid level pump cutoff device set to stop flow at a predetermined level. Liquid level sensing devices should be regularly tested to ensure proper operation,
 - Overflow equalizing lines between tanks should be considered. This makes it possible to overflow to adjacent tankage, if needed,
 - There should be adequate vacuum protection to prevent tank collapse during a pipeline run, and
 - Leaks which result from tank seams, gaskets, rivet and bolts should be promptly corrected.
4. Treatment, Storage, Disposal Facility (TSDF) permitted for hazardous waste. There should be no potential for discharge from a TSDF facility.

B. Material Handling

Material transfer is a primary cause of spills and slug loadings. Determine if there are open drains in the transfer area. As a first line of defense, determine if it is possible to plug any open drains during the transfer. Minimize the material handling and you will minimize the spills. Determine if equipment can be dedicated, i.e. some sites have transfer lines that are hard plumbed in lieu of hoses that need to be washed after each change in transfer chemical. While the hose washing operation may not cause a spill, it may cause a slug loading due to excess raw materials or products being washed to the sanitary sewer. Evaluate the following locations for spill and slug load impacts from material handling:

1. Loading and Unloading at Docks.
2. Loading and Unloading at Bulk Storage.

Tank car, tank truck, and truck loading/unloading procedures should meet the minimum requirements and regulations established by the Department of Transportation.

A quick drainage system should be used for tank truck loading and unloading where area drainage does not flow into a catch basin or treatment facility designed to handle spills. The containment system should be designed to hold at least the maximum capacity of any single compartment of a tank car or truck.

3. Transfer and Pumping Operations.
 - a. Buried piping installations should have a protective wrapping and coating. If a section of buried line is exposed for any reason, it should be carefully examined for deterioration.

- b. When a pipeline is not in service, or in standby service, the terminal connection at the transfer point should be capped.
 - c. Vehicular traffic granted into the facility should be warned verbally or by appropriate signs to be sure that the vehicle will not endanger above ground piping.
 - d. All valves and pipelines should be subjected to regular inspections by operating personnel. Such an inspection should include: flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and periodic pressure testing.
4. Convey waste to Pretreatment System.

Identify whether the waste discharged has dedicated sewers or lines to the pretreatment system. Evaluate the handling practice and determine if there is the potential to impact the spill or slug potential.

5. Waste handling.

Identify any liquid wastes that are not discharged to the sanitary sewer or pretreatment system that are sent off-site for treatment, burned in a fuel blending program, etc. Evaluate the handling practices and determine if they have the potential to impact the spill or slug potential.

C. Batch Discharges

Include a description of batch discharges, especially non-routine discharges since those have the greatest potential to cause upset or interference to pretreatment operations, cause slug loadings or be involved in spills because the procedures are not performed as frequently. A separate form has been attached that can be used to describe each batch discharge and assess its spill/slug load potential.

D. Spill Potential

1. Identify the spill potential to the environment. Where a best management evaluation or experience indicates a reasonable potential for equipment failure (tank overflow, rupture, leakage, etc.); problem with materials transfer; or operator error; the plan should include a prediction of the potential to discharge to the sanitary system, or storm sewers that discharge to waterways. Determine the direction that the sewers flow once any sewer leaves the site so it is clear who will be impacted next if the spill is not controlled. Assess the distance involved for a spill to reach a waterway. Next, if the spill has the potential to flow over the land off the site, an assessment should be made whether there is potential to contaminate a residential, commercial or industrial area so that appropriate planning based on site use can take place to prevent such an impact.
2. Where it has been identified that a reasonable potential exists for spills or slug loads to be discharged, the plan should address means to eliminate or minimize this

potential. Containment and/or diversionary structures or equipment to prevent discharges should be provided. Consider one or more of the following:

- Dikes, berms, or retaining walls;
- Curbing;
- Culverts, gutters, other drainage systems;
- Weirs, booms, or other barriers;
- Sumps and collection systems;
- Sorbent material; and
- Dispersant material.

III. The Plan

A. Spill/Slug Loading Control

1. Identify pollution prevention, best management practices and procedures that have been implemented to prevent or minimize the Spills at the User site from chemical storage, material handling, production or waste handling processes.
2. Identify pollution prevention, best management practices and procedures have been implemented to limit the potential for a Slug Load to be discharged from the User site.
3. Identify physical modifications or containment practices to minimize spills and slug load discharges.

B. Diagrams Required for Submittal

1. Site layout showing storage locations. A site map is required to be submitted that shows the location of the liquid containers identified in Section II A 1-5. This provision can most easily be satisfied by modifying a fire exit diagram that shows the layout of the building. Eliminate the exit routes and add the location of the containers. Use the list you developed in Section II.A. as a starting point for a map key.
2. Site layout showing direction of flow from site. The site map should include storm and sanitary sewers, site contours or directional arrows that indicate the natural drainage direction from the site per Section II D. Indicate the direction that the storm and sanitary sewers flow.

C. Signs

A notice shall be permanently posted on the User's bulletin board or other prominent place advising employees who to call in the event of an accidental discharge or slug load. Employers shall ensure that all employees are advised of the emergency notification procedure. The notice must include the appropriate User supervisory personnel to contact, and identify the District telephone numbers which are:

D. Training

Owners and operators should schedule and conduct spill/slug loading prevention meetings for their operating personnel at intervals frequent enough to assure adequate understanding of the User's Spill Plan for that facility. Such meetings should include a description of historical spill/slug loading events, typical failures or malfunctioning components, and recently developed precautionary measures. The training is required to be documented and must include a description of the meeting such as a copy of the agenda or minutes, and a log signed by the employees that were trained that includes the date of the training. At minimum, all operating employees are required to be trained annually.

E. Inspections

Inspections should be in accordance with written procedures developed for the facility by the owner or operator. These written procedures and a record of the inspections, signed by the appropriate supervisor or inspector, should be made a part of the Spill/Slug Control Prevention Program. Such records should be maintained for a minimum of three years. Examples of appropriate inspections are as follows:

- The outside of all bulk storage tanks should frequently be inspected by operating personnel for signs of deterioration, leakage or accumulation of leaked material inside the diked area, and
- Inspections of alarm systems or liquid level cut-off devices.

Include a copy of inspection documentation with your plan.

F. Notification

The Plan will identify that the notification system is in place for the following items:

1. Designated Spill Plan Manager – Each Industrial User should have a designated person who is accountable for spill/slug loading prevention and who reports to the Authorized Representative. An alternate should be assigned for the designated Spill Plan Manager to cover absences. The Spill Plan is required to include who is designated as well as 24-hour telephone numbers for these individuals.
2. Employee Assigned to Make Notification – The designated Spill Plan Manager or another person designated by the Authorized Representative will notice Agencies as required by the criteria of the event.
3. Notification Timeliness – The User shall immediately notice by telephone the District Executive Director of any discharge, including but not limited to, accidental discharges, discharges of non-routine episodic nature, a non-customary batch discharge, or a slug load, that may cause potential problems for the District. The requirements of the specifics can be found on the Spill Notification Form.
4. Agencies Contacted – The Spill Plan will include a list of agencies that will be contacted in the event of an accidental discharge or slug load. Included in this list will be names and phone numbers for (but not limited to) the Fire Department, the

District Wastewater Treatment Plant; USEPA; IEPA; and other entities as the user may identify as appropriate based on the spill potential of the facility and the required reportable threshold of a particular material for some agencies.

G. Follow-up

1. Written Report – Within 5 working days following such a discharge, the User shall, unless waived by the Wastewater Superintendent Water/Water Reclamation, submit a detailed written report describing the cause(s) of the discharge, the containment measures used to control the event and measures taken by the User to prevent similar future occurrences. The report should include the disposal method of any collected waste, including but not limited to whether the User will send waste off-site as special waste or hazardous waste, identification of the entity hauling the waste, and the location at which it is designated to remain.
2. Identify schedule events or modifications – The written report should include a schedule of remedial actions that will be made to prevent similar future occurrences. The District may identify that the User file progress reports concerning the schedule events.
3. The User shall file confirmation with the District that the waste disposal was completed as well as file a separate report that identifies the completion of schedule events.

H. Certification

The Accidental Discharge and Slug Load Control Plan shall be signed by the Authorized Representative of the facility. The certification will contain the following statement:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Baxter & Woodman, Inc. 2026

P:\DGSD1\2325513-DGSD Pretreatment Assistance\00-PCI and PT Assist\08 ERP\5 - FINAL ERP\Attachments\Attachment G - Spill-Slug Plan Evaluation - Checklist Instructions.docx

***ACCIDENTAL DISCHARGE AND SLUG LOAD CONTROL PLAN
EVALUATION CHECKLIST***

This form is used to evaluate historical impact of past events; establish what items have been or should be addressed and included in an Accidental Discharge and Slug Load Control Plan, normally referred to as a Spill Plan. A Spill Plan is required of all Significant Industrial Users and other users as determined by District's Pretreatment Ordinance Article IIA, Section 3.8.

If a section of the evaluation for your plan is not applicable – **print/type or check N/A in the section** so that it is clear that the item has been evaluated. This form should be submitted with the Spill Plan.

I. Site History for: _____
(site name & address):

A. Identify History of Spill Events at the site during the last two years.

Attach a copy of the spill report or summary for each event. Make sure your report answers all of the questions in the instructions.

B. Identify History of Slug Load Discharge Events (separate from above) at the site during the last two years.

Attach a copy of the spill report or summary for each event. You will need to be able to answer the following questions for each event:

- Was slug caused by a non-routine batch or is it an on-going problem?
- Is slug a result of highly variable production?
- Can slug be controlled through equalization?
- Did the slug cause the pretreatment system to overload?
- Did the slug interfere or upset a biological pretreatment system?
- Did the slug cause the pretreatment system to be bypassed?
- Was the slug a foreign waste that accidentally entered the pretreatment system and upset it?
- Did the slug impact the user's compliance?

II. Current Site Assessment for: _____ (site name)

A. Material Storage

Identify if each of the below storage areas exist at the site and if spill control measures are adequate. The Spill Plan should identify the location of the storage, type of storage, chemicals stored including concentration, the CAS number if established and describe the control measures.

	Spill Control Assessment		
	N/A	OK	Needs Upgrade
1. <u>Drum storage (areas with five or more 55-gallon drums).</u>	_____	_____	_____
Areas (Number.):_____			
Number of Drums:_____			
Comments: _____			

2. <u>Totes (300 gallons or more).</u>	_____	_____	_____
Areas (Number.):_____			
Number of Totes:_____			
Comments: _____			

3. <u>Bulk Storage.</u>	_____	_____	_____
Areas (Number.):_____			
Number of Tanks:_____			
Range of Sizes (gallons):_____			
Location of Bulk storage tanks:			
Inside_____ Outside above ground_____ Outside below ground_____			
Comments: _____			

4. <u>Treatment, Storage, Disposal Facility (TSDF).</u>	_____	_____	_____
Areas (No.) _____			
Number of Drums _____			
Number of Tanks _____			
Comments: _____			

II. Current Site Assessment (continued)

B. Material Handling

Define practices, procedures and site modifications made to prevent spills and slug loads in the following locations:

	Spill Control Assessment		
	N/A	OK	Needs Upgrade
1. <u>Loading at Docks.</u>	_____	_____	_____
Comments: _____			

<u>Unloading at Docks.</u>	_____	_____	_____
Comments: _____			

2. <u>Loading at Bulk Storage.</u>	_____	_____	_____
Comments: _____			

<u>Unloading at Bulk Storage.</u>	_____	_____	_____
Comments: _____			

3. <u>Transfer and Pumping Operations.</u>	_____	_____	_____
Comments: _____			

4. <u>Convey waste to Pretreatment System.</u>	_____	_____	_____
Comments: _____			

5. <u>Waste handling.</u>	_____	_____	_____
Comments: _____			

II. Current Site Assessment (continued)

C. Batch Discharges – Slug Load Potential

	Spill Control Assessment		
	N/A	OK	Needs Upgrade
1. Have separate form(s) been attached to describe each batch discharge and assess its spill/slug load potential?	_____	_____	_____
2. In addition to evaluating primarily the slug load potential of the individual batches, also evaluate these questions for the site as a whole:	_____	_____	_____
• Can your firm maintain compliance consistently? • Are non-routine batches impacting the compliance effectiveness? • Is production highly variable? • Can slugs be controlled through equalization?			
If there is pretreatment at the site:			
• Is pretreatment subject to frequent overloads? • Is biological pretreatment subject to interference or upset? • Has pretreatment been bypassed at any time? • Can foreign wastes accidentally enter the pretreatment system and upset it?			

D. Spill Potential

- Identify the spill potential to the environment. What areas are most likely to be the source of spills or slug loads? Identify the containment or diversionary structures used at each area using the following key:

A. Dikes, berms, or retaining walls;	E. Sumps and collection systems;
B. Curbing;	F. Sorbent material; and
C. Culverts, gutters, other drainage systems;	G. Dispersant material.
D. Weirs, booms, or other barriers;	

Spill/Slug Load Potential Area	Containment
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

III. The Spill/Slug Loading Plan Checklist for (site name): _____ (site name)

	Spill Control Assessment		
	N/A	YES	No
A. Spill/Slug Loading Control			
1. Have you described pollution prevention, best management practices, and procedures that have been implemented to prevent or minimize any <u>Spills</u> ?	_____	_____	_____
2. Have you described pollution prevention, best management practices, and procedures that have been implemented to limit the potential for a <u>Slug Load</u> to be discharged?	_____	_____	_____
3. Have you identified physical modifications or containment practices to minimize spills and slug load discharges?	_____	_____	_____
B. Diagrams Required to be submitted.			
1. <u>Site layout showing storage locations.</u> Have you included a site map that shows the location of the liquid containers identified in Section II A 1-5?	_____	_____	_____
2. <u>Site layout showing direction of flow from site.</u> Have you included the site map that include storm and sanitary sewers, site contours or directional arrows that indicate the natural drainage direction from the site per Section II D? Indicate the direction that the storm and sanitary sewers flow.	_____	_____	_____
C. Signs			
1. Is a notice permanently posted on the User's bulletin board or other prominent place advising employees whom to call in the event of an accidental discharge or slug load?	_____	_____	_____
D. Training			
1. Describe the frequency of spill/slug loading prevention meetings?	_____		
2. What is (or will be) the date that your firm most recently completed training?	_____		
3. Is there a log of training that is signed and dated by the employees?	_____	_____	_____

III. The Spill/Slug Loading Plan Checklist (continued)

Spill/Slug Control Plan		
N/A	YES	No

E. Inspections

- | | | | |
|--|-------|-------|-------|
| 1. Are inspections performed as a part of the Spill/Slug Control Prevention Program? | _____ | _____ | _____ |
| 2. Are the inspections signed and dated? | _____ | _____ | _____ |
| 3. If the inspections are initialed, is there a master log of initials? | _____ | _____ | _____ |
| 4. Is there a procedure to maintain inspection records for a minimum of three years? | _____ | _____ | _____ |

F. Notification

The Plan will identify that the notification system is in place for the following items:

- | | | |
|--|---------|-----------|
| 1. Who is the Designated Spill Plan Manager?
number

Title | 24-hour | telephone |
| Who is the Alternate Site Spill Plan Manager?
number

Title | 24-hour | telephone |
| 2. Who is Employee Assigned to Make Notification?
number

Title | 24-hour | telephone |
| 3. Does Notification procedure require immediate notice to the District General Manager or designee? | _____ | _____ |
| 4. Does the Spill Plan include a list of agencies that could be contacted during an Event? | _____ | _____ |
| Does the Spill Plan contain a list of chemicals that have specific Notification thresholds and the threshold amount? | _____ | _____ |

III. The Spill/Slug Loading Plan Checklist (continued)

	Spill/Slug Control Plan		
	N/A	YES	No
G. Follow-up			
1. Does the Spill Plan have a procedure for filing the Written Report within 5 working days following a discharge of a Spill or Slug Load?	_____	_____	_____
H. Certification			
1. Is the Accidental Discharge and Slug Load Control Plan signed by the Authorized Representative of the facility?	_____	_____	_____
2. Does the Spill Plan contain the certification statement?	_____	_____	_____
I. Schedule			
1. Does the Spill Plan identify a schedule of events to upgrade or modify site elements?	_____	_____	_____
2. Does the schedule define progress dates for completion of the events?	_____	_____	_____
Comments: _____			

This evaluation and checklist is not meant to be all-inclusive for each site but provides a starting point and framework for an Accidental Discharge and Slug Load Control Plan (Spill/Slug Plan).

Review of the Plan, including operating procedures, by the District shall not relieve the IU from the responsibility to modify its facility plan or Spill/Slug Plan as necessary to meet all the requirements of the District, state or Federal code. Review by the District and its designee(s) does not constitute an approval of a Spill/Slug Plan and the District and its designee(s) are not to be construed as responsible for the actions of the IU and any impact the IU may cause as a result of a spill or slug discharge.

Each IU is responsible to modify its plan as needed or when deficiencies are identified by IU, District or USEPA staff to provide adequate protection from Spills or Slug Loads.

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX H

USEPA NON-COMPLIANCE EVALUATION MEMOS

- January 21, 1992 & April 12, 1993 – Determining Industrial User Non-compliance Using Split Samples
- October 1, 1992 – Use of Grab Samples to Detect Violations of Pretreatment Standards
- May 13, 1993 – Compliance with Continuous Monitoring

Appendix F. EPA Memorandum, *Determining Industrial User Noncompliance Using Split Samples*

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
WASHINGTON, D.C. 20460**JAN 21 1992**

OFFICE OF WATER

MEMORANDUM**SUBJECT:** Determining Industrial User Compliance Using Split Samples**FROM:** Richard G. Kozlowski, Director *by Henry Hays*
Enforcement Division**TO:** Mary Jo M. Aiello, Acting Chief
Bureau of Pretreatment and Residuals

This memo is a response to your letter of September 30, 1991, where you requested written clarification regarding the use of split samples for determining industrial user (IU) compliance under the Pretreatment Program. Specifically, you requested guidance on how to use the data from split samples for determining IU compliance in situations where split samples yield different analytical results. The fundamental question posed by your inquiry is whether all analytical results must be used when evaluating the compliance status of IUs and how to use those results for determining compliance. In situations where split samples exist and both samples were properly preserved and analyzed, POTWs should evaluate compliance with applicable Pretreatment Standards in the manner described below.

When evaluating the compliance status of an industrial user, the POTW must use all samples which were obtained through appropriate sampling techniques and analyzed in accordance with the procedures established in 40 CFR Part 136¹. The Environmental Protection Agency (EPA) has consistently encouraged Publicly Owned Treatment Works (POTWs) to periodically split samples with industrial users as a method of verifying the quality of the monitoring data. When a POTW splits a sample with an IU, the POTW must use the results from each of the split samples.

A legitimate question arises, however, when a properly collected, preserved and analyzed split sample produces two different analytical results (e.g., one which indicates compliance and the other shows noncompliance, or where both indicate either compliance or noncompliance but the magnitudes are substantially different). In these instances, questions arise regarding the compliance status of the IU, and what should be done to reconcile the results.

¹ See Memorandum, "Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users," U.S. EPA, September 9, 1991.

There is inherent variation in all analytical measurements, and no two measurements of the same analyte (even when drawn from the same sample) will produce identical results. When a split sample is analyzed using appropriate methods, there is no technical basis for choosing one sample result over the other for determining the compliance status of a facility. Since this is the case for all split samples which have been properly analyzed, the POTW should average the results from the split and use the resulting average number when determining the compliance status of an IU. Using the average of the two sample results avoids the untenable situation of demonstrating compliance and noncompliance from the same sample.

If the split sample produces widely divergent results or results which are different over a long period of time, then the cause of the discrepancy between the analytical results should be reconciled. When this happens, the POTW should investigate Quality Assurance and Quality Control (QA/QC) procedures at each laboratory involved. For example, the POTW could submit a spiked sample (i.e., a sample of known concentration) to the laboratories involved (preferably blind) to determine which laboratory may be in error.

In situations where one or both of the analytical results is determined to be invalid, there are compliance and enforcement consequences. If one of the analytical results is determined to be invalid, the average value for that sample is also invalid. In this situation, the value for this sample should be the value of the sample which was not determined to be invalid (e.g., if the IU's results are determined to be invalid, the POTW should use its sample for assessing compliance, and vice versa). If both samples are determined to be invalid, the averaged result from that sample should be discarded and not used for compliance assessment purposes. In either case, the POTW must recalculate the compliance status of the IU using all remaining valid sample results.

In summary, whenever split samples are taken and both are properly preserved and analyzed, the POTW should average the results from each sample and use the averaged value for determining compliance and appropriate enforcement responses. Where the sample results are widely divergent, the POTW should instigate QA/QC measures at each of the analytical laboratories to determine the cause of the discrepancy. If one or both of the samples are invalid, the POTW must recalculate the compliance status of the IU using all valid results.

If you have any further questions regarding these questions, please feel free to call me at (202) 260-8304. The staff person familiar with these issues is Lee Okster. Lee can be reached at (202) 260-8329.

cc: Cynthia Dougherty
Regional Pretreatment Coordinators
Approved State Pretreatment Coordinators
Bill Telliard



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 12 1993

OFFICE OF
WATER

Mr. Harold R. Otis
Chairman, Split Sampling Task Force
Greater Fort Wayne Chamber of Commerce
826 Ewing Street
Fort Wayne, IN 46802-2182

Re: Using Split Samples to Determine Industrial User Compliance

Dear Mr. Otis:

In response to your letter of January 12, 1993, and your phone conversation of February 9, 1993, with Lee Okster, I am providing a further discussion of the issues surrounding the use of split samples to determine industrial user (IU) compliance with Pretreatment Standards. In your letter and your phone conversation, you requested clarification from the Environmental Protection Agency (EPA) on three issues. First, you requested a firm definition of what constitutes "widely divergent results" when comparing split sample results. Second, when a publicly owned treatment works (POTW) splits a sample with an IU, you inquired whether a POTW must use the industrial user's data to determine compliance with pretreatment standards. Finally, you requested written authorization from the EPA to incorporate the language from our existing guidance memorandum on split samples into the Rules and Regulations of the Water Control Utility for the City of Fort Wayne.

What are Widely Divergent Results?

As you are aware, the EPA issued a memorandum on January 21, 1992, entitled "Determining Industrial User Compliance Using Split Samples." The "widely divergent results" criterion established in this memo is to be used as an indication that a problem exists with the laboratory analysis. We did not include an indication of what constitutes "widely divergent" in our memorandum because the amount of "normal" analytical variability depends on the pollutant parameter being tested and the method being used to analyze the sample. With appropriate QA/QC, this "normal" analytical variability is small. In general, though, metals analyses have a smaller variation than organics analyses, but the magnitude of the variability depends on the pollutants being tested. Therefore, no hard and fast rules exist for determining what is widely divergent. This determination is left to the discretion of the local authority.

Must the POTW Use All Sample Results?

In the January, 1992, memorandum we state that "the POTW must use all samples which were obtained through appropriate sampling techniques and analyzed in accordance with the procedures established in 40 CFR Part 136." The memo further states "[w]hen a POTW splits a sample with an IU; the POTW must use the results from each of the split samples."

The POTW is required to sample the IU at least once per year to determine, independent of information supplied by the IU, the compliance status of that facility. If the POTW does not wish to be in a position of comparing its own data with the IU when it samples the IU's discharge, it is not required to split its samples with the IU. Furthermore, we do not recommend that the POTW use a split sample with the industry to satisfy its annual sampling requirement. The POTW should pull its own sample so that it has data which are truly independent of the IU's results.

The POTW also has the primary responsibility to ensure compliance by the IU with all applicable pretreatment standards and requirements. One way the POTW can satisfy its requirement to ensure compliance is to split a routine sample taken by the IU. If a POTW splits a routine sample taken by the IU, it must use the IU's data, in conjunction with its own, to determine the compliance status of the facility (assuming all of the data are sampled and analyzed appropriately). We encourage POTWs to split samples in this manner to verify the IU's data. In a similar fashion, if the POTW chooses to split its own sample with the IU, it must use all of the data to determine the compliance status of the facility (assuming all of the data are appropriately analyzed).

When the POTW splits a sample with an IU (whether it is a routine sample by the IU or an annual sample by the POTW) the POTW has the responsibility to determine whether the IU's results from the split sample are valid. Where an IU's results are different than the POTW's, the burden is on the IU to show that all preservation, chain-of-custody, and analytical and QA/QC methods were followed. If the IU cannot make this showing, then the analytical results from the IU should be discarded when determining the compliance status of the facility. If the IU establishes that it followed all appropriate procedures, then the POTW should review its own QA/QC program. If both the IU and POTW have followed appropriate procedures, and there is still a wide divergence, then follow-up sampling should be conducted. If follow-up sampling consistently shows IU noncompliance, or if the POTW is otherwise satisfied with the validity of its own results, it should proceed to follow its enforcement procedures.

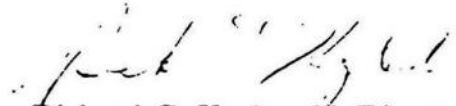
Authorization From the EPA

In regard to your final request, the City of Fort Wayne has the authority to incorporate these procedures into its Rules and Regulations without any authorization from the EPA. As long as the City has the minimum legal authorities to implement its

approved program, it has satisfied its requirements under the Federal regulations. As always, the City is encouraged to adopt the EPA's Pretreatment Guidance whenever possible.

I hope this letter responds to your questions and concerns. If you have any further questions, please feel free to call me at (202) 260-8304 or you can call Lee at (202) 260-8329.

Sincerely yours,



**Richard G. Kozlowski, Director
Water Enforcement Division
U.S. Environmental Protection Agency**

cc: Cynthia Dougherty
Regional Pretreatment Coordinators
Approved State Pretreatment Coordinators

Appendix D. EPA Memorandum, *The Use of Grab Samples to Detect Violations of Pretreatment Standards*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 1 1992

MEMORANDUM

OFFICE OF
WATER

SUBJECT: The Use of Grab Samples to Detect Violations of Pretreatment Standards

FROM: Michael B. Cook, Director *Michael B. Cook*
Office of Wastewater Enforcement & Compliance (WH-546)

Frederick F. Stiehl *Frederick F. Stiehl*
Enforcement Counsel for Water (LE-134W)

TO: Water Management Division Directors, Regions I - X
Environmental Services
Division Directors, Regions I - X
Regional Counsels, Regions I - X

The primary purpose of this Memorandum is to provide guidance on the propriety of using single grab samples for periodic compliance monitoring to determine whether a violation of Pretreatment Standards has occurred. More specifically, the Memorandum identifies those circumstances when single grab results may be used by Control Authorities, including EPA, State or publicly owned treatment works (POTW) personnel, to determine or verify an industrial user's compliance with categorical standards and local limits. Please be aware that the concepts set out below are applicable when drafting self-monitoring requirements for industrial user permits.

REGULATORY BACKGROUND

The General Pretreatment Regulations require Control Authorities to sample all significant industrial users (SIUs) at least once per year [see 40 CFR 403.8(f)(2)(v)]. In addition, the Regulations, at 40 CFR 403.12(e), (g) and (h) require, at a minimum, that all SIUs self-monitor and report on their compliance status for each pollutant regulated by a Pretreatment Standard at least twice per year unless the Control Authority chooses to conduct all monitoring in lieu of self-monitoring by its industrial users.

¹ The POTW should conduct more frequent sampling and/or require more frequent self-monitoring by an industrial user if deemed necessary to assess the industry's compliance status (e.g., a daily, weekly, monthly or quarterly frequency as appropriate).

- 2 -

The Regulations, at 40 CFR 403.12(g) and (h), also specify that pollutant sampling and analysis be performed using the procedures set forth in 40 CFR Part 136. Part 136 identifies the proper laboratory procedures to be used in analyzing industrial wastewater (including the volume of wastewater necessary to perform the tests and proper techniques to preserve the sample's integrity). However, with certain exceptions, Part 136 does not specifically designate the method to be used in obtaining samples of the wastewater. Rather, section 403.12(g) and (h) require sampling to be "appropriate" to obtain "representative" data; that is, data which represent the nature and character of the discharge.

DISCUSSION OF BASIC SAMPLING TYPES

Sampling may be conducted in two basic ways. Both types of sampling provide valid, useful information about the processes and pollutants in the wastewater being sampled. The first is an "individual grab sample." An analysis of an individual grab sample provides a measurement of pollutant concentrations in the wastewater at a particular point in time. For example, a single grab sample might be used for a batch discharge which only occurs for a brief period (e.g., an hour or less). Such samples are typically collected² manually but are sometimes obtained using a mechanical sampler.

The second type of sample is a "composite sample." Composite samples are best conceptualized as a series of grab samples which, taken together, measure the quality of the wastewater over a specified period of time (e.g., an operating day). Monitoring data may be composited on either a flow or time basis. A flow-proportional composite is collected after the passage of a defined volume of the discharge (e.g., once every 2,000 gallons). Alternatively, a flow-proportional composite may be obtained by adjusting the size of the aliquots to correspond to the size of the flow. A time-proportional composite is collected after the passage of a defined period of time (e.g., once every two hours).

Generally, composite samples are collected using a mechanical sampler, but may also be obtained through a series of manual grab samples taken at intervals which correspond to the wastewater flow or time of the facility's operations. In some cases, composite data is obtained by combining grab samples prior

² Mechanical samplers may not be used to sample for certain pollutants (e.g., those which could adhere to the sampler tubing, volatilize in the sampler, or pollutants with short holding times).

- 3 -

to transmittal to a laboratory. At other times, the samples remain discrete and are either combined by the laboratory prior to testing or are analyzed separately (and³ mathematically averaged to derive a daily maximum value).

DETERMINING APPROPRIATE COMPLIANCE SAMPLING METHODS

EPA policy on appropriate compliance sampling types has been articulated in several pretreatment guidance manuals and regulatory preambles, and continues to be as follows:

A. Compliance With Categorical Standards

- Most effluent limits established by categorical standards are imposed on a maximum daily-average and a monthly-average bases. Generally, wastewater samples taken to determine compliance with these limits should be collected using composite methods.
- There are exceptions to the general rule. Composite samples are inappropriate for certain characteristic pollutants (i.e., pH and temperature) since the composite alters the characteristic being measured. Therefore, analysis of these pollutants should be based on individual grab samples. Alternatively, continuous monitoring devices may be used for measuring compliance with pH and temperature limits. Any exceedance recorded by a continuous monitoring device is a violation of the standard.
- Sampling wastewater from electroplating facilities regulated under 40 CFR Part 413 may be conducted using single grab samples [(assuming that the grab samples are representative of the daily discharge for a particular facility); see also preamble discussion at 44 Fed. Reg. 52609, September 7, 1979]
- A series of grab samples may be needed to obtain appropriate composite data for some parameters due to the nature of the pollutant being sampled. Examples of this situation include:

³ Daily maximum discharge limits are controls on the average wastewater strength over the course of the operating day. They are not intended to be instantaneous limits applied at any single point during that operating day.

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- Sampling for parameters which may be altered in concentration by compositing or storage. These pollutants include pH-sensitive compounds (i.e., total phenols, ammonia, cyanides, sulfides);⁴ and volatile organics such as purgeable halocarbons, purgeable aromatics, acrolein, and acrylonitrile.
- Sampling for pollutants with short holding times such as hexavalent chromium and residual chlorine; and
- Sampling for pollutants which may adhere to the sample container or tubing such as fats, oil and grease. Individual analysis for these parameters ensures that all the material in the sample is accounted for.

B. Compliance With Local Limits

- Local limits may be established on an instantaneous, daily, weekly or monthly-average basis. The sample type used to determine compliance with local limits should be linked to the duration of the pollutant limit being applied.
- Compliance with instantaneous limits should be established using individual grab samples. Exceedances identified by composite sampling are also violations.
- Compliance with daily, weekly or monthly average limits should be determined using composited sampling data, with the same exceptions noted in A, above.
- Measurements of wastewater strength for non-pretreatment purposes (e.g., surcharging) may be conducted in a manner prescribed by the POTW.

GRAB SAMPLING AS A SUBSTITUTE FOR COMPOSITE SAMPLING

EPA is aware that a number of Control Authorities currently rely on a single grab sample to determine compliance, particularly at small industrial users, as a way of holding down monitoring costs. It is EPA's experience that the process activities and wastewater treatment at many industrial facilities may not be sufficiently steady-state as to allow for routine use

⁴ Certain pH-sensitive compounds can be automatically composited without losses if the collected sample is only to be analyzed for a single parameter. Additionally, a series of grab samples may be manually composited if appropriate procedures are followed.

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of single grab results as a substitute for composite results. Therefore, the Agency expects composited data to be used in most cases. However, there are several circumstances when a single grab sample may be properly substituted for a single composite sample. These situations are:

- Sampling a batch or other similar short term discharge, the duration of which only allows for a single grab sample to be taken;
- Sampling a facility where a statistical relationship can be established from previous grab and composite monitoring data obtained over the same long-term period of time;⁵ and
- Where the industrial user, in its self-monitoring report, certifies that the individual grab sample is representative of its daily operation.

Except for these circumstances, Control Authorities should continue to use composite methods for their compliance sampling.

GRAB SAMPLES AS A COMPLIANCE SCREENING TOOL

Control Authorities may consider using grab samples as a compliance screening tool once a body of composite data (e.g., Control Authority and self-monitoring samples obtained over a year's time), shows consistent compliance. However, in the event single grab samples suggest noncompliance, the Control Authority

⁵ Grab sampling may provide results that are similar to composite sampling. See for example, a March 2, 1989, Office of Water Regulations and Standards (OWRS) Memorandum to Region IX describing the results of a statistical analysis of sampling data from a single industrial facility. These sampling data included both individual grab and flow-proportional, composite sampling obtained during different, non-overlapping time periods. After reviewing the data, OWRS concluded that the composite and grab sample data sets displayed similar patterns of violation for lead, copper, and total metals. In fact, the analyses did not find any statistically significant difference in the concentration values measured between the grab and composited data. Furthermore, additional statistical tests of the two data sets indicated that the means and variances for each pollutant were similar. The statistical conclusion was that the plant was judged to be out of compliance regardless of what data were analyzed.

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and/or the industrial user should resample using composite techniques on the industrial user's effluent until consistent compliance is again demonstrated.

Control Authorities may also rely on single grab samples, or a series of grab samples for identifying and tracking slug loads/spills since these "single event" violations are not tied to a discharger's performance over time.

Any time an SIU's sample (either grab or composite) shows noncompliance, the General Pretreatment Regulations, at 40 CFR 403.12(g)(2), require that the SIU notify the Control Authority within twenty four (24) hours of becoming aware of the violation and resample within 30 days. Furthermore, EPA encourages Control Authorities to conduct or require more intensive sampling in order to thoroughly document the extent of the violation(s). Of course, the use of grab samples should be reconsidered in the event the SIU changes its process or treatment.

SUMMARY

The collection and analysis of sampling data is the foundation of EPA's compliance and enforcement programs. In order for these programs to be successful, wastewater samples must be properly collected, preserved and analyzed. Although the Federal standards and self-monitoring requirements are independently enforceable, Control Authorities should specify, in individual control mechanisms for industrial users, the sampling collection techniques to be used by the industry. Generally, pretreatment sampling should be conducted using composite methods wherever possible, to determine compliance with daily, weekly or monthly average limits since this sampling technique most closely reflects the average quality of the wastewater as it is discharged to the publicly owned treatment works. Grab samples should be used to determine compliance with instantaneous limits. There are circumstances when discrete grab samples are also an appropriate, cost effective means of screening compliance with daily, weekly and monthly pretreatment standards.

⁶ Where grab samples are used as a screening tool only (i.e., consistent compliance has been demonstrated by composite data), the results should not be used in the POTW's calculation of significant noncompliance (SNC).

⁷ When POTWs choose to allow the SIU to collect single grab samples, the POTW should draft the SIU's individual control mechanism to clearly indicate that grab samples are to be obtained thereby preventing any uncertainty at a later date.

- 7 -

In summary, there are limited situations in which single grab sample data may be used in lieu of composite data. Assuming adequate quality control measures are observed, analyses of these grab samples can indicate noncompliance with Federal, State and Local Pretreatment Standards and can form the basis of a successful enforcement action. Grab sampling can also be useful in quantifying batches, spills, and slug loads which may have an impact on the publicly owned treatment works, its receiving stream and sludge quality.

Should you have any further comments or questions regarding this matter, please have your staff contact Mark Charles of OWEC at (202) 260-8319, or David Hindin of OE at (202) 260-8547.

cc: Frank M. Covington, NEIC
Thomas O'Farrell, OST
Regional and State Pretreatment Coordinators
Lead Regional Pretreatment Attorneys, Regions I - X
Approved POTW Pretreatment Programs

Appendix H. EPA Memorandum, *Compliance with Continuous Monitoring*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 13 1993

OFFICE OF
WATER

Mary Jo M. Aiello, Chief
Bureau of Pretreatment and Residuals
Wastewater Facilities Regulation Program (CN 029)
New Jersey Department of Environmental
Protection and Energy
Trenton, NJ 08625-0029

Dear Ms. Aiello:

Thank you for your letter of January 25, 1993, to Jeffrey Lape of my staff regarding the New Jersey Department of Environmental Protection and Energy's (the Department) proposed policy on waivers from pH limits applicable to industrial discharges to Publicly Owned Treatment Works (POTWs). Subject to the qualifications stated below, your proposed policy is consistent with the federal regulations.

Your letter relates to the application of 40 CFR 401.17, which allows facilities that employ continuous pH monitoring to exceed certain pH limits one percent of the time. Your letter correctly notes that 40 CFR 401.17 applies only to discharges to surface waters, but inquires whether an analogous policy could be applied to discharges to POTWs.

We believe an analogous policy could be applied to discharges to POTWs, subject to several restrictions. First, the federal pretreatment regulations contain a specific prohibition against discharges with a pH below 5.0, from which no waivers are allowed unless the treatment works is specifically designed to accommodate such discharges (40 CFR 403.5(b)(2)). Your letter correctly acknowledges that, except for such specifically designed treatment works, waivers below this minimum limit would not be consistent with federal regulations. Second, although federal pretreatment regulations do not include an upper pH limit applicable to all discharges, some categorical pretreatment standards do so. Waivers from the requirements of those categorical standards would not be allowed unless expressly permitted by the standards themselves.

Third, a POTW may not grant a waiver from a local limit if such waiver would cause pass through or interference. Since local limits are based on considerations at each POTW, it would not be appropriate to institute a waiver of local limits that applies statewide regardless of conditions at individual POTWs.

-2-

So long as POTWs act consistently with their obligations not to allow pass through or interference, however, they might implement waivers that apply either more or less frequently than the 1% you propose. Of course, if it wishes, the State could cap all waivers at 1% and thereby be more stringent than Federal law, which requires no cap.

We note that, if a POTW wishes to provide waivers from pH limits that are technically-based and are part of the POTW's Approved Pretreatment Program, the POTW will have to modify its Approved Pretreatment Program accordingly. The Department should consider for each POTW whether the adoption of this policy is a "change to local limits, which result in less stringent local limits" and therefore requires a formal modification under 40 CFR 403.18(c)(1)(ii), or whether it constitutes a clarification of the POTW's existing local limits.

I hope that this response addresses your concerns. If you have any questions or would like to discuss this further, please call me at (202) 260-5850 or Louis Eby at (202) 260-2991.

Sincerely,


Cynthia C. Dougherty, Director
Permits Division

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX I

ENFORCEMENT RESPONSE GUIDE AND TIMEFRAMES

<u>ENFORCEMENT RESPONSE GUIDE</u>			
GM = General Manager			
DLC = District Legal Counsel or designee			
<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>REPORTING - UNAUTHORIZED DISCHARGES</u>			
Discharge without a Permit	IU unaware of requirement; no harm to POTW/environment	Phone call/Email warning	GM
		NOV with application form	GM
		Late Fee	GM
	IU unaware of requirement; results in harm to POTW/environment	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Injunctive Relief	GM / DLC
	Failure to apply after notice by POTW	NOV	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC
Non-permitted discharge - Failure to Re-new	IU has not renewed discharge permit within 10 calendar days	Phone call/Email warning	GM
		NOV	GM
	IU has not renewed discharge permit within 45 calendar days of due date.	SNC status triggered at 45 days for Annual Publication	GM
		Civil Penalty	GM
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC
<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>OTHER REPORTS</u>			
Failure to conduct self-monitoring and to submit periodic reports by due date	Isolated occurrence	Phone call/Email warning	GM
		NOV	GM
	Repeated occurrence, 45 or more calendar days past due date, or failure to self-monitor and submit periodic reports, failure to comply with NOV	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		SNC status triggered at 45 days for Annual Publication	GM
Certification and/or signature	Report is improperly signed or certified, Isolated occurrence	Phone call/Email warning	GM
		NOV	GM
	Repeated occurrence to properly sign report or certify, failure to comply with NOV	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM

<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
OTHER REPORTS			
Timeliness	Report is late, Isolated occurrence or not significant Repeated occurrence of late report or significant (e.g., report 45 calendar days or more late) or no reports at all	Phone call/Email warning	GM
		NOV	GM
		NOV	GM
		SNC status triggered at 45 days for Annual Publication	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
Modifications & Changes	Failure to report changed discharge (no harm to POTW/environment)	Phone call/Email warning	GM
		NOV	GM
		NOV	GM
	Failure to report changed discharge (results in harm)	Pre-Enforcement Conference	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Injunctive Relief	GM / DLC
	Repeated failure to report changed discharge	NOV	GM
		Show Cause Order	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Cease & Desist	GM / DLC
		Injunctive Relief	GM / DLC
Failure to Report Violation	Failure to report violation within 24-hour	NOV	GM
		Pre-Enforcement Conference	GM
		Consent Order	GM
	Repeated failure to report violation	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
Falsification	Falsification	Pre-Enforcement Conference	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Cease & Desist	GM
		Termination of Discharge	GM / DLC
		Civil Prosecution	GM / DLC
		Referral for Criminal Prosecution	GM / DLC

<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
MONITORING AND SAMPLING			
Failure to monitor correctly	Failure to monitor all pollutants as required by permit	Phone call/Email warning	GM
		NOV	GM
	Recurring failure to monitor	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
Improper sampling	Evidence of intent	NOV	GM
		Cease & Desist	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Penalty	GM
		Termination of Discharge	GM / DLC
		Civil Prosecution	GM / DLC
		Referral for Criminal Prosecution	GM / DLC
Failure to install monitoring equipment	Delay of less than 45 days	NOV	GM
	Delay of 45 days or more	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
	Recurring, violation of ADLCinistrative Order	Civil Penalty	GM
		Show Cause Order	GM
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC
		Civil Prosecution	GM / DLC
Compliance Schedules	Missed milestone by less than 45 days, or will not affect final milestone	NOV	GM
		Pre-Enforcement Conference	GM
		Consent Order	GM
	Missed milestone by more than 45 days, or will affect final milestone (good cause for delay)	NOV	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		SNC status triggered at 45 days for Annual Publication	GM
	Missed milestone by more than 90 days, or will affect final milestone (no good cause for delay)	NOV	GM
		SNC status triggered at 45 days for Annual Publication	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Termination of Discharge	GM / DLC
	Recurring violation of schedule or violation of schedule in ADLCinistrative Order	NOV	GM
		Civil Penalty	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC

<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>DISCHARGE LIMIT VIOLATIONS</u>			
Exceedance of Local or Federal Standard (permit limit)	Isolated, not significant	Phone call/Email warning	GM
		NOV	GM
	Isolated, significant (no harm to POTW/environment)	Phone call/Email warning	GM
		NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	
		Show Cause Order	GM
		Isolated (results in harm to POTW/environment)	Phone call/Email warning
	NOV		GM
	Cost Recovery		GM
	Civil Penalty		GM
	ADLCinistrative Order		GM
	Show Cause Order		GM
	Injunctive Relief		GM / DLC
	Recurring, chronic (no harm to POTW/environment)		NOV
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM / DLC
		Recurring; chronic, significant (results in harm to POTW/environment)	NOV
	Cost Recovery		GM
	Civil Penalty		GM
	ADLCinistrative Order		GM
	Show Cause Order		GM
	Cease & Desist		GM
	Civil Prosecution		GM / DLC
	Injunctive Relief		GM / DLC
	Termination of Discharge		GM / DLC
<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>VIOLATIONS LIKELY DETERMINED DURING SITE VISITS BUT NOT LIMITED TO</u>			
Entry Denial	Entry denied or consent withdrawn	Obtain warrant and return to IU	GM
		NOV	GM
	Copies of records denied	NOV	GM
		ADLCinistrative Order	GM
		Civil Penalty	GM
Illegal Discharge	No harm to POTW/environment	NOV	GM
		Civil Penalty	GM
	Discharges causes harm to POTW/environment or evidence of intent/negligence	Cost Recovery	GM
		Civil Penalty	GM
		Show Cause Order	GM
		Civil Prosecution	GM / DLC
		Cease & Desist	GM / DLC
		Injunctive Relief	GM / DLC
		Termination of Discharge	GM / DLC
		Referral for Criminal Prosecution	GM / DLC
	Recurring, violation of ADLCinistrative Order	Civil Penalty	GM
		Show Cause Order	GM
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC

<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>VIOLATIONS DETERMINED DURING SITE VISITS</u>			
Improper Sampling - Incorrect location; Incorrect sample type; or Incorrect sample collection techniques	Isolated Occurrence Improper Sampling	NOV	GM
		Pre-Enforcement Conference	GM
	Recurring Improper sampling	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
Inadequate recording keeping	Inspector finds files incomplete to missing (no evidence of intent)	NOV	GM
		Pre-Enforcement Conference	GM
	Recurring	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
Failure to report additional monitoring	Inspector finds additional files	NOV	GM
		Pre-Enforcement Conference	GM
	Recurring	NOV	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
Waste streams are diluted in lieu of treatment	Initial violation	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		Show Cause Order	GM
		ADLCinistrative Order	GM
	Recurring	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Show Cause Order	GM
		ADLCinistrative Order	GM
		Cease & Desist	GM / DLC
		Termination of Discharge	GM / DLC
Failure to mitigate noncompliance or halt production	No harm to POTW/environment	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
	Results in harm to POTW/environment	NOV	GM
		Cost Recovery	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM / DLC

<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>VIOLATIONS DETERMINED DURING SITE VISITS</u>			
Failure to properly operate and maintain pretreatment facility	No harm to POTW/environment	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		Consent Order	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
	Results in harm to POTW/environment	NOV	GM
		Pre-Enforcement Conference	GM
		Cost Recovery	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM / DLC
<u>NON-COMPLIANCE</u>	<u>CIRCUMSTANCES</u>	<u>ENFORCEMENT RESPONSES</u>	<u>PERSONNEL</u>
<u>SPILLS AND OTHER VIOLATIONS</u>			
Failure to notify of spill slug load, bypass, or pretreatment malfunction	No known interference, pass through, or threat to human safety	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
	Known interference, pass through, or threat to human safety	NOV	GM
		Pre-Enforcement Conference	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Cease & Desist	GM / DLC
		Injunctive Relief	GM / DLC
		Civil Prosecution	GM / DLC
		Termination of Discharge	GM / DLC
Reported spill, slug load, bypass	Isolated without known interference or pass through	Phone call/Email warning	GM
		NOV	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM / DLC
	Isolated with known interference or pass through	NOV	GM
		Pre-Enforcement Conference	GM
		Cost Recovery	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM / DLC
	Recurring with known interference pass through or threat of human safety	NOV	GM
		Cost Recovery	GM
		Civil Penalty	GM
		ADLCinistrative Order	GM
		Show Cause Order	GM
		Injunctive Relief	GM
		Civil Prosecution	GM

TIME-FRAMES FOR RESPONSES

The time frames for responses identified below are general in nature and may be altered at the discretion of the District with consideration of such factors as holidays, vacations, etc. Specific notation of exceptions may be found for each individual mechanism in the tables above. When those exceptions have been noted, the time frame identified will be followed rather than this more general time frame for response.

- A. District sampling data of the SIU will be screened within 24 working hours of receipt from the contract laboratory and an informal notification made to the SIU by telephone or email.
- B. Initial enforcement actions (involving contact with the User and requesting information on corrective or preventive action(s)) will occur within 30 calendar days of violation detection but no later than 60 calendar days. Initial enforcement actions include but are not limited to: pretreatment review meeting, issuance of NOV, semi-annual report violations, and citations for reports that continue to be received late.
- C. Follow-up actions for continuing or reoccurring violations will occur within 60 calendar days of the initial enforcement response. Follow-up actions could include the issuance of compliance agreements, show cause orders, and compliance orders.
- D. Follow-up actions for missing pretreatment compliance schedule milestones by 90 calendar days will be taken normally within 30 calendar days but no later than 60 calendar days.
- E. Follow-up actions for recurring SNC status for specific analyses will include confirmation of SNC status, followed by an evaluation for the need to issue an enforceable order. If an order will be issued, it will be done normally within 30 calendar days but no later than 60 calendar days of the confirmation of SNC status.
- F. Violations which threaten health, property or environmental quality are considered emergencies and will receive immediate responses such as halting the discharge or terminating the service.

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX J

**ENFORCEMENT TRACKING LOG TEMPLATE – NOTICE OF
VIOLATIONS**

***Downers Grove Sanitary District
NOV Tracking***

Attachment J

[illegible]

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX K

USEPA SIGNIFICANT NON-COMPLIANCE MEMOS

- September 9, 1991 – Application and Use of the Regulatory Definition of Significant Non-compliance for Industrial Users
- January 17, 1992 – Determining Industrial User Significant Non-compliance, One Page Summary

Appendix G. EPA Memorandum, *Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 9 1991

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users

FROM: Michael B. Cook, Director *Michael B. Cook*
Office of Wastewater Enforcement and Compliance

TO: Water Management Division Directors, Regions I-X
Approved Pretreatment State Coordinators

Background:

On July 24, 1990, the Agency replaced the definition of "significant violation" with the definition of "significant noncompliance" (SNC) [see 40 CFR 403.8(f)(2)(vii) and 55 Fed. Reg. 30082]. This change eliminated the inconsistencies which arose in applying the significant violation criteria and established more parity in tracking violations committed by industrial users. The definition of SNC parallels the Pretreatment Compliance Monitoring and Enforcement Guidance (PCME) definition of SNC published in 1986.

This memorandum responds to several questions from States, publicly owned treatment works (POTWs), and industry regarding the application of the SNC definition. One frequently asked question is whether the time frame for determining SNC for technical review criteria effluent violations is a static six month period (i.e., a fixed six month calendar interval) or a rolling six month time frame (i.e., the current day minus six months). POTWs and industry have also inquired whether all data must be used to calculate SNC. The following discussion is provided to promote consistency in the application of this definition. Regions, States and POTWs should determine SNC in the manner prescribed below.

Pretreatment POTWs are required to notify the public of significant industrial users which meet the definition of SNC through publication in the newspaper. The POTW should also use the SNC criteria as the basis for reporting an industrial user's compliance status to the Approval Authority in its Pretreatment Performance Report. According to 40 CFR 403.12(i)(2), the POTW must report on the compliance status of its industrial user universe at the frequency specified by the State or EPA National Pollution Discharge Elimination System (NPDES) permit, but in no case less than once per year. Finally, the definition of SNC is used to determine whether a formal enforcement action against a user is warranted in accordance with the POTW's Enforcement Response Plan (ERP).

Applying the Definition: Use of the Six Month Time Frame:

There are seven criteria set forth in §403.8(f)(2)(vii). Two of these criteria concern violations evaluated over a six month time frame. The Agency intends for Control Authorities to evaluate these criteria on a rolling basis. The EPA's long established practice in the NPDES program is to evaluate SNC for direct dischargers each quarter using data from the previous six months. Similarly, Control Authorities should determine SNC for their universe of industrial users on the same rolling quarters basis using fixed quarters established by the Control Authority to correspond to its "pretreatment year" (e.g., March 31, June 30, September 30 and December 31).

At the end of each quarter, POTWs and States are to evaluate their industrial user's compliance status using the two criteria of the SNC definition which are evaluated on a six month time frame (i.e., the "A" and "B" criteria under the regulatory definition). Under this system, each industrial user is evaluated for SNC four times during the year, and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year through the end of the current year). When the POTW is required to publish, it must list in the newspaper all industrial users which have been identified as SNC during the previous year (i.e., the SNC criteria were met during any of the previous four quarters).

If a facility has been determined to be in SNC based solely on violations which occurred in the first quarter of the 15 month evaluation period (i.e., the last quarter of the previous pretreatment year) and the facility has demonstrated consistent compliance in the subsequent four quarters, then the POTW is not required to republish the Industrial User (IU) in the newspaper if the IU was published in the previous year for the same violations.

Use of Industrial User and POTW Data in Determining SNC:

Several POTWs have inquired whether all data, including Control Authority sampling and industrial user self-monitoring, must be used in determining SNC. This question arises from the concern that an industrial user may choose to conduct its sampling efforts at times in which it knows that it is in compliance (e.g., during early morning start-up or during periods in which the industrial process is down). The concern is that use of these unrepresentative data will allow the industry to craft its compliance status such that it will never be in SNC.

The regulation defining SNC clearly requires that all measurements taken in the appropriate six month period must be used to determine a facility's SNC status. Therefore, any and all samples obtained through appropriate sampling techniques which have been analyzed in accordance with the procedures established in 40 CFR Part 136 must be used to determine whether the facility is in SNC.

The General Pretreatment Regulations further state that periodic compliance reports must be based on data obtained through appropriate sampling and analysis, and the data must be representative of conditions occurring during the reporting period [403.8(f)(1)(iv)]

3

and 403.12(g)(3)]. The Control Authority must require that frequency and scope of industrial user self-monitoring necessary to assess and assure compliance by industrial users with applicable pretreatment standards and requirements.

The nature and scope of the sampling undertaken by an industrial user is under the control of the Control Authority through the issuance of an industrial user permit. These permits should specify the sampling locations and sample collection method necessary to ensure that representative samples are obtained for all regulated waste streams. By requiring industrial users to obtain representative samples, the Control Authority will ensure that industrial users do not evade noncompliance through selective sampling of their industrial processes.

Conclusion:

The Control Authority is required to screen all compliance data, whether generated through industrial user self-monitoring or by the Control Authority, to identify any violations of pretreatment requirements. Whenever there is a violation, the Control Authority must take appropriate enforcement action, as defined in its ERP. After this initial enforcement response, the Control Authority should closely track the industrial user's progress toward compliance by increasing the frequency of user self-monitoring, increasing the POTW's monitoring, or both.

When follow-up activity indicates that the violations persist or that satisfactory progress toward compliance is not being made, the Control Authority is required to escalate its enforcement response in accordance with the procedures established in its ERP. **At a minimum EPA expects POTWs to address SNC with an enforceable order that requires a return to compliance by a specific deadline.** When this enforceable order involves a compliance schedule, the industrial user remains in SNC during the period of the schedule (unless the facility returns to compliance prior to the end of the schedule). For example, if the duration of the schedule is two years, the facility should be published in both years. Of course, the POTW should explain in its publication that the violations have been addressed with a formal enforcement action (similar to a "resolved pending" listing on the Quarterly Noncompliance Report).

The definition of SNC provides a benchmark against which the compliance status of an industrial user and the enforcement activities of POTWs can be measured. The concept of significant noncompliance plays a pivotal role in the implementation and enforcement of the National Pretreatment Program. In order for the definition to succeed, it is critical that each Control Authority apply it on a consistent basis. If you have any further questions on this issue, please feel free to call me at (202) 260-5850. The staff person familiar with these issues is Lee Okster at (202) 260-8329.

cc: Cynthia Dougherty
Regional Water Compliance Branch Chiefs
Regional Pretreatment Coordinators
Lead Regional Pretreatment Attorneys



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 17 1992

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Determining Industrial User Significant Noncompliance - One Page Summary

FROM: Mark D. Charles, Chief *Mark D. Charles*
RCRA and Pretreatment Enforcement Section

TO: Regional Pretreatment Coordinators, Regions I-X

During a recent Pretreatment Coordinator's conference call with Headquarters pretreatment staff, a suggestion was made to prepare a one page visual summary of how to determine Significant Noncompliance (SNC) for Industrial Users (IUs). This request was made in response to the Agency's policy memorandum explaining the correct procedure for applying the SNC definition to IUs. As a result of that request, we have prepared such a visual summary and are now making it available for distribution to your Approved States and POTWs.

The summary presents a chronological example of the steps which a Control Authority should follow when evaluating the compliance status of an industrial user vis-a-vis the SNC definition. The example assumes a "Pretreatment Year" (or "Year") equal to the calendar year and brackets the "Year" with heavy black lines to separate it from the previous and subsequent "Years."

The example illustrates the rolling quarters concept by presenting the six month evaluation periods for SNC determination as coupled quarters. For the purpose of the attached example, the end of each relevant quarter (i.e., the date on which the SNC determination should be made) is March 30th, June 30th, September 30th, and December 31st. As outlined in the policy memorandum, the POTW must publish all IUs which were identified in SNC during the "Year," unless the IU was previously published for violations which occurred solely in the last quarter of the previous "Year."

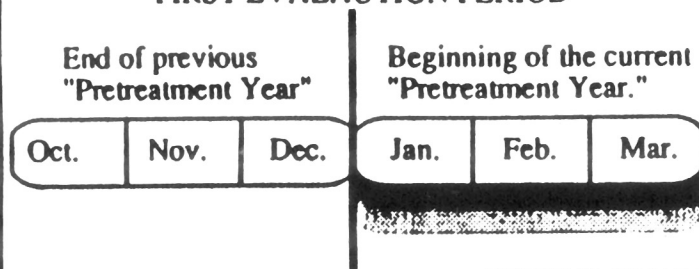
If you have any questions regarding this summary or the application of the definition in general, please feel free to call Lee Okster or my staff at (FTS) 260-8329.

cc: Jeff Lape

Determination of Industrial User (IU) Significant Noncompliance (SNC)

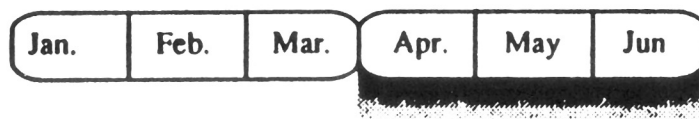
1. The POTW (in conjunction with the Approval Authority) must establish its "Pretreatment Year."
2. At the end of each quarter, POTWs and States should evaluate their IU's compliance status for the two criteria which are evaluated on a six month time frame (i.e., the "A" and "B" criteria - 403.8(f)(2)(vii)(A) and (B)) as illustrated below. The example below assumes a "Pretreatment Year" equal to the calendar year.

FIRST EVALUATION PERIOD



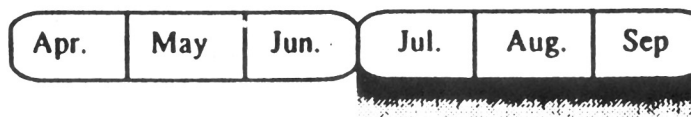
3. At the end of the first quarter (March 30th in our example), the POTW must evaluate the data from an industrial user for the previous six months (e.g., beginning with October 1 of the previous "Pretreatment Year" as in our example). Likewise, the POTW must evaluate six months of data at the end of each subsequent quarter (e.g., June 30th, September 30th, and December 31st).

SECOND EVALUATION PERIOD

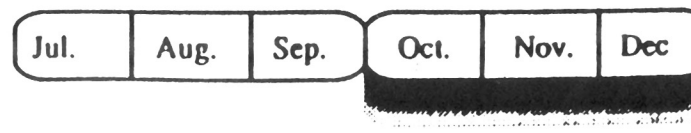


4. At the end of the "Pretreatment Year," the POTW must summarize the compliance status of its industrial users over the reporting period and report on this compliance status to the Approval Authority. The POTW must publish all industrial users which were identified in SNC during the "Pretreatment Year," unless the IU was previously published for violations which occurred solely in the last quarter of the previous "Year."

THIRD EVALUATION PERIOD



FOURTH EVALUATION PERIOD



**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX L

NOTICE OF VIOLATION (NOV) TEMPLATE

Reporting NOV – Substantial Change – With Fine

Board of Trustees
Amy E. Sejnost
President
Jeremy M. Wang
Vice President
Mark Eddington, P.E.
Clerk



General Manager
Amy R. Underwood, P.E.

Legal Counsel
Daniel McCormick, P.C.

2710 Curtiss Street
Downers Grove, IL 60515-07-03
Phone: 630-969-0827
Fax: 630-969-0827
www.dgsd.org

Providing a Better Environment for South Central DuPage County

*****NOTICE OF VIOLATION*****

Certified Mail/Email Return Receipt Requested XXXX XXXX XXXX XXXX XXXX XX

(Date)

(Authorized Representative)

(Company Name)

(Company Address)

Downers Grove, Illinois 60515

(Authorized Representative),

For Daily Maximum Data Violations:

A **(composite/grab)** sample collected **(date)** at **(time)**, during the **(frequency)** sampling event, produced a value of **(result)** mg/L for **(pollutant)**. This value exceeds your permitted **(local/categorical limit daily maximum)** concentration of **(limit)** mg/L. This is a violation of **(Company Name)**'s Wastewater Discharge Permit Part **(X)**.

For Monthly Average Violations:

(Composite/grab) samples collected **(date)** by **(Company Name)** and Downers Grove Sanitary District (DGSD), during the **(frequency)** sampling event, produced an average value of **(average result)** mg/L for **(pollutant)**. This **(average result)** mg/L average was compiled from **(number)** sample from **(Company Name)** **(result)** mg/L) and **(number)** sample collected by DGSD **(result)** mg/L) during the month of **(month)**. This value exceeds your permitted categorical monthly average concentration of **(limit)** mg/L. This is a violation of **(Company Name)**'s Wastewater Discharge Permit Part **(X)**.

Keep - Standard Language

Wastewater Discharge Permit Part Section **D (3)(b)** requires an automatic resample to be taken and submitted to DGSD within 30 calendar days of becoming aware of the original

violation. Please complete this resampling after investigating and improving the current processes to limit **(pollutant)** discharge.

You must respond in writing within 10 business days as to the cause of these **(pollutant)** violations and the specific steps taken to prevent a recurrence.

If you have any questions regarding these violations, please contact Reese Berry at (630) 969-0664.

Sincerely,

DOWNERS GROVE SANITARY DISTRICT

Amy R. Underwood
District General Manager

Board of Trustees
Amy E. Sejnost
President
Jeremy M. Wang
Vice President
Mark Eddington, P.E.
Clerk



General Manager
Amy R. Underwood, P.E.

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Providing a Better Environment for South Central DuPage County

*****REPORTING NOTICE OF VIOLATION*****

(CHOOSE THE VIOLATION TYPE BELOW)

24 HOUR VIOLATION NOTICE

FAILURE TO REPORT AUTHORIZED REPRESENTATIVE CHANGE

FAILURE TO SUBMIT REPORT

FAILURE TO SUBMIT NOV RESPONSE

FAILURE TO NOTIFY OF PRETREATMENT OPERATING UPSET

FAILURE TO PROVIDE WRITTEN REPORT OF PRETREATMENT OPERATING UPSET

FAILURE TO NOTIFY (SPILL/SLUG DISCHARGE)

FAILURE TO NOTIFY SUBSTANTIAL CHANGE

Certified Mail/Email Return Receipt Requested XXXX XXXX XXXX XXXX XXXX XX

(Date)

(Authorized Representative)

(Company Name)

(Company Address)

Downers Grove, Illinois 60515

(Authorized Representative),

Failure to Provide 24 Hour Violation Notice

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to inform the DGSD that a (daily/monthly) (add pollutant) violation had occurred within 24 hours of becoming aware of the violation as required in Part (add permit reference) of your Wastewater Discharge Permit. The violation was from a (composite/grab) sample dated (add date) that was analyzed on behalf of your firm by (add lab name). The data report was dated (add date). Thus, your firm was required to notice the DGSD of the violation no later than (add date). The data was submitted with the Self-Monitoring Report received by the DGSD on (add date).

Failure to Report Authorized Representative Change

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to notify the DGSD of the change in authorized representative for your facility within 30 days of the change as outlined in Part (add permit reference) of your permit.

Failure to Submit Report

This notice is sent to inform you that you are currently in violation of your Wastewater Discharge Permit issued by the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to submit the required (Self-Monitoring Report/Accidental Discharge Slug Control Plan/or other) for the (add month/quarter) of (add year) which was due on (add date). The DGSD received your facility's (Self-Monitoring Report/Accidental Discharge Slug Control Plan/or other) on (add date).

Failure to Submit NOV Response

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to submit the required response to the (add violation reference) violation issued (add date) within 10 working days of receipt of the notice. Your firm received the violation notice on (add date) and the response was due on (add date). The DGSD received your written response on (add date).

Failure to Notify of Pretreatment Operating Upset

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. (Add date and description of pretreatment upset that occurred) Your firm failed to inform the DGSD of this pretreatment operating upset within 24 hours of becoming aware of the issue. A follow up written description was due within 5 working days of becoming aware of the pretreatment operating upset. This notification and report is required in Part (add permit reference) of your Wastewater Discharge Permit. This caused non-complying wastewater to be discharged from your firm to the DGSD's Wastewater Treatment Center over (add number of days) day period. *[last sentence is optional – only include if true]*

[OPTIONAL] A reporting NOV is being issued consistent with the provisions of the Enforcement Response Plan approved by USEPA. A citation is enclosed due to the seriousness of the reporting violations. Continued violations of permit requirements will result in additional Citations being issued. Separate NOV's will be issued for the (add pollutant) violations. *[last sentence is optional – only include if true]*

Failure to Notify of Spill/Slug Load

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to immediately inform the DGSD that a (spill/slug discharge) had occurred on (add date) as required in Part (add permit reference) of your Wastewater

Discharge Permit. Your firm also failed to submit a detailed written report to the DGSD within 5 working days of the (spill/slugs discharge). The DGSD was notified of the (spill/slugs discharge) on (add date).

Failure to Notify of Substantial Change

This letter is to inform you that you are currently in violation of your Wastewater Discharge Permit with the Downers Grove Sanitary District (DGSD) for not meeting reporting requirements. Your firm failed to notify the DGSD of the (add description of change) within 30 calendar days of the change which is a substantial change in operation.

Standard Language (Keep)

You **must** submit in writing to the DGSD within 10 working days the reason the notification for the violation was not submitted and what corrective actions will be taken towards this violation.

Submission of the letter in no way relieves you of liability for any violation occurring before or after receipt of the Notice of Violation.

Send written response to:

DGSD Staff Name
Title
Address Line 1
Address Line 2

Sincerely,

DOWNERS GROVE SANITARY DISTRICT

Amy R. Underwood
District General Manager

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX M

USPEA SHOW CAUSE ORDER TEMPLATE

EXAMPLE SHOW CAUSE ORDER

IN THE MATTER OF	*	ADMINISTRATIVE
[NAME OF INDUSTRY]	*	SHOW CAUSE ORDER
ADDRESS	*	
	*	
	*	

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the General Manager under Article IIA, Section 9.4 of the District's Pretreatment Ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Article IIA, Section 5 of the District's Sewer Use Ordinance.

FINDINGS

1. *[Industry] discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the Downers Grove Sanitary District] (hereafter, "District").*
2. *[Industry] is a "significant industrial user" as defined by Article IIA, Section 2.2 of the District's Sewer Use Ordinance.*
3. *[Industry] was issued a wastewater discharge permit on _____, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.*
4. *Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [Industry].*
5. *This data shows that [Industry] has violated its wastewater discharge permit in the following manner:*
 - a. *[Industry] has violated its permit limit for ____ in each sample collected between ____ and ____ for a total of __ separate violations of the permit.*
 - b. *[Industry] has failed to submit a periodic compliance report due _____.*
 - c. *All of these violations satisfy the District's definition of significant violation.*

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, **[INDUSTRY]** IS HEREBY ORDERED TO:

1. *Appear at a meeting with the General Manager to be held on ____, 20__ at ____ at ____.*
2. *At this meeting, **[Industry]** must demonstrate why the District should not pursue a judicial enforcement action against **[Industry]** at this time.*
3. *This meeting will be closed to the public.*
4. *Representatives of **[Industry]** may be accompanied by legal counsel if they so choose.*
5. *Failure to comply with this order shall also constitute a further violation of the Sewer Use Ordinance and may subject **[Industry]** to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.*
6. *This order, entered this __ day of __, 20__, shall be effective upon receipt by **[Industry]**.*

Signed: _____

[Name]

General Manager

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX N

USEPA ADMINISTRATIVE ORDER TEMPLATE

EXAMPLE ADMINISTRATIVE ORDER

IN THE MATTER OF	*	ADMINISTRATIVE
[NAME OF INDUSTRY]	*	ORDER
ADDRESS	*	
	*	
	*	

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the General Manager, under Article IIA, Section 9.2(D) of the District's Pretreatment Ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Article IIA, Section 5 of the District's Sewer Use Ordinance.

FINDINGS

1. ***[Industry]** discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the Downers Grove Sanitary District (hereafter, "District").*
2. ***[Industry]** is a "significant industrial user" as defined by Article IIA, Section 2.2 of the District's Sewer Use Ordinance.*
3. ***[Industry]** was issued a wastewater discharge permit on _____, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.*
4. *Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of **[Industry]**.*
5. *This data shows that **[Industry]** has violated its wastewater discharge permit in the following manner:*
 - a. ***[Industry]** has violated its permit limit for _____ in each sample collected between _____ and _____ for a total of _____ separate violations of the permit.*
 - b. ***[Industry]** has failed to submit a periodic compliance report due _____.*
 - c. *All of these violations satisfy the District's definition of significant violation.*

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, **[INDUSTRY]** IS HEREBY ORDERED TO:

1. *Within 180 days, install pretreatment technology which will adequately treat **[Industry's]** wastewater to a level which will comply with its wastewater discharge permit.*
2. *Within 5 days, submit all periodic compliance reports due since _____.*
3. *Within 10 days, pay to the Downers Grove Sanitary District, a fine of \$_____ for the above-described violations in accordance with Section ___ of the Pretreatment Ordinance.*
4. *Report, on a monthly basis, the wastewater quality and the corresponding flow and production information as described on page __ of the wastewater discharge permit for a period of one year from the effective date of this order.*
5. *All reports and notices required by this order shall be sent, in writing, to the following address:*

*Downers Grove Sanitary District
Attn: _____
Pretreatment/Lab Supervisor
2710 Curtiss Street
P.O. Box 1412
Downers Grove, Illinois 60515-0703
[Email address]*

6. *This order does not constitute a waiver of the wastewater discharge permit which remains in full force and effect. The District reserves the right to seek any and all remedies available to it under Section ___ of the Sewer Use Ordinance for any violation cited by this order.*
7. *Failure to comply with the requirements of this order shall constitute a further violation of the Sewer Use Ordinance and may subject **[Industry]** to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.*
8. *This order, entered this ___ day of ___, 20___, shall be effective upon receipt by **[Industry]**.*

Signed: _____

[Name]

General Manager

**DOWNERS GROVE SANITARY DISTRICT
ENFORCEMENT RESPONSE PLAN**

APPENDIX O

USEPA CEASE AND DESIST ORDER TEMPLATE

EXAMPLE CEASE AND DESIST ORDER

IN THE MATTER OF	*	
[NAME OF INDUSTRY]	*	CEASE AND DESIST ORDER
ADDRESS	*	
	*	
	*	

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the General Manager under Article IIA, Section 9.2(G) of the District's Sewer Use Ordinance. This order is based on findings of violation of the conditions of the wastewater discharge permit issued under Article IIA, Section 5 of the District's Sewer Use Ordinance.

FINDINGS

1. *[Industry] discharges nondomestic wastewater containing pollutants into the sanitary sewer system of the Downers Grove Sanitary District (hereafter, "District").*
2. *[Industry] is a "significant industrial user" as defined by Article IIA, Section 2.2 of the District's Sewer Use Ordinance.*
3. *[Industry] was issued a wastewater discharge permit on _____, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer.*
4. *Pursuant to the ordinance and the above-referenced permit, data is routinely collected or submitted on the compliance status of [Industry].*
5. *This data shows that [Industry] has violated its wastewater discharge permit in the following manner:*
 - a. *[Industry] has violated its permit limit for _____ in each sample collected between _____ and _____ for a total of _____ separate violations of the permit.*
 - b. *[Industry] has also failed to comply with an administrative compliance order requiring the installation of a pretreatment system and the achievement of compliance with its permit limits by _____, 20__.*
 - c. *[Industry] has failed to appear at a show cause hearing pursuant to an order requiring said attendance.*

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, **[INDUSTRY]** IS HEREBY ORDERED TO:

1. *Within 24 hours of receiving this order, cease all nondomestic discharges into the District's sanitary sewer. Such discharges shall not recommence until such time as **[Industry]** is able to demonstrate that it will comply with its current permit limits.*
2. *Failure to comply with this order may subject **[Industry]** to having its connection to the sanitary sewer sealed by the District and assessed the costs therefor.*
3. *Failure to comply with the requirements of this order shall also constitute a further violation of the Pretreatment Ordinance and may subject **[Industry]** to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.*
4. *This order, entered this ___ day of ___, 20___, shall be effective upon receipt by **[Industry]**.*

Signed: _____

[Name]

General Manager



REGION 5

CHICAGO, IL 60604

October 14, 2026

Amy Underwood, P.E., General Manager
Downers Grove Sanitary District
2710 Curtiss Street
Downers Grove, IL, 60515
aunderwood@dgsd.org

Re: Tentative Approval of Revised Enforcement Response Plan, Downers Grove Sanitary District
Wastewater Treatment Center, Downers Grove, IL, NPDES Permit No. IL0028380

Dear Ms. Underwood:

The U.S. Environmental Protection Agency (EPA) has reviewed the Enforcement Response Plan (ERP) submitted on June 1, 2026 and the revised ERP submitted on September 22, 2026. I am pleased to inform you that in accordance with [40 C.F.R. § 403.18](#) of the General Pretreatment Regulations, the revised ERP is hereby tentatively approved.

Please be advised that EPA withholds final approval of the ERP until it is ratified by the governing body bearing administrative and legal jurisdiction over the wastewater treatment plant. Therefore, this communication should not be construed as the final approval of the ERP. Within ninety (90) days, please submit the following for EPA review and final approval: (1) a copy of the ERP as ratified, and (2) the applicable resolution(s) signed and dated.

These submittals may be emailed to R5NPDES@epa.gov and mcmorrow.karly@epa.gov. Please include District's name, NPDES number, and the word "pretreatment" in the subject line. After receiving the submittal, EPA will respond with its decision on final approval.

If you have any questions, please contact Karly McMorrow at mcmorrow.karly@epa.gov or at 312-353-3126. Thank you for your cooperation during the review process.

Sincerely,

Stephen M. Jann
Manager, Permits Branch
Water Division

cc: Jennifer R. Sorenson (jsorensen@baxterwoodman.com)

Reese Berry (rberry@dgsd.org)

Reylin Dimayuga-McGirr (Reylin.Dimayuga-McGirr@Illinois.gov)

Board of Trustees

Amy E. Sejnost
President

Jeremy M. Wang
Vice President

Mark Eddington, P.E.
Clerk



2710 Curtiss Street
Downers Grove, IL 60515-0703
Phone: 630-969-0664
Fax: 630-969-0827
www.dgsd.org

General Manager
Amy R. Underwood, P.E.

Legal Counsel
Daniel McCormick, PC

Providing a Better Environment for South Central DuPage County

MEMORANDUM

To: Board of Trustees

From: Amy R. Underwood, General Manager

Date: October 16, 2026

Subject: Investment Strategy

As requested at the September 22 Board meeting, staff provided the District's current investment policy via email to the Board for your information. Trustee Eddington responded requesting that review of the District's investment strategy be added to the agenda for the October 20 Board meeting.

To assist with this review, the following documents are attached:

1. October 13, 2026, Memo from Treasurer Carly Shaw re: Investment Strategy and Long-Term Investment Discussion
2. Downers Grove Sanitary District Investment Policy
3. Downers Grove Sanitary District Fund Balance/Net Assets Policy
4. August 18, 2026, Memo from Treasurer Carly Shaw re: Investment Options

The last three documents are provided for information. I expect the discussion at Board meeting to focus on the content of the first document.

C: BOLI, CS, DM

DOWNERS GROVE SANITARY DISTRICT

MEMO

To: Board of Trustees

From: Carly Shaw

Treasurer

Date: October 13, 2026

Re: Investment Strategy and Long-Term Investment Discussion

General Manager Amy Underwood reviewed the District's financial position and the projected fund balances based on our 5-Year Financial Plan to determine how much of the District's cash reserves are available for longer term investments. Under the District's Fund Balance/Net Asset Policy, the General Fund must maintain an unrestricted fund balance equal to 25% of annual operating expenditure. For the purposes of this analysis, that reserve requirement has been rounded up to \$3 million for each of the next five fiscal years. As this is viewed as emergency funds, staff recommend investing it in short-term investments.

In addition, the District needs to maintain approximately \$1.5 million in available cash to meet monthly operating expenses and claim ordinance payments. Actual cash requirements will fluctuate from month to month; however, \$1.5 million has been used as a reasonable estimate based on anticipated monthly expenditures.

The following table summarizes the projected year-end fund balances, anticipated bond payments for facility plan projects, and the amount reserved for operating liquidity and the District's fund balance policy. The resulting balances represent the minimum estimated funds available for longer-term investments. This summary is intended to provide that amount as if the user rates and monthly fees were frozen at the FY 26-27 rates for FY 27-28 through FY 30-31. If the District decides to increase rates, the funds available for long-term investments should be greater.

	FY 26-27	FY 27-28	FY 28-29	FY 29-30	FY 30-31
	Budget	Projected	Projected	Projected	Projected
Ending Fund Balance	12,771,211.00	12,828,711.00	13,851,811.00	15,162,011.00	16,751,311.00
Potential Bond Payment	0.00	0.00	2,276,350.00	4,552,700.00	7,689,000.00
Resulting Ending Fund Balance	12,771,211.00	12,828,711.00	11,575,461.00	10,609,311.00	9,062,311.00
Imprest (Monthly Cash Flow)	1,500,000.00	1,500,000.00	1,500,000.00	1,500,000.00	1,500,000.00
25% O&M Total	3,000,000.00	3,000,000.00	3,000,000.00	3,000,000.00	3,000,000.00
Long Term Investments	8,271,211.00	8,328,711.00	7,075,461.00	6,109,311.00	4,562,311.00

Of the \$8.2 million indicated on the table, \$4.2 million is already invested with Schwab in CDs and Treasuries. For fiscal year 2026-27, I recommend investing the remaining \$4 million in longer-term investments. Of this amount, \$820,000 consists of designated funds within the General Corporate Fund associated with the replacement fund established in 1991 when the District constructed its sand filters. This designation was a stipulation of the IEPA loan for that project. We recommend evaluating these funds separately and investing them in a long-term instrument with anticipated maturity of five years as there are no requirements on the length of the investments in the Sanitary District Act of 1917 or the Public Funds Investment Act. Government Finance Officers Association (GFOA), however, does recommend not going above a 5-year term unless the funds are tied to a specific cash flow need.

The remaining \$3.18 million could be invested in a CD and Treasury ladder with staggering maturities ranging from two to four years. This approach would allow the District to earn interest over a longer period while scheduling maturities to help meet anticipated facility plan financing and repayment needs.

Using Schwab's Treasury and CD ladder building tool, I have prepared potential investment scenarios for the \$3.18 million and separate scenarios for the \$820,000. The attached analysis uses the instruments and rates available as of October 13, 2026. Rates, yields, and available instrument options may change with market conditions and will be reconfirmed before purchases are made.

This proposal does favor US Treasuries over CD's because treasuries generally provide greater flexibility when funds are needed before maturity. They can be sold on the secondary market, although the sale price may be higher or lower than the original purchase price. In addition, finding competitive, non-callable CDs at institutions where the District does not already have deposits can be challenging. For CDs we are limited to the FDIC insured amount of \$250,000 per financial institution.

I recommend retaining the \$4.5 million in Illinois Funds to provide readily accessible cash for monthly expenses and the District's operating reserves. As the District's auditor stated in the September meeting, Illinois Funds is a good option for investing given the security of the account. In my previous memo from August 18, I had shared that it is quite diverse in investments. The rate as of the date of this memo is 3.995%. We could also evaluate whether a portion or all the \$3 million operating expenditure reserve could be invested in Treasury securities with appropriate maturities based upon Board's recommendation.

In addition, it is my recommendation that we develop a long-term investment portfolio consisting of the \$3.18 million available in staggered treasuries and CDs and invest the \$820,000 designated balance in longer-term options with maturities out 5 years.

The funds which this memo focuses on are the minimum funds the District has available to invest. The investment schedule in the October Board packet indicates the District has

approximately \$18,600,000 currently in cash and investments. This is much greater than the ending fund balance projected on April 30, 2027, as shown above. Of the difference, \$4.6 million is currently invested in Illinois Funds and are funds that are expected to be spent down on design and construction of capital improvements projects. The Butterfield Lift Station project has been paused temporarily while it is reevaluated, and design of the projects proposed in the facility plan is on hold pending completion of the regionalization study. At the time staff begin preparing the budget, the status of these projects should be known and where these additional funds are invested will be reviewed.

This memo is for discussion purposes only and for staff to receive the Board's feedback on this recommendation or to provide a recommendation of their own.

C: BOLI, ARU, DM

\$2,430,000 - 4 Year Treasury Ladder

10/13/2026

Principal Cost	\$2,421,240	Accrued Interest	\$3,401.88	Total Par Value	\$2,430,000						
Average Coupon %	4.70%	Average Maturity	3.0 Years	Average Price	99.64						
Average APY/YTM	4.82%	Annual Cash Flow	\$114,412.50	Est. Interest Earnings at Maturity	\$333,871.88						
CUSIP	Description	Quantity	Type	Estimated Annual Income	Estimated Cost	Coupon	Coupon Frequency	Maturity	Price	APY/YTM	Years
91282CJA0	US Treasury	810	Treasury	\$37,462.50	\$807,957.07	4.63%	Semi-annually	9/30/2028	99.74779	4.76%	2
91282CKG5	US Treasury	810	Treasury	\$39,487.50	\$810,750.01	4.88%	Semi-annually	10/15/2029	100.0926	4.84%	3
91282CRQ6	US Treasury	810	Treasury	\$37,462.50	\$802,532.81	4.63%	Semi-annually	9/30/2030	99.07813	4.88%	3.75

Notes: Accrued interest is only paid on instruments purchased between coupon payouts. This is paid at time of purchase but received back on the next coupon payment date.

\$750,000 - 3 Year CD Ladder

10/13/2026

Principal Cost	\$750,000	Accrued Interest	--	Total Par Value	\$750,000						
Average Coupon %	4.95%	Average Maturity	2.4 Years	Average Price	100						
Average APY/YTM	4.95%	Annual Cash Flow	\$37,125.00	Est. Interest Earnings at Maturity	\$86,875.00						
CUSIP	Description	Quantity	Type	Estimated Annual Income	Estimated Cost	Coupon	Coupon Frequency	Maturity	Price	APY/YTM	Years
02007QGV7	Ally Bank PA	250	CD	\$12,250.00	\$250,000.00	4.9	Semi-annually	10/23/2028	100	4.9	2
06051YJX9	Bank of America, Ntn NC	250	CD	\$12,250.00	\$250,000.00	4.9	Semi-annually	10/23/2028	100	4.9	2
856288JR7	State Bank of India NY	250	CD	\$12,625.00	\$250,000.00	5.05	Semi-annually	10/19/2029	100	5.05	3

\$820,000 - CD/Treasury Options

Principal Cost	\$819,365	Accrued Interest	--	Total Par Value	\$820,000						
Average Coupon %	5.12%	Average Maturity	5 Years	Average Price	99.948						
Average APY/YTM	5.13%	Annual Cash Flow	\$41,717.50	Est. Interest Earnings at Maturity	\$208,587.50						
CUSIP	Description	Quantity	Type	Estimated Annual Income	Estimated Cost	Coupon	Coupon Frequency	Maturity	Price	APY/YTM	Years
61778E2N0	Morgan Stanley Bank UT	205	CD	\$10,660.00	\$205,000.00	5.2	Semi-annually	10/21/2031	100	5.2	5
14042RYY1	Captial One Ntnl	205	CD	\$10,557.50	\$205,000.00	5.15	Semi-annually	10/21/2031	100	5.15	5
91282CRN3	US Treasury	410	Treasury	\$20,500.00	\$410,000.00	5	Semi-annually	9/30/2031	99.845	5.035	5

Grand Totals:	
Total Par Value	\$4,000,000
Total Annual Cash Flow	\$193,255.00
Est. Interest Earnings at Maturity	\$629,334.38

INVESTMENT POLICY

This Investment Policy was established by Ordinance No. 99-04, approved November 16, 1999, and subsequently amended by Ordinance No. 00-05 approved October 25, 2000, Ordinance No. 00-07 approved December 19, 2000, Ordinance No. 04-05 approved August 17, 2004, and Ordinance No. 11-03 approved July 12, 2011.

Section 1. Scope

This policy applies to the investment of all current, future or temporary funds under the jurisdiction of the Downers Grove Sanitary District.

Section 2. Safety, Liquidity, Diversification and Return on Investments

The primary objectives of investments shall be safety of principal, liquidity of funds, and return on investments. Safety of principal is the foremost objective of the investment program. The investments shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated and to provide sufficient liquidity to pay obligations as they come due. The investments will be diversified by security type and institution to avoid unreasonable risks. The investments shall be determined taking into account the projected rate of return and liquidity needs. Investments shall not be redeemed prior to maturity except when the liquidity needs of the District require that the investment be redeemed.

Section 3. Authorized Investments

The investments authorized for inclusion in the District's investment portfolio shall be United States Treasury Bills, United States Treasury Notes, and the Illinois Funds Money Market Account. Authorized investments may also include certificates of deposit issued by a bank, savings bank or savings and loan association which is insured by the Federal Deposit Insurance Corporation and which complies with the requirements of the Public Funds Investment Act, in an amount not in excess of the federally insured amount, including certificates of deposit placed through the Certificate of Deposit Account Registry Service (CDARS) if the CDARS investment is made at or through a bank or thrift located in Illinois or the placement of funds in interest bearing savings accounts, or interest bearing time deposits or money market accounts with any bank, as defined by the Illinois Banking Act listed at 205 ILCS 5, and which investment is insured by the Federal Deposit Insurance Corporation and which complies with the requirements of the Public Funds Investment Act, in an amount not in excess of the federally insured amount. Other investments as authorized by the Public Funds Investment Act and listed at 30 ILCS 235/2 may be included with approval by the Board of Trustees prior to purchase.

Section 4. Prudence

The standard of care that must be maintained for the investment of District funds is the "prudent person rule" which provides that investments should be made with the judgement and care, under circumstances then prevailing, that persons of prudence, discretion, and intelligence

exercise in the management of their own affairs, not for speculation but for investment, considering the probable safety of their capital as well as the probable income to be derived from the investment.

Section 5. Collateral Requirements

Collateral agreements shall be required for the deposit of District funds in a financial institution whenever all District funds in such financial institution exceed the insurance provided by the Federal Deposit Insurance Corporation rules and regulations. Such collateral agreements shall be approved by the District Board of Trustees.

Section 6. Identification of Chief Investment Officer

Authority to manage the investment program is granted to the Treasurer who shall be the chief investment officer.

Section 7. Internal Controls and Operational Procedures

The Treasurer shall be responsible for all transactions and shall establish a system of controls of the activities of all subordinates who are directly involved in the assistance of such investment activities. Such system of controls shall be designed to prevent losses of funds that might arise from fraud, employee error, misrepresentation by third parties, or imprudent actions by District employees.

Section 8. Performance Measures

The investment portfolio shall be compared on a regular basis to appropriate benchmarks, such as The Illinois Funds Money Market Account.

Section 9. Periodic Review and Written Report of Investment Activities

The Treasurer shall periodically review, at least monthly, the investment portfolio, its effectiveness in meeting the District's needs for safety, liquidity, rate of return and diversification, and its general performance. A written report of investment activities shall be provided at least quarterly for submission to the District Board of Trustees. The report shall include information regarding securities in the portfolio by class or type, book value, rate of return, and market value as of the report date.

Section 10. Selection of Investment Advisors, Money Managers and Financial Institutions

The Treasurer shall determine the need for investment advisors, money managers and financial institutions and recommend such investment advisors, money managers and financial institutions to the Board of Trustees. Approval by the Board of Trustees shall be required.

Section 11. Ethics and Conflicts of Interest

District officers and employees involved in the investment process shall refrain from any personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Officers and employees shall disclose any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Officers and employees shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the District.

DOWNERS GROVE SANITARY DISTRICT
FUND BALANCE/NET ASSETS POLICY
August 16, 2016

Purpose

A Fund Balance/Net Assets Policy establishes a minimum level at which the projected end-of-year fund balance/net assets must observe; as a result of the constraints imposed upon the resources reported by the governmental and proprietary funds. This policy is established to provide financial stability, cash flow for operations, and the assurance that the District will be able to respond to emergencies with fiscal strength. More detailed fund balance financial reporting and the increased disclosures will aid the user of the financial statements in understanding the availability of resources.

It is the District's philosophy to support long-term financial strategies, where fiscal sustainability is its first priority, while also building funds for future growth. It is essential to maintain adequate levels of funds balance/net assets to mitigate current and future risks and to ensure tax rates. Fund balance/net asset levels are also crucial consideration in long-term financial planning. Credit rating agencies carefully monitor levels of fund balance/net assets and unassigned fund balance in the General Fund to evaluate the District's continued creditworthiness.

Definitions

Governmental Funds

The fund balance will be composed of three primary categories:

- 1) Nonspendable Fund Balance – portion of a Governmental Fund's fund balance that are not available to be spent, either in the short-term or long-term, or through legal restrictions (e.g., inventories, prepaid items, land held for resale and endowments).
- 2) Restricted Fund Balance – portion of a Governmental Fund's fund balance that are subject to external enforceable legal restrictions (e.g., grantor, contributor and property tax levies).
- 3) Unrestricted Fund Balance – is made up of three components:
 - A) Committed Fund Balance – the portion of a Governmental Fund's fund balance with self-imposed constraints or limitations that have been placed at the highest level of decision making through formal Board action. The same action is required to remove the commitment of fund balance.
 - B) Assigned Fund Balance – the portion of a Governmental Fund's fund balance to denote an intended use of resources but with no formal Board action.
 - C) Unassigned Fund Balance – available expendable financial resources in a governmental fund that is not the object of tentative management plan.

Some funds are funded by a variety of resources, including both restricted and unrestricted (committed, assigned and unassigned). The District assumes that the order of spending fund balance is as follows: restricted, committed, assigned, unassigned.

Authority

Governmental Funds

Committed Fund Balance – A self-imposed constraint on spending the fund balance must be approved by ordinance or resolution of the Board. Any modifications or removal of the self-imposed constraint must use the same action used to commit the fund balance. Formal action to commit fund balance must occur before the end of the fiscal year. The dollar amount of the commitment can be determined after year end.

Assigned Fund Balance – A self-imposed constraint on spending the fund balance based on the District's intent to use fund balance for a specific purpose. The authority may be delegated to members of the management team by the Board.

Minimum Unrestricted Fund Balance Levels

Governmental Funds

General Fund

Purpose – Is a major fund and the general operating fund of the District. It is used to account for all activities that are accounted for in another fund.

Fund Balance – Unrestricted fund balance targets should represent 25% of annual operating expenditures. Year-end balances above or below the target are considered when establishing subsequent adjustments in revenue rates.

Special Revenue Fund

Purpose - Used to account for and report the proceeds of specific revenue sources that are legally restricted or committed to expenditures for specified purposes other than debt service or capital projects.

Financing – Special revenue funds are provided by a specific restricted and/or committed revenue source. Financing may also be received from other charges for services, interest income, etc.

Fund Balance – Derived from a restricted revenue source; therefore, legally restricted. The remaining fund balance will be adjusted annually with the adoption of the annual budget and is targeted to meet potential future needs.

Debt Service Fund

Purpose – Established to account for financial resources that are restricted, committed, or assigned to expenditure for principal and interest.

Financing – The municipality levies an amount or transfers in an amount close to the principal and interest that is anticipated to be paid.

Fund Balance –Derived from property taxes; therefore, legally restricted. Any fund balance accumulation should be targeted as a maximum of the amount of the next principal and interest payment due.

Minimum Unrestricted Fund Balance Levels - Continued

Capital Projects Fund

Purpose - Established to account for and report financial resources that are restricted, committed, or assigned to expenditure for capital outlays including the acquisition or construction of capital facilities and other capital assets, excluding those types of capital related outflows financed by special revenue funds.

Financing – Specific charges, debt financing, grants, interest income or interfund transfers are used to finance projects.

Fund Balance – Considered segregated for construction and land acquisition; therefore, considered committed, restricted, or assigned depending on the intended source/use of the funds. The remaining fund balance will be adjusted annually with the adoption of the annual budget and is targeted to meet potential future needs identified in the 5-year plan.

Other Considerations

In establishing the above policies for unrestricted fund balance/net asset levels, the District considered the following factors:

- The predictability of the District's revenues and the volatility of its expenditures (i.e., higher levels of unrestricted fund balance may be needed if significant revenue sources are subject to unpredictable fluctuations or if operating expenditures are highly volatile)
- The District's perceived exposure to significant one-time outlays (e.g., disasters, immediate capital needs, state budget cuts)
- The potential drain upon General Fund resources from other funds as well as the availability of resources in other funds (i.e., deficits in other funds may require a higher level of unrestricted fund balance be maintained in the General Fund, just as, the availability of resources in other funds may reduce the amount of unrestricted fund balance needed in the General Fund)
- Liquidity (i.e., a disparity between when financial resources actually become available to make payments and the average maturity of related liabilities may require that a higher level of resources be maintained)
- Commitments and assignments (i.e., governments may wish to maintain higher levels of unrestricted fund balance to compensate for any portion of unrestricted fund balance already committed or assigned by the government for a specific purpose)

If any of the above factors change, the District should readdress current unrestricted fund balance/net asset levels to ensure amounts are appropriate.

DOWNERS GROVE SANITARY DISTRICT

MEMO

To: Board of Trustees

From: Carly Shaw

Administrative Supervisor

Date: August 18, 2026

Re: Investment Options for District Funds - Informational

Amy Underwood recommended that I investigate short-term investment options for the funds currently held in Illinois Funds for Fund 02 and Fund 03, which are scheduled to be consolidated into Fund 01 at the end of the current fiscal year. The combined balance of these funds is approximately \$4 million. The current average interest rate at Illinois Funds is 3.8%. I have reviewed short-term investment options, including Illinois Funds, U.S. Treasury securities, and Certificates of Deposit (CDs), to determine whether investing the \$4 million in another instrument could provide a meaningful increase in interest earnings.

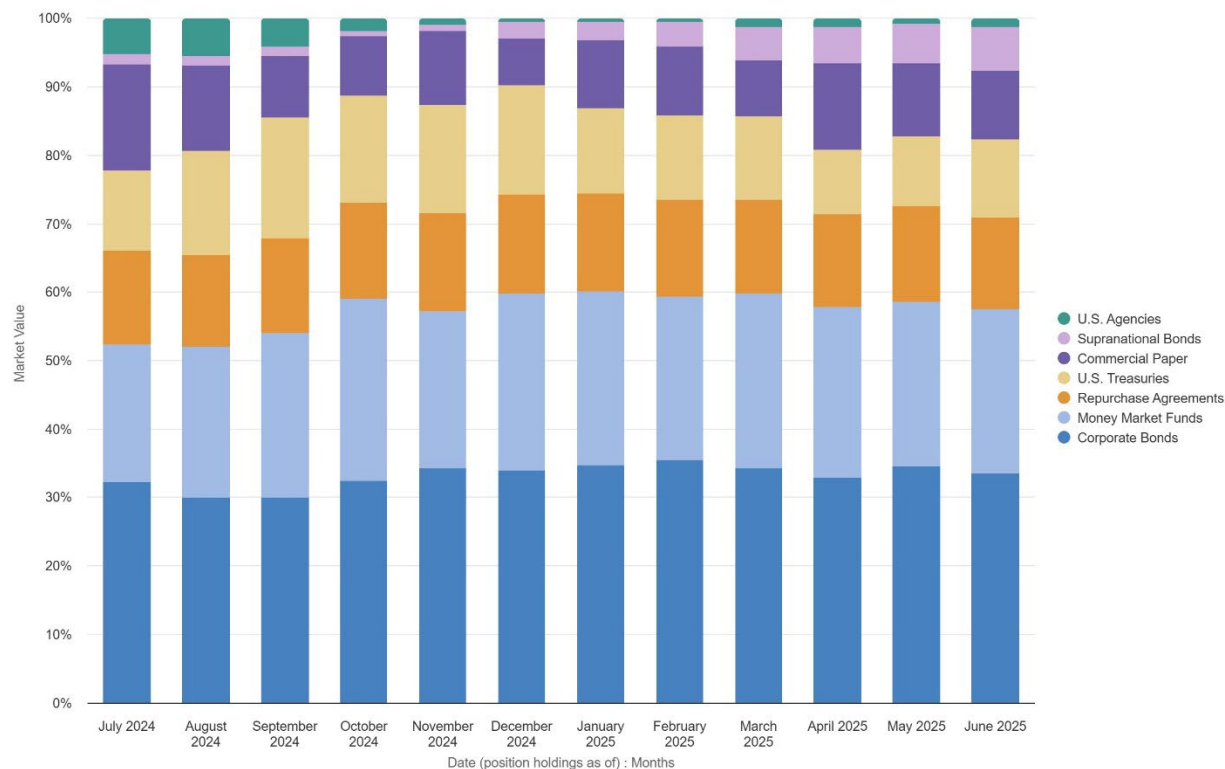
Using the current Illinois Funds interest rate and the interest rates currently reported by Schwab for Treasury securities and CDs, I have calculated the estimated interest earnings on \$4 million invested for 3-, 6-, and 9-month terms. These terms were considered because the timing of future facility plan expenditures and the Butterfield Lift Station replacement is not yet certain, and maintaining access to the funds is an important consideration. Attached are tables comparing the estimated interest earnings for each investment option and term. As demonstrated in the tables, there is not a significant difference in the projected interest earnings among the options. Illinois Funds also compounds interest monthly, which provides an additional benefit to the overall return.

It is important to note that the 3.8% Illinois Funds rate used in the comparison represents the average rate earned during 2026 to date and is not a fixed rate. The Illinois Funds rate fluctuates with market conditions. The rate does change daily in response to shifting money market conditions and portfolio performance but there is a lag of up to a few months to catch up to the Federal Reserve interest rate movements. Therefore, if interest rates increase during the remainder of the year, the amount earned in Illinois Funds would increase accordingly. For purposes of the 9-month comparison, I have applied a slightly higher projected rate based on the expectation that interest rates may increase by approximately 0.25% during the remainder of the year. Because of the delay in the increase to the rates in Illinois Funds, I did not account for the full possible increase which is projected by the Federal Open Market Committee.

Based on the comparison, Illinois Funds remains a strong option for both short- and longer-term investment of these funds. The primary advantages are the liquidity of the investment, the ability to access the funds quickly if needed for facility plan expenditures, and the ease of transferring funds between the District's bank account and Illinois Funds.

There is also no limit on the amount that can be transferred between the accounts at one time.

Illinois Funds also maintains a diversified investment portfolio designed to maximize interest earnings while maintaining liquidity. See below for a graph from Illinois Funds illustrating the various types of investments held within the portfolio for the Board’s review. While our investment in Illinois Funds is labeled as a “Money Market” on the District’s investment schedule, only approximately 20% of the funds are invested in Money Market funds.



For funds that are not anticipated to be needed in the near term, it makes sense to look at longer-term investment options that would allow the District to lock in current interest rates. Current rates reviewed through Schwab indicate that a 2-year Treasury security can provide a rate of approximately 4.125% without paying a premium. The highest rate identified for a 2-year CD was approximately 4.35% for a CD purchased without a premium.

One consideration with CDs is the \$250,000 FDIC insurance limit per depositor. As the District already holds several CDs through Schwab, identifying additional institutions offering competitive rates can become more challenging. In addition, purchasing CDs at the highest available rates may require paying a premium, which can reduce the overall benefit of the higher stated interest rate.

The District currently has approximately \$785,000 in reserves currently in the Schwab Money Market account earning 3.4% interest that we can invest in a CD or Treasury to take advantage of the higher rates. I anticipate that this amount may be divided between CDs and Treasury securities and will evaluate the available options at the time of purchase to determine the most advantageous allocation for maximizing interest earnings while maintaining appropriate diversification and liquidity.

In addition, the District is closing a money market account with First Financial that currently has a balance of approximately \$250,000. These funds will also be reinvested in a longer-term investment option to lock in a higher rate than it currently earns, which is 3.22%.

For funds that are not expected to be needed in the near term, I believe the District should utilize longer-term investments, such as Treasury securities and CDs, in order to take advantage of current rates and potentially lock in higher returns. I will continue to evaluate these options and make investment decisions based on the District's cash needs, available rates, and applicable investment and insurance requirements.

Short Term Investment Comparison

Compare independent rates for 3-, 6-, and 9-month terms using the same starting principal.

ASSUMPTIONS

Starting Principal \$4,000,000

3-MONTH TERM

Investment Option	Annual Rate	Interest Paid	Compounds / Year	Final Balance	Interest Earned	Difference vs Lowest
Illinois Funds Money Market	3.78% Monthly		3	\$4,037,740.78	\$37,740.78	\$173.34
Schwab Treasury	3.81% Semiannually		1	\$4,037,567.44	\$37,567.44	\$0.00
Certificate of Deposit	3.91% Semiannually		2	\$4,038,910.74	\$38,910.74	\$1,343.31

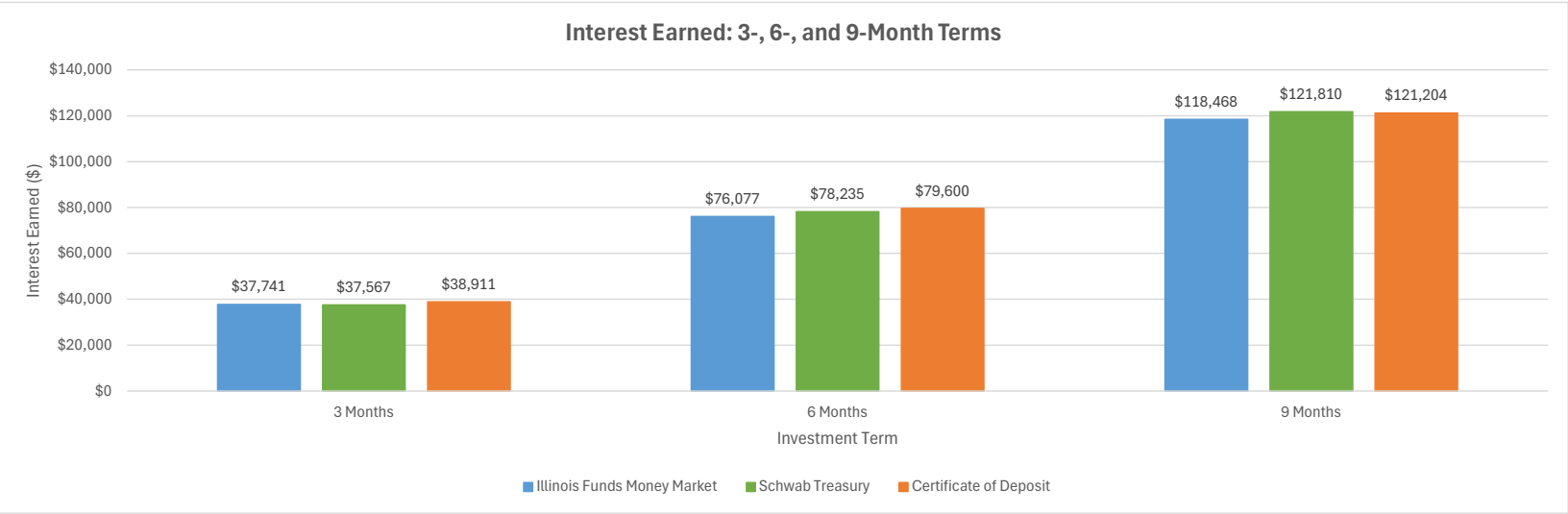
6-MONTH TERM

Investment Option	Annual Rate	Interest Paid	Compounds / Year	Final Balance	Interest Earned	Difference vs Lowest
Illinois Funds Money Market	3.78% Monthly		6	\$4,076,077.28	\$76,077.28	\$0.00
Schwab Treasury	3.95% Semiannually		1	\$4,078,234.91	\$78,234.91	\$2,157.63
Certificate of Deposit	3.98% Semiannually		2	\$4,079,600.00	\$79,600.00	\$3,522.72

9-MONTH TERM

Investment Option	Annual Rate	Interest Paid	Compounds / Year	Final Balance	Interest Earned	Difference vs Lowest
Illinois Funds Money Market	3.90% Monthly		9	\$4,118,467.67	\$118,467.67	\$0.00
Schwab Treasury	4.04% Semiannually		2	\$4,121,810.01	\$121,810.01	\$3,342.35
Certificate of Deposit	4.02% Semiannually		2	\$4,121,204.00	\$121,204.00	\$2,736.33

CHART — INTEREST EARNED ACROSS TERMS



Longer Term Investment Comparison

Compare independent rates for 2 year terms using the same starting principal.

ASSUMPTIONS

Starting Principal \$1,000,000

2 YEAR TERM

Investment Option	Annual Rate	Interest Paid	Compounds / Year	Final Balance	Interest Earned	Difference vs Lowest
Illinois Funds Money Market	3.78%	Monthly	12	\$1,078,402.93	\$78,402.93	\$0.00
Schwab Treasury	4.13%	Semiannually	2	\$1,085,087.62	\$85,087.62	\$6,684.69
Certificate of Deposit	4.35%	Semiannually	2	\$1,089,879.76	\$89,879.76	\$11,476.82

Board of Trustees

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President

Jeremy M. Wang
Vice President

Mark Eddington, P.E.
Clerk



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General Manager
Amy R. Underwood, P.E.

Legal Counsel
Daniel McCormick, PC

Providing a Better Environment for South Central DuPage County

MEMORANDUM

To: Board of Trustees

From: Amy R. Underwood, General Manager

Date: October 16, 2026

Subject: 2026 Project Assessment Payment to DRSCW

Attached please find correspondence and a survey from the DuPage River Salt Creek Workgroup (DRSCW). The survey asks when the Downers Grove Sanitary District wants to be invoiced for the current fiscal year's project assessment.

The DRSCW Nutrient Implementation Plan (NIP), which was submitted to the Illinois Environmental Protection Agency (IEPA) in December 2023, recommended foregoing implementation of the 1.0 mg/L total phosphorus (TP) limit in DGSD's and other members' current NDPES permits. The NIP recommended a lower limit to become effective in 2040 and additional stream restoration projects to be constructed by 2037. The NIP included the attached schedule for assessments to fund the projects. The project assessments were calculated based on a portion of what each treatment facility would have spent annually operating phosphorus removal facilities to meet the limit implemented at other facilities in the state.

DGSD and DRSCW have a signed agreement for collection of project assessments through 2025. DGSD required assurance from IEPA in the form of issued permit language before signing the agreement with DRSCW. Before paying the NIP proposed assessments, DGSD and DRSCW will need to sign an amendment to our existing agreement. To date, however, IEPA has not issued any permits containing the NIP recommendations. DRSCW, therefore, has not drafted the amendment with DGSD and did not include the 2026 project assessment in the 2026 dues invoice which we paid earlier in the year.

As noted in the attached email, DRSCW is trying to determine when to invoice members for the 2026 project assessments based on their budget constraints and the comfort level of their Boards/Councils in signing the agreements before IEPA issues permits with the NIP recommendations incorporated.

I recommend DGSD respond to the survey indicating that DGSD prefers to pay two project assessments in our FY 2027-28, assuming IEPA has issued permits by then. When preparing the FY2027-28 budget, I would reduce the projected FY2026-27 actual expenses by the amount of the 2026 project assessment and add it to the FY2027-28 expenses so there is no impact to our projected fund balance at the end of FY2027-28.

I have added this to the agenda for the October 20 Board meeting for Board feedback on this recommendation, in case you prefer another approach.

C: BOLI, CS, DM

From: [Nancy Cinati](#)
To: [Nancy Cinati](#)
Cc: [Stephen McCracken](#)
Subject: RSVP re: Update on NIP Special Conditions and Questions on DRSCW 2026-27 Assessments
Date: Thursday, October 15, 2026 1:56:56 PM
Attachments: [image001.png](#)
[To IEPA re DRSC permits 9-9-26.pdf](#)
[DRSCW LDRWCResponse Letter re FAGComments.10012026.pdf](#)

Dear Special Conditions Permit Holders,

Please find attached our latest exchange on the NIP (EAG Letter "to IEPA reDRSC permits 9-926.pdf" and our response "DRSCW.LDRWCResponse Letter re EAGComments.10012026"). While we are continuing to try and finalize negotiations to get the NIP Special Condition language into permits, we have had several members inquire about the situation with special assessments and agreement renewals.

To that end the Board has decided to start investigating accepting assessments as set out in the DRSCW annual budget for its FY 2026-27. This question pertains to the agencies who plan not to implement a 1 mg/L TP effluent limit in this next permit cycle and move directly to the TP implementation schedule and assessments recommended in the NIP (these agencies are shown in the non-highlighted cells in the table below, that is not in green).

There are two possibilities set out here:

- A. Move forward with paying the DRSCW FY 2026-27 Special Assessment in the your agency's current fiscal year with the understanding that if the NIP Special Condition language in the final NPDES permit does not satisfy the priorities of the Special Condition Permit Holders (as agreed upon by the DRSCW), the full amount of the payment will be reimbursed to your agency by the DRSCW.
- B. Your agency retains/holds back your DRSCW FY 2026-27 payment this year until final permit language is issued with the understanding that the DRSCW FY 2026-27 Special Assessment will be due along with the DRSCW FY 2027-28 assessment payment next fiscal year.

Please use this link to access a survey on this item. [Preference for Payment of DRSCW FY 2026-27 Special Condition Assessment – Fill out form](#)

The DRSCW will draft an amendment to our existing agreement with your agency for funding and completion of projects and provide that to you based on the timing indicated in your survey responses. Please contact me with any questions.

Thanks
Stephen

Table of TP limit adoption by Members- Members opting to implement a 1 mg/L in Green , members forgoing a 1 mg/L in White

Agency Members	IL NPDES
Addison - AJ LaRocca	IL0027367
Addison - North	IL0033812
Bartlett	IL0027618
Bensenville	IL0021849
Bloomington	IL0021130
Bolingbrook #1	IL0032689
Bolingbrook #2	IL0032735
Carol Stream	IL0026352
Downers Grove SD	IL0028380
DuPage County Greene Valley	IL0031844
Elmhurst	IL0028746
Glenbard WW Authority	IL0021547
Glendale Heights	IL0028967
Hanover Park	IL0034479
Itasca	IL0026280
MWRDGC (Egan WRP)	IL0036340
MWRDGC (Hanover Park)	IL0036137
Roselle - Botterman	IL0048721
Roselle - Devlin	IL0030813
Salt Creek SD	IL0030953
West Chicago	IL0023469
Wheaton SD	IL0031739
Wood Dale - North	IL0020061
Wood Dale - South	IL0034274

Stephen M^cCracken
Director DuPage River Salt Creek Workgroup
 The Conservation Foundation
 10s404 Knoch Knolls Rd.
 Naperville, IL 60565
 C 630-768-7427

www.theconservationfoundation.org

www.DRSCW.org



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Preference for Payment of DRSCW FY 2026-27 Special Condition Assessment

Please select how your agency would prefer to pay the FY 2026-27 Special Assessments

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

1. Name

Enter your answer

2. Agency

Enter your answer

3. To pay the DRSCW 2026 Special Assessments within your current fiscal year, by what date do you need the agreement and invoice (enter date)?

Enter your answer

4. If the IEPA has not issued any NPDES Permits with the NIP Special Condition language by the date you identified in Question 3, does your agency want to be invoiced for the 2026 Special Assessments with the understanding that if the NIP Special Condition language in your final NPDES Permit does not satisfy the priorities of the Special Condition Holders (as agreed upon by the DRSCW), the full amount of the payment will be reimbursed to your agency by the DRSCW?

☐ Yes

☐ No

5. If you answered no to the above question, can your agency pay two years of Special Assessments in the next fiscal year (i.e., the 2026 and 2027 assessments)?

☐ Yes☐ No

6. If you answered no to the Question 4 and 5, please provide information to assist the DRSCW in determining how best to collect the full amount of Special Assessments from your agency (i.e., spread the Year 1 Assessment out of all of the remaining years of Assessments, spread out the Year 1 Assessment over the next 3 years of assessments, extend the time frame of assessment so that only one payment is due each year, etc.),

Enter your answer

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Table 47. DRSCW proposed NIP project assessments

DuPage River Salt Creek Workgroup Proposed NIP Assessments October 10, 2023	Proposed Assessments based on 1.0 mg/L TP				Proposed Assessments based on 0.5 mg/L TP				NIP			
Current DRSCW Agency members	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Subtotal	
Assessment (as % of O&M costs)	30%	30%	30%	30%	30%	30%	30%	30%	30%	30%	-	
Addison	\$ 86,311	\$ 88,900	\$ 91,567	\$ 94,314	\$ 116,969	\$ 120,478	\$ 124,092	\$ 127,815	\$ 131,649	\$ 135,599	\$ 1,117,694	
Bartlett	-	-	-	-	26,151	26,936	27,744	28,576	29,433	30,316	169,156	
Bensenville	-	-	-	-	22,138	22,802	23,486	24,190	24,916	25,664	143,196	
Bloomington	38,752	39,914	41,112	42,345	64,322	66,251	68,239	70,286	72,395	74,567	578,183	
Bolingbrook (#1 & #2)	101,232	104,269	107,397	110,618	117,345	120,865	124,491	128,226	132,073	136,035	1,182,551	
Carol Stream	117,860	121,396	125,038	128,789	135,384	139,446	143,629	147,938	152,376	156,947	1,368,803	
Downers Grove SD	223,259	229,956	236,855	243,961	256,110	263,794	271,707	279,859	288,254	296,902	2,590,657	
DuPage County	63,093	64,985	66,935	68,943	250,682	258,202	265,948	273,927	282,144	290,609	1,885,468	
Elmhurst	151,268	155,806	160,481	165,295	186,262	191,850	197,605	203,533	209,639	215,929	1,837,668	
Glenbard WW Authority	325,146	334,900	344,947	355,296	372,990	384,179	395,705	407,576	419,803	432,397	3,772,939	
Glendale Heights	-	-	-	-	38,769	39,932	41,130	42,364	43,635	44,944	250,774	
Hanover Park	49,117	50,590	52,108	53,671	56,344	58,035	59,776	61,569	63,416	65,318	569,944	
Itasca	-	-	-	-	23,953	24,671	25,412	26,174	26,959	27,768	154,937	
MWRDGC	609,739	628,031	646,872	666,279	742,715	764,997	787,947	811,585	835,933	861,011	7,355,109	
Roselle	19,659	20,249	20,857	21,482	29,473	30,357	31,267	32,205	33,172	34,167	272,888	
Salt Creek SD	51,684	53,235	54,832	56,477	64,801	66,745	68,747	70,810	72,934	75,122	635,387	
West Chicago	-	-	-	-	127,762	131,595	135,543	139,609	143,798	148,112	826,419	
Wheaton SD	-	-	-	-	58,502	60,257	62,065	63,927	65,844	67,820	378,415	
Wood Dale	62,918	64,806	66,750	68,753	72,177	74,342	76,572	78,869	81,235	83,672	730,094	
Totals	\$ 1,900,038	\$ 1,957,037	\$ 2,015,751	\$ 2,076,223	\$ 2,762,849	\$ 2,845,734	\$ 2,931,105	\$ 3,019,038	\$ 3,109,608	\$ 3,202,899	\$ 25,820,282	
Cumulative totals	\$ 1,900,038	\$ 3,857,075	\$ 5,872,826	\$ 7,949,049	\$ 10,711,898	\$ 13,557,632	\$ 16,488,737	\$ 19,507,775	\$ 22,617,383	\$ 25,820,282	\$ 25,820,282	

Table 48. LDRWC proposed NIP project assessments

Lower DuPage River Watershed Coalition Proposed NIP Assessments December 31, 2023	Proposed Assessments based on 1.0 mg/L				Proposed Assessments based on 0.5 mg/L						NIP
Current LDRWC Agency members	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Subtotal
Bolingbrook (#3)	0	0	0	0	\$ 42,819	\$ 44,104	\$ 45,427	\$ 46,790	\$ 48,194	\$ 49,640	\$ 276,974
Crest Hill	0	0	0	0	30,268	31,176	32,111	33,074	34,066	35,088	195,783
Joliet	0	0	0	0	25,469	26,233	27,020	27,830	28,665	29,525	164,742
Minooka	0	0	0	0	51,222	52,759	54,341	55,972	57,651	59,380	331,325
Naperville	32,978	33,968	34,987	36,036	149,008	153,478	158,083	162,825	167,710	172,741	1,101,814
Plainfield	0	0	0	0	20,354	20,965	21,594	22,242	22,909	23,596	131,660
Totals	\$ 32,978	\$ 33,968	\$ 34,987	\$ 36,036	\$ 319,140	\$ 328,715	\$ 338,576	\$ 348,733	\$ 359,195	\$ 369,970	\$ 2,202,298
Cumulative totals	\$ 32,978	\$ 66,946	\$ 101,933	\$ 137,969	\$ 457,109	\$ 785,824	\$ 1,124,400	\$ 1,473,133	\$ 1,832,328	\$ 2,202,298	\$ 2,202,298

**BOARD OF LOCAL IMPROVEMENTS
DOWNERS GROVE SANITARY DISTRICT**

PROPOSED AGENDA

October 20th, 2026

6:30 p.m.

- I. Election of Officers
- II. Approve Minutes of April 21st, 2026
- III. Public Comment
- IV. P725: 3300 Lacey Road – Ann & Robert H. Lurie Children’s Hospital and Clinic Facility

DOWNERS GROVE SANITARY DISTRICT
M E M O

DATE: October 06, 2026

TO: BOARD OF LOCAL IMPROVEMENTS

FROM: Amy R. Underwood
General Manager

RE: Election of BOLI officers for Fiscal Year 2026-2027

On May 26, 2026, the Board of Trustees re-appointed the members of the Board of Local Improvements for Fiscal Year 2026-2027. The BOLI will need to elect officers for the fiscal year at the October 20th, 2026, meeting. The following excerpt is from previous minutes for your reference.

Election of Officers

A motion was made by Jungwirth seconded by Scacco nominating Kenneth J. Rathje as President of the Board of Local Improvements, closing the nominations and electing Kenneth J. Rathje as President. The motion carried. (Votes recorded: Ayes–Rathje, Jungwirth and Scacco.) A motion was made by Scacco seconded by Jungwirth nominating Robert T. Jungwirth as Vice President, closing the nominations, and electing Robert T. Jungwirth as Vice President. The motion carried. (Votes recorded: Ayes–Rathje, Jungwirth and Scacco.) A motion was made by Jungwirth seconded by Rathje nominating Mark J. Scacco as Clerk, closing the nominations, and electing Mark J. Scacco as Clerk. The motion carried. (Votes recorded: Ayes–Rathje, Jungwirth and Scacco.)

cc: AES, JMW, ME, KWS, CS, & DM

BOARD OF LOCAL IMPROVEMENTS
MINUTES

April 21, 2026

A meeting of the Board of Local Improvements of the Downers Grove Sanitary District was held on Tuesday, April 21, 2026. The meeting was held at the District's Administration Center, 2710 Curtiss Street, Downers Grove. Present were Board Members Kenneth J. Rathje, Robert T. Jungwirth and Mark Scacco, and General Manager Amy R. Underwood, Administrative Supervisor Carly Shaw, Sewer Construction Supervisor Keith W. Shaffner, Information Coordinator Alyssa J. Caballero, and Trustees Amy E. Sejnost, Jeremy M. Wang and Mark Eddington and Attorney Dan McCormick. President Rathje called the meeting to order at 6:30 p.m. Also present was Derek Wold from Baxter & Woodman.

Minutes of February 10, 2026, Meeting

A motion was made by Jungwirth seconded by Scacco approving the revised minutes of the meeting held on February 10, 2026. The motion carried.

Public Comment – None

P724 – 2001-2153 63rd Street Shoppes of Meadowbrook Phase 1B, Downers Grove

The Board reviewed a request for sanitary sewer service from Stellco Properties, property owner, for a proposed two building commercial development located at 2001-2153 63rd Street Shoppes of Meadowbrook Phase 1B, Downers Grove. Lot 1 is proposed to be a car wash and lot 2 is proposed to be a mixed retail space. The property will need a 595-foot sewer main extension to be served. The property has a gross acreage of 2.6 acres and is within the District's Facilities Planning Area (FPA). The proposed building will generate an estimated wastewater flow of 6,500 gallons per day. Service can be provided to the property by extending the sanitary sewer main located on Belmont Road. The downstream trunk sewers have adequate reserve capacity to serve this request. Staff recommended approval of this request. Scacco inquired about the invert elevations and flow direction. Staff informed Scacco the flow direction and that the plans were preliminary, and the final plans would go through full review by District staff ensuring proper elevations. Jungwirth inquired about the location of the extension. Staff informed Jungwirth that the main extension will run from Belmont Road to the east, south of the gas station at the corner. Rathje inquired if the District will be responsible for maintenance. Staff informed Rathje that the sewer extension will be an 8-inch main line sewer and the District will maintain the sanitary sewer line. He also asked about the car wash and if they will recycle water that would result in a lower PE. Staff informed Rathje that there is a water recycling system being installed that will lower the amount of wastewater being produced. A motion was made by Scacco seconded by Jungwirth approving this request, with updated engineering plans, subject to receipt of Illinois EPA permit, payment of all fees per ordinance, compliance with all District ordinances and standard conditions. The motion carried. (Votes recorded: Ayes– Rathje, Jungwirth and Scacco.)

Upon a motion by Jungwirth seconded by Scacco, the meeting was adjourned at 6:45 p.m. The motion carried.

Approved: October 20, 2026

Attest: _____
Clerk

President

BOARD OF LOCAL IMPROVEMENTS
October 20, 2026
STAFF BRIEFING

P725: 3300 Lacey Road, Downers Grove, IL

REQUEST:

RWG Engineering is requesting sanitary sewer service for a proposed children's hospital and clinic facility. This property has a combined gross acreage of 21.5 acres. This property is within the District's Facilities Planning Area (FPA) and is within the District's current corporate limits. The proposed building will generate an estimated wastewater flow of 30,500 gallons per day or a density of 14.2 PE per acre, which is below the District design flow allocation of 25 PE per acre for commercial parcels. The wastewater PE estimate was provided by the owner and is attached to the packet.

SUMMARY:

Service can be provided to the property by the existing sanitary sewer main located to the west of the property in the center of Birchwood Place as shown on the attached map. The downstream trunk sewers have adequate reserve capacity to serve this request. Attached is a downstream sanitary sewer study performed by B&W Engineering. Staff recommend approval of this request subject to receipt of an Illinois EPA permit and payment of all fees per ordinance.

DATE 10/02/26

P725

DOWNERS GROVE SANITARY DISTRICT
2710 CURTISS STREET
DOWNERS GROVE, ILLINOIS 60515
(630) 969-0664

SANITARY SEWER SERVICE REQUEST

Location 3300 Lacey Road

Legal Description Lot Parcel F2 Block _____ Subdivision Esplanade Assessment

Plat No. 4 P.I.N. 06-31-100-024

Contract Purchaser Ann & Robert H. Lurie Childrens Hospital of Chicago Phone No. (312) 227-0927

Developer Ann & Robert H. Lurie Childrens Hospital of Chicago Phone No. (312) 227-0927

Name of Person Making Request RWG Engineering, LLC Phone No. (630) 480-7889

E mail: mkr@rwg-engineering.com

Address (we will be sending information regarding this request; please be sure address is legible)

975 E. 22nd Street, Suite 400, Wheaton, IL 60189

This Applicant's Interest in This Property Contract Purchaser
(Owner/Developer/Beneficiary Land Trust, etc.)

Number of Acres Involved 13.20 Present Zoning ORM Proposed Zoning ORM

Is the Property (A) Improved _____ (B) Vacant X

(A) If Improved, Describe Improvements _____

Number & Type of Units _____

(B) If Vacant or Additional Improvements or Remodeling Are Proposed, Describe Request for 3 sanitary sewer services to serve the new Lurie Children's hospital and clinic facility.

Number & Type of Units _____

Estimated Starting Date of Project 12/01/26

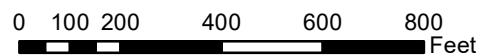
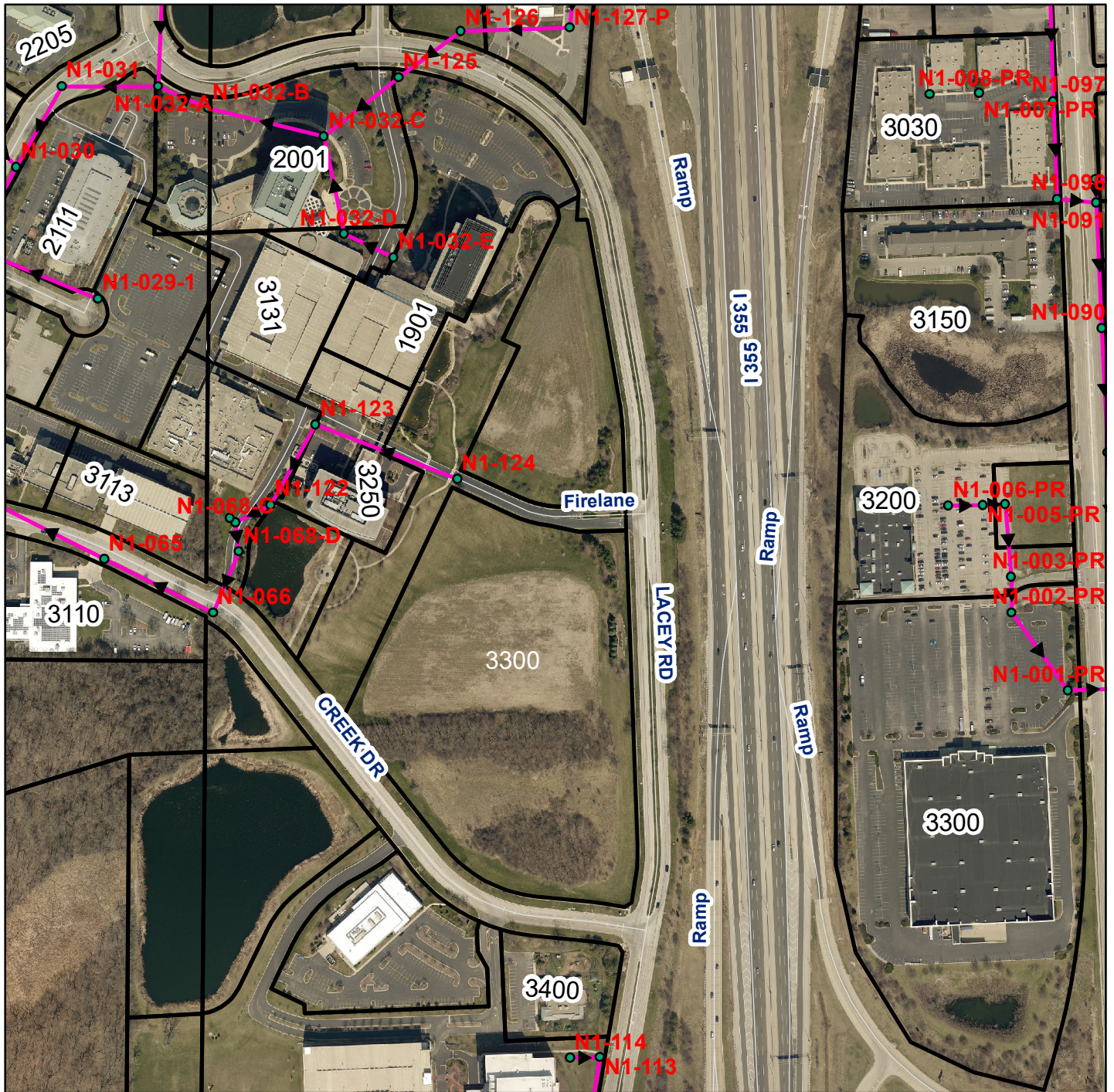
If You Propose to Annex to a Community, Which One N/A

NOTE: If this request is for

- a multiple family development, indicate the number of units for each bedroom count.
- a restaurant, indicate the seating capacity and hours of operation. If drive-up is proposed, give the number of orders per day.
- a commercial project, indicate the floor area.
- an office/warehouse or light manufacturing development, indicate the floor area.
- an office/research development, indicate the floor area and number of employees.
- commercial/industrial buildings(s), provide an estimate of wastewater flow in gallons per day 30,538 gpd

****SERVICE REQUEST APPROVALS ARE VALID FOR SIX MONTHS****

Sanitary Sewer Atlas



Technical Memorandum

Date: July 20, 2026
To: Mr. Keith Shaffner
Downers Grove Sanitary District
From: Shane Firsching, P.E.
Project No. 2600031.00
Subject **Capacity Analysis – Proposed Development at 3300 Lacey Road**

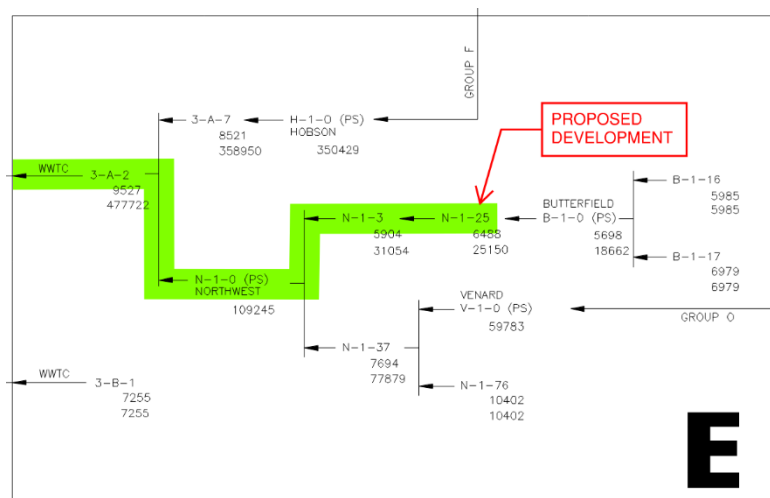
The purpose of this memorandum is to evaluate available capacity of the downstream collection system to receive wastewater loading from the proposed development at 3300 Lacey Road, Lisle, IL. The proposed development is a four-story, 48-bed children's hospital with a large clinic facility located on a 13.2-acre parcel (PIN 06-31-100-024). It will provide medical service to both inpatient children and daily clinical children's visits.

Flow Loading

For this parcel, a maximum land use of 25 PE/acre is allowed. The proposed development includes a projection of 30,538 gpd (305.38 P.E.) sewage loading to the District's collection system based on land use of 23.1 PE/acre. The proposed loading results with an average flow of 21 gpm and peak flow of 86 gpm using an IEPA Peaking Factor of 4.08 per IEPA Title 35, Section 370, Appendix D.

Flow Routing

The proposed flow routing is to connect to the existing 10-inch sanitary sewer along Birchwood Place at Manhole N1-124 in Flow Meter Group E. The flow routing of the proposed development includes downstream meters N1-025, N1-003, Northwest Pump Station (N1-000), and 3A-002 before discharging to the WWTP.



Flow Meter Data

The flow routing of the proposed development includes downstream meters N1-025, N1-003, Northwest Pump Station, and 3A-002 before discharging to the WWTP.

Flow Meter Manhole	N1-025	N1-003	3A-002
Diameter (inch)	16	24	42
Average Weekday Flow (gpm)	250	230	2,700
Average Weekend Flow (gpm)	280	240	4,400
I/I Basin Rank (1 st is Worst)	28	31	83
Design Capacity (% Full)	66.7	80.0	80.0
Design Capacity (gpm) at Min. Slope	940	2,300	6,900

In the I/I records, there was only one wet weather event that caused surcharging at these flow meter locations. N1-003 had a peak depth of 74 inches during a 4.5-inch rain event on June 26, 2021, that also resulted with peak I/I of 98 MGD at the WWTC. This size event is beyond the District's 10-year design event. For 10-year design events, the collection system performs well within District design guidelines.

Northwest Pump Station is adequately sized for the additional flow of the proposed development.

Recommendation

We recommend approving connection of the proposed development. The downstream sewers have adequate capacity to convey the proposed wastewater loadings in both dry weather and wet weather conditions.

DOWNERS GROVE SANITARY DISTRICT

M E M O

TO: Amy R. Underwood
General Manager

FROM: Carly Shaw
Administrative Supervisor

DATE: October 6, 2026

RE: Administrative Services Progress Report – September 2026

ADMINISTRATIVE

Personnel

We have completed first round of interviews with the Electrical Technician candidates and have scheduled second round interviews with 2 of them during the week of October 5.

Open House

Staff did a great job getting ready for and running the annual Open House again this year. There is a memo included in the packet regarding the attendance. We focused on the new Sewer System TV Truck this year. A lunch is being held in the MSB for employees on Wednesday October 7 to show our appreciation of their hard work and participation in the Open House.

Reimbursement Program for Sanitary Sewer Backups Caused by Public Sanitary Sewer Blockages

We did not receive any new claims during the month of August therefore there is no updated report.

Technology

In September, with the help of Kazys Motekaitis of Exodus Technologies, we updated the email domain for Invoice Cloud so that it is more personalized to the District. Previously customers would get emails from a noreply@invoicecloud.com or similar email address which may cause them to ignore the emails or cause confusion on what these were referencing. The customers will now get an email from noreply@dgsd.org with the name DG Sanitary District so that they are clear on what the email is regarding and who it is from.

I have also requested quotes from BS&A for some programming updates for some specific reports we would like to run for billing and for the addition of the health insurance enrollment process. Once received it will be determined if these will be completed this year or budgeted for the next fiscal year.

FINANCIAL

Treasurer's Report and Investment Activity

The monthly Treasurer's Report and the District's Investment Schedule with detailed investment information (financial institution name, current rate, and dollar amount) are provided separately in the packet each month. The Schwab statement and information sheet are also attached to the investment schedule.

Funds from a Treasury that matured with Schwab on September 8, along with funds from the closed money market account at First Financial, were reinvested in a two-year Treasury with Schwab. Another Treasury matured on September 30, and those funds were reinvested in one- and two-year Treasuries.

We have worked to stagger the maturities so that multiple investments do not mature at the same time. As a result, we will have Treasury maturities occurring throughout each year over the next two years.

User Billing

The billing information attached includes the September billed amounts and the past due balances. Pre-enforcement letters were mailed out to 24 delinquent accounts in September, and we have received payment from 2 of those. The next round of shut offs has been scheduled for Westmont, Downers Grove, and Oak Brook. There are a total of 24 accounts facing shut-off. The schedule is November 9 for Westmont (8 accounts), November 10 for Oak Brook (2 accounts), and November 10 for Downers Grove (14 accounts).

The most recent counts on Invoice Cloud for paperless customers are 6376 and for auto pay is 10,756.

In response to the inquiry made by Mark Eddington at the September 22 regular meeting regarding our service area and total customers served in each, the information is provided below:

Downers Grove – 15,242
Westmont – 4,407
Oak Brook – 409
Darien - 135
Liberty Park – 9
Woodridge – 104
Lombard – 2
Lisle – 14

Of these areas we currently have IGA's with Westmont, Downers Grove, and Oak Brook for water shut off. It might be a good idea to explore an IGA with Woodridge. With how small the service counts are for the others, I am not sure it is necessary. Staff did mention that we have presented the idea of an IGA with Liberty Park in the past, but they have refused. We could make another attempt if the Board feels we should.

cc: AES, JMW, ME, KJR, RTJ, MJS, DM

USER BILLING SUMMARY

Billings for September 2026 were as follows:

User	\$518,382.22
Surcharge	36,546.31
Monthly fees	419,997.33
Total	<u>\$974,925.86</u>
Billable Flow	142,022,526
Budgeted Billable Flow	145,794,420
% Actual/Budgeted Billable Flow	97.41%
* YTD Billable Flow	858,532,467
YTD Budgeted Billable Flow	859,039,512
% Actual/Budgeted Billable Flow	99.94%

*YTD billable flow has been corrected to reflect the proper amounts based on total billed and any credits issued on accounts. July's report did duplicate the summer adjustment credits in the calculation of the billable flow.

The user accounts receivable balance on 09/30/2026 is \$1,068,849.83 and consists of:

Current charges due 10/15/2026	\$977,226.53
Past due charges and penalty	91,623.30
Total	<u>\$1,068,849.83</u>

Penalties applied beginning with October 15 due date:

<u>Age</u>	<u>User Charges</u>	<u>Penalty</u>	<u>Totals</u>
< 30 days past due	\$112,421.63	\$16,857.87	\$129,279.50
30 days past due	18,625.95	3,608.01	\$22,233.96
60 days past due	13,963.29	4,442.45	\$18,405.74
90 days & greater past due	28,952.51	5,173.22	\$34,125.73
Totals	<u>\$173,963.38</u>	<u>\$30,081.55</u>	<u>\$204,044.93</u>

Past Due Charges 90 Days and Over

Five Year Comparison

	<u>Year</u>	<u>User Fees</u>	<u>September</u> <u>Monthly</u> <u>Fee/Surcharge</u>	<u>Penalty</u>	<u>Total</u>
*	2026	\$17,913.89	\$11,038.62	\$5,173.22	\$34,125.73
**	2025	87,785.05	94,110.61	0.00	181,895.66
	2024	74,136.03		11,993.15	86,129.18
	2023	57,856.34		9,871.97	67,728.31
	2022	41,581.27		7,914.98	49,496.25

* User Fees shown separately for 2025 and 2026 to reflect accurate comparison to previous years. I began reporting monthly fees and surcharges in addition to User Fees in September 2025.

** With transition to new accounting software, no penalties were applied.

Twelve Months Ending September 2026

<u>Month Ending</u>	<u>User Fees</u>	<u>Monthly Fee/Surcharge</u>	<u>Penalty</u>	<u>Total</u>
09/30/26	\$17,913.89	\$11,038.62	\$5,173.22	\$34,125.73
08/31/26	17,099.43	10,592.13	5,033.05	32,724.61
07/31/26	25,475.00	17,412.70	10,695.80	53,583.50
06/30/26	26,721.12	18,485.53	4,987.16	50,193.81
05/31/26	40,609.47	23,706.86	4,366.53	68,682.86
04/30/26	47,671.56	36,798.99	6,259.57	90,730.12
03/31/26	68,690.78	40,164.28	8,466.73	117,321.79
02/28/26	81,267.32	55,206.37	9,224.31	145,698.00
01/31/26	59,483.44	53,605.47	4,653.01	117,741.92
12/31/25	54,643.15	70,012.60	4,013.14	128,668.89
11/30/25	56,864.01	72,013.28	0.00	128,877.29
10/31/25	122,415.20	124,364.08	0.00	246,779.28

To: Amy Underwood, General Manager
From: Marc Majewski, Operations Supervisor
Date: October 14, 2026
Subject: September 2026 WWTC Operations Report

Dear Amy,

Please find attached the detailed operating data and monthly report to the Illinois EPA for September.

Operations Highlights:

1. Monthly flow:

- Average daily flows: 10.19 (Million Gallons per Day)
- Total precipitation: 7.06 inches
- Excess Flow days: 3
- Days of discharge over 11 MGD: 8

2. Activated Sludge:

- Good operating performance observed throughout September.

3. Anaerobic Digesters:

- Pumped Volumes:
 - Primary Sludge: 702,258 gallons
 - TWAS to Dig 4 (Thickened Waste Activated Sludge): 176,590 gallons
 - Total WAS to Digester 4: 176,590 gallons
 - Waste grease: 219,588 gallons

4. Digester Gas:

- Total production: 3,341,241 cubic feet
- Usage Breakdown:
 - Heat Exchangers: 161,561 cubic feet
 - CHP facilities: 3,151,662 cubic feet
- Flared gas recorded: 28,018 cubic feet
- Munters dehumidifier gas consumption: 0 cubic feet

5. Biosolids:

- We distributed 75 tons of Class A biosolid in September.

6. Electricity:

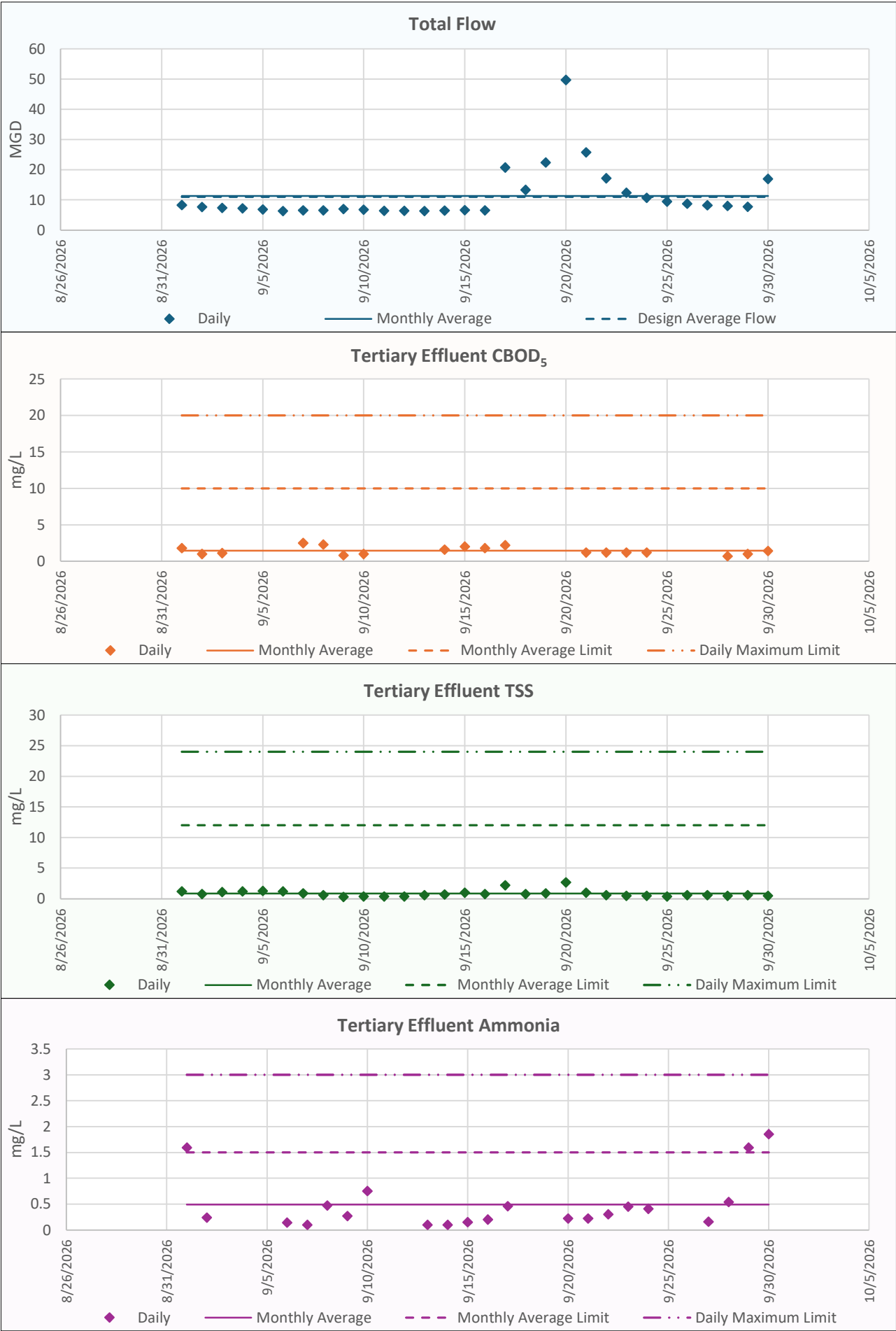
- Overall net energy from ComEd: 103,964 kWh
- Electricity generated by CHP system: 274,527 kWh
- Monthly net energy (including natural gas usage): 106 MWh

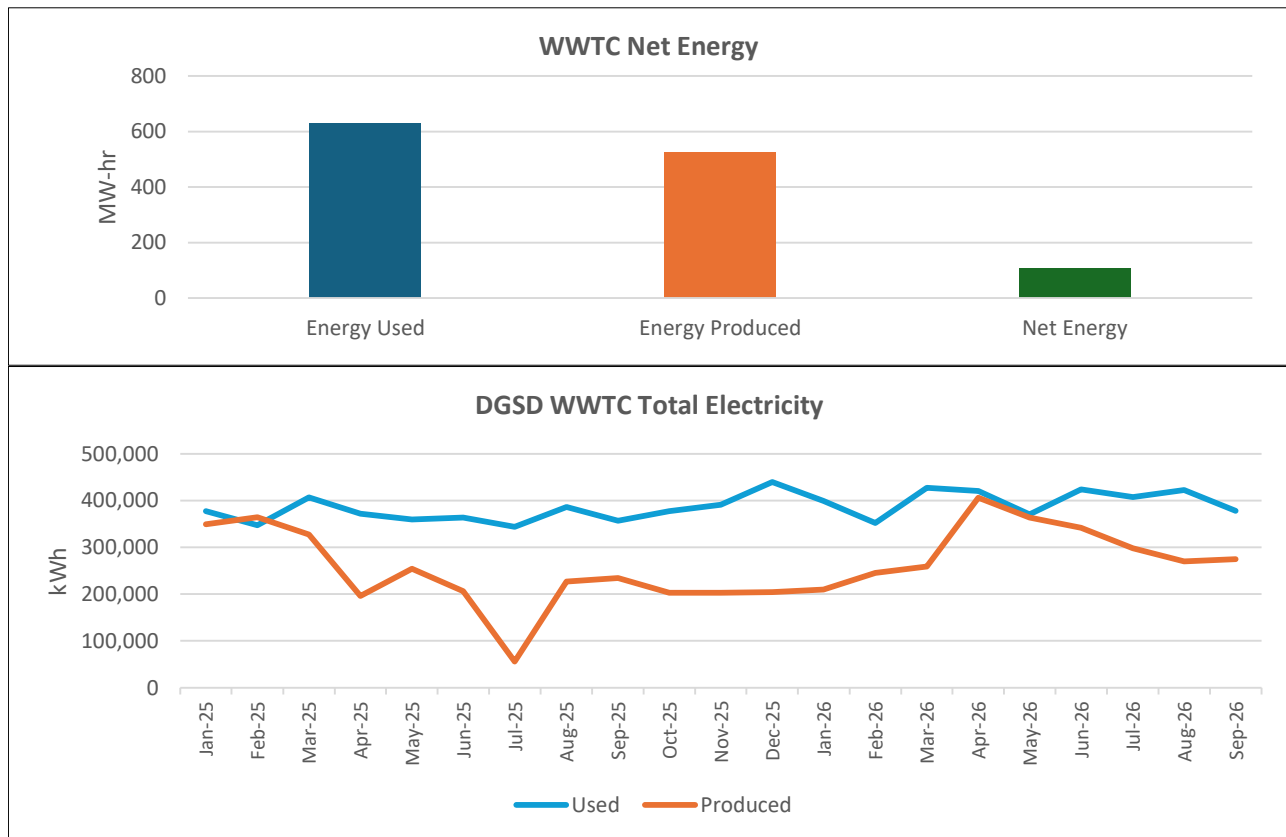
Recipients: ME, AES, JMW, KJR, RTJ, MJS, CS, DM

Sincerely,

Marc Majewski

Operations Supervisor





	Electricity Used kWh	Electricity Produced			Electricity Savings*	REC Sales	O&M Costs**
		CHP1 kWh	CHP2 kWh	Total kWh			
Jan-25	378,177	172,164	177,717	349,881	\$18,268.30	\$9,680.20	\$0.00
Feb-25	347,830	181,973	182,371	364,344	\$31,459.14	\$10,096.05	\$4,952.09
Mar-25	406,994	131,167	196,321	327,488	\$16,243.80	\$8,925.35	\$1,019.20
Apr-25	372,167	0	195,969	195,969	\$9,994.42	\$4,944.00	\$26,507.11
May-25	359,786	0	254,536	254,536	\$10,689.07	\$6,437.50	\$138,048.43
Jun-25	363,710	0	206,012	206,012	\$11,118.49		\$941.00
Jul-25	344,117	0	56,274	56,274	\$3,545.06		\$3,734.65
Aug-25	386,921	0	227,142	227,142	\$13,174.24		\$9,250.53
Sep-25	357,236	0	234,177	234,177	\$11,005.05		\$1,050.00
Oct-25	378,170	0	202,757	202,757	\$11,151.64		\$7,076.72
Nov-25	391,388	0	202,885	202,885	\$11,970.22		\$41.63
Dec-25	439,570	0	204,112	204,112	\$13,267.28		\$3,522.06
2025 Total					\$161,886.68	\$40,083.10	\$196,143.42

Jan-26	399,266	0	210,373	210,373	\$11,149.77		\$5,049.00
Feb-26	352,662	767	245,327	246,094	\$19,687.72		\$44,022.52
Mar-26	427,334	142,301	117,202	259,503	\$4,064.93		\$42,173.24
Apr-26	421,035	200,377	205,972	406,349	\$27,741.04		\$894.27
May-26	370,620	133,775	229,721	363,496	\$42,110.61		\$12,204.72
Jun-26	424,076	197,839	144,524	342,363	\$32,176.86		\$1,296.95
Jul-26	407,130	215,635	82,399	298,034	\$37,555.99		\$9,313.67
Aug-26	423,167	189,042	81,070	270,112	\$25,816.04		\$4,905.34
Sep-26	378,491	190,164	84,363	274,527	\$29,065.40		\$40,223.53
2026 Total					\$229,368.36	\$0.00	\$160,083.24

*Includes electricity supply and electricity sold to ComEd. (Distribution savings are not easily quantified and therefore not included.)

**DGSD staff labor is not included.

Monthly Operations Report Page 1

	WWTC Rainfall	B01 Parshall Flume Flow Max	B01 Parshall Flume Flow Min	B01 Parshall Flume Flow Avg (Daily Total)	A01 Parshall Flume Flow Max	A01 Parshall Flume Flow Avg (Daily Total)	C01 Int Clar #1 Flow Max	C01 Int Clar #1 Flow Avg (Daily Total)	Outfall 003 Flow Max	Outfall 003 Flow Avg (Daily Total)	Total Flow Leaving WWTC Avg (Daily Total)	Total Flow Leaving WWTC Max MGD	002 Outfall Flow Avg (Daily Total)
Date	inches	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD
9/1/2026	0.00	12.41	5.59	8.29	0.00	0.00	0.00	0.00	0.00	0.00	8.29	12.41	0.00
9/2/2026	0.00	13.36	4.62	7.61	0.00	0.00	0.00	0.00	0.00	0.00	7.61	13.36	0.00
9/3/2026	0.00	12.23	4.49	7.30	0.00	0.00	0.00	0.00	0.00	0.00	7.30	12.23	0.00
9/4/2026	0.00	12.03	4.24	7.19	0.00	0.00	0.00	0.00	0.00	0.00	7.19	12.03	0.00
9/5/2026	0.00	9.51	4.38	6.81	0.00	0.00	0.00	0.00	0.00	0.00	6.81	9.51	0.00
9/6/2026	0.00	9.05	3.84	6.35	0.00	0.00	0.00	0.00	0.00	0.00	6.35	9.05	0.00
9/7/2026	0.00	9.50	3.59	6.53	0.00	0.00	0.00	0.00	0.00	0.00	6.53	9.50	0.00
9/8/2026	0.00	11.37	3.45	6.54	0.00	0.00	0.00	0.00	0.00	0.00	6.54	11.37	0.00
9/9/2026	0.04	9.63	3.68	6.94	0.00	0.00	0.00	0.00	0.00	0.00	6.94	9.63	0.00
9/10/2026	0.00	11.40	3.89	6.76	0.00	0.00	0.00	0.00	0.00	0.00	6.76	11.40	0.00
9/11/2026	0.00	10.89	3.73	6.42	0.00	0.00	0.00	0.00	0.00	0.00	6.42	10.89	0.00
9/12/2026	0.00	9.23	3.47	6.37	0.00	0.00	0.00	0.00	0.00	0.00	6.37	9.23	0.00
9/13/2026	0.02	9.00	3.31	6.33	0.00	0.00	0.00	0.00	0.00	0.00	6.33	9.00	0.00
9/14/2026	0.00	9.38	3.32	6.47	0.00	0.00	0.00	0.00	0.00	0.00	6.47	9.38	0.00
9/15/2026	0.00	9.75	3.60	6.63	0.00	0.00	0.00	0.00	0.00	0.00	6.63	9.75	0.00
9/16/2026	0.01	9.38	3.46	6.52	0.00	0.00	0.00	0.00	0.00	0.00	6.52	9.38	0.00
9/17/2026	2.44	28.03	3.72	17.46	23.21	3.23	0.00	0.00	0.00	0.00	20.69	51.24	2.99
9/18/2026	0.00	18.78	10.00	13.29	0.00	0.00	0.00	0.00	0.00	0.00	13.29	18.78	0.00
9/19/2026	1.52	28.76	7.21	20.64	10.85	1.71	0.00	0.00	0.00	0.00	22.35	39.61	1.39
9/20/2026	1.85	30.00	14.47	23.39	28.59	20.84	18.00	4.10	30.24	1.39	49.72	106.83	29.83
9/21/2026	0.00	26.39	19.07	22.67	13.68	3.05	0.00	0.00	0.00	0.00	25.72	40.07	1.12
9/22/2026	0.00	21.23	14.72	17.16	0.00	0.00	0.00	0.00	0.00	0.00	17.16	21.23	0.00
9/23/2026	0.00	17.89	4.43	12.38	0.00	0.00	0.00	0.00	0.00	0.00	12.38	17.89	0.00
9/24/2026	0.00	14.72	8.06	10.66	0.00	0.00	0.00	0.00	0.00	0.00	10.66	14.72	0.00
9/25/2026	0.00	14.07	6.80	9.46	0.00	0.00	0.00	0.00	0.00	0.00	9.46	14.07	0.00
9/26/2026	0.00	13.13	6.06	8.69	0.00	0.00	0.00	0.00	0.00	0.00	8.69	13.13	0.00
9/27/2026	0.00	12.12	5.25	8.23	0.00	0.00	0.00	0.00	0.00	0.00	8.23	12.12	0.00
9/28/2026	0.00	12.59	4.99	8.00	0.00	0.00	0.00	0.00	0.00	0.00	8.00	12.59	0.00
9/29/2026	0.00	10.81	4.77	7.71	0.00	0.00	0.00	0.00	0.00	0.00	7.71	10.81	0.00
9/30/2026	1.18	27.74	4.62	16.93	0.00	0.00	0.00	0.00	0.00	0.00	16.93	27.74	0.00
Minimum	0.00	9.00	3.31	6.33	0.00	0.00	0.00	0.00	0.00	0.00	6.33	9.00	0.00
Maximum	2.44	30.00	19.07	23.39	28.59	20.84	18.00	4.10	30.24	1.39	49.72	106.83	29.83
Total	7.06	444.38	176.83	305.73	76.33	28.83	18.00	4.10	30.24	1.39	340.05	568.95	35.33
Average	0.24	14.81	5.89	10.19	2.54	0.96	0.60	0.14	1.01	0.05	11.34	18.97	1.18

Monthly Operations Report Page 2

	Tertiary Flow	MLSS Avg	Activated Sludge Inventory Lbs MLSS	Activated Sludge SRT Days	15 Minutes Aeration Settling %	30 Minutes Aeration Settling %	60 Minutes Aeration Settling %	Sludge Volume Index	System 1 RAS TSS	System 2 RAS TSS	Dupage River Outfall DO
Date	MGD		LBS	DAYS	mL/L	mL/L	mL/L	mL/g	mg/l	mg/l	mg/l
9/1/2026	8.29	1,945	60,327	11.54	16	13	13	70	4,422		7.0
9/2/2026	7.61	1,922	59,614	9.10	16	13	13	68		3,952	6.9
9/3/2026	7.30	1,908	59,206	8.73	16	13	12	68	4,253		
9/4/2026	7.19	1,463	45,386	8.83	16	14	14	94		3,019	
9/5/2026	6.81		45,386	9.25							
9/6/2026	6.35		45,386	9.14							
9/7/2026	6.53		45,386	9.16							
9/8/2026	6.54	1,754	54,424	11.65	15	13	13	76	2,856		6.8
9/9/2026	6.94	1,606	49,835	11.77	16	14	13	87		2,875	6.9
9/10/2026	6.76	1,612	50,004	12.53	17	14	13	88	3,200		6.8
9/11/2026	6.42	1,677	52,042	12.79	18	15	14	92		2,875	
9/12/2026	6.37		52,042	12.47							
9/13/2026	6.33		52,042	12.69							
9/14/2026	6.47	1,531	47,499	10.90	22	18	17	118		3,070	7.5
9/15/2026	6.63	1,828	56,705	13.10	22	18	16	97	3,482		7.0
9/16/2026	6.52	1,898	58,891	10.89	22	19	17	101		3,739	6.9
9/17/2026	17.46	1,402	43,481	7.77	20	16	58	114	4,342		
9/18/2026	13.29	1,878	65,083	6.74	22	18	17	96		5,611	
9/19/2026	20.64		58,254	6.59							
9/20/2026	23.39		58,254	6.58							
9/21/2026	22.67	1,464	45,414	4.65	17	14	13	92		6,213	
9/22/2026	17.16	1,710	53,042	5.42	24	19	17	109	3,783		7.1
9/23/2026	12.38	2,098	65,088	8.37	29	22	20	104		4,960	7.5
9/24/2026	10.66	1,789	55,500	7.15	29	22	20	123	4,265		7.4
9/25/2026	9.46	1,611	49,966	8.12	30	23	20	143		4,044	
9/26/2026	8.69		49,966	8.61							
9/27/2026	8.23		49,966	8.53							
9/28/2026	8.00	1,790	55,530	11.95	32	25	22	139		3,243	7.2
9/29/2026	7.71	1,848	57,320	11.98	36	27	22	145	4,170		7.0
9/30/2026	16.93	2,126	65,960	11.80	41	29	24	136		3,629	7.0
Minimum	6.33	1,402	43,480.53	4.65	15.50	12.75	12.00	67.62	2,856	2,875	6.8
Maximum	23.39	2,126	65,959.65	13.10	40.80	29.02	57.65	145.44	4,422	6,213	7.5
Total	305.73	36,859	1,606,994.93	288.79	478.23	378.23	388.90	2,159.74	34,773	47,230	99.0
Average	10.19	1,755	53,566.63	9.63	22.67	18.05	18.48	102.86	3,864	3,936	7.1

Monthly Operations Report Page 3

	Tertiary Flow	Influent BOD 5	Primary Clarifier BOD 5	Intermediate Clarifier CBOD 5	Tertiary Effluent CBOD 5	Tertiary Effluent CBOD 5 Load	BOD 5 Removal %	Ambient Air Temp Min	Ambient Air Temp Max	Influent Flow Temp
Date	MGD	mg/l	mg/l	mg/l	mg/l		%	Deg F	Deg F	Deg F
9/1/2026	8.29	230	143	1.3	1.8	124	97.9	78	100	67.5
9/2/2026	7.61	247	120		1.0	63	98.5	78	101	67.8
9/3/2026	7.30	360	177	1.2	1.1	67		81	98	68.0
9/4/2026	7.19							80	98	
9/5/2026	6.81							75	89	
9/6/2026	6.35							66	86	
9/7/2026	6.53	210	167		2.5	136	98.7	62	89	
9/8/2026	6.54	267	150	1.4	2.3	125	98.0	62	91	67.3
9/9/2026	6.94	227	130		0.8	46	98.3	73	86	67.1
9/10/2026	6.76	267	153	0.8	1.0	56	97.8	61	83	67.5
9/11/2026	6.42							58	87	
9/12/2026	6.37							66	93	
9/13/2026	6.33							55	79	
9/14/2026	6.47	207	133		1.6	86	98.9	50	75	67.8
9/15/2026	6.63	305	136	1.1	2.0	111	98.4	70	88	67.3
9/16/2026	6.52	171	163		1.8	98	97.8	68	83	67.8
9/17/2026	17.46	200	103	2.4	2.2	320	96.9	69	92	67.8
9/18/2026	13.29							67	77	
9/19/2026	20.64	118						65	74	
9/20/2026	23.39	72						63	72	
9/21/2026	22.67	116			1.2	227	97.5	61	72	66.7
9/22/2026	17.16	132			1.2	172	97.7	59	69	66.7
9/23/2026	12.38	154	47		1.2	124	97.7	59	69	66.6
9/24/2026	10.66	235	76	1.3	1.2	107	98.0	62	73	66.7
9/25/2026	9.46							60	77	
9/26/2026	8.69							53	70	
9/27/2026	8.23							49	78	
9/28/2026	8.00	195	98		0.7	47	97.8	48	78	66.6
9/29/2026	7.71	205	99	0.5	1.0	64		49	82	66.6
9/30/2026	16.93	148	78		1.4	198	95.6	53	84	66.6
Minimum	6.33	72	47	0.5	0.70	46	95.6	48	69	66.6
Maximum	23.39	360	177	2.4	2.50	320	98.9	81	101	68.0
Total	305.73	4,066	1,973	10.0	26.00	2,172	1,565.6	1,142	2,492	1,142.4
Average	10.19	203	123	1.3	1.44	121	97.8	63	83	67.2

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	Tertiary Flow	Influent TSS	Primary Clarifier TSS	Intermediate Clarifier TSS	Tertiary Effluent TSS	Tertiary Effluent TSS Load	TSS Removal %	Influent pH	Primary Clarifier pH	Tertiary Effluent pH	Intermediate pH
Date	MGD	mg/l	mg/l	mg/l	mg/l	lbs/day	%	SU	SU	SU	SU
9/1/2026	8.29	192	100	3.0	1.2	83	99.4	7.6	7.4	7.1	7.2
9/2/2026	7.61	276	86		0.8	51	99.7	7.6	7.5	7.1	7.2
9/3/2026	7.30	273	132	3.8	1.1	67	99.6	7.6	7.3	7.1	7.2
9/4/2026	7.19	210			1.2	72	99.4	7.5	7.3	7.1	7.2
9/5/2026	6.81	185			1.3	74	99.3				
9/6/2026	6.35	170			1.2	64	99.3				
9/7/2026	6.53	264	115		0.9	49	99.7	7.5		7.3	
9/8/2026	6.54	208	123	3.0	0.6	33	99.7	7.5	7.3	7.2	7.3
9/9/2026	6.94	225	100		0.3	17	99.9	7.5	7.3	7.1	7.3
9/10/2026	6.76	230	118	1.0	0.4	23	99.8	7.4	7.3	7.1	7.3
9/11/2026	6.42	224			0.4	21	99.8	7.6	7.2	7.1	7.2
9/12/2026	6.37	208			0.4	21	99.8				
9/13/2026	6.33	202			0.6	32	99.7				
9/14/2026	6.47	220	88		0.7	38	99.7	7.5	7.2	7.2	7.2
9/15/2026	6.63	244	90	2.8	1.0	55	99.6	7.5	7.3	7.1	7.6
9/16/2026	6.52	140	89		0.8	44	99.4	7.5	7.4	6.9	7.1
9/17/2026	17.46	228	99	9.2	2.2	320	99.0	7.4		7.0	7.1
9/18/2026	13.29	136			0.8	89	99.4	7.7	7.7	7.4	7.5
9/19/2026	20.64	144			0.9	155	99.4				
9/20/2026	23.39	98			2.7	527	97.2				
9/21/2026	22.67	88	59		1.0	189	98.9	7.7	7.6	7.4	7.5
9/22/2026	17.16	102	48	4.4	0.6	86	99.4	7.8	7.7	7.4	8.1
9/23/2026	12.38	152	44		0.5	52	99.7	7.8	7.7	7.4	7.5
9/24/2026	10.66	178	46	3.0	0.5	44	99.7	7.7	7.6	7.3	7.4
9/25/2026	9.46	188			0.4	32	99.8	7.6	7.7	7.3	7.7
9/26/2026	8.69	128			0.6	43	99.5				
9/27/2026	8.23	140			0.6	41	99.6				
9/28/2026	8.00	140	103		0.5	33	99.6	7.6	7.5	7.4	7.4
9/29/2026	7.71	200	79	2.4	0.6	39	99.7	7.6	7.4	7.3	7.5
9/30/2026	16.93	156	69	3.4	0.5	71	99.7	7.6	7.6	7.2	7.4
Minimum	6.33	88	44	1.0	0.3	17	97.2	7.4	7.2	6.9	7.1
Maximum	23.39	276	132	9.2	2.7	527	99.9	7.8	7.7	7.4	8.1
Total	305.73	5,549	1,588	36.0	25.3	2,463	2,984.4	166.8	149.0	158.5	154.9
Average	10.19	185	88	3.6	0.8	82	99.5	7.6	7.5	7.2	7.4

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	Tertiary	Influent	Tertiary Effluent	Tertiary Effluent	Chlorine	Fecal
	Flow	Ammonia-N	Ammonia-N	Ammonia-N Load	Residual	Coliform
Date	MGD	mg/l	mg/l	lbs/day	mg/l	col/100ml
9/1/2026	8.29	21.50	1.59	109.9	0.015	3
9/2/2026	7.61	24.91	0.24	15.2	0.015	
9/3/2026	7.30					
9/4/2026	7.19					
9/5/2026	6.81					
9/6/2026	6.35	19.93	0.14	7.4		
9/7/2026	6.53	20.45	0.10	5.4		
9/8/2026	6.54	20.50	0.47	25.6	0.015	4
9/9/2026	6.94	28.11	0.27	15.6	0.015	5
9/10/2026	6.76	19.58	0.75	42.3		
9/11/2026	6.42					
9/12/2026	6.37					
9/13/2026	6.33	20.71	0.10	5.3		
9/14/2026	6.47	29.62	0.10	5.4	0.015	50
9/15/2026	6.63	30.20	0.15	8.3	0.015	7
9/16/2026	6.52	14.08	0.20	10.9		
9/17/2026	17.46	8.58	0.46	67.0		
9/18/2026	13.29					
9/19/2026	20.64					
9/20/2026	23.39	2.97	0.22	42.9		
9/21/2026	22.67	4.96	0.22	41.6		
9/22/2026	17.16	7.95	0.30	42.9	0.015	5
9/23/2026	12.38	11.98	0.45	46.5	0.015	4
9/24/2026	10.66	13.53	0.41	36.5		
9/25/2026	9.46					
9/26/2026	8.69					
9/27/2026	8.23	14.50	0.16	11.0		
9/28/2026	8.00	21.64	0.54	36.0	0.015	2
9/29/2026	7.71	21.05	1.59	102.2	0.015	0
9/30/2026	16.93	9.25	1.85	261.2		
Minimum	6.33	2.97	0.10	5.3	0.015	0.0
Maximum	23.39	30.20	1.85	261.2	0.015	50.0
Total	305.73	366.00	10.31	939.2	0.150	80.0
Average	10.19	17.43	0.49	44.7	0.015	5.5

SLUDGE DATA

Primary Sludge	TS	2.62 %	702,258 Gallons
WAS to Digester 4	TS	2.40 %	0 Gallons
WAS to Thickener	TS	2.40 %	757,963 Gallons
TWAS to Digester 4	TS	5.75 %	176,590 Gallons
Hauled Grease to Digs	TS	5.10 %	219,588 Gallons
<u>Anaerobically Digested Sludge Pumping</u>			
to Drying Beds	TS	2.23 %	169,260 Gallons
to BFP	TS	2.49 %	611,792 Gallons
to Lagoons	TS	%	Gallons
Total			781,052.0 Gallons

VS Destruction

51.5 %

Biosolids Disposal

Class A Distribution	Sep	75 Dry Tons
Class B Hauling	Sep	Dry Tons
Total	Sep	75 Dry Tons
Class A Distribution	YTD	437 Dry Tons
Class B Hauling	YTD	204 Dry Tons
Total	YTD	641 Dry Tons

ENERGY DATA

Total Digester Gas Production	3,341,241 SCF
Gas Volume per Volatile Solids Load	12.3 Cu.Ft./Lb.

Digester Gas Utilization

Heat Exchangers	161,561 SCF
Dehumidification	0 SCF
CHP	3,151,662 SCF
Total	3,313,223 SCF
Digester Gas Flared	28,018 SCF

Natural Gas Consumed

WWTC	5,000 SCF
MSB	1,900 SCF
Chemical Feed	200 SCF
5006 Walnut	0 SCF
Kilowatt-hours Generated CHP	274,527 KWH
Net energy from Comed	103,964 KWH
Monthly net energy	106 MWH

MISCELLANEOUS

Grit Removal	Sep	40 Cu. Yds
Grit Removal	YTD	240 Cu. Yds
Anaerobic Supernate		515,354 Gallons
Waste Activated Sludge		183,389 Gals/Day
City Water Consumed		156,998 Gallons

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	Tertiary Flow	Influent Phosphorus	Tertiary Effluent Phosphorus	Influent Phosphorus Load	Tertiary Effluent Phosphorus Load	Phosphorus Removal %	Influent Nitrogen	Tertiary Effluent Nitrogen	Influent Nitrogen Load	Tertiary Effluent Nitrogen Load	Nitrogen Removal %	Tertiary Effluent Nitrate
Date	MGD	mg/l	mg/l	lbs/day	lbs/day	%	mg/l	mg/l	lbs/day	lbs/day	%	mg/l
9/1/2026	8.29											
9/2/2026	7.61	6.08	4.01	397.5	254.50	34.0						
9/3/2026	7.30											
9/4/2026	7.19											
9/5/2026	6.81											
9/6/2026	6.35	4.91	4.28	260.0	226.7	12.8						
9/7/2026	6.53						30.6	16.8	1,684.3	914.9	45.7	16.80
9/8/2026	6.54											
9/9/2026	6.94	5.68	4.10	323.1	237.3	27.8						
9/10/2026	6.76											
9/11/2026	6.42											
9/12/2026	6.37											
9/13/2026	6.33											
9/14/2026	6.47											
9/15/2026	6.63											
9/16/2026	6.52	4.25	4.59	223.3	249.6	-8.0						
9/17/2026	17.46											
9/18/2026	13.29											
9/19/2026	20.64											
9/20/2026	23.39											
9/21/2026	22.67	1.85	0.73	347.9	138.0	60.5						
9/22/2026	17.16											
9/23/2026	12.38	3.52	1.46	381.9	150.7	58.5						
9/24/2026	10.66											
9/25/2026	9.46											
9/26/2026	8.69											
9/27/2026	8.23											
9/28/2026	8.00											
9/29/2026	7.71	4.88	3.09	321.5	198.7	36.7						
9/30/2026	16.93											
Minimum	6.33	1.85	0.73	223.3	138.0	-8.0	30.6	16.8	1,684.3	914.9	45.7	16.80
Maximum	23.39	6.08	4.59	397.5	254.5	60.5	30.6	16.8	1,684.3	914.9	45.7	16.80
Total	305.73	31.17	22.26	2,255.3	1,455.5	222.4	30.6	16.8	1,684.3	914.9	45.7	16.80
Average	10.19	4.45	3.18	322.2	207.9	31.8	30.6	16.8	1,684.3	914.9	45.7	16.80

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Permit

Permit #:	IL0028380	Permittee:	DOWNERS GROVE SANITARY DISTRICT		Facility:	DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER	
Major:	Yes	Permittee Address:	2710 CURTISS STREET DOWNERS GROVE, IL 60515		Facility Location:	5003 WALNUT AVENUE DOWNERS GROVE, IL 60515	
Permitted Feature:	001 External Outfall	Discharge:	001-0 COMBINED DISCHARGE FROM A01, B01, & C01				

Report Dates & Status

Monitoring Period:	From 09/01/26 to 09/30/26	DMR Due Date:	10/25/26	Status:	NetDMR Validated
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Considerations for Form Completion

W0430300002 ; NUMBER OF DAYS OF DISCHARGE.COMBINED OUTFALLS: A01-MIXING CHAMBER DISCHARGE TO E BR OF DUPAGE RIVER-EFFECTIVE WHEN FLOWS TO TRT PLT ARE GREATER THAN 22 MGD & EXCESS FLOW FAC IS IN OPERATION. 002 BECOMES OPERATIONAL WHEN 001, A01,& B01 EXCEED 30 MGD.

Principal Executive Officer

First Name:	Amy	Title:	General Manager	Telephone:	630-969-0664
Last Name:	Underwood				

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration						# of Ex.	Frequency of Analysis	Sample Type					
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3				Units				
00300	Oxygen, dissolved [DO]	1 - Effluent Gross	0	--	Sample							=	6.9		=	6.7		=	5.7		19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.							Req Mon MO AV MN		Req Mon MN WK AV		Req Mon DAILY MN		19 - mg/L	DL/DS - Daily When Discharging	GR - Grab				
					Value NODI																			
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample									=	6.3		=	7.8		19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab	
					Permit Req.								<=	30.0 MO AVG		<=	45.0 WKLY AVG		19 - mg/L	DL/DS - Daily When Discharging		GR - Grab		
					Value NODI																			
00400	pH	1 - Effluent Gross	0	--	Sample							=	6.3				=	7.8		12 - SU	0	DL/DS - Daily When Discharging	GR - Grab	
					Permit Req.							>=	6.0 MINIMUM			<=	9.0 MAXIMUM		12 - SU	DL/DS - Daily When Discharging		GR - Grab		
					Value NODI																			
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample									=	2.0		=	4.1		19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab	
					Permit Req.								<=	30.0 MO AVG		<=	45.0 WKLY AVG		19 - mg/L	DL/DS - Daily When Discharging		GR - Grab		
					Value NODI																			
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	0	--	Sample									=	0.84		=	3.03		19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab	
					Permit Req.								Req Mon MO AVG		Req Mon DAILY MX		19 - mg/L	DL/DS - Daily When Discharging	GR - Grab					
					Value NODI																			
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample									=	2.86		=	4.59		19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab	
					Permit Req.								Req Mon MO AVG		Req Mon DAILY MX		19 - mg/L	DL/DS - Daily When Discharging	GR - Grab					
					Value NODI																			
50060	Chlorine, total residual	1 - Effluent Gross	0	--	Sample									=	0.08				19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab		
					Permit Req.								<=	0.75 MO AVG				19 - mg/L	DL/DS - Daily When Discharging		GR - Grab			
					Value NODI																			
74055	Coliform, fecal general	1 - Effluent Gross	0	--	Sample											=	80.0		13 - #/100mL	0	DL/DS - Daily When Discharging	GR - Grab		
					Permit Req.												<=	400.0 DAILY MX			13 - #/100mL	DL/DS - Daily When Discharging	GR - Grab	
					Value NODI																			
82220	Flow, total	1 - Effluent Gross	0	--	Sample			=	303.33		80 - Mgal/mo										0	99/99 - Continuous		
					Permit Req.			Req Mon MO TOTAL		80 - Mgal/mo										99/99 - Continuous				
					Value NODI																			

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

30 days of discharge, including 4 days combined with A01 and 1 day combined with C01.

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-09 08:12 (Time Zone: -05:00)

Report Last Signed By

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-09 08:21 (Time Zone: -05:00)

DMR Copy of Record

Form Approved OMB No. 2040-0004 expires on 07/31/2026

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Permit

Permit #:

IL0028380

Major:

Yes

Permittee:

DOWNERS GROVE SANITARY DISTRICT

Permittee Address:

2710 CURTISS STREET
DOWNERS GROVE, IL 60515

Facility:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER

Facility Location:

5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Permitted Feature:

002
External Outfall

Discharge:

002-0
MIXING CHAMBER OVERFLOW TO ST JOSEPH CRK

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002 ; NUMBER OF DAYS OF DISCHARGE:CS

Principal Executive Officer

First Name:

Amy

Last Name:

Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00300	Oxygen, dissolved [DO]	1 - Effluent Gross	0	--	Sample										=	5.7	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MN	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample								=	11.6	=	12.9	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	30.0 MO AVG	<=	45.0 WKLY AVG	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00400	pH	1 - Effluent Gross	0	--	Sample						=	7.2			=	7.5	12 - SU	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.						>=	6.0 MINIMUM			<=	9.0 MAXIMUM	12 - SU		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample								=	6.7	=	8.5	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	30.0 MO AVG	<=	45.0 WKLY AVG	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	0	--	Sample										=	2.84	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample								=	1.93	=	3.04	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L	DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
50060	Chlorine, total residual	1 - Effluent Gross	0	--	Sample								=	0.2			19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	0.75 MO AVG			19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
74055	Coliform, fecal general	1 - Effluent Gross	0	--	Sample										=	54.0	13 - #/100mL	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.										<=	400.0 DAILY MX	13 - #/100mL		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
82220	Flow, total	1 - Effluent Gross	0	--	Sample			=	35.33	80 - Mgal/mo									DL/DS - Daily When Discharging	
					Permit Req.				Req Mon MO TOTAL	80 - Mgal/mo									DL/DS - Daily When Discharging	
					Value NODI															

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

3 days of discharge.

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-09 08:12 (Time Zone: -05:00)

Report Last Signed By

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-09 08:21 (Time Zone: -05:00)

DMR Copy of Record

Form Approved OMB No. 2040-0004 expires on 07/31/2026

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Permit

Permit #:
Major:

IL0028380
Yes

Permittee:
Permittee Address:

DOWNERS GROVE SANITARY DISTRICT
2710 CURTISS STREET
DOWNERS GROVE, IL 60515

Facility:
Facility Location:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER
5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Permitted Feature:

003
External Outfall

Discharge:

003-0
EXCESS FLOW TO ST JOSEPH CREEK

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002 ; NUMBER OF DAYS OF DISCHARGE:CS

Principal Executive Officer

First Name:
Last Name:

Amy
Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00300	Oxygen, dissolved [DO]	1 - Effluent Gross	0	--	Sample										=	6.9	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MN	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample								=	5.4	=	5.4	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	30.0 MO AVG	<=	45.0 WKLY AVG	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00400	pH	1 - Effluent Gross	0	--	Sample						=	7.5			=	7.5	12 - SU	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.						>=	6.0 MINIMUM			<=	9.0 MAXIMUM	12 - SU		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample								=	6.4	=	6.4	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	30.0 MO AVG	<=	45.0 WKLY AVG	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	0	--	Sample										=	0.43	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample								=	1.09	=	1.09	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon MO AVG	Req Mon DAILY MX	19 - mg/L	DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
50060	Chlorine, total residual	1 - Effluent Gross	0	--	Sample								=	0.13			19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.								<=	0.75 MO AVG			19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
74055	Coliform, fecal general	1 - Effluent Gross	0	--	Sample										=	380.0	13 - #/100mL	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.										<=	400.0 DAILY MX	13 - #/100mL		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
82220	Flow, total	1 - Effluent Gross	0	--	Sample			=	1.39	80 - Mgal/mo								0	DL/DS - Daily When Discharging	
					Permit Req.				Req Mon MO TOTAL	80 - Mgal/mo									DL/DS - Daily When Discharging	
					Value NODI															

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

1 day of discharge.

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-08 16:06 (Time Zone: -05:00)

Report Last Signed By

User:reeseberry

Name:Dorrance Berry

E-Mail:rberry@dgsd.org

Date/Time:2026-10-09 08:21 (Time Zone: -05:00)

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Permit

Permit #:
Major:

IL0028380
Yes

Permittee:
Permittee Address:

DOWNERS GROVE SANITARY DISTRICT
2710 CURTISS STREET
DOWNERS GROVE, IL 60515

Facility:
Facility Location:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER
5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Permitted Feature:

A01
External Outfall

Discharge:

A01-0
EXCESS FLOW FROM EXCESS FLOW CLARIFIERS

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002 ; NUMBER OF DAYS OF DISCHARGE:CS

Principal Executive Officer

First Name:
Last Name:

Amy
Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample										=	42.0	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	29.0	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	0	--	Sample										=	11.1	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample							=	1.43		=	2.04	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon MO AVG	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
82220	Flow, total	1 - Effluent Gross	0	--	Sample			=	28.83	80 - Mgal/mo									DL/DS - Daily When Discharging	CN - Continuous
					Permit Req.				Req Mon MO TOTAL	80 - Mgal/mo									DL/DS - Daily When Discharging	CN - Continuous
					Value NODI															

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

No errors.

Comments

4 days of discharge. Event 1: 9/17/26, discharging for 6.7 hours. 2.44 inches of rain over 7 hours. B01 flow rate at A01 start time: 17,299 gpm. Event 2: 9/19/26 to 9/21/26, discharging for 46.4 hours. 3.37 inches of rain over 32 hours. B01 flow rate at A01 start time: 16,689 gpm. 3 separate samples were collected during this multi-day continuous event.

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:

reeseberry

Name:

Dorrance Berry

E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-09 08:19 (Time Zone: -05:00)
<i>Report Last Signed By</i>	
User:	reeseberry
Name:	Dorrance Berry
E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-09 08:21 (Time Zone: -05:00)

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Permit

Permit #:

IL0028380

Major:

Yes

Permitted Feature:

B01
External Outfall

Permittee:

DOWNERS GROVE SANITARY DISTRICT

Permittee Address:

2710 CURTISS STREET
DOWNERS GROVE, IL 60515

Discharge:

B01-0
MIXING CHAMBER DISCHARGE TO THE E BRANCH DUPAGE RVR

Facility:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER

Facility Location:

5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002 ; DMF LOAD LIMITS DISPLAYED.

Principal Executive Officer

First Name:

Amy

Last Name:

Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00011	Temperature, water deg. fahrenheit	1 - Effluent Gross	0	--	Sample										=	71.8	15 - deg F	0	01/30 - Monthly	GR - Grab
					Permit Req.											Req Mon MO MAX	15 - deg F		01/30 - Monthly	GR - Grab
					Value NODI															
00300	Oxygen, dissolved [DO]	1 - Effluent Gross	1	--	Sample					=	7.1	=	6.8	=	6.8	19 - mg/L	0	03/DW - 3 Days Every Week	GR - Grab	
					Permit Req.					>=	5.5 MO AV MN	>=	4.0 MN WK AV	>=	3.5 DAILY MN	19 - mg/L		02/DA - 2 Days Every Week	GR - Grab	
					Value NODI															
00400	pH	1 - Effluent Gross	0	--	Sample					=	6.9			=	7.4	12 - SU	0	05/DW - 5 Days Every Week	GR - Grab	
					Permit Req.					>=	6.0 MINIMUM			<=	9.0 MAXIMUM	12 - SU		02/DA - 2 Days Every Week	GR - Grab	
					Value NODI															
00410	Alkalinity, total [as CaCO3]	1 - Effluent Gross	0	--	Sample										=	136.0	19 - mg/L	0	01/30 - Monthly	CP - Composite
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample	=	82.1	=	526.7	26 - lb/d			=	0.8	=	2.7	19 - mg/L	0	05/DW - 5 Days Every Week	CP - Composite
					Permit Req.	<=	2202.0 MO AVG	<=	4404.0 DAILY MX	26 - lb/d			<=	12.0 MO AVG	<=	24.0 DAILY MX	19 - mg/L		02/DA - 2 Days Every Week	CP - Composite
					Value NODI															
00600	Nitrogen, total [as N]	1 - Effluent Gross	0	--	Sample										=	16.8	19 - mg/L	0	01/30 - Monthly	CP - Composite
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite
					Value NODI															
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	8	--	Sample	=	44.72	=	261.21	26 - lb/d			=	0.49	=	1.85	19 - mg/L	0	05/DW - 5 Days Every Week	CP - Composite
					Permit Req.	<=	275.0 MO AVG	<=	550.0 DAILY MX	26 - lb/d			<=	1.5 MO AVG	<=	3.0 DAILY MX	19 - mg/L		02/DA - 2 Days Every Week	CP - Composite
					Value NODI															
00625	Nitrogen, Kjeldahl, total [as N]	1 - Effluent Gross	0	--	Sample										<	1.0	19 - mg/L	0	01/30 - Monthly	CP - Composite
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite
					Value NODI															
00630	Nitrite + Nitrate total [as N]	1 - Effluent Gross	0	--	Sample										=	16.8	19 - mg/L	0	01/30 - Monthly	CA - Calculated
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CA - Calculated
					Value NODI															
					Sample								=	3.18	=	4.59	19 - mg/L		01/30 - Monthly	CP - Composite
					Permit Req.									Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite

00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Value NODI													0					
00666	Phosphorus, dissolved	1 - Effluent Gross	0	--	Sample										=	4.27	=	4.27	19 - mg/L	0	01/30 - Monthly	CP - Composite	
					Permit Req.											Req Mon MO AVG		Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite	
					Value NODI																		
00940	Chloride [as Cl]	1 - Effluent Gross	0	--	Sample												=	140.0	19 - mg/L	0	01/30 - Monthly	GR - Grab	
					Permit Req.													Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	GR - Grab	
					Value NODI																		
30500	Coliform, fecal - % samples exceeding limit	1 - Effluent Gross	0	--	Sample												=	0.0	23 - %	0			
					Permit Req.													<=	10.0 MAXIMUM		23 - %		
					Value NODI																		
50050	Flow, in conduit or thru treatment plant	1 - Effluent Gross	0	--	Sample	=	10.19	=	23.39	03 - MGD										0	99/99 - Continuous		
					Permit Req.		Req Mon MO AVG		Req Mon DAILY MX	03 - MGD												99/99 - Continuous	
					Value NODI																		
50060	Chlorine, total residual	1 - Effluent Gross	0	--	Sample												<	0.015	19 - mg/L	0	02/DA - 2 Days Every Week	GR - Grab	
					Permit Req.													<=	0.038 DAILY MX		19 - mg/L	02/DA - 2 Days Every Week	GR - Grab
					Value NODI																		
74055	Coliform, fecal general	1 - Effluent Gross	0	--	Sample										=	5.4	=	50.0	13 - #/100mL	0	02/DA - 2 Days Every Week	GR - Grab	
					Permit Req.											<=	200.0 GEO MEAN		Req Mon DAILY MX		13 - #/100mL	02/DA - 2 Days Every Week	GR - Grab
					Value NODI																		
80082	BOD, carbonaceous [5 day, 20 C]	1 - Effluent Gross	0	--	Sample	=	120.68	=	320.36	26 - lb/d					=	1.4	=	2.5	19 - mg/L	0	02/DA - 2 Days Every Week	CP - Composite	
					Permit Req.	<=	1835.0 MO AVG	<=	3670.0 DAILY MX	26 - lb/d					<=	10.0 MO AVG	<=	20.0 DAILY MX	19 - mg/L		02/DA - 2 Days Every Week	CP - Composite	
					Value NODI																		

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User: reeseberry

Name: Dorrance Berry

E-Mail: rberry@dgsd.org

Date/Time: 2026-10-08 16:11 (Time Zone: -05:00)

Report Last Signed By

User: reeseberry

Name: Dorrance Berry

E-Mail: rberry@dgsd.org

Date/Time: 2026-10-09 08:21 (Time Zone: -05:00)

EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the [NPDES eReporting Help Desk](#) for further guidance. Please note that EPA may contact you after you submit this report for more information.

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Permit

Permit #:
Major:

IL0028380
Yes

Permittee:
Permittee Address:

DOWNERS GROVE SANITARY DISTRICT
2710 CURTISS STREET
DOWNERS GROVE, IL 60515

Facility:
Facility Location:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER
5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Permitted Feature:

C01
External Outfall

Discharge:

C01-0
EXCESS FLOW FROM INTERMEDIATE CLARIFIER #1

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002 ; NUMBER OF DAYS OF DISCHARGE:CS

Principal Executive Officer

First Name:
Last Name:

Amy
Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI:

--

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00310	BOD, 5-day, 20 deg. C	1 - Effluent Gross	0	--	Sample										=	23.8	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00530	Solids, total suspended	1 - Effluent Gross	0	--	Sample										=	32.3	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00610	Nitrogen, ammonia total [as N]	1 - Effluent Gross	0	--	Sample										=	3.78	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon DAILY MX	19 - mg/L		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
00665	Phosphorus, total [as P]	1 - Effluent Gross	0	--	Sample							=	1.25		=	1.25	19 - mg/L	0	DL/DS - Daily When Discharging	GR - Grab
					Permit Req.											Req Mon MO AVG	Req Mon DAILY MX		DL/DS - Daily When Discharging	GR - Grab
					Value NODI															
82220	Flow, total	1 - Effluent Gross	0	--	Sample			=	4.1	80 - Mgal/mo								0	DL/DS - Daily When Discharging	CN - Continuous
					Permit Req.				Req Mon MO TOTAL	80 - Mgal/mo									DL/DS - Daily When Discharging	CN - Continuous
					Value NODI															

Submission Note

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Edit Check Errors

No errors.

Comments

1 day of discharge. Event 1: 9/20/26, discharging for 9.1 hours. 3.37 inches of rain over 32 hours. B01 flow rate at C01 start time: 17,956 gpm.

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:

reeseberry

Name:

Dorrance Berry

E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-09 08:21 (Time Zone: -05:00)
<i>Report Last Signed By</i>	
User:	reeseberry
Name:	Dorrance Berry
E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-09 08:21 (Time Zone: -05:00)

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Major:

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Permittee:
Permittee Address:

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2710 CURTISS STREET
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Facility:
Facility Location:

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER
5003 WALNUT AVENUE
DOWNERS GROVE, IL 60515

Permitted Feature:

INF
Influent Structure

Discharge:

INF-L
INFLUENT MONITORING

Report Dates & Status

Monitoring Period:

From 09/01/26 to 09/30/26

DMR Due Date:

10/25/26

Status:

NetDMR Validated

Considerations for Form Completion

W0430300002

Principal Executive Officer

First Name:
Last Name:

Amy
Underwood

Title:

General Manager

Telephone:

630-969-0664

No Data Indicator (NODI)

Form NODI: --

Parameter		Monitoring Location	Season #	Param. NODI		Quantity or Loading					Quality or Concentration							# of Ex.	Frequency of Analysis	Sample Type
Code	Name					Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units			
00310	BOD, 5-day, 20 deg. C	G - Raw Sewage Influent	0	--	Sample								=	203.0			19 - mg/L	0	09/99 - See Permit	CP - Composite
					Permit Req.									Req Mon MO AVG			19 - mg/L		09/99 - See Permit	CP - Composite
					Value NODI															
00530	Solids, total suspended	G - Raw Sewage Influent	0	--	Sample								=	185.0			19 - mg/L	0	09/99 - See Permit	CP - Composite
					Permit Req.									Req Mon MO AVG			19 - mg/L		09/99 - See Permit	CP - Composite
					Value NODI															
00600	Nitrogen, total [as N]	G - Raw Sewage Influent	0	--	Sample										=	30.6	19 - mg/L	0	01/30 - Monthly	CP - Composite
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite
					Value NODI															
00665	Phosphorus, total [as P]	G - Raw Sewage Influent	0	--	Sample										=	6.08	19 - mg/L	0	01/30 - Monthly	CP - Composite
					Permit Req.											Req Mon DAILY MX	19 - mg/L		01/30 - Monthly	CP - Composite
					Value NODI															
50050	Flow, in conduit or thru treatment plant	G - Raw Sewage Influent	0	--	Sample	=	10.13	=	22.77	03 - MGD								0	99/99 - Continuous	
					Permit Req.		Req Mon MO AVG		Req Mon DAILY MX	03 - MGD									99/99 - Continuous	
					Value NODI															

Submission Note

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Edit Check Errors

No errors.

Comments

Attachments

No attachments.

Report Last Saved By

DOWNERS GROVE SANITARY DISTRICT

User:

reeseberry

Name:

Dorrance Berry

E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-08 16:13 (Time Zone: -05:00)
<i>Report Last Signed By</i>	
User:	reeseberry
Name:	Dorrance Berry
E-Mail:	rberry@dgsd.org
Date/Time:	2026-10-09 08:21 (Time Zone: -05:00)

DOWNERS GROVE SANITARY DISTRICT

M E M O

TO: Amy Underwood, General Manager

FROM: Nick Whitefleet, Maintenance Supervisor

DATE: October 15th, 2026

SUBJECT: September 2026 Maintenance Report

Attached is a work order summary detailing equipment repair and preventive maintenance activities conducted by the maintenance department during September 2026.

Special projects in September included:

Bar Screen 2 Compactor Overhaul:

The large conveyor screw or auger broke at the coupler where it attaches to the gear motor that spins the conveyor. The same failure occurred several years ago, but instead of replacing the auger and coupler maintenance personnel welded the broken auger and put it back in service. This time repair was no longer an option due to significant corrosion of the auger. Additionally, it was noted that the discharge screen on the outlet of the compactor had been damaged. The screen was repaired at a local welding/fabrication shop and was able to be reused. The auger, coupler, seals, and liner were all replaced with new components from stock. The parts were purchased in 2024 at the cost of \$7,015 and the screen repair was \$500. The compactor is back in service and performs as designed.

Earlston Lift Station Intake Valve Actuator Repair:

Valve exercising is regularly performed at both the plant and at lift stations to maintain the functionality and lifespan of each valve. The procedure for exercising valves varies based on the type of valve, but essentially the valve is fully opened and fully closed by personnel at planned intervals. Personnel performing the exercise report back on their condition, so we can plan valve replacements in advance. While exercising the valves during routine lift station inspections at Earlston lift station, the 10" intake valve for pump 2 failed while closing it and the valve was stuck at 50% open. Fortunately, while investigating what had failed, maintenance personnel were able to determine that the segment gear was the problem, and they were able to manually open the valve to 100%. Due to their ability to safely open the valve, pump 2 was able to remain in operation while we waited for the parts to arrive. Two segment gear assemblies were ordered. One was installed on pump 2 and the other was kept for stock. The total cost of the actuator repair was only \$450 and that includes the spare gear. The valve itself is being monitored closely as it may need near-future repair as well.

Lift station Air Relief Valve Maintenance:

This month the maintenance department performed maintenance on the vacuum / air relief valves installed on lift station force mains. Fourteen (14) valves were removed from service, rebuilt, and reinstalled. This maintenance keeps the valves functioning, ensuring optimal flow, which reduces operational costs and water hammer.

Northwest Lift Station Low-Flow Pump 1, Overhaul:

Due to the intake valve replacement at Northwest lift station being completed last month, Maintenance personnel were finally able to remove pump 1 and bring it to our shop for overhaul. The pump was disassembled, assessed, and repaired. We believe the shaft seal failed, allowing water to infiltrate the lower bearing cavity and caused the bearings to fail. All upper and lower bearings were replaced with new, along with oil seals, gaskets, fastening hardware, and the shaft seal. All parts that were reused were cleaned, inspected, and tolerances measured as applicable before reassembly. After the overhaul was completed, the pump was reinstalled and put back into service. The pump is currently operating as expected. The total cost for the required overhaul parts came in at \$4,065 and were purchased last fiscal year.



NWLS LF Pump 1 – Failed shaft seal (above).

CHP System – Units 1&2 Operation Update:

CHP 1: CHP 1 performed as expected through the month of September. There were no major repairs required and downtime was due to planned maintenance, or low fuel levels, and the gas cleaning equipment required repair.

CHP 2: CHP 2 was inoperable to begin the month while we waited on a replacement part. Once the part was received and installed CHP 2 performed as expected throughout the rest of the month. Downtime was limited to planned maintenance, low fuel levels, and the gas cleaning equipment required repair.

Procurement:

Nissen, \$2,636, 2-site visits in August, troubleshoot & repair throttle valve on CHP 2.

Grainger, \$5,777.36, Eaton soft-start, Liberty Park LS pump 2.

Grainger, \$531.17, New pallet jack for MSB.

John Crane, \$2,075.92, shaft sleeve for excess raw sewage pump 8.

BEA Illinois, \$1,033.75, Level transducer, Belt press sludge hopper #2.

Concentric Int. \$1,499.85, Analog input card, stock/CHP gas cleaning PLC.

Delta Ind. \$1,811.28, Preventative maintenance on WWTC ODS grit compressor.

LAI LTD, \$12,858.62, New Rotork valve actuator, Manhole 2 (South).

Create-Cut-Invent, \$2,000, Modify/reinforce the fabricated discharge screen, Bar screen compactors 1.

Northwest Electric Motor, \$13,942.22, New spare DeMag motor, Excess clarifier cord reels.

A-Formula, \$856.25, Investigate/repair JTS chiller, CHP gas cleaning system.

A-Formula, \$715, Investigate/repair Hobson LS control building AC units (2).

Maddox, \$12,918.63, Isolation transformer, Turbo blower 3.

cc: AES, JMW, ME, KJR, RTJ, MJS, CS, DM

Work Order Summary

Work Order Completion Dates from 9/1/2026 to 9/30/2026

Work Assignment	Completion Date	Equipment	NOTATIONS
Digester 1 Mixing System Semi-Annual/2000 Hour Oil Change	01-Sep-26	Digester 1 Mixing Pump	
Quarterly oil sample		Emergency Generator 1 Emergency Generator 2 Emergency Generator 3	Altorfer CAT took oil samples and sent out for lab analysis.
Excessive belt noise - adjust tension		Intermediate Sludge Pump 2	Adjusted tension on belt w/ adjustable pump base. Verified improved operation.
Six Month Oil Change Primaries 5 & 6 Long & Cross Collector		Primary Clarifier 5 Primary Clarifier 6	
Six Month Oil Change Primaries 7-8-9 Long & Cross Collector		Primary Clarifier 7 Primary Clarifier 8 Primary Clarifier 9	
Procure spare A/I card - compactlogix		SCADA	Purchased spare analog input card for stock (replace the one used for gas cleaning PLC).
2 Month grease of new WAS pump #2	02-Sep-26	WAS Pump 2 (Thickener Feed)	
Grease Tracks, Check Lube Sites On Bar Screens #1 & #2	03-Sep-26	Bar Screen 1 - North Bar Screen 2 -South Bar Screen Rag Compactor	
Gas mixer won't run in auto - PLC		Digester 1 Mixing Pump	DGSD performed troubleshooting & determined the issue was with the PLC. Concentric was contacted and were able to resolve the PLC fault.
6 months greasing of op station roof vent blowers		Operations Center	
Gas mixer won't run in auto - PLC		SCADA	DGSD performed troubleshooting & determined the issue was with the PLC. Concentric was contacted and were able to resolve the PLC fault.
Exercising of secondaries 1 and 2 influent gates		Secondary Clarifier 1 Secondary Clarifier 2	
Clean Pump Seal Water Filters At Lift Stations	04-Sep-26	Butterfield Pump 1 Butterfield Pump 2 Earlston Pump 1 Earlston Pump 2	Replaced station filters elements w/ new from stock. reordered for stock.
6 Month Oil Change On Bearings on Grit Pumps 1, 2, 3, & 4.		Grit Pump 1 Grit Pump 2 Grit Pump 3	
PLANT BIO FILTER MEDIA CHANGEOUT		Hobson Lift Station	Uno construction removed old media from filters. DGSD transported old media away from site. DGSD staff refilled filters w/ new media.
Clean Pump Seal Water Filters At Lift Stations		Hobson Pump 1	Replaced station filters elements w/ new from stock. reordered for stock.

Work Assignment	Completion Date	Equipment	NOTATIONS
		Hobson Pump 2	
		Hobson Pump 3	
		Hobson Pump 4	
		Wroble Pump 1	
		Wroble Pump 2	
PLANT BIO FILTER MEDIA CHANGEOUT		WWTC Bio-Filter	Uno construction removed old media from filters. DGSD transported old media away from site. DGSD staff refilled filters w/ new media.
CHP 1 oil change, 31,135 hours	08-Sep-26	CHP Engine Genset #1	Changed oil and oil filters. Took oil sample and sent for lab analysis. Sample # IND-81429.
Lubricate skid steer and attachment mechanism	09-Sep-26	2019 Skid Steer	
EXERCISE OF A.T. 1-7 MUD VALVES		Aeration Tank 01	
		Aeration Tank 02	
		Aeration Tank 03	
		Aeration Tank 04	
		Aeration Tank 05	
		Aeration Tank 06	
		Aeration Tank 07	
3 MONTH EXERCISE OF A.T. DIFFUSER VALVES		Aeration Tank 08	
		Aeration Tank 09n	
		Aeration Tank 10	
		Aeration Tank 11	
Coolant Leak from 10mm flared line		CHP Engine Genset #2	Unable to source replacement locally. Ordered used line from Nissen & installed. 10mm tube from turbo to fr. intake. Cyl.1-4 side upper.
Oil Bell & Gosset Pumps		Digester 1 Heat Exchanger	
		Digester 2 Heat Exchanger	
		Digester 3 Heat Exchanger	
		Digester 4 Heat Exchanger	
		Digester 5 Heat Exchanger	
		Excess Flow Pump Station	
Replace Air Filter On Operations Center Furnace		Operations Center	Replaced 20"x25"x5" air filter at Ops furnace.
Control bldg. AC - clean coils, rplc. capacitor & contactors	10-Sep-26	Hobson Lift Station	Both Liebert units required repair. DGSD clean coils & replace filters. A-Formula replaced 2-contactors & 1 capacitor.
2 MONTH EXERCISE AND INSPECTION OF PORTABLE GENERATORS		Portable Generator 150	Inspected and tested portable generator as described in task w/o.
		Portable Generator 200	
		Portable Generator 350	
Overhaul South compactor, repair outlet screen	11-Sep-26	Bar Screen Rag Compactor	South compactor overhauled in shop. New coupler, auger, liner, & seals installed. CCI repaired discharge screen.

Work Assignment	Completion Date	Equipment	NOTATIONS
Exercise valves at Belt Press Building		Belt Filter Press Belt Filter Press Building Belt Press Feed Sludge Pits Belt Press Polymer Mix System Belt Press Sludge Conveyor Belt Press Sludge Feed Pump 1 Belt Press Washwater System	
Change Pre-Filters Blowers 1 - 4.		Blower Bag Room	
Quarterly Flushing of Dig 4/5 sludge line air relief valve		Digester 4 - 5 SI Recrc Pmp 6	
12 Month/10,000 Mile Synthetic Oil Change (2026 F-250) # 348 MAINTENANCE	14-Sep-26	2026 Ford F-250	Changed oil and oil filter. Replaced cabin and engine air filters.
Check Hose Connections On #2 & #4 PEARTH Units		Digester 2 Mixing System	
500 Hour Oil Change on Pearth 4		Digester 4 Mixing System	
Monthly Underground Storage Tanks Inspection		Emerg Gen Diesel Storage Tank	
Recall - Replace emmissions decal	15-Sep-26	2024 Ford F150 XL 2WD SuperCab	Cleaned sticker location under hood. Installed engine emissions decal over original.
Inspect Chiller Unit - Add Refrigerant		CHP Gas Cleaning System	A-Formula investigated JTS chiller unit due to excessive noise while loading/unloading. Added 5-lbs. refrigerant.
MONTHLY SAMPLE FOR LAB OF SUP FROM 3&5		Digester 3 Digester 5	
Replace Discharge Force Main Air Relief Valves (1)	16-Sep-26	Centex Discharge Force Main	Replaced the lone A/V/R valve w/ rebuilt assy. Overhauled old valve assy.
Replace lag sump pump check valve		Digester 3 Control Building	Replaced failed check valve w/ new. lag sump pump in dig. 3 bsmt.
Replace Discharge Force Main Air Relief Valves (2)		Hobson Discharge Force Main	Replaced both A/V/R valves w/ overhauled assys. Overhauled the assys that were removed.
Replace worn out wiper blades	17-Sep-26	2020 F350 4x4	Replaced both windshield wiper blade assys. w/ new.
Replace failed battery, install trickle charger		2021 Miller Bobcat Gas Welder	Replaced battery with new. Installed trickle on welder to maintain battery while not in use.
Check Sump Pumps at The WWTC and Administration Bldg.		Administration Center Blower Building Digester 1 and 2 Control Bldg Digester 3 Control Building Digester 4 - 5 Control Buildg Excess Flow Pump Station Excess Flow Sludge Pump House Grit Building Hypochlorite Feed Blg	

Work Assignment	Completion Date	Equipment	NOTATIONS
Replace Discharge Force Main Air Relief Valves (4)		Interm Clarifier Sludge Bldg	
Check Sump Pumps at The WWTC and Administration Bldg.		Liberty Park Dschrg Force Main	Replaced 2 of 4 A/V/R valves on LP FM w/ rebuilt assys. Overhauled valves that were removed.
Replace Discharge Force Main Air Relief Valves (3)		Maintenance Services Building	
Check Sump Pumps at The WWTC and Administration Bldg.		Microstrainer Building	
		Northwest Discharge Force Main	Removed and replaced all 3 A/V/R valves at NWLS w/ rebuilt assys. Overhauled all 3 valves that were removed.
		Operations Center	
Compressor failed - replace blown fuses		Raw Sewage Pump Station	
Semi-Annual Greasing Of Various Equipment	18-Sep-26	Tunnel/Chan Aeration Tank 1-11	Blown 20 amp fuses replaced w/ new. Utility power line broke during storm and plant ATS switched feeds.
		WWTC ODS Pump Air Compressor	
		Chlorine Contact Tank	
		Digester 3	
		Digester 5	
		Excess Flow Clarifier 1	
		Excess Flow Clarifier 2	
		Excess Flow Clarifier 3	
		Excess Flow Clarifier 4	
		Grease Pump	
		Grease Pump - West	
		Microstrain Wastewater Pump 1	
		Microstrain Wastewater Pump 2	
Overhaul pump - failed seal & bearings		Northwest Low Flow Pump 1	Removed pump from station & overhauled in shop. Replaced bearings,gaskets,hardware&all seals w/ new from stock.
Valve # 1 wont' fully close		Primary Clarifier 1	Replace internal plug assy. only in valve. Adjusted mechanical open/close limits. verified operation w/ actuator reinstalled.
Monthly Cross Collector Check		Primary Clarifier 3	
		Primary Clarifier 4	
		Primary Clarifier 5	
		Primary Clarifier 6	
		Primary Clarifier 7	
		Primary Clarifier 8	
		Primary Clarifier 9	
Semi-Annual Greasing Of Various Equipment		TWAS Pump	
Replace Discharge Force Main Air Relief Valves (2)		Venard Discharge Force Main	Replaced both A/V/R valves with rebuilt assys. Overhauled both valves that were removed.
		Wroble Discharge Force Main	Replaced both A/V/R valves with rebuilt assys. Cleaned and overhauled both valves after removal.
Qt. Valves and Gates Exercise	20-Sep-26	Excess Flow 003 Valves	
By-Weekly Fluid and Misc. Check	21-Sep-26	Emergency Generator 1	

Work Assignment	Completion Date	Equipment	NOTATIONS
of Generators		Emergency Generator 2 Emergency Generator 3	
Delta Ind. PM of compressor	22-Sep-26	WWTC ODS Pump Air Compressor	Delta ind. performed PM due to runtime.
Monthly Fire Extinguishers Inspection	23-Sep-26	5006 Walnut Eqpmnt Strge Bldg Administration Center Bar Screen Building Belt Filter Press Building Bisulfite Building Blower Building Digester 1 and 2 Control Bldg Digester 3 Control Building Digester 4 - 5 Control Buildg Emergency Generator Building Excess Flow Pump Station Excess Flow Sludge Pump House Filter Building Grit Building Hypochlorite Feed Blg Interm Clarifier Sludge Bldg Laboratory Maintenance Services Building Microstrainer Building Operations Center Raw Sewage Pump Station System Garage	
Repair intake valve actuator	24-Sep-26	Earlston Pump 2	Replaced broken worm gear w/ new on intake plug valve actuator.
MONTHLY TWAS POLYMER SYSTEM CLEANING	25-Sep-26	WAS Thickener Polymer System	
3 Months Inspection on Electric Carts and Front End Loader	28-Sep-26	2016 Club Car Carryall 300 2019 Yamaha UMAX 2 AC (#3) 2022 Club Car Carryall 500 2023 Club Car Carryall 500	
Assemble new office chairs		Administration Center	Assembled new office chairs. Delivered to admin and removed old chairs.
52,910 hours, 1200 hour service		CHP Engine Genset #2	Performed all required tasks of a 1200 hour service. Replaced engine air filter(1) and ign. wire insulators(8)from
Thursday, October 15, 2026			

Work Assignment	Completion Date	Equipment	NOTATIONS
Procure new actuator - Manhole 2 South		Secondary Clarifier 1	stock.
		Secondary Clarifier 2	Procured new Rotork actuator w/ machined bushing to install at manhole 2 South (to intermediates).
		Secondary Clarifier 3	
		Secondary Clarifier 4	
		Secondary Clarifier 5	
		Secondary Clarifier 6	
		Secondary Clarifier 7	
		Secondary Clarifier 8	
		Secondary Clarifier 9	
		Yard Piping - Liquid Treatment	
Replace level sensor / transducer - sludge hopper 2	29-Sep-26	Belt Press Feed Sludge Pits	Replaced failed level transducer with new from stock. Ordered new sensor for stock.
Procure maintenance parts for stock		CHP Engine Genset #1	Purchased bldg. vent filters from Grainger & engine air filters & spark plug seals from Energy choice.
		CHP Engine Genset #2	
Procure air/vacuum relief valve maint. parts for stock	30-Sep-26	Centex Discharge Force Main	
Procure spare DeMag motor - excess bridge cord reels		Excess Flow Clarifier 1	Our third/spare DeMag motor was no longer repairable. New unit purchased and blower Assy was transferred from old to new.
		Excess Flow Clarifier 2	
		Excess Flow Clarifier 3	
		Excess Flow Clarifier 4	
Procure air/vacuum relief valve maint. parts for stock		Hobson Discharge Force Main	
		Liberty Park Dschrg Force Main	
Pump 2 fail - replace soft start & 24v. power supply		Liberty Park LS Pump 2	Pump 2 failed unexpectedly during a storm & utility power loss. Both the 24v power supply & soft start tested "bad" and were replaced.
Patch & paint drywall - MSB		Maintenance Services Building	Patched drywall throughout MSB where necessary. Painted patches and touched up interior wall paint.
Procure air/vacuum relief valve maint. parts for stock		Northwest Discharge Force Main	
		Venard Discharge Force Main	
		Wroble Discharge Force Main	

DOWNERS GROVE SANITARY DISTRICT
M E M O

DATE: October 6, 2026

TO: Amy Underwood
General Manager

FROM: Todd Freer
Sewer System Maintenance Supervisor

RE: Monthly Report – September 2026

1.

JULIE Line Markings:	Current	Year to Date
Received	2,180	15,525
In District	2,043	14,531
Marked	467	4,133
Man Hours	206.0	1,592.8

2.

Building Service:	Current	Year to Date
BSSRAP TV Inspections	18	168
Emergency BSSRAP Repairs	7	84
Total BSSRAP Repairs	18	137
I&I Inspections	0	0
I&I C.O. Inspections	0	0
Replace Broken Cleanout Caps	0	7
OHSP TV Inspections	0	4
Post Rodding TV	6	49

3.

Sewer Back-Ups:	Current	Year to Date
Public Sewer	0	6
Private Sewer	18	195
Surcharged Main	1	8
Pump Station	0	1
Total	19	210

4.

	Current	Year to Date
Sewer Cleaning (DGSD Personnel):	35,976.4 Ft.	222,883.0 Ft.
a. Sewer Cleaning (Outside Contractors)	0 Ft.	372 Ft.

5.

Main Sewer Televising (DGSD personnel)	3,452 Ft..	7,294.6 Ft.
a. Sewer Televising (Outside Contractors)	0 Ft.	52,271 Ft.

6.

	Current	Year to Date
LETS TV	0	0

7.

Manhole Inspections	0	44
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8. Infiltration/Inflow Removal Work

Inspection efforts on private property under the I/I program with the intention of conducting I/I removal are on-going in the 1K-028 basin in downtown Downers Grove. A map showing progress for the 1K-028 is included herein, as well as a summary sheet.

9.

The televising truck has been received, however it is back with the local manufacturer's representative who is working with the manufacturer to resolve a high temperature problem. The problem was discovered during training when the control room was uncharacteristically hot. It was pinpointed to the lack of heat shielding from under the chassis causing inside floor temperatures around 140F, with under chassis readings in excess of 200F at idle. The truck was received back briefly for Open House and was used to televise a main later in the week.

10.

What appears to be a foam-based grout was discovered blocking two sections of the public main across from the Downers Grove Village Hall. Fortunately, these two sections are not serving any properties in a significant manner presently. Televising shows evidence of the foam entering joints through the ground, suspected to have originated from the St. Joe's Creek large diameter storm sewer lining project. Efforts are currently underway to remove the hardened grout.

11.

A letter was written to the President of National Power Rodding regarding their sub-par performance in fulfilling the terms of the 2025-2026 Sewer Televising Project. The President of NPR has received and acknowledged the letter. He has contacted our office and has offered to televise 3800 feet of sewer at no charge on a project we wish and has expressed his deepest apology regarding the matter.

12.

Efforts are being made to move forward to accomplish tree clearing near southern portion of the 24-inch diameter trunk line at Northwest Lift Station. Competitive quotes are being gathered currently and is estimated to be under \$20K for the work. We hope to accomplish this between November 1st and March 1st, 2027.

13.

Payment of \$3451.90 to DGSD was received from a Directional Boring Contractor for the BSSRAP repair that was done at 4518 Prince Street for a hit service.

14.

A claim was recently made to the contractor regarding a recent watermain hit a sanitary service at 255th Street, Downers Grove. DGSD repaired the service as an emergency under the BSSRAP Program. DGSD is seeking \$13,995.13 for the repair from the Contractor. The project was for new watermain installed across the street from the property in Westmont.

15. Approximately 50% more total JULIE tickets have been received as opposed to this time last year and the amount of tickets marked by personnel has doubled respectively. This is attributed to multiple fiber boring projects as well as new gas main boring projects. It is anticipated to continue at this pace through 2027.

CC: AES, JMW, KJR, RTJ, MJS, DM, CS, KWS, ME

Downers Grove Sanitary District I&I Removal Target Area 1K-028 Parcel Status



- Legend**
- 2021 Phase III Mainlines Replaced
 - Failed Review
- Replaced**
- 2018 Replacement
 - 2016 Sanitary Sewers Replaced
 - Parcels Assessment/Real Estate
 - SWNETMHG
 - Manholes
 - Mainlines
- 1K-028 Parcels**
- Inspection Needed
- Status**
- 1A Has a Cleanout And All PVC Service
 - 1B All PVC Service No OSCO
 - 2A C/O Installed, Ready For Rehab
 - 2AI C/O Installed Needs Investigation
 - 2B Agreement Received Ready For C/O
 - 2BC Agreements Received, C/O & TV Needed
 - 2D BSSRAP/OHSP TV Done
 - 3A Released For Cleanout
 - 4 Inspection Done Agreements Needed
 - 4A Has An Existing Cleanout
 - 5 Scheduled For An Inspection
 - 5A Inspection Done Qualifies for BSSRAP
 - 5B Unable to TV
 - 5BX Unable to TV, Violation
 - 5X Violation
 - X Demolished/Vacant

STATUS OF 1K-028 INSPECTIONS AND AGREEMENT ACQUISITIONS

Category	Inspections Scheduled	Inspections Completed	Application Received	Agreements Signed	Cleanout Installed	Service Rehab Done	Totals	Total as Percentage
1A	Y	Y	N	Y	Y	N/A	19	8%
1B	Y	Y	N	N	N	N/A	1	0%
2A	Y	Y	Y	Y	Y	N	89	38%
2B	Y	Y	Y	Y	Y	N	17	7%
2D	Y	Y	Y	N	N	N	3	1%
3A	Y	Y	Y	Y	N	N	4	2%
4	Y	Y	N	N	N	N	38	16%
4A	N	N	N	N	N/A	N	4	2%
5	Y	N	N	N	N	N	0	0%
5A	Y	Y	N	N	N	N	11	5%
5AX	Y	Y	N	N	N	N	0	0%
5B	Y	N	N	N	N	N	12	5%
5BX	Y	N	N	N	N	N	1	0%
0	N	N	N	N	N	N	30	13%
X	-	-	-	-	-	-	5	2%
5X	-	-	-	-	-	-	1	0%

Category Description:

- 1A - PVC service with cleanout(may need to be sealed at the main)
- 1B - All PVC no Cleanout
- 2A - Cleanout installed, ready for rehab
- 2B - Ready for rehab
- 2D - BSSRAP/OHSP TV done
- 3A - Released to contractor for cleanout installation
- 4 - Inspection completed (Program application needed)
- 4A - Has an existing cleanout
- 5 - Inspections scheduled
- 5A - Inspection done - BSSRAP needed (qualifying defects or obstructions seen during TV)
- 5AX - Violation, BSSRAP needed
- 5B - Unable to TV
- 5BX - Unable to TV Violation
- 0 - Inspection Needed
- X - Demolished
- 5X - Inspection done - Violation not corrected

235 100%

11% Complete

2015 Basin I&I Ranking = 1
2016 Basin I&I Ranking = 27
2018 Basin I&I Ranking = 6
2019 Basin I&I Ranking = 20
2020 Basin I&I Ranking = 15
2025 Basin I&I Ranking = 10

Combined pit violations found and corrected to date - 0
Storm pit violations found and corrected to date - 2
Leaking catch basin disconnected and abandoned to date - 1

DOWNERS GROVE SANITARY DISTRICT
M E M O

DATE: October 05, 2026

TO: Amy R. Underwood
General Manager

FROM: Keith Shaffner
Sewer Construction Supervisor

RE: Monthly Report: Sewer Construction \ Code Enforcement – September 2026

1.	Permits issued:	Current	Year to Date
	a. Single family	10	79
	b. Multiple family	0	2
	c. Commercial	2	8
	d. Repair	1	11
	e. Disconnection	<u>2</u>	<u>27</u>
	Total	15	127
2.	Inspections made:	Current	Year to Date
	a. Connections	15	90
	b. Finals	7	29
	c. Repairs	1	13
	d. Disconnects	7	33
	f. Walk-Thru	0	0
	g. Pre-connections	0	7
	h. Overhead Sewer Program	0	1
	i. Code Enforcement	0	4
	j. Lateral testing	<u>11</u>	<u>49</u>
	Total	41	226
3.	New Sewer Extension Construction:		
	None		
4.	New Sewer Extension Testing - air, deflection, manhole, and televising:		
	None		
5.	Code Enforcement:		
	None		

6. Plan & Permit Reviews:
 - a. 6120 S. Cass – Commercial Review
 - b. 4820 Linscott – Single Family Review
 - c. 330 Ogden – Commercial Review
 - d. 4917 Main – Commercial Review
 - e. 1440 Gilbert – Single Family Home Review
 - f. 417 2nd – Pool House Connection Review
 - g. 70 Pierce – Single Family Home Review
 - h. 3813 Cumnor – Single Family Home Review
7. Building Sanitary Service Access Agreements:
 - a. 4820 Linscott – Downers Grove
 - b. 4640 Stonewall – Downers Grove
 - c. 1440 Gilbert – Downers Grove
8. Illinois EPA Permits:

4031 Venard – Sewer Extension - 4 PE
9. Miscellaneous:

None

CC: AES, JMW, ME, KJR, RTJ, MJS, TF, CS & DM

Permits Issued: SEPTEMBER 2026

YEAR	PERMIT #	ADDRESS	STREET	CITY	ISSUE	TYPE	TAP FEE	INSP FEE
2026	112	417	2ND	DG	9/1/2026	DISCON		
2026	66	414	OGDEN	DG	9/2/2026	COM		\$285.00
2026	60	241 S	PARK	W	9/3/2026	SF-RB		\$298.00
2026	98	306	60TH	DG	9/4/2026	SF	\$4,035.50	\$298.00
2026	97	302	60TH	DG	9/4/2026	SF	\$4,035.50	\$298.00
2026	111	4820	LINSCOTT	DG	9/4/2026	SF	\$4,035.50	\$298.00
2026	105	4640	STONEWALL	DG	9/9/2026	SF-RB		\$298.00
2026	115	70	PIERCE	DG	9/11/2026	SF	\$4,035.50	\$298.00
2026	117	4632	WASHINGTON	DG	9/14/2026	DISCON		
2026	119	5313	FAIRVIEW	DG	9/16/2026	REPAIR		
2026	114	417	2ND	DG	9/16/2026	SF-RB		\$298.00
2026	113	1440	GILBERT	DG	9/16/2026	SF	\$4,035.50	\$298.00
2026	123	4917	MAIN	DG	9/18/2026	COM		\$285.00
2026	121	3813	CUMNOR	DG	9/21/2026	SF	\$4,035.50	\$298.00
2026	91	6040	MARGO	DG	9/30/2026	SF	\$4,035.50	\$298.00
TOTAL:							\$28,248.50	\$3,550.00

Permit Final Inspections: SEPTEMBER 2026

YEAR	PERMIT #	ADDRESS	STREET	CITY	FINAL
2025	82	2001	63RD	DG	9/3/2026
2026	13	130	39TH	DG	9/8/2026
2025	105	6130	FAIRVIEW	DG	9/18/2026
2025	29	2539	OGDEN	DG	9/21/2026
2026	14	150	39TH	DG	9/23/2026
2025	83	2300	WARRENVILLE	DG	9/29/2026
2025	51	5721	LYMAN	DG	9/29/2026

Progress Report

To: Amy Underwood, General Manager
From: Reese Berry, Laboratory Supervisor
Date: October 8, 2026
Re: September 2026 Laboratory Report

DGSD had 4 excess flow sampling events with zero permit excursion during September 2026.

Pretreatment:

I had an initial brief discussion with another wastewater agency about shared equipment for PFAS sampling. This equipment needs to be dedicated to only sampling for PFAS to eliminate contamination sources. The idea is to share the equipment and save money as a shared purchase. We collected a laboratory filtered water sample to check if our system is PFAS free and the results were No Detection of PFAS in the sample. We are moving on to build a sampling SOP and beginning to understand the equipment we'd need to purchase for PFAS sampling. I'm waiting for an update from the other wastewater agency after a meeting they had scheduled during September.

Semi-annual sampling of Industrial Users was all well under their permit limits. We are completing inspections in the month of October as well.

IWS and Dental Amalgam follow up letters were sent out in September.

We completed the semi-annual NPDES sampling requirements in the month of September. All data was acceptable and under concentration limitations.

Surcharge:

We were able to complete 1 week of surcharge sampling this month. During the month of October, we hope to complete 3 weeks of sampling, since it's a slower month without biosolids salmonella testing.

Biosolids:

We sampled our Class A Biosolids during the month of September and all results were well below acceptable limits.

Procurement:

The laboratory microscope had an issue with the software crashing while using the camera when viewing filamentous bacteria and live organism samples. A tech came to our facility and stated software/camera needed the older OS and software on the PC. To fix the issue, we needed the software/camera updated on the microscope to match the OS. That work was completed the week before Open House. We have much clearer images after the upgrade. This makes identifying the filamentous bacteria much easier and faster for our technicians.

C: AES, JMW, ME, KJR, RTJ, MJS, CSS, DM

To: Board of Trustees
From: Amy R. Underwood, P.E.
Re: Engineering Report for September 2026
Date: October 16, 2026



A summary of the status of several projects is provided below.

I. PLANNING

A. Facility Plan

Any further action on the facility plan is on hold until the regionalization study is completed. The regionalization study will include a review and value engineering of the facility plan.

B. Regionalization Study

The second payment to Donohue & Associates, Inc. is included in the October Claim Ordinance. Please note that the District will invoice DuPage County, Flagg Creek WRD, and Glenbard WA for their shares when the project is complete.

	<u>Overall</u>	<u>DGSD Share</u>
Engineering Fee	\$113,470.00	\$101,410.00
Total Billed to Date	\$33,327.40	\$31,915.70
Less Previous Payments	- <u>\$20,720.75</u>	- <u>\$19,888.25</u>
Current Payments Due	<u>\$12,606.65</u>	<u>\$12,027.45</u>
Remaining	\$80,142.60	\$69,494.30

A lift station site visit was completed with Donohue in September. A meeting was held with Flagg Creek WRD staff to work out potential connection points and force main routings. A similar meeting will be held in October with DuPage County.

C. Manhole 1K-049 Review

Manhole 1K-049 had a wet weather overflow on August 1, 2026. Baxter & Woodman (B&W) is reviewing recent televising footage between Manhole 1K-049 and the next downstream manhole. A report from B&W is expected in October.

II. DESIGN PROJECTS

A. Maple Grove Bridge and Sanitary Sewer Replacement Project

Christopher B. Burke Engineering, Ltd. continues working on the Phase I and Phase II design.

B. Butterfield Lift Station Replacement

The design-build contractor who provided a proposal for this work has provided a revised proposal for consideration. District staff have not responded yet as they are considering delaying this project and combining it with the College Lift Station replacement project, which is currently planned to start construction in 2028.

C. Filter Building Dehumidifier (Munters)

The existing filter building dehumidifier, which uses digester gas, is currently non-functional. A technician from the manufacturer, Munters, inspected the system and recommended modifying the existing system from an indirect fired burner to a direct fired burner. Due to efficiency, indirect fired units and subsequently the associated parts are no longer available for this application. Digester gas cannot be used in direct fired units because of the impurities in the gas. District staff have asked Munters whether the existing unit can be modified to operate on natural gas. The Munters salesperson believes it can, and the District is expecting a proposal for the work soon.

Concurrently, District staff have asked B&W to review the system. They are evaluating replacing it with an air handling unit that operates on an alternate renewable energy source.

D. Earlston Lift Station Wet Well Repair

Rehabilitation of the underside of the top slab of the wet well at the Earlston Lift Station was recommended in the Facility Plan. The design was budgeted in FY 2026-27 and the work was expected to be completed in FY 2027-28. As this project will not be impacted by the outcome of the regionalization study, staff asked B&W to start design.

A beam in the top slab (ceiling) of the wet well supports the building. The wet well was brought down so that the beam and the top slab on the other side of the beam could be reviewed. B&W determined that the beam is structurally sound. The top slab and beam do not need to be replaced, and rehabilitation of the concrete will be sufficient.

III. CONSTRUCTION PROJECTS

A. High-speed Turbo-blower Replacement

A summary of payments to date is provided below. The current payments are included in the October Claim Ordinance.

	APG-Neuros (Blowers)	Dahme (Mechanical)	Maddox (Transformers)	Tri-R (Electrical)	Concentric (Integration)
Contract Price	\$315,880.00	\$178,888.00	\$20,707.26	\$120,000.00	\$23,850.00
Expedited Shipping	<u>\$18,400.00</u>		<u>\$2,565.00</u>		
Current Contract Price	\$334,280.00	\$178,888.00	\$23,272.26	\$120,000.00	\$23,850.00
Total Billed to Date	\$318,486.00	\$125,222.00	\$23,272.26	\$0.00	\$1,725.00
Less Previous Payments	<u>-\$271,104.00</u>	<u>-\$25,000.00</u>	<u>-\$12,918.63</u>	<u>-\$0.00</u>	<u>-\$206.25</u>
Current Payments Due	<u>\$47,382.00</u>	<u>\$100,222.00</u>	<u>\$10,353.63</u>	<u>\$0.00</u>	<u>\$1,518.75</u>
Remaining (w/o tariffs)	\$15,794.00	\$53,666.00	\$0.00	\$120,000.00	\$22,125.00

Dahme has set the first new turbo-blower (Turbo-Blower 2) in place and installed the piping. District staff poured the pad for the new isolation transformers. Electrical work for Turbo-Blower 2 has started. Startup of Turbo-Blower 2 is scheduled for October 27. Turbo-Blower 3 and its isolation transformer have been delivered.



B. 2026 Painting Services

Era-Valdivia asked to postpone the work until spring because summer wet weather events created a backlog in their schedule.

DOWNERS GROVE SANITARY DISTRICT CASH BALANCES AND INVESTMENT SCHEDULE
 DATE 9/30/2026

CASH BALANCES					9/30/2026				EARNINGS	YTD	INT EARNED ON
ACCOUNT NAME		ACCOUNT NUMBER		BALANCE PER	BALANCE PER	MONTHLY	CREDIT APPLIED	NET MONTHLY	CUMULATIVE	FUNDS IN EXCESS	
				BANK STATEMENT	BANK STATEMENT	EARNINGS CREDIT	TO BANK FEES	EARNINGS CREDIT	EARNINGS CREDIT	OF PEG BALANCE	
DEPOSIT		XXXXXXXX1116		\$1,277,799.79							
DISBURSEMENT		XXXXXXXX1111		\$341,492.95							
FLEXIBLE BENEFITS		XXXXXXXX6025		\$26,179.24							
PAYROLL		XXXXXXXX1117		\$300,000.00							
PETTY CASH		XXXXXXXX1112		\$4,382.10							
USER REFUNDS		XXXXXXXX1114		\$10,449.14							
TOTAL - CASH AT BANK*				\$1,960,303.22		\$1,000,383.65	\$1,449.14	(\$1,583.52)	(\$134.38)	(\$969.87)	\$6.08
INVESTMENTS											
TYPE	FINANCIAL INSTITUTION	TERM	MATURITY	AMOUNT	ANNUAL INT. RATE	GENERAL CORPORATE FUND (01)	IMPROVEMENT FUND (02)	CONSTRUCTION FUND (03)	PUBLIC BENEFIT FUND (05)	SEWER EXTENSION FUND (71)	EST INTEREST EARNED ANNUALLY
CD	TRISTATE CAPITAL BANK	24 MOS	8/12/2028	\$250,000.00	4.220%			\$250,000.00			\$10,550.00
TOTAL CDs				\$250,000.00	4.220%	\$0.00	\$0.00	\$250,000.00	\$0.00	\$0.00	\$10,550.00
SCHWAB - US TREASURIES				\$1,628,376.99	SEE ATTACHED	\$1,628,376.99					
SCHWAB - CD's				\$2,595,000.00	SEE ATTACHED	\$2,595,000.00					
SCHWAB - SNSXX AND CASH				\$25,005.35	SEE ATTACHED	\$25,005.35					
ILLINOIS FUNDS - MONEY MARKET*				\$12,222,946.69	3.870%	\$7,776,515.12	\$1,628,408.50	\$2,818,023.07	\$0.00	\$0.00	\$473,028.04
TOTAL - ALL INVESTMENTS				\$16,721,329.03		\$12,024,897.46	\$1,628,408.50	\$3,068,023.07	\$0.00	\$0.00	
TOTAL CASH AND INVESTMENTS				\$18,681,632.25							

NOTES:

"Net Monthly Earnings Credits" in excess of the "Earnings Credit Applied to Bank Fees" accumulate and roll forward into the "YTD Cumulative Earnings Credit". The "YTD Cumulative Earnings Credit" resets to \$0 at the end of each fiscal year. The Monthly Earnings Credit Rate was 1.10% for AUGUST 2026 and was applied to any balances that did not earn interest.

We earn CASH interest on all Chase daily balances in excess of the the peg balance. In order to accumulate more Net Monthly Earnings Credits over earning more interest, the Treasurer set the peg balance to \$2,000,000 on 8/22/26 attempting to balance out the YTD Cumulative Earnings Credit against the bank fees. The Interest Rate for AUGUST 2026 was 1.05%.

*As the Chase earnings rates remain low, the Treasurer will invest temporary cash surpluses from Chase into IL Funds which earned an Average Daily Yield of 3.870% for SEPTEMBER 2026. This is a temporary way to earn additional interest beyond that available in the current Chase structure of earning interest or ERC's. The Treasurer will monitor the funds and place them in the best investment possible to maximize earings while allowing for necessary liquidity to cover the daily cash flow needs.



Schwab One® Account of

DOWNERS GROVE SANITARY DISTRICT

Account Number

****-875

Statement Period

September 1-30, 2026

A Message About Your Account (continued)

The most recent statement of financial condition for Charles Schwab & Co., Inc. (CS&Co) may be obtained at no cost, via the Internet at <http://www.schwab.com/legal/financials> or by contacting CS&Co at 1-800-435-4000. If you are a client of an independent investment advisor, contact Schwab Alliance at 1-800-515-2157. International clients, please call us at +1-415-667-7870 and Charles Schwab Hong Kong clients, please call +852-2101-0500. At June 30, and July 31, 2026, CS&Co had net capital of \$16.1 billion and \$16.5 billion, respectively, and a net capital requirement of \$3.5 billion and \$3.5 billion, respectively. A copy of the report may be requested via: Investor Relations, 3000 Schwab Way, Westlake, TX 76262. Independent investment advisors are not owned by, affiliated with, or supervised by CS&Co.

Positions - Summary

Beginning Value as of 09/01	+	Transfer of Securities(In/Out)	+	Dividends Reinvested	+	Cash Activity	+	Change in Market Value	=	Ending Value as of 09/30	Cost Basis	Unrealized Gain/(Loss)
\$3,974,874.56		\$0.00		(\$31.32)		\$275,292.96		(\$20,388.14)		\$4,229,748.06	\$4,223,376.99	(\$18,634.28) ^b

Values may not reflect all of your gains/losses; Schwab has provided accurate gain and loss information wherever possible for most investments. Cost basis may be incomplete or unavailable for some of your holdings and may change or be adjusted in certain cases. Statement information should not be used for tax preparation, instead refer to official tax documents. For additional information refer to Terms and Conditions.

Cash and Cash Investments

Type	Symbol	Description	Quantity	Price(\$)	Beginning Balance(\$)	Ending Balance(\$)	Change in Period Balance(\$)	Pending/Unsettled Cash(\$)	Interest/ Yield Rate	% of Acct
Cash					0.00	8,718.13	8,718.13	0.00		<1%
Bank Sweep		CHARLES SCHWAB BANK ^{X,Z}			6,233.23	14,178.97	7,945.74		0.01%	<1%
Money Fund (Non-Sweep)	SNSXX	SCHWAB US TREASURY MONEY ⁺	2,108.2500	1.0000	4,286.93	2,108.25	(2,178.68)			<1%
Total Cash and Cash Investments					\$10,520.16	\$25,005.35	\$14,485.19			<1%

Rates for Bank Sweep and Schwab One® Interest are the annual percentage yields (APY) determined as of the last business day of the statement period or the last day a balance was held.

Positions - Fixed Income

Symbol/ CUSIP	Description	Maturity Coupon Date	Quantity/Par	Price(\$)	Market Value(\$)	Adj Cost Basis/ Orig Cost Basis(\$)	Unrealized Gain/(Loss)(\$) ^b	Yield to Maturity	Est. Annual Income(\$)	Accrued Interest(\$)	% of Acct
912797WA1	US TREASURY	09/02/27	380,000.0000	96.03800	364,944.40	364,675.49 364,675.49	268.91	4.51%	N/A	N/A	9%
91282CQY0	US TREASU NT	4.125% 06/30/28	578,000.0000	98.80078	571,068.51	577,372.22 577,372.22	(6,303.71)	N/A ^y	23,842.50	6,025.41	14%



Schwab One® Account of

DOWNERS GROVE SANITARY DISTRICT

Account Number
****-*875Statement Period
September 1-30, 2026

Positions - Fixed Income (continued)

Symbol/ CUSIP	Description	Maturity Coupon Date	Quantity/Par	Price(\$)	Market Value(\$)	Adj Cost Basis/ Orig Cost Basis(\$)	Unrealized Gain/(Loss)(\$) ^b	Yield to Maturity	Est. Annual Income(\$)	Accrued Interest(\$)	% of Acct
91282CJA0	US TREASU NT	4.625% 09/30/28	377,000.0000	99.50781	375,144.44	378,361.34 378,399.02	(3,216.90)	4.43%	17,436.26	47.90	9%
91282CRP8	US TREASUR NT	4.75% 09/30/28	309,000.0000	99.76171	308,263.68	307,967.94 307,967.94	295.74	4.93%	14,677.50	40.32	7%
38151PHX2	GOLDMAN SACHS BAN Moody's: NR S&P: NR	3.7% 02/18/27	250,000.0000	99.80280	249,507.00	250,000.00 250,000.00	(493.00)	3.70%	9,250.00	5,702.05	6%
178180HM0	CITY NTNL BANK Moody's: NR S&P: NR	3.8% 03/04/27	250,000.0000	99.82120	249,553.00	250,000.00 250,000.00	(447.00)	3.80%	9,500.00	5,491.78	6%
06654BHL8	BANKWELL BANK Moody's: NR S&P: NR	3.75% 03/05/27	250,000.0000	99.79930	249,498.25	250,000.00 250,000.00	(501.75)	3.75%	9,375.00	5,393.84	6%
59013K5F9	MERRICK BANK Moody's: NR S&P: NR	4.25% 03/10/27	125,000.0000	100.05010	125,062.63	125,000.00 125,000.00	62.63	4.25%	2,634.41	305.65	3%
359899CV1	FULTON BANK, NTN Moody's: NR S&P: NR	3.75% 03/24/27	250,000.0000	99.81240	249,531.00	250,000.00 250,000.00	(469.00)	3.75%	10,094.18	5,625.00	6%
87165G6W7	SYNCHRONY BANK Moody's: NR S&P: NR	3.95% 05/28/27	240,000.0000	99.81830	239,563.92	240,000.00 240,000.00	(436.08)	3.95%	7,090.52	883.07	6%
949764UB8	WELLS FARGO BANK, Moody's: NR S&P: NR	3.7% 08/23/27	250,000.0000	99.51690	248,792.25	250,000.00 250,000.00	(1,207.75)	3.70%	8,464.39	202.74	6%
90355GJ72	UBS BANK USA, NTN Moody's: NR S&P: NR	3.8% 02/25/28	250,000.0000	99.25260	248,131.50	250,000.00 250,000.00	(1,868.50)	3.80%	9,500.00	156.16	6%
23204HRM2	CUSTOMERS BANK Moody's: NR S&P: NR	3.7% 02/28/28	250,000.0000	99.04450	247,611.25	250,000.00 250,000.00	(2,388.75)	3.70%	9,250.00	785.62	6%
94789PCL6	WEBSTER FIVE CEN Moody's: NR S&P: NR	4.15% 02/28/28	240,000.0000	99.72470	239,339.28	240,000.00 240,000.00	(660.72)	4.15%	9,960.01	818.63	6%
61781BJC7	MORGAN STANLEY P Moody's: NR S&P: NR	4.25% 08/28/28	240,000.0000	99.47150	238,731.60	240,000.00 240,000.00	(1,268.40)	4.25%	10,200.00	1,006.03	6%
Total Fixed Income			4,239,000.0000		\$4,204,742.71		(\$18,634.28)		\$151,274.77	\$32,484.20	99%
Total Adj Cost Basis		\$4,223,376.99									
Total Orig Cost Basis		\$4,223,414.67									

Accrued Interest represents the interest that would be received if the fixed income investment was sold prior to the coupon payment.

DESCRIPTION (TERM AND COUPON RATE)	MATURITY DATE	QUANTITY/PAR	9/30/2026		PURCHASE PRICE(\$)	AT DATE OF PURCHASE		9/30/2026	
			CURRENT MARKET PRICE(\$)	SCHWAB MARKET VALUE		COST BASIS/PURCHASE PRICE	MARK TO MARKET UNREALIZED GAIN/(LOSS)		
91282CLP4 US TREASURY NOTE 3.5%	MATURED 9/30/2026	673,000.00	\$ 100.000000	\$ 673,000.00	\$ 98.913000	\$ 665,684.49	\$ 7,315.51		
61690DT81 MORGAN STANLEY B CD 18MO 4.25%	MATURED 9/8/2026	125,000.00	\$ 100.000000	\$ 125,000.00	\$ 100.000000	\$ 125,000.00	\$ -		
US TREASURY HOLDINGS:									
912797WA1 US TREASURY 4.51% (NEW)	9/2/2027	380,000.00	\$ 96.038000	\$ 364,944.40	\$ 95.967234	\$ 364,675.49	\$ 268.91		
91282CQ0 US TREASURY NOTE 4.125%	6/30/2028	578,000.00	\$ 98.800780	\$ 571,068.51	\$ 99.891387	\$ 577,372.22	\$ (6,303.71)		
91282CJA0 US TREASURY NOTE 4.625% (NEW)	9/30/2028	377,000.00	\$ 99.507810	\$ 375,144.44	\$ 100.371093	\$ 378,399.02	\$ (3,254.58)		
91282CJA0 US TREASURY NOTE 4.625% (NEW) ADJUSTMENT TO COST BASIS			\$ -	\$ -		\$ (37.68)	\$ 37.68		
91282CRP8 US TREASURY NOTE 4.75% (NEW)	9/30/2028	309,000.00	\$ 99.761710	\$ 308,263.68	\$ 99.666000	\$ 307,967.94	\$ 295.74		
SUBTOTAL TREASURY HOLDINGS		1,644,000.00	\$	1,619,421.04		\$ 1,628,376.99	\$ (8,955.95)		
CERTIFICATE OF DEPOSIT HOLDINGS:									
38151PHX2 GOLDMAN SACHS CD 12MO 3.70%	2/18/2027	250,000.00	\$ 99.802800	\$ 249,507.00	\$ 100.000000	\$ 250,000.00	\$ (493.00)		
178180HM0 CITY NTNL BANK - 12MO 3.80%	3/4/2027	250,000.00	\$ 99.821200	\$ 249,553.00	\$ 100.000000	\$ 250,000.00	\$ (447.00)		
06654BHL8 BANKWELL BANK CD - 12MO 3.75%	3/5/2027	250,000.00	\$ 99.799300	\$ 249,498.25	\$ 100.000000	\$ 250,000.00	\$ (501.75)		
59013K5F9 MERRICK BANK CD 24MO 4.25%	3/10/2027	125,000.00	\$ 100.050100	\$ 125,062.63	\$ 100.000000	\$ 125,000.00	\$ 62.63		
359899CV1 FULTON BANK - 13MO 3.75%	3/24/2027	250,000.00	\$ 99.812400	\$ 249,531.00	\$ 100.000000	\$ 250,000.00	\$ (469.00)		
87165G6W7 SYNCHRONY BANK - 9MO 3.95%	5/28/2027	240,000.00	\$ 99.818300	\$ 239,563.92	\$ 100.000000	\$ 240,000.00	\$ (436.08)		
949764UB8 WELLS FARGO - 18MO 3.70%	8/23/2027	250,000.00	\$ 99.516900	\$ 248,792.25	\$ 100.000000	\$ 250,000.00	\$ (1,207.75)		
90355GJ72 UBS BANK USA - 24MO 3.80%	2/25/2028	250,000.00	\$ 99.252600	\$ 248,131.50	\$ 100.000000	\$ 250,000.00	\$ (1,868.50)		
23204HRM2 CUSTOMERS BANK - 24MO 3.70 %	2/28/2028	250,000.00	\$ 99.044500	\$ 247,611.25	\$ 100.000000	\$ 250,000.00	\$ (2,388.75)		
94789PCL6 WEBSTER FIVE CEN - 18MO 4.15%	2/28/2028	240,000.00	\$ 99.724700	\$ 239,339.28	\$ 100.000000	\$ 240,000.00	\$ (660.72)		
61781BJC7 MORGAN STANLEY P - 24MO 4.25%	8/28/2028	240,000.00	\$ 99.471500	\$ 238,731.60	\$ 100.000000	\$ 240,000.00	\$ (1,268.40)		
SUBTOTAL CERTIFICATE OF DEPOSIT HOLDINGS		2,595,000.00	\$	2,585,321.68		\$ 2,595,000.00	\$ (9,678.33)		
FIXED INCOME - POSITIONS				\$ 4,204,742.71		\$ 4,223,376.99	\$ (18,634.28)		
CASH				\$ 22,897.10		\$ 22,897.10			
MONEY FUND (SNSXX) 30-Day Yield 9/30/26 3.43%				\$ 2,108.25		\$ 2,108.25			
TOTAL									
		4,239,000.00	MARKET VALUE	\$ 4,229,748.06	INVESTMENT SCH TOTAL	\$ 4,248,382.34			
UNREALIZED GAIN/(LOSS)					9/30/2026	\$ (18,634.28)			
ENDING MARKET VALUE AS REPORTED ON SCHWAB STATEMENT					9/30/2026	\$ 4,229,748.06			

DIVIDENDS AND INTEREST EARNED**	BEGINNING 5/1/26-CUMULATIVE EARNINGS THRU 9/30/26	\$ 56,935.75
	REALIZED EARNINGS THIS MONTH 9/30/26	\$ 24,843.15
	FOR INFORMATIONAL PURPOSES: ACCRUED INTEREST 9/30/26	\$ 32,484.20

						REMAINING	2026			2027												2028												
PURCHASE DATE		COUPON RATE	TERM	MATURITY DATE	COST BASIS	TOTAL INCOME	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
	SCHWAB US TREASURY HOLDINGS:																																	
9/30/2026	912797WA1 US TREASURY BILL	4.510%		9/2/2027	364,675.49	15,325												380,000																
7/15/26 & 8/21/2026	91282CQY0 US TREASURY NOTE 4.125%	4.125%		6/30/2028	577,372.22	46,437			10,673						11,921						11,921						589,921							
9/10/2026	91282CIA0 US TREASURY NOTE 4.625%	4.625%		9/30/2028	378,361.34	34,872						8,718						8,718						8,718					385,718					
9/30/2026	91282CRP8 US TREASURY NOTE 4.75%	4.750%		9/30/2028	307,967.94	29,355						7,339						7,339						7,339					316,339					
	SUBTOTAL TREASURY HOLDINGS				1,628,376.99	125,988.51																												
		INTEREST RATE																																
	SCHWAB CERTIFICATE OF DEPOSIT HOLDINGS:																																	
2/18/2026	38151PHX2 GOLDMAN SACHS CD (@ MATURITY)	3.700%	12 MO	2/18/2027	250,000.00	9,250					259,250																							
3/4/2026	178180HM0 CITY NTNL BANK (@ MATURITY)	3.800%	12 MO	3/4/2027	250,000.00	9,500						259,500																						
3/5/2026	06654BHL8 BANKWELL BANK CD (@ MATURITY)	3.750%	12 MO	3/5/2027	250,000.00	9,375						259,375																						
3/10/2025	59013K5F9 MERRICK BANK CD (MONTHLY)	4.250%	24 MO	3/10/2027	125,000.00	2,656	443	443	443	443	443	125,443																						
2/24/2026	359899CV1 FULTON BANK (@ MATURITY)	3.750%	13 MO	3/24/2027	250,000.00	10,156						260,156																						
8/26/2026	87165G6W7 SYNCHRONY BANK (@ MATURITY)	3.950%	9 MO	5/28/2027	240,000.00	7,110								247,110																				
2/23/2026	949764UB8 WELLS FARGO (MONTHLY)	3.700%	18 MO	8/23/2027	250,000.00	8,479	771	771	771	771	771	771	771	771	771	771	250,771																	
2/25/2026	90355GJ72 UBS BANK USA (MONTHLY)	3.800%	24 MO	2/25/2028	250,000.00	13,458	792	792	792	792	792	792	792	792	792	792	792	792	792	792	792	792	250,792											
2/26/2026	23204HRM2 CUSTOMERS BANK (SEMI ANNUAL)	3.700%	24 MO	2/28/2028	250,000.00	13,875					4,625						4,625																	
8/31/2026	94789PCL6 WEBSTER FIVE CEN (MONTHLY)	4.150%	18 MO	2/28/2028	240,000.00	14,110	830	830	830	830	830	830	830	830	830	830	830	830	830	830	830	830	240,830											
8/26/2026	61781BJC7 MORGAN STANLEY P (SEMI ANNUAL)	4.250%	24 MO	8/28/2028	240,000.00	20,400					5,100						5,100												245,100					
	SUBTOTAL CERTIFICATE OF DEPOSIT HOLDINGS				2,595,000.00	118,370.03																												
8/12/2026	TRISTATE CAPITAL CD	4.000%	24 MO	8/12/2028	250,000.00	19,166	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	833	250,833						
	TOTAL INVESTMENTS / MONTHLY CASH FLOW				4,473,376.99	263,524.80	3,669	3,669	14,342	3,669	272,644	923,757	3,226	250,336	15,147	3,226	262,951	398,512	2,455	2,455	14,376	2,455	752,180	16,890	833	833	590,755	833	495,933	702,057	-	-	-	
	FISCAL YEAR SUMMARY:						FY 2026-2027							FY 2027-2028							FY 2028-2029													

This sheet has been added to show the schedule of interest payments and maturities by month for each of our treasury and CD investments. The amounts in green indicate maturities. All others are interest payments.

Board of Trustees

Amy E. Sejnost
President

Jeremy M. Wang
Vice President

Mark Eddington, P.E.
Clerk



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Downers Grove, IL 60515-0703
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General Manager
Amy R. Underwood, P.E.

Legal Counsel
Daniel McCormick, P.C.

Providing a Better Environment for South Central DuPage County

MEMORANDUM

To: Board of Trustees
From: Amy R. Underwood, General Manager
Date: October 16, 2026
Subject: Treasurer's Report for September 2026

Attached please find the subject report that tracks revenue and expenses for the first five months of Fiscal Year (FY) 26-27.

Totals of revenue and expenses are shown in the YTD columns in the attached fund balance table.

C: BOLI, DM, CS

**DOWNERS GROVE SANITARY DISTRICT
TREASURER'S REPORT RECAP FOR MONTH ENDING
9/30/2026**

FUND NUMBER & DESCRIPTION	FUND BALANCE 5/1/2026	RESTRICTED FOR REPLACEMENT 5/1/2026	YTD REVENUE 9/30/2026	YTD EXPENSES 9/30/2026	NET REVENUE/(EXPENSE) THROUGH 9/30/2026	ENDING FUND BALANCE 9/30/2026
FUND 01: GENERAL FUND	\$ 9,380,664.00	\$ 820,000.00	\$ 7,763,006.20	\$ 4,220,098.02	\$ 3,542,908.18	\$ 13,743,572.18
FUND 02: CAPITAL IMPROVEMENT FUND	\$ 1,763,577.43	\$ -	\$ -	\$ -	\$ -	\$ 1,763,577.43
FUND 03: CONSTRUCTION FUND	\$ 3,086,271.70	\$ -	\$ -	\$ -	\$ -	\$ 3,086,271.70
FUND 05: PUBLIC BENEFIT FUND	\$ 37,817.83	\$ -	\$ -	\$ 37,817.83	\$ (37,817.83)	\$ -
FUND 71: SEWER EXTENSION ESCROW FUND	\$ 7,527.49	\$ -	\$ -	\$ -	\$ -	\$ 7,527.49
	\$ 14,275,858.45	\$ 820,000.00	\$ 7,763,006.20	\$ 4,257,915.85	\$ 3,505,090.35	\$ 18,600,948.80

TREASURER'S REPORT FOR DOWNERS GROVE SANITARY DISTRICT

Balance As of 09/30/2026

GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 01 GENERAL FUND							
Account Category: Revenues							
Department: 005 REVENUES							
01-005-3000	PROPERTY TAXES	690,452.11	696,285.00	1,586,427.71	1,571,188.00	1,623,800.00	2.30
01-005-3001	USER RECEIPTS	633,291.85	681,626.00	2,569,857.70	2,519,258.00	6,245,200.00	58.85
01-005-3002	SURCHARGES	56,462.11	55,663.00	260,716.09	205,729.00	510,000.00	48.88
01-005-3004	PLAN REVIEW FEES	0.00	0.00	468.00	250.00	500.00	6.40
01-005-3005	CONSTRUCTION INSPECTION FEES	0.00	0.00	0.00	240.00	500.00	100.00
01-005-3006	PERMIT INSPECTION FEES	3,550.00	1,500.00	16,245.00	7,500.00	18,000.00	9.75
01-005-3007	INTEREST ON INVESTMENTS	64,506.08	26,500.00	236,778.52	132,400.00	317,900.00	25.52
01-005-3009	SEWER PERMIT FEES	28,248.50	20,800.00	411,390.40	104,000.00	250,000.00	(64.56)
01-005-3010	TRUNK SEWER SERVICE CHARGES	4,863.64	8,300.00	242,796.72	41,500.00	100,000.00	(142.80)
01-005-3013	SAMPLING AND MONITORING	14,594.64	12,250.00	67,127.60	61,250.00	147,000.00	54.33
01-005-3014	REPLACEMENT TAXES	0.00	0.00	54,742.45	37,000.00	90,000.00	39.18
01-005-3015	MISCELLANEOUS INCOME	415.00	300.00	6,970.91	1,900.00	4,000.00	(74.27)
01-005-3016	SALE OF ELECTRICITY	3,406.50	400.00	9,339.50	2,000.00	5,000.00	(86.79)
01-005-3020	SALE OF PROPERTY	0.00	1,300.00	400.00	6,500.00	15,000.00	97.33
01-005-3021	TELEVISION INSPECTION	0.00	0.00	0.00	0.00	200.00	100.00
01-005-3023	PROPERTY LEASE PAYMENTS	3,481.05	3,500.00	17,405.25	17,500.00	41,800.00	58.36
01-005-3024	MONTHLY SERVICE FEES	450,839.73	428,275.00	2,195,589.41	2,141,375.00	5,139,300.00	57.28
01-005-3027	GREASE WASTE	14,134.68	18,000.00	86,750.94	88,000.00	210,000.00	58.69
01-005-3035	INTERFUND TRANSFER	0.00	0.00	0.00	0.00	4,662,020.00	100.00
01-005-3040	RENEWABLE ENERGY CREDITS	0.00	0.00	0.00	10,000.00	40,000.00	100.00
Total Dept 005 - REVENUES		1,968,245.89	1,954,699.00	7,763,006.20	6,947,590.00	19,420,220.00	60.03
Revenues		1,968,245.89	1,954,699.00	7,763,006.20	6,947,590.00	19,420,220.00	60.03
Account Category: Expenditures							
Department: 011 O & M - ADMINISTRATION							
01-011-A001	TRUSTEES	0.00	0.00	9,000.00	9,000.00	18,000.00	50.00
01-011-A002	BOLI	0.00	0.00	0.00	450.00	900.00	100.00
01-011-A003	GENERAL MANAGEMENT	26,647.49	27,500.00	147,625.96	151,400.00	357,800.00	58.74
01-011-A004	FINANCIAL RECORDS	18,936.86	21,400.00	104,691.02	117,700.00	278,200.00	62.37
01-011-A005	ADMINISTRATIVE RECORDS	4,387.86	3,500.00	24,117.84	19,200.00	45,000.00	46.40
01-011-A006	ENGINEERING	0.00	400.00	0.00	2,100.00	5,000.00	100.00
01-011-A007	CODE ENFORCEMENT	32,728.14	30,100.00	170,867.20	165,800.00	391,700.00	56.38
01-011-A008	SAFETY ACTIVITIES	0.00	4,300.00	10,764.86	23,700.00	56,000.00	80.78
01-011-A030	BUILDING AND GROUNDS	0.00	45.00	0.00	260.00	600.00	100.00
01-011-B100	ELECTRICITY	661.25	900.00	3,047.42	4,500.00	8,800.00	65.37
01-011-B101	NATURAL GAS	67.47	200.00	516.10	1,000.00	3,000.00	82.80
01-011-B102	WATER, GARBAGE AND OTHER UTILITIES	199.88	100.00	482.17	400.00	700.00	31.12
01-011-B110	BANK CHARGES	50.00	0.00	1,229.44	1,500.00	1,500.00	18.04
01-011-B112	COMMUNICATION	2,242.81	2,200.00	10,260.38	11,000.00	26,000.00	60.54
01-011-B113	EMERGENCY/SAFETY EQUIPMENT	75.17	2,500.00	3,446.12	13,800.00	29,800.00	88.44
01-011-B115	EQUIPMENT/EQUIPMENT REPAIR	9,613.45	5,500.00	85,139.97	112,500.00	164,900.00	48.37
01-011-B116	SUPPLIES	859.57	600.00	2,193.68	3,000.00	7,000.00	68.66
01-011-B117	EMPLOYEE/DUTY COSTS	67.01	1,500.00	4,251.50	7,500.00	17,500.00	75.71
01-011-B118	BUILDING AND GROUNDS	6,897.51	4,700.00	18,352.43	32,800.00	60,000.00	69.41
01-011-B119	POSTAGE	43.05	700.00	3,123.60	3,500.00	8,100.00	61.44
01-011-B120	PRINTING/PHOTOGRAPHY	0.00	1,000.00	5,427.07	9,900.00	14,400.00	62.31
01-011-B121	USER BILLING MATERIALS	12,144.05	9,800.00	56,991.96	49,400.00	118,000.00	51.70
01-011-B124	CONTRACT SERVICES	25,220.27	14,000.00	70,207.57	87,500.00	185,500.00	62.15

TREASURER'S REPORT FOR DOWNERS GROVE SANITARY DISTRICT

Balance As of 09/30/2026

GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 01 GENERAL FUND							
Account Category: Expenditures							
Department: 011 O & M - ADMINISTRATION							
01-011-B137	MEMBERSHIPS/SUBSCRIPTIONS	1,121.20	550.00	1,421.20	700.00	9,800.00	85.50
01-011-C222	GAS/FUEL	211.34	200.00	1,091.03	1,000.00	2,300.00	52.56
01-011-C225	OPERATION/REPAIR	0.00	0.00	147.57	600.00	1,200.00	87.70
Total Dept 011 - O & M - ADMINISTRATION		142,174.38	131,695.00	734,396.09	830,210.00	1,811,700.00	59.46
Department: 012 O & M - WWTC							
01-012-A006	ENGINEERING	0.00	2,300.00	0.00	12,700.00	30,000.00	100.00
01-012-A009	OPERATIONS MANAGEMENT	10,418.16	10,500.00	57,299.88	57,500.00	135,400.00	57.68
01-012-A011	MAINTENANCE - WWTC	35,354.76	38,700.00	224,955.17	212,800.00	502,500.00	55.23
01-012-A012	MAINTENANCE - VEHICLES	0.00	25.00	0.00	125.00	300.00	100.00
01-012-A013	MAINTENANCE - ENERGY RECOVERY	351.04	700.00	1,097.17	3,800.00	8,800.00	87.53
01-012-A014	MAINTENANCE - ELECTRICAL	5,662.00	17,800.00	73,185.32	97,900.00	230,800.00	68.29
01-012-A021	WWTC - OPERATIONS	34,617.95	36,100.00	206,061.16	198,900.00	469,700.00	56.13
01-012-A022	WWTC - SLUDGE HANDLING	15,363.45	14,600.00	78,078.42	80,300.00	189,300.00	58.75
01-012-A023	WWTC - ENERGY RECOVERY	0.00	200.00	0.00	1,000.00	2,300.00	100.00
01-012-A030	BUILDING AND GROUNDS	0.00	1,700.00	0.00	9,500.00	22,300.00	100.00
01-012-B100	ELECTRICITY	32,425.01	24,000.00	91,489.72	104,500.00	244,500.00	62.58
01-012-B101	NATURAL GAS	471.83	700.00	2,715.59	3,300.00	12,000.00	77.37
01-012-B102	WATER, GARBAGE AND OTHER UTILITIES	5,597.86	4,000.00	16,601.07	19,000.00	40,300.00	58.81
01-012-B103	ODOR CONTROL	0.00	250.00	0.00	1,250.00	3,000.00	100.00
01-012-B104	FUEL - GENERATORS	0.00	0.00	0.00	4,000.00	8,000.00	100.00
01-012-B112	COMMUNICATION	1,157.68	1,400.00	6,153.91	7,000.00	16,500.00	62.70
01-012-B113	EMERGENCY/SAFETY EQUIPMENT	580.03	3,000.00	4,493.73	15,000.00	35,100.00	87.20
01-012-B116	SUPPLIES	1,461.81	2,400.00	7,751.26	12,000.00	28,200.00	72.51
01-012-B117	EMPLOYEE/DUTY COSTS	3,784.56	2,600.00	14,965.65	13,300.00	31,500.00	52.49
01-012-B124	CONTRACT SERVICES	0.00	0.00	27,273.00	27,300.00	250,600.00	89.12
01-012-B130	NPDES PERMIT FEES	0.00	0.00	53,000.00	53,000.00	53,000.00	0.00
01-012-B131	SLUDGE HAULING/DISPOSAL SERVICES	0.00	0.00	0.00	0.00	65,000.00	100.00
01-012-B401	CHEMICALS - DISINFECTION	7,531.51	10,600.00	62,614.49	53,000.00	96,000.00	34.78
01-012-B402	CHEMICALS - SLUDGE DEWATERING	6,425.64	6,300.00	22,970.65	31,500.00	75,500.00	69.58
01-012-B403	CHEMICALS - TERTIARY TREATMENT	0.00	600.00	0.00	3,000.00	7,000.00	100.00
01-012-B404	CHEMICALS - OTHER	0.00	0.00	0.00	0.00	28,800.00	100.00
01-012-B501	EQPT/EQPT REPAIR - BIOSOLIDS AGING & DIS	126.40	5,000.00	1,822.26	29,800.00	64,800.00	97.19
01-012-B502	EQPT/EQPT REPAIR - DISINFECTION	0.00	2,500.00	98.08	12,800.00	30,300.00	99.68
01-012-B503	EQPT/EQPT REPAIR - EXCESS FLOW	6,062.95	16,000.00	10,912.95	51,000.00	61,700.00	82.31
01-012-B504	EQPT/EQPT REPAIR - GRIT REMOVAL	21.80	3,900.00	1,272.04	19,600.00	46,900.00	97.29
01-012-B505	EQPT/EQPT REPAIR - INFLUENT PUMPING	5,713.38	5,600.00	37,715.52	28,600.00	66,600.00	43.37
01-012-B506	EQPT/EQPT REPAIR - PRIMARY TREATMENT	0.00	2,500.00	15,305.98	14,800.00	30,300.00	49.49
01-012-B507	EQPT/EQPT REPAIR - SECONDARY TREATMENT	6,359.70	2,400.00	21,111.17	13,000.00	28,100.00	24.87
01-012-B508	EQPT/EQPT REPAIR - SLUDGE CONCENTRATION	0.00	500.00	11.10	17,400.00	20,900.00	99.95
01-012-B509	EQPT/EQPT REPAIR - SLUDGE DEWATERING	1,251.66	3,400.00	1,648.44	17,000.00	40,100.00	95.89
01-012-B510	EQPT/EQPT REPAIR - SLUDGE DIGESTION	0.00	6,300.00	18,509.52	31,600.00	75,700.00	75.55
01-012-B511	EQPT/EQPT REPAIR - TERTIARY TREATMENT	1,409.50	9,600.00	1,549.37	29,600.00	60,600.00	97.44
01-012-B512	EQPT/EQPT REPAIR - WWTC GENERAL	3,713.75	4,500.00	8,909.10	22,500.00	54,000.00	83.50
01-012-B513	EQPT/EQPT REPAIR - WWTC UTILITIES	8,503.98	19,900.00	45,750.66	107,500.00	238,800.00	80.84
01-012-B801	BLDG AND GROUNDS - BIOSOLIDS AGING & DIS	938.70	25.00	980.52	125.00	300.00	(226.84)
01-012-B802	BLDG AND GROUNDS - DISINFECTION	0.00	140.00	(154.64)	700.00	1,600.00	109.67
01-012-B803	BLDG AND GROUNDS - EXCESS FLOW	0.00	100.00	0.00	500.00	1,100.00	100.00

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GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 01 GENERAL FUND							
Account Category: Expenditures							
Department: 012 O & M - WWTC							
01-012-B804	BLDG AND GROUNDS - GRIT REMOVAL	0.00	700.00	184.62	3,800.00	8,700.00	97.88
01-012-B805	BLDG AND GROUNDS - INFLUENT PUMPING	70.00	2,000.00	1,252.93	8,300.00	17,300.00	92.76
01-012-B807	BLDG AND GROUNDS - SECONDARY TREATMENT	0.00	100.00	0.00	1,500.00	2,200.00	100.00
01-012-B809	BLDG AND GROUNDS - SLUDGE DEWATERING	0.00	100.00	31.41	1,200.00	2,200.00	98.57
01-012-B810	BLDG AND GROUNDS - SLUDGE DIGESTION	372.30	300.00	917.88	1,500.00	3,300.00	72.19
01-012-B811	BLDG AND GROUNDS - TERTIARY TREATMENT	0.00	60,800.00	5,599.65	124,000.00	249,600.00	97.76
01-012-B812	BLDG AND GROUNDS - WWTC GENERAL	4,577.86	9,400.00	25,666.31	45,900.00	100,700.00	74.51
01-012-B813	BLDG AND GROUNDS - WWTC UTILITIES	0.00	400.00	0.00	2,000.00	3,800.00	100.00
01-012-C222	GAS/FUEL	2,722.95	2,200.00	12,887.76	11,100.00	26,500.00	51.37
01-012-C225	OPERATION/REPAIR	215.73	700.00	1,755.75	2,700.00	6,500.00	72.99
01-012-C226	VEHICLE PURCHASES	19,367.45	0.00	19,393.91	20,000.00	20,000.00	3.03
Total Dept 012 - O & M - WWTC		222,631.40	337,540.00	1,183,838.48	1,640,200.00	3,849,000.00	69.24
Department: 013 O & M - LABORATORY							
01-013-A009	OPERATIONS MANAGEMENT	5,682.02	8,900.00	29,499.71	49,100.00	116,600.00	74.70
01-013-A041	LAB - WWTC	13,818.01	13,700.00	69,097.95	75,350.00	178,100.00	61.20
01-013-A042	LAB - PRETREATMENT	3,300.31	1,100.00	11,766.76	6,100.00	14,400.00	18.29
01-013-A043	LAB - SURCHARGE PROGRAM	0.00	300.00	0.00	1,700.00	4,300.00	100.00
01-013-A048	LAB - ENERGY RECOVERY	435.89	350.00	3,574.03	1,900.00	4,400.00	18.77
01-013-B112	COMMUNICATION	174.71	200.00	873.37	1,100.00	2,500.00	65.07
01-013-B114	CHEMICALS	1,447.01	2,500.00	7,031.83	12,500.00	29,900.00	76.48
01-013-B115	EQUIPMENT/EQUIPMENT REPAIR	483.86	2,100.00	2,294.95	10,500.00	24,800.00	90.75
01-013-B116	SUPPLIES	1,774.88	2,000.00	4,860.80	10,100.00	24,100.00	79.83
01-013-B117	EMPLOYEE/DUTY COSTS	146.38	500.00	1,175.34	2,500.00	5,500.00	78.63
01-013-B122	MONITORING EQUIPMENT	0.00	0.00	0.00	5,000.00	10,000.00	100.00
01-013-B123	OUTSIDE LAB SERVICES	1,968.40	3,400.00	9,396.37	17,000.00	40,100.00	76.57
01-013-B124	CONTRACT SERVICES	408.75	400.00	2,616.25	2,200.00	5,000.00	47.68
01-013-C222	GAS/FUEL	106.21	100.00	385.88	500.00	1,000.00	61.41
01-013-C225	OPERATION/REPAIR	0.00	0.00	5.75	500.00	1,000.00	99.43
Total Dept 013 - O & M - LABORATORY		29,746.43	35,550.00	142,578.99	196,050.00	461,700.00	69.12
Department: 014 O & M - SEWER SYSTEM							
01-014-A006	ENGINEERING	0.00	577.00	0.00	3,173.00	7,500.00	100.00
01-014-A051	SEWER MAINTENANCE	29,905.47	29,500.00	154,196.65	162,100.00	383,100.00	59.75
01-014-A054	SEWER MAINTENANCE - BACKUPS AND HIGH FLO	400.00	50.00	2,400.00	260.00	600.00	(300.00)
01-014-A061	INSPECTION - NEW CONSTRUCTION	0.00	85.00	0.00	467.00	1,100.00	100.00
01-014-A062	INSPECTION - CONSTRUCTION OF DGSD PROJEC	0.00	1,100.00	0.00	6,000.00	14,200.00	100.00
01-014-A063	INSPECTION - PERMIT INSPECTIONS	0.00	700.00	0.00	3,800.00	8,500.00	100.00
01-014-A064	INSPECTION - MISCELLANEOUS	0.00	500.00	0.00	2,750.00	6,500.00	100.00
01-014-A065	INSPECTION - CONSTR BY VILLAGES, UTILITI	0.00	1,000.00	1,007.34	5,500.00	13,000.00	92.25
01-014-A066	INSPECTION - CODE ENFORCEMENT	11,596.87	12,000.00	70,726.99	65,800.00	154,600.00	54.25
01-014-A072	SEWER INVESTIGATIONS	0.00	770.00	0.00	4,230.00	10,000.00	100.00
01-014-B112	COMMUNICATION	659.72	700.00	3,165.92	3,600.00	8,500.00	62.75
01-014-B113	EMERGENCY/SAFETY EQUIPMENT	146.16	470.00	2,813.65	4,310.00	7,100.00	60.37
01-014-B115	EQUIPMENT/EQUIPMENT REPAIR	14,574.53	10,000.00	31,242.59	65,000.00	83,500.00	62.58
01-014-B116	SUPPLIES	720.53	600.00	5,290.12	3,000.00	6,900.00	23.33
01-014-B117	EMPLOYEE/DUTY COSTS	932.80	1,100.00	2,720.59	5,800.00	13,500.00	79.85
01-014-B124	CONTRACT SERVICES	59,023.88	26,000.00	59,023.88	26,000.00	130,000.00	54.60
01-014-B127	JULIE SYSTEM	0.00	0.00	4,329.81	4,350.00	17,700.00	75.54

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Fund: 01 GENERAL FUND							
Account Category: Expenditures							
Department: 014 O & M - SEWER SYSTEM							
01-014-B128	OVERHEAD SEWER/BACKFLOW PREVENTION PROGR	0.00	1,000.00	67.00	5,000.00	12,000.00	99.44
01-014-B129	REIMBURSEMENT PROGRAM/PUBLIC SEWER BLOCK	79.00	900.00	1,356.00	4,500.00	10,500.00	87.09
01-014-B901	SEWER SYSTEM REPAIRS - I/I PROGRAM	0.00	4,200.00	0.00	20,600.00	50,000.00	100.00
01-014-B903	SEWER SYSTEM REPAIRS - REHABILITATION	0.00	400.00	0.00	2,000.00	5,000.00	100.00
01-014-B910	SEWER SYSTEM REPAIRS - BSSRAP PROGRAM	63,247.70	80,000.00	303,246.99	320,000.00	960,000.00	68.41
01-014-B913	SEWER SYSTEM REPAIRS - BSSRAP-REPAIR/REP	2,251.83	10,400.00	51,375.39	41,600.00	125,000.00	58.90
01-014-C222	GAS/FUEL	2,573.76	2,000.00	12,258.75	10,000.00	24,000.00	48.92
01-014-C225	OPERATION/REPAIR	5,928.29	1,700.00	15,542.87	8,500.00	19,900.00	21.90
01-014-C226	VEHICLE PURCHASES	0.00	0.00	407,526.17	462,200.00	462,200.00	11.83
Total Dept 014 - O & M - SEWER SYSTEM		192,040.54	185,752.00	1,128,290.71	1,240,540.00	2,534,900.00	55.49
Department: 015 O & M - LIFT STATIONS							
01-015-A006	ENGINEERING	0.00	600.00	0.00	3,100.00	7,500.00	100.00
01-015-A009	OPERATIONS MANAGEMENT	0.00	1,100.00	0.00	5,900.00	13,900.00	100.00
01-015-A030	BUILDING AND GROUNDS	0.00	30.00	0.00	170.00	400.00	100.00
01-015-A080	LIFT STATION MAINTENANCE	5,978.49	2,800.00	14,823.24	15,500.00	36,600.00	59.50
01-015-B100	ELECTRICITY	20,109.40	18,900.00	65,760.58	91,900.00	224,900.00	70.76
01-015-B104	FUEL - GENERATORS	5,673.43	0.00	5,673.43	2,400.00	4,600.00	(23.34)
01-015-B112	COMMUNICATION	307.57	300.00	1,533.35	1,900.00	4,000.00	61.67
01-015-B113	EMERGENCY/SAFETY EQUIPMENT	0.00	0.00	0.00	2,200.00	3,300.00	100.00
01-015-B116	SUPPLIES	0.00	0.00	0.00	100.00	200.00	100.00
01-015-B124	CONTRACT SERVICES	0.00	40.00	0.00	220.00	500.00	100.00
01-015-B520	EQPT/EQPT REPAIR - BUTTERFIELD	0.00	250.00	191.09	1,250.00	3,000.00	93.63
01-015-B521	EQPT/EQPT REPAIR - CENTEX	0.00	700.00	0.00	3,500.00	8,200.00	100.00
01-015-B522	EQPT/EQPT REPAIR - COLLEGE	309.00	500.00	2,554.00	2,500.00	5,700.00	55.19
01-015-B523	EQPT/EQPT REPAIR - EARLSTON	0.00	500.00	7,972.70	2,700.00	6,200.00	(28.59)
01-015-B524	EQPT/EQPT REPAIR - HOBSON	3,126.81	12,000.00	3,477.72	16,000.00	136,800.00	97.46
01-015-B525	EQPT/EQPT REPAIR - LIBERTY PARK	0.00	400.00	306.27	2,000.00	4,800.00	93.62
01-015-B526	EQPT/EQPT REPAIR - NORTHWEST	(821.56)	7,800.00	113.39	9,200.00	19,100.00	99.41
01-015-B527	EQPT/EQPT REPAIR - VENARD	0.00	700.00	1,968.95	3,500.00	7,600.00	74.09
01-015-B528	EQPT/EQPT REPAIR - WROBLE	0.00	500.00	1,371.10	2,500.00	17,300.00	92.07
01-015-B529	EQPT/EQPT REPAIR - LIFT STATIONS GENERAL	316.56	6,400.00	1,274.33	35,000.00	77,300.00	98.35
01-015-B820	BLDG AND GROUNDS - BUTTERFIELD	163.32	0.00	896.47	0.00	0.00	0.00
01-015-B821	BLDG AND GROUNDS - CENTEX	163.32	0.00	904.25	0.00	0.00	0.00
01-015-B823	BLDG AND GROUNDS - EARLSTON	163.32	0.00	890.76	0.00	0.00	0.00
01-015-B824	BLDG AND GROUNDS - HOBSON	878.32	0.00	1,893.03	0.00	0.00	0.00
01-015-B825	BLDG AND GROUNDS - LIBERTY PARK	163.32	0.00	913.67	0.00	0.00	0.00
01-015-B826	BLDG AND GROUNDS - NORTHWEST	163.32	0.00	1,057.15	28,200.00	28,200.00	96.25
01-015-B827	BLDG AND GROUNDS - VENARD	163.32	0.00	905.69	0.00	0.00	0.00
01-015-B828	BLDG AND GROUNDS - WROBLE	163.32	0.00	913.67	0.00	0.00	0.00
01-015-B829	BLDG AND GROUNDS - LIFT STATIONS GENERAL	0.00	2,800.00	0.00	14,000.00	33,600.00	100.00
Total Dept 015 - O & M - LIFT STATIONS		37,021.26	56,320.00	115,394.84	243,740.00	643,700.00	82.07
Department: 017 O & M - INSURANCE & BENEFITS							
01-017-E452	LIABILITY/PROPERTY	0.00	0.00	286,955.55	332,000.00	332,000.00	13.57
01-017-E455	EMPLOYEE GROUP HEALTH	56,747.57	63,200.00	294,374.81	316,000.00	758,500.00	61.19
01-017-E460	IMRF	17,969.90	19,000.00	97,494.06	106,300.00	243,500.00	59.96
01-017-E461	SOCIAL SECURITY	19,026.65	21,100.00	109,378.29	116,800.00	276,000.00	60.37

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Fund: 01 GENERAL FUND							
Account Category: Expenditures							
Department: 017 O & M - INSURANCE & BENEFITS							
	Total Dept 017 - O & M - INSURANCE & BENEFITS	93,744.12	103,300.00	788,202.71	871,100.00	1,610,000.00	51.04
Department: 712 CAPITAL - WWTC							
01-712-0502	DESIGN ENGINEERING/ARCHITECTURAL	0.00	40,000.00	2,500.00	139,700.00	1,271,600.00	99.80
01-712-0506	CONSTRUCTION CONTRACTS AND PURCHASES	26,345.15	147,400.00	94,710.88	496,000.00	696,800.00	86.41
01-712-0515	LOAN/BOND PAYMENT	0.00	0.00	0.00	0.00	28,900.00	100.00
	Total Dept 712 - CAPITAL - WWTC	26,345.15	187,400.00	97,210.88	635,700.00	1,997,300.00	95.13
Department: 714 CAPITAL - SEWER SYSTEM							
01-714-0502	DESIGN ENGINEERING/ARCHITECTURAL	0.00	0.00	0.00	0.00	53,200.00	100.00
01-714-0515	LOAN/BOND PAYMENT	0.00	0.00	0.00	0.00	181,600.00	100.00
	Total Dept 714 - CAPITAL - SEWER SYSTEM	0.00	0.00	0.00	0.00	234,800.00	100.00
Department: 715 CAPITAL - LIFT STATIONS							
01-715-0502	DESIGN ENGINEERING/ARCHITECTURAL	0.00	0.00	0.00	0.00	34,000.00	100.00
01-715-0506	CONSTRUCTION CONTRACTS AND PURCHASES	28,585.32	16,000.00	28,585.32	59,000.00	1,957,000.00	98.54
01-715-0508	LEGAL/ADMINISTRATIVE	0.00	0.00	1,600.00	0.00	0.00	0.00
01-715-0515	LOAN/BOND PAYMENT	0.00	0.00	0.00	0.00	93,200.00	100.00
	Total Dept 715 - CAPITAL - LIFT STATIONS	28,585.32	16,000.00	30,185.32	59,000.00	2,084,200.00	98.55
	Expenditures	772,288.60	1,053,557.00	4,220,098.02	5,716,540.00	15,227,300.00	72.29
Fund 01 - GENERAL FUND:							
	TOTAL REVENUES	1,968,245.89	1,954,699.00	7,763,006.20	6,947,590.00	19,420,220.00	60.03
	TOTAL EXPENDITURES	772,288.60	1,053,557.00	4,220,098.02	5,716,540.00	15,227,300.00	72.29
	NET OF REVENUES & EXPENDITURES:	1,195,957.29	901,142.00	3,542,908.18	1,231,050.00	4,192,920.00	

TREASURER'S REPORT FOR DOWNERS GROVE SANITARY DISTRICT

Balance As of 09/30/2026

GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 02 CAPITAL IMPROVEMENT FUND							
Account Category: Revenues							
Department: 005 REVENUES							
02-005-3035	INTERFUND TRANSFER	0.00	0.00	0.00	0.00	(1,707,164.00)	100.00
	Total Dept 005 - REVENUES	0.00	0.00	0.00	0.00	(1,707,164.00)	100.00
	Revenues	0.00	0.00	0.00	0.00	(1,707,164.00)	100.00
Fund 02 - CAPITAL IMPROVEMENT FUND:							
	TOTAL REVENUES	0.00	0.00	0.00	0.00	(1,707,164.00)	100.00
	TOTAL EXPENDITURES	0.00	0.00	0.00	0.00	0.00	100.00
	NET OF REVENUES & EXPENDITURES:	0.00	0.00	0.00	0.00	(1,707,164.00)	

TREASURER'S REPORT FOR DOWNERS GROVE SANITARY DISTRICT

Balance As of 09/30/2026

GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 03 CONSTRUCTION FUND							
Account Category: Revenues							
Department: 005 REVENUES							
03-005-3035	INTERFUND TRANSFER	0.00	0.00	0.00	0.00	(2,954,856.00)	100.00
	Total Dept 005 - REVENUES	0.00	0.00	0.00	0.00	(2,954,856.00)	100.00
	Revenues	0.00	0.00	0.00	0.00	(2,954,856.00)	100.00
Fund 03 - CONSTRUCTION FUND:							
	TOTAL REVENUES	0.00	0.00	0.00	0.00	(2,954,856.00)	100.00
	TOTAL EXPENDITURES	0.00	0.00	0.00	0.00	0.00	100.00
	NET OF REVENUES & EXPENDITURES:	0.00	0.00	0.00	0.00	(2,954,856.00)	

TREASURER'S REPORT FOR DOWNERS GROVE SANITARY DISTRICT

Balance As of 09/30/2026

GL Number	Description	CURRENT MONTHLY ACTIVITY 09/30/26	CURRENT MONTHLY BUDGET 09/30/26	YTD ACTIVITY 09/30/26	YTD BUDGET 09/30/26	FISCAL 2026-27 ANNUAL BUDGET	% OF ANNUAL BUDGET REMAINING
Fund: 05 PUBLIC BENEFIT FUND							
Account Category: Expenditures							
Department: 014 O & M - SEWER SYSTEM							
05-014-C226	VEHICLE PURCHASES	0.00	0.00	37,817.83	37,818.00	37,818.00	0.00
Total Dept 014 - O & M - SEWER SYSTEM		0.00	0.00	37,817.83	37,818.00	37,818.00	0.00
Expenditures		0.00	0.00	37,817.83	37,818.00	37,818.00	0.00
Fund 05 - PUBLIC BENEFIT FUND:							
TOTAL REVENUES		0.00	0.00	0.00	0.00	0.00	100.00
TOTAL EXPENDITURES		0.00	0.00	37,817.83	37,818.00	37,818.00	0.00
NET OF REVENUES & EXPENDITURES:		0.00	0.00	(37,817.83)	(37,818.00)	(37,818.00)	
Report Totals:							
TOTAL REVENUES - ALL FUNDS		1,968,245.89	1,954,699.00	7,763,006.20	6,947,590.00	14,758,200.00	47.40
TOTAL EXPENDITURES - ALL FUNDS		772,288.60	1,053,557.00	4,257,915.85	5,754,358.00	15,265,118.00	72.11
NET OF REVENUES & EXPENDITURES:		1,195,957.29	901,142.00	3,505,090.35	1,193,232.00	(506,918.00)	

NPDES
FORM
6100-043



Sewer Overflow and Bypass Event Report [40 CFR 122.41(l)(4), (6), and (7)]

FORM
Approved OMB No.
2040-0004
Expires on
07/31/2026

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2040-0004). Responses to this collection of information are mandatory in accordance with this permit and EPA NPDES regulations (40 CFR 122.41(l)(4),(6), and (7) and 122.41(m)). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information are estimated to average 1 to 5 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA may make all the information submitted through this form (including all attachments) available to the public without further notice to you. Do not use this online form to submit personal information (e.g., non-business cell phone number or non-business email address), confidential business information (CBI), or if you intend to assert a CBI claim on any of the submitted information. Pursuant to 40 CFR 2.203(a), EPA is providing you with notice that all CBI claims must be asserted at the time of submission. EPA cannot accommodate a late CBI claim to cover previously submitted information because efforts to protect the information are not administratively practicable since it may already be disclosed to the public. Although we do not foresee a need for persons to assert a claim of CBI based on the types of information requested in this form, if persons wish to assert a CBI claim we direct submitters to contact the NPDES eReporting Help Desk NPDESereporting@epa.gov (mailto:NPDESereporting@epa.gov) for further guidance.

Facility Information

Facility Name: DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER

NPDES ID: IL0028380

Facility Address: 5003 WALNUT AVENUE DOWNERS GROVE, IL 60515

Program Information

Select the type of report you want to submit: Sewer Overflow/Bypass Event Report

Were the sewer overflows or unanticipated bypass events caused by an extreme event (e.g., hurricane that flooded the sewer system) such that the number of sewer overflows cannot be tabulated as they are too numerous to count?

No

Event Information

Please enter the start and end dates of your reporting period. You can use this report to cover one or more related sewer overflow or bypass events.

Reporting Period Start Date: 09/20/2026

Reporting Period End Date: 09/20/2026

Are you submitting this sewer overflow/bypass event report due to a wet-weather event? Yes

Event Information

Please enter one event for each CSO, SSO, or bypass that has occurred for this reporting period.

Event ID: 1

Description: Manhole 2D-001

Reporting Requirement: 5-day reporting for noncompliance that may endanger health or the environment

Event Category: SSO

Please enter the type of structure of the sewer overflow. If other is selected, please enter a description of the other structure.

Type of Structure: Manhole

Collection System ID: 001 - DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER SSCS

Latitude and Longitude: 41.791869°N, 88.016492°W

Did this event reach waters of the United States? No

Is this an ongoing event with an unknown end date/time? No

➔ Please enter the approximate event start and end date.

Same as reporting period start and end date: No

Event Start Date: 09/20/2026

Event End Date: 09/20/2026

Please enter the approximate event start and end time.

Event Approximate Start Time:

05:21 am

Event Approximate End Time:

07:41 am

Duration of Event:

2 hour(s), 20 minute(s)

Please enter the estimated discharge volume in gallons OR the estimated average discharge rate in gallons per hours.

Estimated Discharge Volume (gallons): 700

Estimated Average Discharge Rate (gallons per hour): 300

Method for Quantifying Discharge: Best Professional Judgement

Violation Detection Information

Violation Code	Violation Description	Event ID	Start Date	End Date
R011S	Wet-weather SSO, no discharge to waters of the U.S., that may "endanger health or the environment"	1	2026-09-20	2026-09-20

Causes

Please enter at least one cause for each event ID entered in the Sewer Overflow/Bypass Event Information section of this report.

1)

Category: Sewer Collection System Problems

Cause: High Levels of Inflow and/or Infiltration

Event IDs:

- 1 - Manhole 2D-001

2)

Category: Sewer Collection System Problems

Cause: Blockage - Tree Roots

Event IDs:

- 1 - Manhole 2D-001

Corrective Actions

Please enter at least one corrective action for each event ID entered in the Sewer Overflow/Bypass Event Information section of this report.

1)

Category: Short Term Response Actions

Corrective Action: Limit Access to Areas Affected by Sewer Overflow or Bypass (including posting signs)

Event IDs:

- 1 - Manhole 2D-001

2)

Category: Long Term Corrective Actions

Corrective Action: Implement Inflow and Infiltration Control Program

Event IDs:

- 1 - Manhole 2D-001

3)

Category: Long Term Corrective Actions

Corrective Action: Increase Routine Cleaning Frequency

Event IDs:

- 1 - Manhole 2D-001

4)

Category: Long Term Corrective Actions

Corrective Action: Increase Routine Inspection Frequency

Event IDs:

- 1 - Manhole 2D-001

Impacts

Please enter at least one impact for each event ID entered in the Sewer Overflow/Bypass Event Information section of this report.

1)

Category: No Potential Impacts Expected

Impact: No Potential Impacts Expected

Event IDs:

- 1 - Manhole 2D-001

Additional Information

Are you required to submit a twenty-four hour notification to the permitting authority for the events included in this report? Yes

➡ Twenty-Four Hour Reporting

Please identify the individual at the permitting authority notified of the event, or if not an individual, how the permitting authority was notified.

Chad Kruse, Regional Manager, IEPA Des Plaines Field Operations Section

Date Notified: 09/20/2026

Time Notified: 05:27 pm

Please identify the individual who reported the event to the permitting authority.

Name:

Amy R. Underwood, General Manager

Please enter any additional information that you would like to provide in the comment box below.

Additional Attachments

Name	Created Date	Size
------	--------------	------

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

Certified By: Amy R. Underwood (ARUNDERWOOD)

Certifier Organization: Downers Grove Sanitary District

Certifier Title:

Certifier Email: aunderwood@dgsd.org

Certified On: 09/22/2026 2:36 PM ET

NeT Report No.: 9

Version No.: 1

Form ID: 47029

GENERAL MANAGER'S REPORT TO EMPLOYEES

October 2, 2026

Open House

The Open House will be held tomorrow, October 3. Please verify with your supervisor what time you should plan to arrive. The event is from 9 am – 12 pm.

Personnel

We have held first interviews for the Electrical Technician and plan to schedule the second round soon. The job is still posted on the District website if you know anyone who may be interested. We will still accept new applications during the interview process.

Employee Open House Luncheon

We are having an employee luncheon on Wednesday October 7 from 11:30 am – 1:30 pm. We will have games and activities for employees. Buona Beef will cater the event, and we will be serving Italian Beef, Lemon Chicken, Italian Sausage, Fettuccini, salads, and deserts. Water, juice, and soda will be provided as well. The District really appreciates the hard work and participation of staff at our annual open house. We know a lot goes into it above and beyond your normal daily tasks. Thank you, everyone!

Paid Leave Balances

As a reminder, please be aware of your vacation and personal leave balances. Personal leave is use it during the calendar year, so if you do not use it by December 31, you will lose those hours. You can roll 40 hours of vacation time into the new calendar year. If you have a balance over 40 hours, please be sure to work with your supervisor to schedule that time off. If you need to inquire about your balance, please ask your supervisor or Michelle Jasso. You can also view leave balances on the Employee Self Service site which BS&A recently rolled out or on the timekeeping portal.

Voluntary Life Insurance

As a reminder, October 1 through November 30 is the open enrollment period for the Voluntary Group Life Plan from the National Conference on Public Employees Retirement Systems (NCPERS). If you are already a participant, there is nothing you need to do. If you do not participate in this plan currently, you can reach out to Carly Shaw for the information.

Employee Flu Shots

Edwards will be onsite administering flu shots for District staff on Wednesday, October 14, between 8:00 a.m. and 9:00 a.m. in the Admin Board Room. There is a QR code posted by time clocks so that staff may sign up for available time slots.

Illinois Wastewater Surveillance System

The District continues to participate in the Illinois Wastewater Surveillance System. COVID, RSV and Influenza data from our wastewater treatment center can be found at <https://iwss.uillinois.edu/wastewater-treatment-plant/275/>.

Sewer Rehabilitation/Infiltration and Inflow Removal

We are targeting the 1K-028 area for private property inspections and I/I removal. Regular flow monitoring has been on pause for a few months due to high sewer system workload. The regular flow monitoring is expected to start again next week.

Status of Projects

1) Turbo-blowers

One of the new turbo-blowers has been moved into the blower room. Mechanical and electrical work are ongoing. Startup of the first new blower is scheduled for the last week of October.

2) 2026 Painting Services

Due to wet weather events delaying Era-Valdivia's other projects, they have requested to do this work in the Spring.

3) Regionalization Study

A site visit of the lift stations being reviewed in the study was completed on September 23rd. Donohue continues to evaluate the regionalization alternatives and work on value engineering the facility plan.

4) WWTC Asphalt Paving

Paving south and west of the Dewatering Building is expected to be completed today.

WWTC Operations Data – September

The DMR for September indicates that the final effluent averaged 1.44 mg/l CBOD, 0.8 mg/l suspended solids and 0.49 mg/l ammonia nitrogen over a daily average flow of 10.19 MGD. There were no permit excursions in September.

Sewer Permits – September

There were 15 sewer permits issued in September – 10 single family, 1 repair, and 2 disconnections.

Financial Data – September

In September, the District received \$1,968,246 in the General fund, including \$690,452 in property taxes, \$633,292 in user charges, \$56,462 in surcharges, and \$450,840 in monthly fees. General fund expenses totaled \$722,289.

Personnel

An offer has been accepted for the Electrical Technician position. We are awaiting post offer requirements to be fulfilled.

Employee Functions

Thank you to all who attended the lunch on October 7. We hope you enjoyed the down time and the food.

Jason Herrell and Stephanie Cioni are coordinating a “Dip-Off” for November 18 at 11:30 am in the MSB lunchroom. Please look for the signs posted in the Admin Center and Plant for details. May the best dip maker win!

We will begin planning the holiday lunch next and will share those details as soon as they are available.

Voluntary Life Insurance

As a reminder, October 1 through November 30 is the open enrollment period for the Voluntary Group Life Plan from the National Conference on Public Employees Retirement Systems (NCPERS). If you are already a participant, there is nothing you need to do. If you do not participate in this plan currently, you can reach out to Carly Shaw for the information.

Outerwear Orders

The store has closed and orders will be processed. It takes a couple of weeks for us to get the items. We will reach out once everything is received and ready to be picked up.

Illinois Wastewater Surveillance System

The District continues to participate in the Illinois Wastewater Surveillance System. COVID, RSV and Influenza data from our wastewater treatment center can be found at <https://iwss.uillinois.edu/wastewater-treatment-plant/275/>.

Sewer Rehabilitation/Infiltration and Inflow Removal

We are targeting the 1K-028 area for private property inspections and I/I removal. Regular flow monitoring has been on pause for a few months due to high sewer system workload. The regular flow monitoring is expected to start again next week.

Status of Projects

1) Turbo-blowers

Mechanical work on the new Turbo-Blower 2 is complete. Electrical work is ongoing. Startup of Turbo-Blower 2 is scheduled for the last week of October. Turbo-Blower 3 has been delivered.

2) 2026 Painting Services

Work has been delayed until Spring.

3) Regionalization Study

Meetings were held recently with Flagg Creek WRD and DuPage County recently to determine potential force main routes to their facilities.

4) WWTC Asphalt Paving

Paving work is done.

5) Building Heat

Maintenance staff will be completing their annual building heat startup checks at the Admin Center, WWTC and Lift Stations next week.

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER

Wastewater Report, September 2026

For updates on your plant in-between these monthly reports, please visit our wastewater dashboard <https://iwss.uillinois.edu>

LOCATION: DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER (DuPage County)

Catchment Information

Population Served	65,000
NPDES	IL0028380
zipcode	60515
IL Covid Region	8

SARS-CoV-2 LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of the SARS-CoV-2 virus in a sample. The nucleocapsid protein (N) gene of the virus is targeted in the assay, and results are reported in gene copies per liter of starting wastewater.

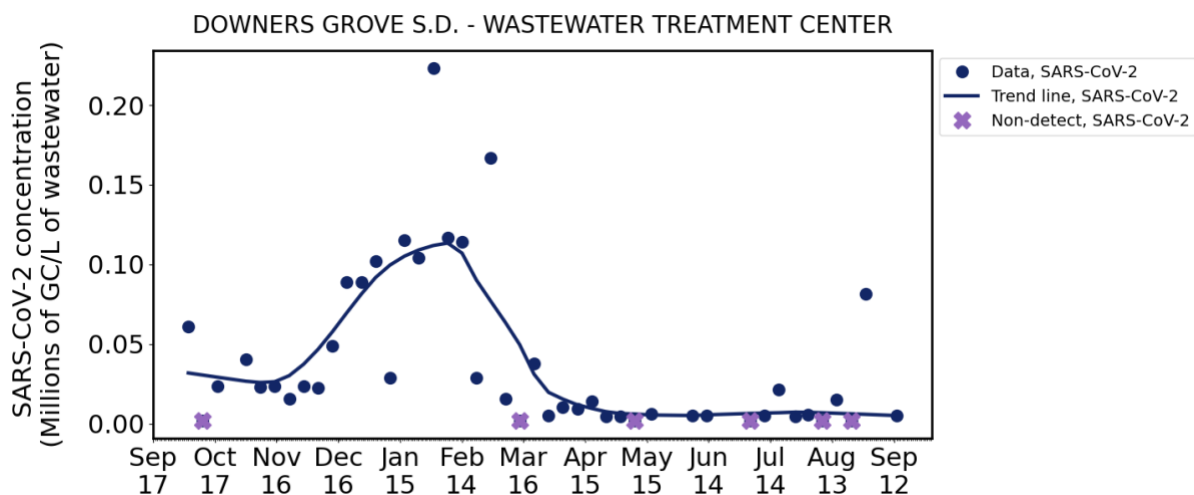


Figure 1. Time series plot of SARS-CoV-2 viral concentrations in millions of gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

SARS-CoV-2 SAMPLING RESULTS - LAST 8 SAMPLES

Date	SARS-CoV-2 (GC/L)
2026-09-14	5,115.45

2026-08-30	81,205.52
2026-08-23	2,040.0
2026-08-16	15,285.31
2026-08-09	2,040.0
2026-08-02	5,365.71
2026-07-27	4,635.69
2026-07-19	21,366.43

SARS-CoV-2 LINEAGES IN WASTEWATER

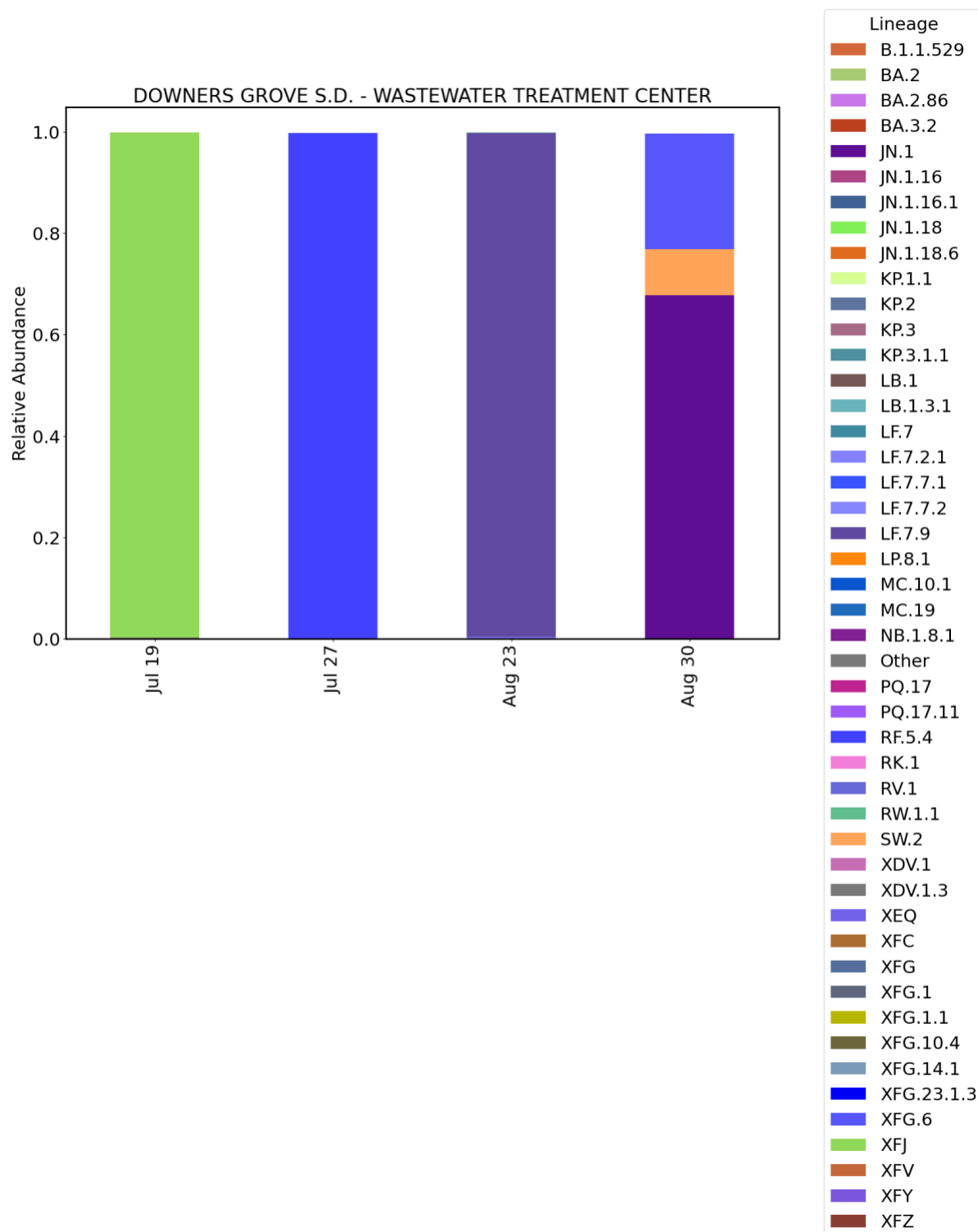


Figure 2. Stacked barplot showing the relative abundances of SARS-CoV-2 lineages in wastewater samples. All lineages in the legend, excluding "Other," are associated with Omicron. The most recently available two months worth of data are shown.

INFLUENZA A/B LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of influenza A and influenza B viruses in a sample. Results are reported in gene copies per liter of starting wastewater.

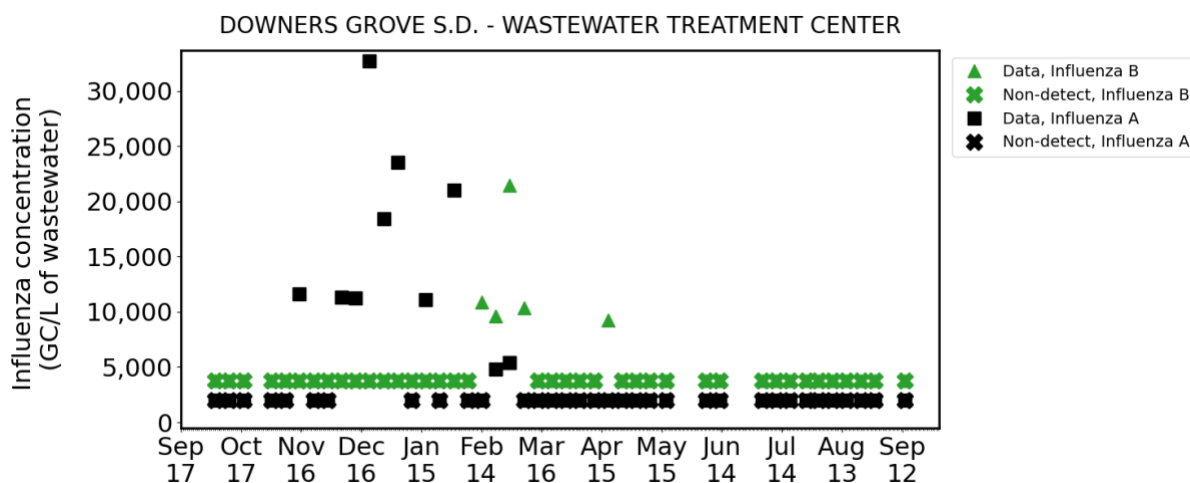


Figure 3. Time series plot of Influenza A/B viral concentrations in gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

INFLUENZA A/B SAMPLING RESULTS - LAST 8 SAMPLES

Date	Influenza A (GC/L)	Influenza B (GC/L)
2026-09-14	Non-detect	Non-detect
2026-08-30	Non-detect	Non-detect
2026-08-23	Non-detect	Non-detect
2026-08-16	Non-detect	Non-detect
2026-08-09	Non-detect	Non-detect
2026-08-02	Non-detect	Non-detect
2026-07-27	Non-detect	Non-detect
2026-07-19	Non-detect	Non-detect

RSV LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of Respiratory Syncytial Virus (RSV) in a sample. Results are reported in gene copies per liter of starting wastewater.

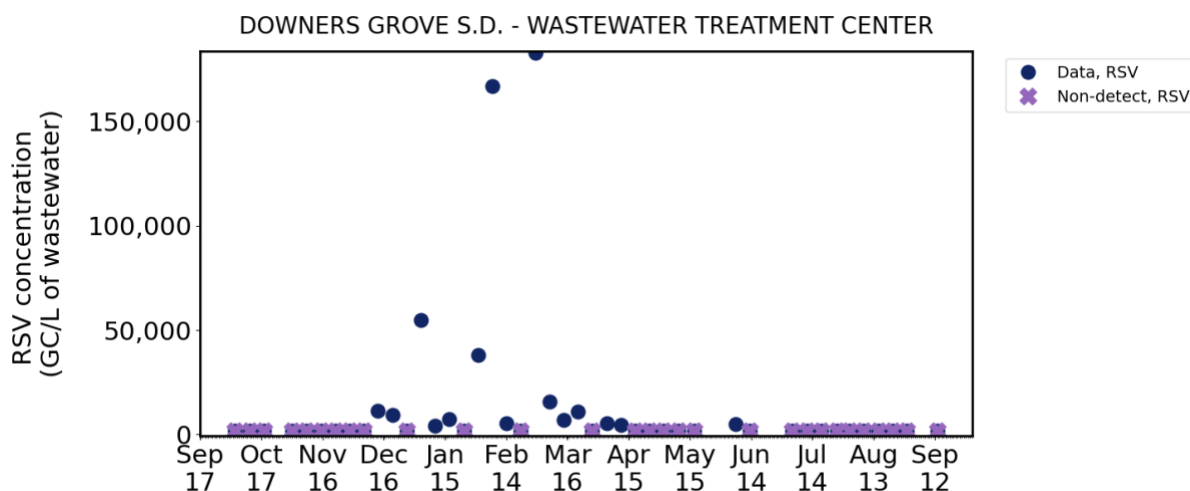


Figure 4. Time series plot of RSV viral concentrations in gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

RSV SAMPLING RESULTS - LAST 8 SAMPLES

Date	RSV (GC/L)
2026-09-14	Non-detect
2026-08-30	Non-detect
2026-08-23	Non-detect
2026-08-16	Non-detect
2026-08-09	Non-detect
2026-08-02	Non-detect
2026-07-27	Non-detect
2026-07-19	Non-detect

Guide to Interpreting Data on SARS-CoV-2, Influenza, & Respiratory Syncytial Virus (RSV) Gene Copies in Wastewater Samples

What do the results mean?

There are several factors to consider when interpreting viral data in wastewater. The rate, magnitude, and duration of shedding may vary from one person to another and from virus to virus, thus how or even whether it is possible to translate viral levels in wastewater into precise community health metrics is an open scientific question. It is only appropriate to monitor and observe the trends of viral gene copies detected in a community over time. The data presented in tables, graphs, and trend assessments show the concentration of RNA copies in the wastewater area from the community where the wastewater was collected. A significant increase in viral gene copies over time is an indicator that cases may be increasing in the community. Wastewater data should not be interpreted in isolation but rather considered alongside other public health metrics.

What does the number that is reported on a sample day mean?

It is a measure of how many gene copies are present in a sample, typically reported as gene copies per liter of wastewater (GC/L). Samples are typically obtained from municipal wastewater treatment plants and reflect inputs of viral material shed by the community served by the treatment plant. This number does not indicate gene copies per person or population.

How are the gene copies measured in the wastewater?

Wastewater samples are first processed to concentrate and isolate genetic material (RNA) that is present in the sample. RNA sequences specific to SARS-CoV-2, influenza A & B, and RSV are then detected and quantified using a molecular biology tool called digital polymerase chain reaction (dPCR). During dPCR, a targeted segment of the RNA is converted to DNA and then amplified (copied many times) so it can be detected by laboratory instruments. Specific methods for sample processing and PCR-based quantification differ among wastewater monitoring projects and analytical laboratories.

What does it mean if a data point for a sample is 0 or a non-detect?

A non-detect means that the amount of SARS-CoV-2, influenza, or RSV RNA in the wastewater sample is below the level that can be reliably detected by the quantification methods used in a given laboratory. A determination of non-detect does not necessarily mean that no viral RNA is present in the sample or in the system – rather that the levels are low enough that they cannot be reliably determined. In some cases, other components of wastewater may interfere with individual measurements, leading to an incorrect non-detection similar to false negatives that can occur from at-home and clinical testing. A non-detect does not necessarily mean that there are no infected individuals within the associated community.

What is the viral gene copy trend line?

The trend line is calculated using Locally Weighted Scatterplot Smoothing (LOWESS), a local regression analysis. It allows us to see the change in trend over time by fitting a curve to the data. This method is useful because it reduces the influence of outliers, and wastewater data can be highly variable. LOWESS is a more complex extension of the moving average.

Does the number of gene copies in a sample tell us how many people are sick?

There are not presently agreed-upon methods for translating concentration of SARS-CoV-2, influenza, or RSV genetic material in wastewater into a measure of how many people, or even what percentage of a community, have COVID-19, flu, or RSV, respectively. Variability between different wastewater sources, treatment facilities, and communities makes it difficult to translate the SARS-CoV-2, influenza, or RSV concentrations into a measure of how many people are infected in the community. However, an upward or downward trend in viral gene copies per liter of wastewater generally suggests a similar trend in the number of people infected within a given community.

Can I compare the number of gene copies in a sample from site to site?

Because each community has a different mix of wastewater inputs, different populations, and different wastewater systems, it is not appropriate to compare viral gene copy numbers among communities. Instead, trends in SARS-CoV-2, influenza, or RSV concentrations from a specific community over time can be used to help understand whether cases or hospitalizations are likely to increase or decrease in the community. Sample collection methods and mechanisms, collection times, and sample variability are other factors that discourage cross-site comparison.

Can I compare the gene copies of different pathogens to one another?

Because each pathogen is distinct, it is not appropriate to compare their viral gene copy numbers, even at the same site. Instead, trends in SARS-CoV-2, influenza, or RSV concentrations (increasing/decreasing) can be used to understand if cases or hospitalizations for each pathogen are likely to increase or decrease in the community.

Guide to Interpreting Data on SARS-CoV-2 Lineages in Wastewater Samples

What are lineages and how are they determined?

Wastewater is sequenced to determine the variants of SARS-CoV-2 virus present in a sample, a proxy for circulating variants in the community. Our sequencing strategy utilizes the entire genome of SARS-CoV-2 to identify mutations that are diagnostic of variants of the virus. Full genome coverage gives us better resolution for distinguishing variants, especially those very similar to each other. Variant names and lineage relationships are determined by the World Health Organization (WHO).

Variant: A genome that contains a particular set of mutations.

Mutation: A change in the genetic information introduced during viral replication.

Lineage: A collection of variants all related to each other based on analysis of the virus genomic sequence.

What is the sequencing plot showing me?

This plot is displaying the relative abundance, or proportion, of lineages found in a wastewater sample collected on a particular date. This plot was generated after comparing sample sequences to a SARS-CoV-2 reference genome and identifying characteristic mutations that are

associated with different variants. We then calculate the percentage of each variant present in the sample. This plot summarizes the variant detections; lineages are displayed, as there are often many variants detected that are in the same lineage.

What do the results mean?

The SARS-CoV-2 variants identified in a particular plant's wastewater can provide insight into the variants circulating in the population that the plant serves. This information can be useful, as there tend to be fewer clinical sequences, and those might only reflect a small proportion of the community feeling sick enough to pursue testing. The wastewater samples passively capture the virus shed in wastewater from the community where the wastewater was collected, not just those who are symptomatic. Wastewater data is not interpreted in isolation but rather considered alongside other public health metrics.

Does the number or type of lineages tell us how many people are sick?

We cannot tell how many people are sick from the lineages observed in the wastewater. We can only see relative proportions of the variants that are present in the community served by the wastewater treatment plant. We do pay attention to specific mutations that have been identified as having clinical implications (e.g., for effectiveness of medications or disease severity).

Can I compare the lineages in a sample from site to site?

Yes. We often detect variants in a particular plant first, and then see the relative abundance change over time, with certain lineages becoming more prevalent across the state from plant to plant. We compare these detections to sequence data from across the United States and the world.

Why are the dates of the sequencing data not as current as the gene copies data?

Sequencing results are available about two weeks after sample collection. This is because the quantification of SARS-CoV-2 levels by dPCR happens first, and then genetic material (RNA) is sent for sequencing. Additionally, samples then take multiple days to run on the sequencer and computational processing of sequences takes additional time before results are available.

Why do the lineages in the legend change periodically?

The lineages shown in the sequencing plot of this report are in alignment with the CDC's national genomic surveillance system. As the SARS-CoV-2 virus mutates, new variants emerge. This means there are regularly new variants that contribute to the spread of COVID-19. Some variants will disappear while others will continue to spread and even replace others as the dominant variant. These monthly reports reflect those changes as we continue to monitor for emerging variants of concern.



DISCOVERY PARTNERS INSTITUTE
PART OF THE UNIVERSITY OF ILLINOIS SYSTEM

DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER

Wastewater Report, October 2026

For updates on your plant in-between these monthly reports, please visit our wastewater dashboard <https://iwss.uillinois.edu>

LOCATION: DOWNERS GROVE S.D. - WASTEWATER TREATMENT CENTER (DuPage County)

Catchment Information

Population Served	65,000
NPDES	IL0028380
zipcode	60515
IL Covid Region	8

SARS-CoV-2 LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of the SARS-CoV-2 virus in a sample. The nucleocapsid protein (N) gene of the virus is targeted in the assay, and results are reported in gene copies per liter of starting wastewater.

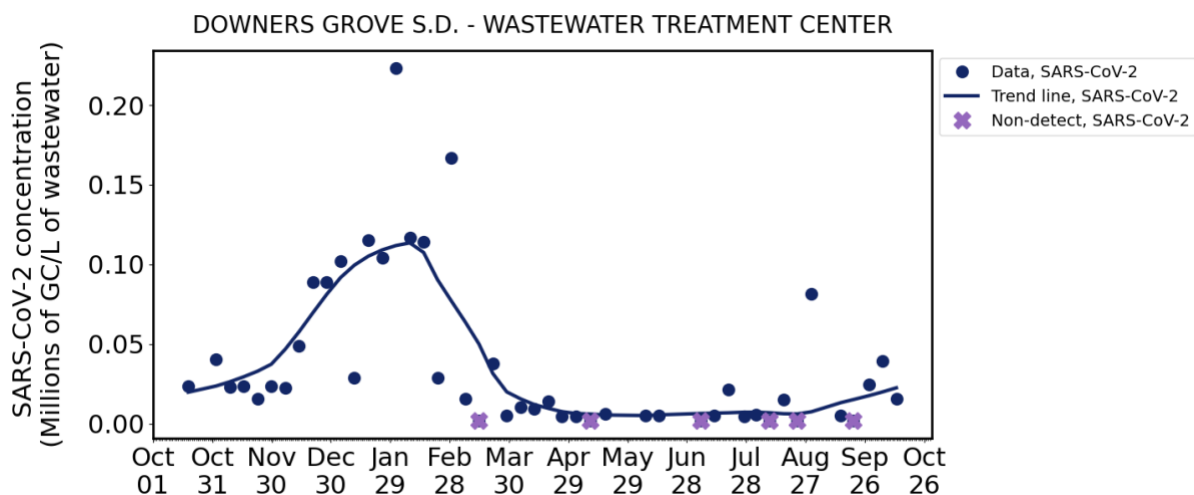


Figure 1. Time series plot of SARS-CoV-2 viral concentrations in millions of gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

SARS-CoV-2 SAMPLING RESULTS - LAST 8 SAMPLES

Date	SARS-CoV-2 (GC/L)
2026-10-12	15,465.94

2026-10-05	39,194.44
2026-09-28	24,628.18
2026-09-20	2,040.0
2026-09-14	5,115.45
2026-08-30	81,205.52
2026-08-23	2,040.0
2026-08-16	15,285.31

SARS-CoV-2 LINEAGES IN WASTEWATER

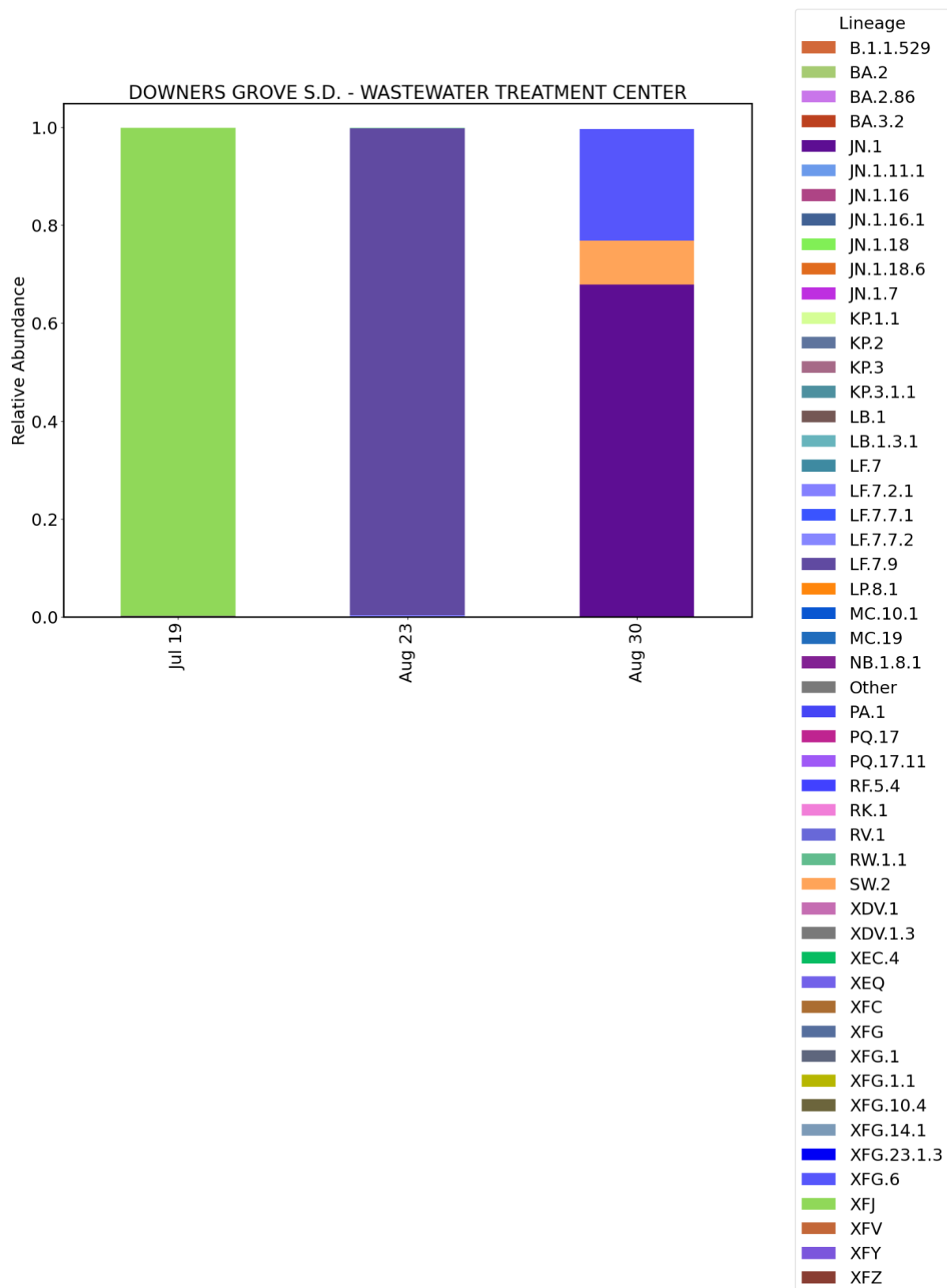


Figure 2. Stacked barplot showing the relative abundances of SARS-CoV-2 lineages in wastewater samples. All lineages in the legend, excluding "Other," are associated with Omicron. The most recently available two months worth of data are shown.

INFLUENZA A/B LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of influenza A and influenza B viruses in a sample. Results are reported in gene copies per liter of starting wastewater.

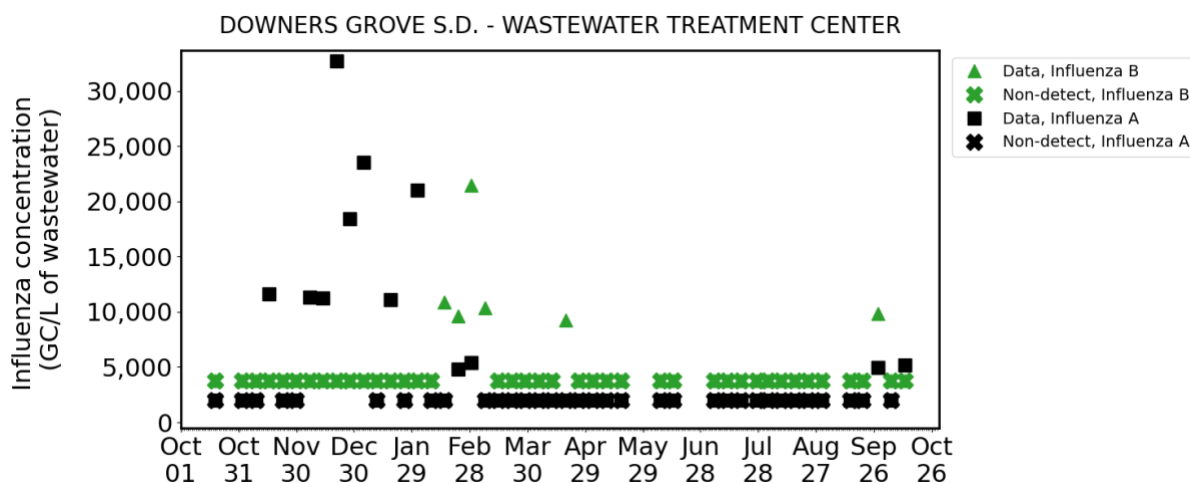


Figure 3. Time series plot of Influenza A/B viral concentrations in gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

INFLUENZA A/B SAMPLING RESULTS - LAST 8 SAMPLES

Date	Influenza A (GC/L)	Influenza B (GC/L)
2026-10-12	5,155	Non-detect
2026-10-05	Non-detect	Non-detect
2026-09-28	4,925	9,850
2026-09-20	Non-detect	Non-detect
2026-09-14	Non-detect	Non-detect
2026-08-30	Non-detect	Non-detect
2026-08-23	Non-detect	Non-detect
2026-08-16	Non-detect	Non-detect

RSV LEVELS IN WASTEWATER

Wastewater is analyzed using digital PCR (dPCR) to determine the concentration of Respiratory Syncytial Virus (RSV) in a sample. Results are reported in gene copies per liter of starting wastewater.

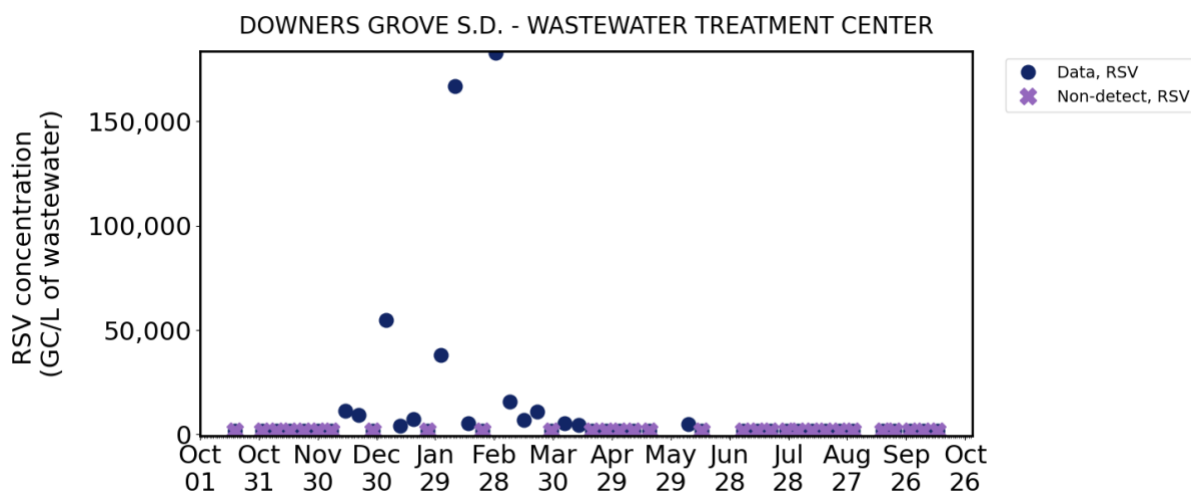


Figure 4. Time series plot of RSV viral concentrations in gene copies per liter (GC/L) of wastewater. Historical data can be found on the IWSS dashboard, link above.

RSV SAMPLING RESULTS - LAST 8 SAMPLES

Date	RSV (GC/L)
2026-10-12	Non-detect
2026-10-05	Non-detect
2026-09-28	Non-detect
2026-09-20	Non-detect
2026-09-14	Non-detect
2026-08-30	Non-detect
2026-08-23	Non-detect
2026-08-16	Non-detect

Guide to Interpreting Data on SARS-CoV-2, Influenza, & Respiratory Syncytial Virus (RSV) Gene Copies in Wastewater Samples

What do the results mean?

There are several factors to consider when interpreting viral data in wastewater. The rate, magnitude, and duration of shedding may vary from one person to another and from virus to virus, thus how or even whether it is possible to translate viral levels in wastewater into precise community health metrics is an open scientific question. It is only appropriate to monitor and observe the trends of viral gene copies detected in a community over time. The data presented in tables, graphs, and trend assessments show the concentration of RNA copies in the wastewater area from the community where the wastewater was collected. A significant increase in viral gene copies over time is an indicator that cases may be increasing in the community. Wastewater data should not be interpreted in isolation but rather considered alongside other public health metrics.

What does the number that is reported on a sample day mean?

It is a measure of how many gene copies are present in a sample, typically reported as gene copies per liter of wastewater (GC/L). Samples are typically obtained from municipal wastewater treatment plants and reflect inputs of viral material shed by the community served by the treatment plant. This number does not indicate gene copies per person or population.

How are the gene copies measured in the wastewater?

Wastewater samples are first processed to concentrate and isolate genetic material (RNA) that is present in the sample. RNA sequences specific to SARS-CoV-2, influenza A & B, and RSV are then detected and quantified using a molecular biology tool called digital polymerase chain reaction (dPCR). During dPCR, a targeted segment of the RNA is converted to DNA and then amplified (copied many times) so it can be detected by laboratory instruments. Specific methods for sample processing and PCR-based quantification differ among wastewater monitoring projects and analytical laboratories.

What does it mean if a data point for a sample is 0 or a non-detect?

A non-detect means that the amount of SARS-CoV-2, influenza, or RSV RNA in the wastewater sample is below the level that can be reliably detected by the quantification methods used in a given laboratory. A determination of non-detect does not necessarily mean that no viral RNA is present in the sample or in the system – rather that the levels are low enough that they cannot be reliably determined. In some cases, other components of wastewater may interfere with individual measurements, leading to an incorrect non-detection similar to false negatives that can occur from at-home and clinical testing. A non-detect does not necessarily mean that there are no infected individuals within the associated community.

What is the viral gene copy trend line?

The trend line is calculated using Locally Weighted Scatterplot Smoothing (LOWESS), a local regression analysis. It allows us to see the change in trend over time by fitting a curve to the data. This method is useful because it reduces the influence of outliers, and wastewater data can be highly variable. LOWESS is a more complex extension of the moving average.

Does the number of gene copies in a sample tell us how many people are sick?

There are not presently agreed-upon methods for translating concentration of SARS-CoV-2, influenza, or RSV genetic material in wastewater into a measure of how many people, or even what percentage of a community, have COVID-19, flu, or RSV, respectively. Variability between different wastewater sources, treatment facilities, and communities makes it difficult to translate the SARS-CoV-2, influenza, or RSV concentrations into a measure of how many people are infected in the community. However, an upward or downward trend in viral gene copies per liter of wastewater generally suggests a similar trend in the number of people infected within a given community.

Can I compare the number of gene copies in a sample from site to site?

Because each community has a different mix of wastewater inputs, different populations, and different wastewater systems, it is not appropriate to compare viral gene copy numbers among communities. Instead, trends in SARS-CoV-2, influenza, or RSV concentrations from a specific community over time can be used to help understand whether cases or hospitalizations are likely to increase or decrease in the community. Sample collection methods and mechanisms, collection times, and sample variability are other factors that discourage cross-site comparison.

Can I compare the gene copies of different pathogens to one another?

Because each pathogen is distinct, it is not appropriate to compare their viral gene copy numbers, even at the same site. Instead, trends in SARS-CoV-2, influenza, or RSV concentrations (increasing/decreasing) can be used to understand if cases or hospitalizations for each pathogen are likely to increase or decrease in the community.

Guide to Interpreting Data on SARS-CoV-2 Lineages in Wastewater Samples

What are lineages and how are they determined?

Wastewater is sequenced to determine the variants of SARS-CoV-2 virus present in a sample, a proxy for circulating variants in the community. Our sequencing strategy utilizes the entire genome of SARS-CoV-2 to identify mutations that are diagnostic of variants of the virus. Full genome coverage gives us better resolution for distinguishing variants, especially those very similar to each other. Variant names and lineage relationships are determined by the World Health Organization (WHO).

Variant: A genome that contains a particular set of mutations.

Mutation: A change in the genetic information introduced during viral replication.

Lineage: A collection of variants all related to each other based on analysis of the virus genomic sequence.

What is the sequencing plot showing me?

This plot is displaying the relative abundance, or proportion, of lineages found in a wastewater sample collected on a particular date. This plot was generated after comparing sample sequences to a SARS-CoV-2 reference genome and identifying characteristic mutations that are

associated with different variants. We then calculate the percentage of each variant present in the sample. This plot summarizes the variant detections; lineages are displayed, as there are often many variants detected that are in the same lineage.

What do the results mean?

The SARS-CoV-2 variants identified in a particular plant's wastewater can provide insight into the variants circulating in the population that the plant serves. This information can be useful, as there tend to be fewer clinical sequences, and those might only reflect a small proportion of the community feeling sick enough to pursue testing. The wastewater samples passively capture the virus shed in wastewater from the community where the wastewater was collected, not just those who are symptomatic. Wastewater data is not interpreted in isolation but rather considered alongside other public health metrics.

Does the number or type of lineages tell us how many people are sick?

We cannot tell how many people are sick from the lineages observed in the wastewater. We can only see relative proportions of the variants that are present in the community served by the wastewater treatment plant. We do pay attention to specific mutations that have been identified as having clinical implications (e.g., for effectiveness of medications or disease severity).

Can I compare the lineages in a sample from site to site?

Yes. We often detect variants in a particular plant first, and then see the relative abundance change over time, with certain lineages becoming more prevalent across the state from plant to plant. We compare these detections to sequence data from across the United States and the world.

Why are the dates of the sequencing data not as current as the gene copies data?

Sequencing results are available about two weeks after sample collection. This is because the quantification of SARS-CoV-2 levels by dPCR happens first, and then genetic material (RNA) is sent for sequencing. Additionally, samples then take multiple days to run on the sequencer and computational processing of sequences takes additional time before results are available.

Why do the lineages in the legend change periodically?

The lineages shown in the sequencing plot of this report are in alignment with the CDC's national genomic surveillance system. As the SARS-CoV-2 virus mutates, new variants emerge. This means there are regularly new variants that contribute to the spread of COVID-19. Some variants will disappear while others will continue to spread and even replace others as the dominant variant. These monthly reports reflect those changes as we continue to monitor for emerging variants of concern.



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Amy R. Underwood, P.E.

Legal Counsel

Daniel McCormick, P.C.

Providing a Better Environment for South Central DuPage County

MEMORANDUM

To: Board of Trustees

From: Amy Underwood, General Manager

Date: October 16, 2026

Subject: NPR Offer

At the September 22 Board meeting, the Board of Trustees requested that staff send the attached letter to National Power Rodding Corp. (NPR) expressing our disappointment with how work was performed on our 2025 Sanitary Sewer Televising Services project.

In response to the letter, Bill Kreidler, President of NPR, reached out to the District. Other than the initial time extension, he was unaware of the issues we dealt with to complete the project. He has offered 3,800 feet of televising work at no cost to the District to maintain the good faith NPR and the District have had through our long working relationship before this project. Sewer Maintenance Supervisor, Todd Freer, is coordinating with him to complete the work.

C: BOT, BOLI, CS, DM, TMF

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Providing a Better Environment for South Central DuPage County

September 23, 2026

William T. Kreidler
President
National Power Rodding Corp.
2500 W Arthington St.
Chicago, Illinois 60612

Subject: 2025 Sanitary Sewer Televising Services

Dear Mr. Kreidler:

I am writing on behalf of the Board of Trustees of the Downers Grove Sanitary District to express our disappointment the work National Power Rodding Corp. (NPR) recently performed on the District's 2025 Sanitary Sewer Televising Services contract.

The videos of the first 11,162 feet which was televised were excellent. The video of the remaining 45,135 feet was of poor quality. Significant staff time was needed to determine whether the District could accept the videos and to work with NPR to get the videos properly labeled. This took District resources away from other necessary tasks.

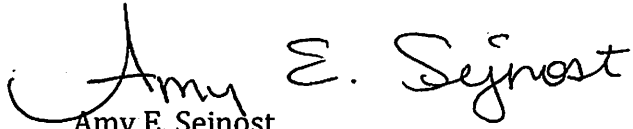
Once every video was reviewed, approximately 3,800 feet of sewer had to be removed from the contract as it had not been televised satisfactorily. The District will now have to either do this work in house with our stretched resources or include it in a future contract where the District will most likely pay more due to inflation.

NPR had not started the work by the original contract completion date of November 19, 2025. When NPR requested a time extension, District staff made it very clear that the work needed to be completed by the end of March and the final invoice received by the end of the District's fiscal year, which was April 30, 2026. Despite the assurances of NPR staff when the time extension was approved, these deadlines were not met. The District therefore had to make the final payment to NPR against the next fiscal year's budget, which then resulted in the District having to cancel other work to cover this expense.

Within the requirements of its NPDES permit, the District has set goals for televising our

sewer system annually. The delay in this project and the reduction in footage resulted in the District not meeting its goals for both 2025 and 2026.

Sincerely,


Amy E. Sejnost
President

cc: Board of Trustees

BOARD OF LOCAL IMPROVEMENTS (BOLI)

Matters to be reviewed by the BOLI:

1. Special Assessments
2. Projects requiring Sanitary Sewer Extensions
3. Commercial Projects requiring Annexation into Sanitary District
4. Projects that have wastewater flow above the District's design allocation
5. Projects as referred to by the Board of Trustees or General Manager

BOLI Briefing Checklist:

1. Project location
2. Project scope (number of units, building square footage, etc)
3. Parcel size in gross acres
4. Estimated wastewater flows
5. Proposed density in PE per Acre
6. Is property within the District Boundaries, if not is it contiguous?
7. Is sewer available, does it require an extension?
8. Is the sewer extension in compliance with the Unsewered Area Plan
9. Do the downstream trunk sewer have capacity, may need flow study by consulting engineer (Baxter & Woodman) to determine
10. State conditions for approval
11. Location map
12. Map of sewer extension route
13. Additional supporting exhibits