

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/785-0561

February 21, 2023

CERTIFIED MAIL # 7021 2720 0000 2345 0397 RETURN RECEIPT REQUESTED

Graham Correctional Center c/o Glen Austin 12078 IL Rte 185 Hillsboro, IL 62995

Re: Violation Notice: GRAHAM CORRECTIONAL CENTER

Facility No.: IL01355100

Violation Notice No.: W-2023-00020

Dear Mr. Austin:

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

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

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

Page 2 of 2 IL0875510 GRAHAM CORRECTIONAL CENTER VN W-2023-00020

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

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

Written communications should be directed to:

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

All communications must include reference to this Violation Notice number, W-2023-00020.

Questions regarding this Violation Notice should be directed to Kathy Andring at 217/785-0561.

Sincerely, Open Logue Logue

Joey Logan-Pugh

Manager, Compliance Assurance Section

Division of Public Water Supplies

Bureau of Water

Attachments

cc: Jared Brunk

Rodney Thacker

BOW ID: W1358070007

GRAHAM CORRECTIONAL CENTER, IL13355100 VIOLATION NOTICE NO. W-2023-00020:

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

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

Drinking Water Construction Permit

Public Water Supplies (PWSs) are required to obtain a construction permit from Illinois EPA for all construction. To meet compliance, the supply is expected to submit as-built plans and specifications pursuant to 35 Ill. Adm. Code 602.116 within 120 days for approval by Illinois EPA.

Violation	Violation
Date	Description
10/25/2022	Failure to obtain a construction permit for the installation of
	multiple water softeners and the brine storage tank used to
	treat water that may be used for consumption.
Rule/Reg.	Sections 15(a) and 18(a)(3) of the Act, 415 ILCS 5/15 and 5/18,
	and 35 Ill. Adm. Code 602.101(a) and (b) and 602.200(a) and (b)

Drinking Water Monthly Operating Reports

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

Violation Date	Violation Description
10/25/2022	Failure to submit monthly operating reports. (on-going
	violation)
Rule/Reg.	Section 18(a) and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35
	Ill. Adm. Code. 604.165(a), (c), and (d).

GRAHAM CORRECTIONAL CENTER, IL1355100 VIOLATION NOTICE NO. W-2023-00020:

Drinking Water Cross-Connection Control Program

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

Violation	Violation
Date	Description
10/25/2022	Failure to have a comprehensive cross-connection control
	program. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	601.101(a) and 604.1505(a) and (b).

Drinking Water Cross-Connection Program Device Inventory

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

Violation	Violation					
Date	Description					
10/25/2022	Failure to mai	ntain recor	rds of all	backflow	preventers	that
	require annual	testing.				
Rule/Reg.	Section 18 of the	ne Act 415 I	LCS 5/18, 35	5 Ill. Adm.	Code 601.10	01(a)
	and 604,1505(b)	(5).				

Drinking Water Cross-Connection Device Testing

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

Violation	Violation
Date	Description
10/25/2022	Failure to perform annual testing of all backflow prevention
	devices in the system. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	601.101(a) and 604.1510(a).

Rule/Reg.

ATTACHMENT A

GRAHAM CORRECTIONAL CENTER, IL1355100 VIOLATION NOTICE NO. W-2023-00020:

Emergency Operation Plan

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

Violation Date	Violation Description
10/25/2022	Failure to have an Emergency Operations Plan for the provision
	of water under emergency circumstances. (on-going violation)
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	601.101 and 604.135(d).

Water Treatment Plant/Distribution System Maintenance

601.101(a) and 604.1425(c).

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

Violation
Description
Verify that the sodium chloride used for regenerating the Ion
Exchange units meets the American National Standards Institute
Standard 60. Evidence of approval must be provided from one of
the three certifying organizations: National Sanitation
Foundation, Underwriters Laboratories, Inc. or Water Quality
Association.
Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
604.105(b) and (g).
Install 4 mesh, non-corrodible screen on the 200,000 gallon
elevated storage tank overflow line to prevent contamination.
Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
601.101(a) and 604.1305(e).
Failure to develop and maintain a systematic flushing program.
(on-going violation)

Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code

Date

Violation

ATTACHMENT A

GRAHAM CORRECTIONAL CENTER, IL1355100 VIOLATION NOTICE NO. W-2023-00020:

10/25/2022	Obtain chlorine residual testing equipment to verify chlorine
	residual.
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 604.130(c).
10/25/2022	Bare metal rust is present on the exterior of the 200,000
	elevated storage tank. A comprehensive inspection of the
	200,000 gallon elevated storage tank is recommended every five
	years.
Rule/Reg.	Section 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	601.101(a) and 604.1330(a).

Responsible/Certified Operator

Violation

Description

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

Violation Date	Violation Description
10/25/2022	Operations of a Class B Water system without a properly
	certified drinking water operator. An operator with a valid
	Class B Certification or higher is required.
Rule/Reg	Section 18(a) of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	601.101(a), 603.101(d), 603.103(a) and (b), and 681.215(a) and
	(b).

Notification of Ownership or Responsible Operational Personnel

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

Violation	Violation
Date	Description
10/25/2022	Lack of "Notification of Responsible Operational Personnel" form
	on file with the Illinois EPA identifying a Responsible Operator
	in Charge (ROINC).
Rule/Reg	Section 18(a) of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code
	603.103(e).

GRAHAM CORRECTIONAL CENTER, IL1355100 VIOLATION NOTICE NO. W-2023-00020:

Drinking Water Monitoring Site Plan Requirements

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

Violation Violation Date Description

To/25/2022 Failure to submit, for Agency approval, a written sample siting plan for coliform that identifies sampling sites representative of water throughout the distribution system. (on-going violation)

Rule/Reg. Sections 18 of the Act, 415 ILCS 5/18, and 35 Ill. Adm. Code 611.1053(a)(1).

10/25/2022 Failure to submit, for Agency approval, a written sample siting plan for lead and copper that identifies sampling sites representative of water throughout the distribution system. (ongoing violation)

Rule/Reg. Sections 18 of the Act, 415 ILCS 5/18, and 35 Ill Adm. Code 611.356(a).

10/25/2022 Failure to submit, for Agency approval, a written sample siting plan for disinfection by-product samples. (on-going violation) Rule/Reg. Sections 18 of the Act, 415 ILCS 5/18, and 35 Ill Adm. Code 611.972(a).

Drinking Water Monitoring

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

V	iolation	Violation
ķ.	Date	Description
2000	10-10-00	

10/25/2022 Failure to collect samples and submit coliform sample results. Rule/Reg. Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35 Ill. Adm. Code 611.1053(a)(2) and (3).

GRAHAM CORRECTIONAL CENTER, IL1355100 VIOLATION NOTICE NO. W-2023-00020:

Violation	Violation
Date	Description
10/25/2022	Failure to collect samples and submit disinfectant residual
	sample results.
Rule/Reg.	Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35
	Ill. Adm. Code 611.382(a) and (c).
10/25/2022	Failure to collect samples and submit lead and copper sample
	results.
Rule/Reg.	Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35
	Ill. Adm. Code 611.350(h) and 611.356(c).
10/25/2022	Failure to collect samples and submit disinfectants and
	disinfection by-products (DBPs) sample results.

Nitrification Action Plan

Ill. Adm. Code 611.971(a)

Rule/Reg.

Any community water supply distributing water without a free chlorine residual must create a Nitrification Action Plan (NAP). The NAP must:

Sections 18 and 19 of the Act, 415 ILCS 5/18 and 5/19, and 35

- a. Contain a plan for monitoring total ammonia as nitrogen (N), free ammonia as N, nitrite as N, nitrate as N, monochloramine residual, dichloramine residual, and total chlorine residual.
- b. Contain system specific levels of the chemicals in listed in A when action must be taken.
- c. Contain specific correction actions to be taken if the levels listed in B are exceeded.
- d. Be maintained on site and made available to the Agency upon request.

Violation	Violation
Date	Description
10/25/2022	No Nitrification Action Plan has been created for the
	distribution system. A NAP for the distribution system must be
	created.

Rule/Reg. Section 18 of the Act, 415 ILCS 5/18, 35 Ill. Adm. Code 601.101 and 604.140.



Notification of Responsible Operational Personnel

Please use this form to make community water supply (CWS) contact changes. Number: CWS Name: REASON FOR CHANGE (check all applicable boxes) Change in Owner and/or Official Change in Administrative Contact Change of Sample Collector Custodian Information Information Information Change in Responsible Operator in Updating phone, mailing address, and/ This is a NEW CWS Charge Information or E-Mail information only OWNER (OW) If the CWS is privately owned, identify the individual (and contact information) exercising direct supervision over the CWS in accordance with 35 III. Adm. Code 603,101 (e.g., Mobile Home Park, Apartment Complex, or Private Business, etc.). This individual must sign. If the CWS is publically owned or owned by private corporation, or regularly organized body, identify the entity exercising direct supervision over the CWS in accordance with 35 III. Adm. Code 603.101 (e.g., Municipality, Water District, Water Corporation, Water Cooperative, Conservancy District, Subdivision, or Association). If an entity, only complete Entity Name, Business #, and Address (no signature required) and then complete OFFICIAL CUSTODIAN (OC) box. Name (Individual) or Entity Name (Municipality, Water District, Assoc., etc.) **Business Address** Title: Business#: (Cell#: Fax#: (_____ Home#: E-Mail: If Individual, Signature: (Signature of Individual) OFFICIAL CUSTODIAN (OC) If the owner is an Entity as listed above (Municipality, Water District, Water Corporation, Water Cooperative, Conservancy District, Subdivision or Association, etc.) identify a person who acts on behalf and is responsible for the supply. This person should be an elected official of a municipality, member of the board, or an officer of the organization that runs the supply (mayor, president, chairman, etc.). Business Address (print) Name: Title (if applicable) Business#: () Cell # Home# Fax#: (E-Mail: Signature: Date: (Signature of Official Custodian) ADMINISTRATIVE CONTACT (AC) An owner or official custodian may designate an administrative contact to oversee daily managerial operations of the CWS. Any notice provided by the Agency to the AC shall be considered notice to the owner or official custodian. These notices may include, but are not limited to Sample Demand Letters, Public Notice Advisories, Violation Notice, Notice of Intent to Pursue Legal Action, and notices of regulatory requirements and permitting transactions. **Business Address** Name: (print) Title: Cell#: Work#: (Fax#: (Home#: E-Mail: Date: Signature: (Signature of AC) Signature of the Owner or Official Custodian is required before Illinois EPA will add or change an AC contact: (print) as my Agent, with actual authority to conduct legal transactions arising from the daily managerial operations of the CWS on my behalf.

(Signature of Owner or Official Custodian)

RESPONSIBLE OPERATOR IN CHARGE (ROINC) Identify the certified Code 603.103 in responsible charge of the CWS operations. The ROINC runs and oversees daily w	operator(s) designated pursuant to 35 III. Adm.
CWS must select only one designated ROINC for treatment and one designated ROINC for distribution ROINC may be the same person.	tion. The treatment ROINC and distribution
Current ROINC on File:	(print name)
Please check box that best describes status of current ROINC on File	
Current ROINC on file will no longer be employed or under contract with PWS effective	
Current ROINC on file is still working with PWS but will no longer serving as ROINC.	CONTRACTOR
NEW ROINC 1 Please Check One: Full Time Employee or Contract Oper	rator (include copy of contract)
Name: (print)	Business Address
Circle Certificate Class: A B C D	
Circle One: Treatment & Distribution Treatment Only Distribution Only	7
Cell#: () Work#: ()	
Home#: () Fax#: ()	
E-Mail:	
Signature:	Date:
(Signature of ROINC 1)	J
NEW ROINC 2 Please Check One: Full Time Employee or Contract Ope	erator (include copy of contract)
Name: (print)	Business Address
Circle Certificate Class: A B C D Circle One: Distribution Only	
Cell#: () Work#: () Fax#: ()	4 150 U U U U U U U U U U U U U U U U U U U
E-Mail:	
Signature:	Date:
(Signature of ROINC 2)	Buto.
Signature of Owner, Official Custodian, or Administrative Contact is requi	red before Illinois EPA will add or
change a ROINC contact(s).	ted before lillions El A will add or
As Owner/Official Custodian or Administrative Contact, I	(print name), accept and
assign the duties and responsibilities for the proper operation and maintenance of the public water	supply facilities by the operator(s) listed above as
being in responsible charge.	
Signature:	Date:
(Signature of Owner/Official Custodian or Administrative Contact)	
Sample Collector/Bottle Recipient Identify the person employed by the CWS the	at will collect samples and complete the
paperwork associated with sampling.	
	Bottle Mailing Address
Name:(print)	No P.O.Box Numbers Allowed
Cell#: () Work#: ()	
Home#: ()	
E-Mail:	
Signature:	Date:
(Sample Collector's Signature)	

Completion of this form shall indicate acceptance of the duties and responsibilities for the proper operation and maintenance of the public water supply facilities by both the owner or official custodian and the certified operators designated as being in responsible charge pursuant to 35 III. Adm. Code 603.101(d). Please be advised that it is the responsibility of the owner, official custodian and the certified operator(s) in responsible charge to notify this office within 15 days of any changes in responsible personnel. Completion and submittal of this form will satisfy the notification of responsible personnel requirements of Title 35: Environmental Protection, Subtitle F: Public Water Supplies, Chapter I: Pollution Control Board, Part 603, Sections 603.101, 603.102, and 603.103.

Be sure to retain copies of this document for your files. Should you need additional forms, please call (217)785-0561 or download at http://www.epa.state.il.us/water/operator-cert/drinking-water/forms/notification-of-ownership.pdf. Return this completed form to:

Illinois Environmental Protection Agency, Bureau of Water #19, 1021 North Grand Ave East, P.O. Box 19276, Springfield, IL 62794-9276

This Agency is authorized to require this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$1,000.00. Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))



RESPONSIBLE OPERATOR IN CHARGE (ROINC) Identify the certified Code 603 103 in responsible charge of the CWS operations. The ROINC runs and oversees daily v CWS must select only one designated ROINC for treatment and one designated ROINC for distribution ROINC may be the same person.	vater treatment and distribution operations. A
Current ROINC on File:	(print name)
Please check box that best describes status of current ROINC on File	(pint name)
Current ROINC on file will no longer be employed or under contract with PWS effective	
Current ROINC on file is still working with PWS but will no longer serving as ROINC.	
NEW ROINC 1 Please Check One: Full Time Employee or Contract Ope	rator (include copy of contract)
Name: (print)	Business Address
Circle Certificate Class: A B C D	No.
Circle One: Treatment & Distribution Treatment Only Distribution Only	
Cell#: () Work#: ()	
Home#: () Fax#: ()	
E-Mail:	
Signature:	Date:
(Signature of ROINC 1)	Date.
NEW ROINC 2 Please Check One: Full Time Employee or Contract Op-	erator (include copy of contract)
Name: (print)	Business Address
Circle Certificate Class: A B C D Circle One: Distribution Only	<u> Daomeso Address</u>
Cell#: ()Work#: ()	
Home#: () Fax#: ()	
E-Mail:	
Signature:	Date:
(Signature of ROINC 2)	Date
Signature of Owner, Official Custodian, or Administrative Contact is requi	rad before Illinois EDA will add as
change a ROINC contact(s).	red before minois EPA will add or
As Owner/Official Custodian or Administrative Contact, I	(print name), accept and
assign the duties and responsibilities for the proper operation and maintenance of the public water	supply facilities by the operator(s) listed above as
being in responsible charge.	
Signature:	Date:
(Signature of Owner/Official Custodian or Administrative Contact)	
Sample Collector/Bottle Recipient Identify the person employed by the CWS the	nat will collect samples and complete the
paperwork associated with sampling.	
	Bottle Mailing Address
Name: (print)	No P.O.Box Numbers Allowed
Cell#: () Work#: ()	
Home#: (Fax#: ()	
E-Mail:	
Signature:	Date:
(Sample Collector's Signature)	

Completion of this form shall indicate acceptance of the duties and responsibilities for the proper operation and maintenance of the public water supply facilities by both the owner or official custodian and the certified operators designated as being in responsible charge pursuant to 35 III. Adm. Code 603.101(d). Please be advised that it is the responsibility of the owner, official custodian and the certified operator(s) in responsible charge to notify this office within 15 days of any changes in responsible personnel. Completion and submittal of this form will satisfy the notification of responsible personnel requirements of Title 35: Environmental Protection, Subtitle F: Public Water Supplies, Chapter I: Pollution Control Board, Part 603, Sections 603.101, 603.102, and 603.103.

Be sure to retain copies of this document for your files. Should you need additional forms, please call (217)785-0561 or download at http://www.epa.state.il.us/water/operator-cert/drinking-water/forms/notification-of-ownership.pdf. Return this completed form to:

Illinois Environmental Protection Agency, Bureau of Water #19, 1021 North Grand Ave East, P.O. Box 19276, Springfield, IL 62794-9276

This Agency is authorized to require this information under 415 ILCS 5/4(b)(2012). Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$1,000.00. Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))