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## Agenda Memo

Crest Hill, IL

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**Date:** 12/15/2025

**Submitter:** Julius Hansen, Interim Director of Public Works

**Department:** Public Works

**Agenda Item:** Industrial Wastewater Pretreatment Program SIU Permit Revision

**Summary:**

The revised wastewater discharge permit for the Significant Industrial User (SIU), includes the following revisions:

- The items in yellow highlight are for the planned switch from *time proportional* sampling to *flow proportional* sampling for the composite wastewater samples that Rich Products Corporation are required to collect. The switch to flow proportional composite sampling is required by Newton Ellens at USEPA Region 5. This item was discussed at last year's Pretreatment Compliance Inspection (PCI) with Newton at the City and for several months after the PCI. Although we tried to allow the time proportional sampling to continue as authorized by the Control Authority (City), the USEPA feels strongly that the composite samples are required to be collected using flow proportional methods per the regulation – 40 CFR Part 403.12(g)(3). (When wastewater flow is constant, meaning flow does not vary by more than 10% of the average flow over time, time proportional sampling for composite samples can be used. When flow is not constant, meaning the flow does vary by 10% of the average over time, flow proportional sampling is required for composite samples. We recently provided Newton Ellens with 24 hours of wastewater flow volume data, and it was determined to vary by more than 10% during a 24-hour period and, as such, he is requiring that Rich Products switch to flow proportional sampling for representative composite samples of the wastewater stream entering the East STP.
- The red line comments in the draft permit are proposed changes to the surcharge based on Rich Products May 21, 2025, email request to allow an increase in wastewater discharge from a maximum volume of 50,000 gpd to 75,000 gallons per day (gpd) in the next 12 to 16 months. Currently, they are discharging between 20K to 30K+ gpd as shown in recent monthly surcharge invoices. The request for an increased maximum flow volume in a permit revision for an increased volume of wastewater discharge does not mean they will discharge the maximum 75K gpd. They will be increasing production of the pizza lines in the middle of 2026 and that will result in increased wash down sanitation of the lines and increased volume of wastewater discharge to the sewer system. According to the former plant operator, the East STP can accommodate the additional volume of wastewater at the treatment plant. The surcharge sliding scale on page 5 of

the permit was adjusted to allow the 75,000 gpd maximum discharge at no surcharge and if discharge goes beyond that amount, a surcharge of \$1,000 per day would apply. The surcharge rates are raised every year by 5% unless the City decides otherwise.

- Given the increased volume of wastewater and given the surcharge calculations outlined in the discharge permit, the surcharge dollar amount will continue to trend upward each month, and it will increase because the volume of water is increasing. The surcharge is dependent on the concentrations of both BOD and TSS in the wastewater samples collected and the volume of wastewater as shown in the monthly surcharge invoice.
- The environmental impact remains the same for the wastewater treatment process and the East STP NPDES permit requirements. The wastewater characteristics will not change, just the volume of water that will be treated at the East STP and entering the receiving waters. In general, surcharge funds recovered from this SIU facility can be used by the City for funding needed for maintenance at the East STP and/or for funding the City's wastewater pretreatment program.

**Recommended Council Action:**

Approve the agreement.

**Attachments:**

- Cover Memo
- Wastewater Discharge Permit # 1001-22 agreement for Rich Products Corporation