



Sugar Camp Energy, LLC
11525 N. Thompsonville Rd.
Macedonia, IL 62860

June 14, 2022

Via Email and Certified Mail/Return Receipt Requested

Illinois Environmental Protection Agency
Bureau of Water, Compliance Assurance Section
Attn: Caleb Ruyle
P.O. Box 19276
Springfield, IL 62794-9276
caleb.ruyle@illinois.gov

Re: Section 31 Waiver: Sugar Camp Energy, LLC
IL0078565 – W0558010004
Violation Notice No.: W-2022-50051

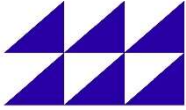
Dear Mr. Ruyle:

Pursuant to Section 31(a)(11) of the Act (415 ILCS 5/31), Sugar Camp Energy, LLC (“Sugar Camp”) consents to waiver of the procedural requirements of subsections (a) and (b) of Section 31 of the Act related to the allegations set forth in Violation Notice No.: W-2022-50051.

Per Sugar Camp’s letter to the Illinois Environmental Protection Agency (“IEPA”) dated May 26, 2022, the alleged violation in this VN is consistent with similar events included in the proposed IEPA Consent Order for the mine wastewater pipeline. As discussed in the meeting between representatives of IEPA and Sugar Camp held on June 14, 2022, Sugar Camp consents to this Section 31 waiver on the understanding that this violation will be included in the existing proposed Consent Order.

Respectfully,

Authorized Person



Sugar Camp Energy, LLC
11525 N. Thompsonville Rd.
Macedonia, IL 62860

May 26, 2022

Illinois Environmental Protection Agency
Division of Water Pollution Control
Attn: Rob Yoggerst/ CAS #19
P.O. Box 19276
Springfield, IL 62794-9276
Robert.yoggerst@illinois.gov

Re: Violation Notice: Sugar Camp Energy, LLC
IL0078565 – W0558010004
Violation Notice No.: W-2022-50051

Dear Mr. Yoggerst:

Please find the following information in response to Violation Notice (“VN”) W-2022-50051 received by Sugar Camp Energy, LLC (“Sugar Camp”) on April 18, 2022. Sugar Camp would like to request a meeting with representatives of the Illinois Environmental Protection Agency (“IEPA”) if the issues detailed herein cannot be resolved from this written response.

The VN alleges certain violations related to a release of high chloride water from a wastewater pipeline due to a combination air relief/vacuum valve leak. Sugar Camp staff reported the release to IEPA on January 13, 2022.

Combination air relief/vacuum valves are protective devices recommended and used extensively in fluids transmission pipelines constructed in undulating terrain and/or in systems with variable operation cycles. These valves work by introducing air necessary to prevent pipe collapse from internal vacuum pressure and also to purge air accumulation at system elevation peaks which increases operating efficiency, protects against air related surges, and reduces overpressures which lead to potential burst failure. The leak at issue in this VN is consistent with similar events included in the proposed IEPA Consent Order for the mine wastewater pipeline network. The recommendations provided by IEPA in Attachment B of the VN have been implemented and/or are addressed in the proposed Consent Order, as follows:

1. Recommendation No. 1 instructs Sugar Camp to immediately cease all process wastewater discharges that are not tributary to permitted outfalls in the facility’s NPDES Permit. This recommendation has been implemented. The release was inadvertent due to a mechanical failure of an air relief valve. The leak was promptly reported to IEPA and was stopped within thirty minutes of Sugar Camp’s awareness.

2. Recommendation No. 2 directs Sugar Camp to routinely inspect the underground mine water pumpage transmission lines for leaks and report or update lines and/or fittings if necessary. This recommendation has been implemented and is addressed in the proposed Consent Order in Sections I.D.1. and III.D.1, which detail the inspection protocol Sugar Camp has developed and implemented.
3. Recommendation No. 3 directs Sugar Camp to utilize a continuous monitoring system that identifies leakage with the underground mine water collection system. This recommendation is addressed in Section III.D.5. of the proposed Consent Order.

Because the event at issue in this VN is consistent with similar leaks covered in the proposed Consent Order, and IEPA's remedial recommendations are covered by the terms of the proposed Consent Order, rather than proposing an additional agreement, Sugar Camp requests that this violation be grouped with the similar past violations and included in the existing proposed Consent Order.

If you have any questions or concerns, or if you wish to discuss this matter in any particular, please do not hesitate to contact me.

Respectfully,

A handwritten signature in blue ink, appearing to read "James Miller".

Authorized Person