

August 1, 2016

Mr. Alan Keller P.E.
Manager, Permit Section
Division of Water Pollution Control
1021 North Grand Avenue East
Springfield, IL 62794-9276

Re: Baxter Healthcare Corporation Permit # IL0024074

Dear Mr. Keller:

On behalf of "Stop Pollution in Long Lake (SPILL)", a group of Lake County, IL residents and/or homeowners, we are writing to go on record with the IEPA as opposing the issuance of any Clean Water Act (CWA) renewal permit(s) to Baxter Healthcare, Inc., 25212 W. IL Route 120, Round Lake, IL 60073 for wastewater discharge that flows into the body of water named Long Lake in northwest Lake County, IL (Squaw Creek Watershed).

In March 2001, the IEPA held a meeting in Round Lake to obtain reaction from residents to Baxter's request to renew its discharge permit. As a result of residents' objections, the Long Lake Improvement and Sanitation Association (LLISA) met for several months with Baxter representatives. Baxter requested at these meetings that due to the remote location of the public sanitary sewers in the region, and the capital outlay required, alternative options be considered. The enclosed Press Release dated 7/18/02 outlined the specific actions to be taken, i.e. the treated wastewater was to be used for irrigation, and during winter months, the water was to be retained in a storage pond. This plan was never put into effect by Baxter, and for another 15 years, Squaw Creek flowing into Long Lake has been the recipient of more than 250,000 average gallons/day of treated industrial wastewater.

Our other issues and concerns relate to the fact that Baxter has expanded their on-site wastewater treatment plant, as opposed to choosing a public sewer connection. As an industrial facility discharging to a small lake that is already struggling to revive itself after decades of leaching from failing residential septic systems, as well as previous Round Lake and Lake Villa sewage treatment plant discharges, we believe expansion and re-permitting is unacceptable.

We expect Baxter Healthcare, Inc. to be required to connect to a public sanitary sewer for the following reasons (not all-inclusive):

- 1) Repeated and numerous EPA violations as noted on the EPA website
- 2) Nearby availability of publicly-owned and monitored sanitary sewers in Lake County
- 3) Treatment and discharge of non-residential waste
- 4) Noncompliance with the agreement with the Long Lake Improvement and Sanitation Association (LLISA) as noted in Baxter's Press Release dated 7/18/2001 (attached)
- 5) Lack of transparency due to self-reporting by Baxter with inability to frequently monitor the activities, processes, and discharge from this facility.

All Long Lake homeowners connected to the public sewer many decades ago. Baxter, an industrial user, should no longer be allowed to continue as an exception. Please respond, and let us know (1) what specific actions we need to take to ensure this public sanitary sewer connection is pursued prior to the expiration date in 2018, and the permit noted above will not be renewed and also (2) what actions have been taken to address Baxter Healthcare's violations on the current permit # IL0024074.

Sincerely,

David Brooks
Paige Fitton
Jennifer Sundberg

Members of S.P.I.L.L.

www.stoplonglakepollution.org

Email: stoplonglakepollution@gmail.com

Enclosure – Copy of Baxter Press Release – July 18, 2002

Copies to:

Jose (Joe) E. Almeida, Chairman and CEO, Baxter Healthcare International
Kurt S. Stimpson - Lakes Region Sanitary District
Katrina Phillips and Cindy Skrukrud - Sierra Club (Illinois Chapter)
Craig Taylor and Michael Warner, Stormwater Management Commission, Lake County
Bonnie Thompson Carter, Tom Weber, Terry Wilke, Linda Peterson, Lake County Board
Daniel A. MacGillis – Mayor of Round Lake
Richard Hill - Mayor of Round Lake Beach
Linda Lucassen - Mayor of Round Lake Park
Gary Swick - President, Friends of the Fox River
R.J. Ringa - Long Lake Improvement & Sanitation Association
www.StopLongLakePollution.org - SPILL Organization Website