AGENDA
COUNCIL WORKSHOP
January 20, 2022
5:30 P.M.

(1) KEDC Hotel/Motel Tax Request.

(2) Keokuk Main Street Hotel/Motel Tax Request.

(3) Rand Park Pavilion Hotel/Motel Tax Request.

(4) Keokuk Area Tourism & Convention Hotel/Motel Tax Request.

(5) Keokuk Art Center Hotel/Motel Tax Request.

(6) Review council meeting agenda.

AGENDA
CITY COUNCIL MEETING
January 20, 2022
501 Main Street
6:30 P.M.

1. Call to Order.

2. Pledge of Allegiance.

3. Roll Call.

4. Mayor's Correspondence:

5. Citizen's Request.

6. Consent Agenda.

   - Minutes of the Council Workshop & Regular City Council meeting of January 6, 2022;
   - Minutes of the Special Council meeting of January 10, 2022;
   - Cash Receipts & Treasurer's Report for December 2021;
   - Resolution approving an Urban Revitalization Tax Exemption for;
     - Kurt and Casey Barnes, 2525 Decatur Street, garage;
     - Christian and Josephine White, 320 S. 9th Street, garage;
     - Kevin and Jeanne Kuckelman, 1005 N. 14th Street, interior remodel;
   - Motion to pay bills and transfers listed in Register No.'s 5251-5252;

7. Consider resolution approving agreement for services with Askew Scientific.

8. Consider resolution allocating American Resource Plan Act (ARPA) funds.

9. Consider resolution approving memorandum of understanding with KEDC.

10. Consider resolution authorizing the filing of a grant application for properties in the block of 600 Main with the Iowa Economic Development Authority.

11. Boards & Commissions.

12. Staff Reports:

13. New Business:

14. Adjourn meeting.

MEETING MINUTES
COUNCIL WORKSHOP
JANUARY 6, 2022
5:30 p.m.

PRESENT: Mahoney, Crenshaw, Altheide, Garcia, Winn, Helenthal, Andrews, Marsden, Bryant, Greenwald.

STAFF PRESENT: O'Donnell, Ludwig, Broomhall, Weis, Rose, Clark, Helenthal, Hinton, Ott, DePriest, Crew, Beaird as well as other city employees.

1) Lake Cooper Foundation – Hotel Motel Tax Request. (no show)

2) Council opted to move implementation OSHA ETS Covid Vaccination, Testing and Face Covering policy to the workshop for discussion. O'Donnell gave an overview of the history of the ETS mandate. Discussion took place. Council would like policy revised and brought back for consideration. A special meeting will be scheduled to consider the rewritten policy on Monday, January 10 at 5:30pm.

3) Discussed APRA committee funding recommendations.

4) Adjourn 6:30 p.m.

MINUTES
CITY COUNCIL MEETING
January 6, 2022
501 Main Street
6:30 P.M.

The City Council of the City of Keokuk met in regular session on January 6, 2022 at 501 Main Street. Mayor Kathie Mahoney called the meeting to order at 6:30 p.m. There were nine council members present, none absent. Carissa Crenshaw, Linda Altheide, Roslyn Garcia, Dan Winn, John Helenthal, Steve Andrews, Linda Marsden, Roger Bryant, and Michael Greenwald were present. Staff in attendance: City Administrator Cole O'Donnell, City Clerk Jean Ludwig, Public Works Director Robert Helenthal, Community Development Director Pam Broomhall, Police Chief Dave Hinton, Bridge, Park, Cemetery and Sanitation Manager Bob Weis, Sewer Manager Michael Clark, Airport Manager Raymond Ott, Fire Chief Gabe Rose, Assistant Police Chief Brian DePriest, Animal Control Officer Tom Crew, Street Department Manager Tom Beaird as well as other City Employees.

MAYOR'S CORRESPONDENCE: Mayor Mahoney swore in appointed city officials, City Clerk Jean Ludwig, Chief of Police Dave Hinton, and City Attorney James Dennis. City Clerk Ludwig read the names of management employees that will continue their current positions: Community Development Director Pam Broomhall, Director of Public Works Robert Helenthal, Superintendent Water Pollution Control Plant Tom Wills, Fire Chief Gabe Rose, Street Department Tom Beaird, Bridge, Park, Cemetery and Sanitation Departments Bob Weis, Sewer Maintenance Department Michael Clark, and Airport Manager Raymond Ott.

Mayor Mahoney thanked Joe Shuman and volunteers for City of Christmas display, announced the retirement of Captain Robert Haflinger with 32 years of service in the Keokuk Police Department, announced Eagle Days, announced library reading program and urged citizen's to get involved on Boards & Commissions and thanked everyone for the support she has received.

Motion by Greenwald to approve the regular agenda less Item #7, including the consent agenda, second by Garcia. (9) AYES, (0) NAYS. Motion carried.

- Minutes of the Council Workshop, Regular City Council meeting & Special Work Session of December 16, 2021;
- Minutes of the Safety Committee meeting of December 16, 2021;
- **RESOLUTION NO. 1-2022** Approving an Urban Revitalization Tax Exemption for James & Ginger Knisley, 3405 Middle Road, garage;
- **RESOLUTION NO. 2-2022** Approving a Liquor License for Columbian Room of Keokuk, 11 N. 6th Street, effective January 20, 2022 – Class C Liquor License with Sunday Sales & Outdoor Service;
- Motion to pay bills and transfers listed in Register No.'s 5248-5250;

Consider resolution adopting policy pertaining to OSHA'S Emergency temporary standard. (Strike from the agenda)

Motion made by Helenthal, second by Winn to approve the following proposed **RESOLUTION NO. 3-2022:** "A RESOLUTION DESIGNATING DEPOSITORIES FOR CITY MONIES AND CITY FUNDS NOT TO EXCEED THE SUMS LISTED PER FINANCIAL INSTITION." (9) AYES, (0) NAYS. Motion carried.

Motion made by Helenthal, second by Winn to approve the following proposed **RESOLUTION NO. 4-2022:** "A RESOLUTION AUTHORIZING MAYOR KATHIE MAHONEY AND CITY ADMINISTRATOR COLE O'DONNELL TO SIGN ALL CHECKS ISSUED BY THE CITY." (9) AYES, (0) NAYS. Motion carried.

Motion made by Helenthal, second by Winn to approve the following proposed **RESOLUTION NO. 5-2022:** "A RESOLUTION MAKING THE SAFE DEPOSIT BOX RENTED IN THE NAME OF THE CITY OF KEOKUK ACCESSIBLE TO THE MAYOR, CITY ADMINITSTRATOR & CITY CLERK." (9) AYES, (0) NAYS. Motion carried.

Motion made by Marsden, second by Bryant to approve the following proposed **RESOLUTION NO. 6-2022:** "A RESOLUTION DESIGNATING THE DAILY GATE CITY AS A NEWSPAPER OF GENERAL CIRCULATION FOR PUBLICATION OF OFFICIAL NOTICES." (9) AYES, (0) NAYS. Motion carried.

Motion made by Helenthal, second by Bryant to approve the following proposed **RESOLUTION NO. 7-2022:** "A RESOLUTION APPOINTING COLE O'DONNELL TO THE SOUTHEAST IOWA REGIONAL PLANNING COMMISSION (SEIRPC) BOARD OF DIRECTORS." (9) AYES, (0) NAYS. Motion carried.

Motion made by Winn, second by Helenthal to approve the following proposed **RESOLUTION NO. 8-2022:** "A RESOLUTION DESIGNATING MICHAEL GREENWALD AS MAYOR PRO TEM OF THE CITY OF KEOKUK IN THE ABSENCE OF MAYOR KATHIE MAHONEY." (9) AYES, (0) NAYS. Motion carried.

BOARDS & COMMISSIONS: First Notification for Devon Dade to the City Planning Commission, filling an unfinished 5-year term to expire 5/14/2025. First Notification for Dustin Wade to the Depot Commission, filling an unfinished 5-year term to expire 6/1/2022.

STAFF REPORTS: Public Works Director Robert Helenthal reported on cemetery clean-up/maintenance and repairs on N. 2nd Street. WPC Superintendent Tom Wills reported on plant/pre-treatment operations and progress on new belt press. Community Development Director Broomhall reported on updated city fee structure, UTV/golf cart ordinance, demos of 422 Main, old Jefferson School and two homes, sign violations, vacant building registry, funding for re-habilitating city owned buildings in 600 block of Main, funding to save some homes rather than demo. Helenthal reported on new storage building and runway lighting project at airport, holiday double trash pickups were run without overtime. Snow crews did a good job over the holiday weekend. Discussed snow ordinance. Chief Hinton said national crime rates are high and we tend follow those trends. Court cases are often delayed. O'Donnell reported on monthly meetings with each council member, development of city owned building in the 600 block of Main, an increase in GRRWA fees and budget calendar.

Motion made by Helenthal, second by Marsden to adjourn the meeting at 7:12 p.m.

MINUTES
CITY COUNCIL MEETING
January 10, 2022
501 Main Street
5:30 p.m.

The City Council of the City of Keokuk met in special session on January 10, 2022 at 501 Main Street. Mayor Kathie Mahoney called the meeting to order at 5:30 p.m. There were nine council members present, none absent. Carissa Crenshaw, Linda Altheide, Roslyn Garcia, Dan Winn, John Helenthal, Steve Andrews, Linda Marsden, Roger Bryant, and Michael Greenwald were present. Staff in attendance: City Administrator Cole O'Donnell, City Clerk Jean Ludwig, Public Works Director Robert Helenthal, Bridge, Park, Cemetery and Sanitation Manager Bob Weis (6:02), and Celeste El Anfaoui as well as other City Employees.

Consider resolution adopting a policy pertaining to OSHA'S Emergency Temporary Standard. Council discussed issues with the policy as it is written. Citizen Bobbi Lutzen requested that the council not pass the policy. Resolution died for lack of motion

There being no further business, the meeting adjourned at 6:09 p.m.

CASH RECEIPTS FOR THE MONTH OF
December, 2021

General Fund	$	2,704,889.30
Park Maint./Improv. Total	$	200.00
Road Use Tax	$	98,581.82
Employee Benefit Total	$	124,892.22
Emergency Tax Levy Total	$	5,033.41
Sales Tax Human Development Total	$	126,263.43
Tax Increment Financing Total	$	20,965.97
Economic Development Total	$	42,279.30
Library Trust Total	$	1,254.25
Debt Service Total	$	346,025.78
Capital Improvement Project Total	$	15,000.00
Capital Equip Purchase Total	$	350,568.00
Perpetual Care Total	$	1,200.00
WPC Maint/Operation Total	$	222,422.69
Municipal Bridge Total	$	53,419.66
Internal Service Fund Total	$	55,748.09
TOTAL	**$**	**4,168,743.92**

TREASURER'S REPORT
CALENDAR 12/2021, FISCAL 6/2022

HOL FUND#	TITLE	LAST REPORT ON HAND	EXPENSES	REVENUE	BALANCE
001	GENERAL	230,009.87	743,674.70	2,704,889.30	2,189,273.65
002	PARK MAINT/IMPROV	397,206.67	.00	200.00	397,406.67
087	PUBLIC WKS EQUIP REP	12,800.78	.00	.00	12,800.78
110	ROAD USE	1,358,796.13	76,423.34	98,581.82	1,380,954.61
112	EMPLOYEE BENEFIT	2,050,835.16	1,204,379.00	124,892.22	971,348.38
119	EMER - TAX LEVY	77,878.06	.00	5,033.41	82,911.47
121	SALES TAX - HUMAN DEV	1,353,903.28	685,039.00	126,263.43	795,127.71
122	SALES TAX - INFRASTRUCT	.00	.00	.00	.00
125	TAX INCREMENT FINANCING	622,453.46	686,665.50	20,965.97	43,246.07-
160	ECONOMIC DEVELOPMENT	73,582.36	51,043.50	42,279.30	64,818.16
167	LIBRARY TRUST	95,968.39	.00	1,254.25	97,222.64
168	GRAND THEATRE RESERVE	1,051.17	.00	.00	1,051.17
169	MARY E TOLMIE FUND	85,794.89	.00	.00	85,794.89
182	SWIMMING POOL RESERVE	1,070.00	.00	.00	1,070.00
199	AMERICAN RESCUE PLAN	759,352.27	.00	.00	759,352.27
200	DEBT SERVICE	830,835.03	.00	346,025.78	1,176,860.81
301	CAPITAL IMPROV PROJECTS	227,651.93	600.75	15,000.00	242,051.18
302	RIVERFRONT BARGE	109,113.17	.00	.00	109,113.17
303	CAP EQUIP PURCHASES	1,039,403.44-	402.15	350,568.00	689,237.59-
304	CAPITAL PROJECT	97,502.57-	14,699.69	.00	112,202.26-
500	PERPETUAL CARE	500,561.56	.00	1,200.00	501,761.56
610	WPC MAINT/OPERATION	5,328,162.59	357,271.80	222,422.69	5,192,801.26
611	WPC IMPR RESERVE	88,270.05	.00	.00	88,270.05
612	SEWER MAINT EQUIP REPL	70,629.05-	.00	.00	70,629.05-
613	WAT POL CONTR CAP	.00	.00	.00	.00
614	SEWER IMPROV RESERVE	2,554,427.83-	1,181.50	.00	2,555,609.33-
617	CDBG SWR POINT REPAIR	1,157,219.40	.00	.00	1,157,219.40
670	SOLID WASTE	272,774.18	50,814.09	.00	221,960.09
671	SOL WAS EQUIP PRELACE	.00	.00	.00	.00
672	CAP PROJ REMEDIAL	.00	.00	.00	.00
690	MUNICIPAL BRIDGE	2,339,217.38	17,233.48	53,419.66	2,375,887.18
810	INTERNAL SERVICE FUND	12,770.25	54,166.96	55,748.09	14,351.38
	Report Total	14,225,315.14	3,943,595.46	4,168,743.92	14,448,484.18

RESOLUTION NO.

WHEREAS, The City Council of the City of Keokuk has adopted provisions for Urban Revitalization Tax Exemption and;

WHEREAS, Applications have been submitted;

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF KEOKUK, IOWA, THAT:

An Urban Revitalization Tax Exemption for the following homeowners be approved:

- Kurt/Casey Barnes – 2525 Decatur Street - garage
- Christian/Josephine White – 320 S 9th Street – garage
- Kevin/Jeanne Kuckelman – 1005 N. 14th – interior remodel

Passed & **Approved** this 20th day of January, 2022.

_____
Kathie Mahoney, Mayor

Attest: _____
Jean Ludwig, City Clerk

APPLICATION FOR URBAN REVITALIZATION EXEMPTION

Pursuant to the provisions of Iowa Code Chapter 404 and Ordinance 1716 of the City of Keokuk, application is made for an Urban Revitalization Tax Exemption. This application to be filed with the City of Keokuk by February 1, of the assessment year for which the exemption is first claimed, but not later than the year in which all improvements included in the project are first assessed for taxation.

Property Owner Name: **Kurt & Casey Barnes**

Property Owner Address: **2525 Decatur Street**

Address of Residential Property Claimed for Exemption: **2525 Decatur Street**

All qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by improvements. The exemption is for three years.

1. If applicable, describe in detail the new construction for which an exemption is claimed:
   Garage
2. If applicable, describe in detail the reconstruction of existing buildings or structures:
3.
4. Was prior approval given by the City Council for this exemption?
   Yes: ☐ **(by Res. No. _____)** **No:** ☒
5. Estimated costs of the improvements? **$22,000**
6. Estimated or actual date of completion? November 2021
7. Please provide the names of tenants that occupied the building on April 1, 2001. See Iowa Code Section 404.6 with regard to relocation expenses of tenants.

I hereby swear that the information presented on this application, and all attached supporting documents are true, correct and complete.

[signature] Property Owner Jan. 11 - 2022

Signature of Applicant | Title | Date

FOR ASSESSOR USE ONLY

I have examined this application for urban revitalization tax exemption and hereby certify $_____ of the 20___ final taxable value qualifies for urban revitalization tax exemption.

_____ _____

Assessor Signature | Date

January 10, 2022

Honorable Mayor, City of Keokuk
P. O. Box 400
Keokuk, IA 52632

Honorable Mayor:

Please accept this application for urban revitalization tax exemption (as adopted by City Ordinance No. 1716) for my improvement project located at **2525 Decatur Street.**

As per the guidelines set forth in Section 404, of the Iowa Code, which deals with applying for an exemption, please find in the succeeding paragraphs the following information:

- Nature of the improvement
- Cost of the improvement
- Estimated date of completion.
- Tenants that occupied the owner's building on the April 1, 2001
- Elected exemption as prescribed by ordinance.

My project is (describe in detail): **Garage**

The estimated cost of the completed project is **$22,000.00** and it will be completed on, November 2021.

The tenants that now occupy the property are the same tenants that occupied the property on April 1, 2001, or I am the owner–occupant, or:

Because my building is a new building, there were no tenants occupying my building on April 1, 2001.

Upon approval of my application for tax exempt status, the exemption schedule as specified in Section 404.3, subsection 3: ".....qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by the improvements. The exemption is for a period of three years."

I hope you find this application acceptable. Please let me know if you need additional information.

Sincerely,

C L Barn

Property Owner(s) Signature

APPLICATION FOR URBAN REVITALIZATION EXEMPTION

Pursuant to the provisions of Iowa Code Chapter 404 and Ordinance 1716 of the City of Keokuk, application is made for an Urban Revitalization Tax Exemption. This application to be filed with the City of Keokuk by February 1, of the assessment year for which the exemption is first claimed, but not later than the year in which all improvements included in the project are first assessed for taxation.

Property Owner Name: **Christian/Josephine White**

Property Owner Address: **320 S 9th Street**

Address of Residential Property Claimed for Exemption: **320 S 9th Street**

All qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by improvements. The exemption is for three years.

1. If applicable, describe in detail the new construction for which an exemption is claimed:
   Garage
2. If applicable, describe in detail the reconstruction of existing buildings or structures:
3.
4. Was prior approval given by the City Council for this exemption?
   Yes: ☐ **(by Res. No. _____)** **No:** ☒
5. Estimated costs of the improvements? **$10,000**
6. Estimated or actual date of completion? **December 2021**
7. Please provide the names of tenants that occupied the building on April 1, 2001. See Iowa Code Section 404.6 with regard to relocation expenses of tenants.

I hereby swear that the information presented on this application, and all attached supporting documents are true, correct and complete.

Signature of Applicant	Property Owner Title	1-12-22 Date

FOR ASSESSOR USE ONLY

I have examined this application for urban revitalization tax exemption and hereby certify $_____ of the 20___ final taxable value qualifies for urban revitalization tax exemption.

Assessor Signature	Date

January 12, 2022

Honorable Mayor, City of Keokuk
P. O. Box 400
Keokuk, IA 52632

Honorable Mayor:

Please accept this application for urban revitalization tax exemption (as adopted by City Ordinance No. 1716) for my improvement project located at **320 S 9th Street.**

As per the guidelines set forth in Section 404, of the Iowa Code, which deals with applying for an exemption, please find in the succeeding paragraphs the following information:

- Nature of the improvement
- Cost of the improvement
- Estimated date of completion.
- Tenants that occupied the owner's building on the April 1, 2001
- Elected exemption as prescribed by ordinance.

My project is (describe in detail): **Garage**

The estimated cost of the completed project is **$10,000.00** and it will be completed on, **December 2021 .**

The tenants that now occupy the property are the same tenants that occupied the property on April 1, 2001, or I am the owner–occupant, or:

Because my building is a new building, there were no tenants occupying my building on April 1, 2001.

Upon approval of my application for tax exempt status, the exemption schedule as specified in Section 404.3, subsection 3: "…..qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by the improvements. The exemption is for a period of three years."

I hope you find this application acceptable. Please let me know if you need additional information.

Sincerely,

Property Owner(s) Signature

January 14, 2022

Honorable Mayor, City of Keokuk
P. O. Box 400
Keokuk, IA 52632

Honorable Mayor:

Please accept this application for urban revitalization tax exemption (as adopted by City Ordinance No. 1716) for my improvement project located at **1005 N 14th Street.**

As per the guidelines set forth in Section 404, of the Iowa Code, which deals with applying for an exemption, please find in the succeeding paragraphs the following information:

- Nature of the improvement
- Cost of the improvement
- Estimated date of completion.
- Tenants that occupied the owner's building on the April 1, 2001
- Elected exemption as prescribed by ordinance.

My project is (describe in detail): **Interior Remodel**

The estimated cost of the completed project is **$32,000.00** and it will be completed on, Oct 1, 2021

The tenants that now occupy the property are the same tenants that occupied the property on April 1, 2001, or I am the owner–occupant, or:

Because my building is a new building, there were no tenants occupying my building on April 1, 2001.

Upon approval of my application for tax exempt status, the exemption schedule as specified in Section 404.3, subsection 3: "…..qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by the improvements. The exemption is for a period of three years."

I hope you find this application acceptable. Please let me know if you need additional information.

Sincerely,

Kevin J. Kuhlman

Property Owner(s) Signature

APPLICATION FOR URBAN REVITALIZATION EXEMPTION

Pursuant to the provisions of Iowa Code Chapter 404 and Ordinance 1716 of the City of Keokuk, application is made for an Urban Revitalization Tax Exemption. This application to be filed with the City of Keokuk by February 1, of the assessment year for which the exemption is first claimed, but not later than the year in which all improvements included in the project are first assessed for taxation.

Property Owner Name: **Kevin/Jeanne Kuckelman**

Property Owner Address: **1005 N 14th Street**

Address of Residential Property Claimed for Exemption: **1005 N 14th Street**

All qualified real estate is eligible to receive a one–hundred percent exemption from taxation on the actual value added by improvements. The exemption is for three years.

1. If applicable, describe in detail the new construction for which an exemption is claimed:

2. If applicable, describe in detail the reconstruction of existing buildings or structures:
   Interior Remodel
3. Was prior approval given by the City Council for this exemption?
   Yes: ☐ **(by Res. No. _____)** **No:** ☒

4. Estimated costs of the improvements? **$32,000.00**

5. Estimated or actual date of completion? Oct 1, 2021

6. Please provide the names of tenants that occupied the building on April 1, 2001. See Iowa Code Section 404.6 with regard to relocation expenses of tenants.

I hereby swear that the information presented on this application, and all attached supporting documents are true, correct and complete.

Kevin J. Kuckelman — Signature of Applicant

Property Owner — Title

Jan 14, 2022 — Date

FOR ASSESSOR USE ONLY

I have examined this application for urban revitalization tax exemption and hereby certify $_____ of the 20___ final taxable value qualifies for urban revitalization tax exemption.

_____ Assessor Signature

_____ Date

PAYMENT OF THE FOLLOWING CLAIMS FOR THE CITY ARE APPROVED AND CLAIMS FOR THE LIBRARY AND AIRPORT ARE ACKNOWLEDGED FOR THE PURPOSE OF PAYING THE SEMI-MONTHLY BILLS FOR THE COUNCIL MEETING OF JANUARY 20, 2022.

REGISTER NO. 5251

AHLERS & COONEY, P.C.	PROFESSIONAL SERVICES	$	196.00
BEARING HEADQUARTERS CO.	PARTS	$	67.84
KEOKUK MUNICIPAL WATER WORKS	MONTHLY SEWER/GARBAGE BILLING	$	1,865.00
GATE CITY PUBLISHING	PUBLICATIONS	$	42.44
JIM BAIER, INC	PARTS	$	125.44
KEOKUK HOMESTORE	SUPPLIES	$	59.11
RIVER CITY PARTS, INC.	PARTS	$	26.16
J & S ELECTRONICS BUSINESS,INC	SERVICE CALL/CONTRACT	$	215.48
TASKE FORCE, INC.	TEMPORARY HELP	$	480.00
BAKER & TAYLOR BOOKS	BOOKS KEOKUK PUBLIC LIBRARY	$	1,271.23
MCFARLAND-SWAN OFFICE CITY	SUPPLIES	$	1,604.66
ALLIANT	ELECTRIC BILL	$	40,967.41
CENTURY LINK	SERVICE	$	1,209.60
PRINCIPAL LIFE INSURANCE CO.	DISABILITY/ LIFE INS.	$	1,311.58
GREAT RIVER REGIONAL WASTE	INTEGRATED WASTE SERVICES	$	9,565.05
MIDLAND SCIENTIFIC, INC	LAB SUPPLIES	$	67.32
UNITY POINT HEALTH-KEOKUK	MEDICAL SERVICES	$	384.50
HARNETIAUX FARM & HOME SUPPLY	PARTS/MATERIALS	$	213.95
VAN METER INDUSTRIAL	PARTS/SUPPLIES	$	1,564.08
SOUTHEASTERN COMMUNITY COLLEGE	SAFETY TRAINING CLASSES	$	700.00
GOODYEAR AUTO SERVICE CENTER	WHEEL ALIGNMENT	$	99.99
TREASURER STATE OF IOWA	WPC SALES TAX	$	1,820.00
SPRINGFIELD ELECTRIC SUPPLY CO	SEWER SUPPLIES/FREIGHT	$	94.71
FISHER SCIENTIFIC	LAB SUPPLIES-WPC	$	292.69
SHOTTENKIRK, INC	PARTS	$	387.46
NORTH CENTRAL LABORATORIES	WPC LAB SUPPLIES	$	189.07
YOUNGGREN SHOES	PUBLIC WORKS SUPPLIES	$	15.99
MID-STATES ORGANIZED CRIME	MEMBERSHIP FEE KPD	$	150.00
RANDY WINN	REIMB.HEALTH INSURANCE PREMIUM	$	845.00
U.S. CELLULAR	CELL PHONE SERVICE	$	381.38
TERMINAL SUPPLY CO.	PARTS/FREIGHT	$	71.82
JAMES K. NEFF	LABOR/MATERIALS	$	497.72
USA BLUE BOOK	WPC SUPPLIES	$	578.11
DOUBLE A" GLASS L.L.C. "	LABOR/MATERIALS	$	2,355.00
PAUL S. KELLY SR.	PARTS/LABOR WPC	$	2,461.82
TOTAL SOLUTIONS, INC.	IT SERVICES	$	1,270.00
PETROLEUM MARKETERS MANAGEMENT	INSURANCE AIRPORT FUEL TANKS	$	1,981.00
DES MOINES STAMP MANUFACTURING	OFFICE SUPPLIES	$	36.90
POLYDYNE, INC.	POLYMER - WPC	$	20,472.30
O'REILLY AUTOMOTIVE INC.	PARTS	$	1,393.35
HY-VEE	BASIC ACADEMY MEALS	$	2,121.12

REGISTER NO. 5252

STANLEY CONSULTANTS INC.	PROFESSIONAL SERVICES WPC	$ 7,000.00
MEDIACOM	SERVICE	$ 652.52
SERVICEMASTER OF FT.MADISON	JANITORIAL SERVICE @ POLICE PD	$ 429.92
SANDRY FIRE SUPPLY, L.L.C.	FIRE DEPT SUPPLIES/MATERIALS	$ 459.15
LEXISNEXIS RISK SOLUTIONS	KEOKUK POLICE DEPARTMENT	$ 138.40
EMPLOYEE BENEFIT SYSTEMS	INSURANCE	$ 212,309.35
RAILROAD MANAGEMENT COMPANY	SEWER PIPELINE CROSSING RENT	$ 313.34
RELIABLE PEST SOLUTIONS	PEST CONTROL	$ 77.25
HALL & ASSOCIATES	PROFESSIONAL SERVICES	$ 386.93
TWO RIVERS VETERINARY CENTER	ANIMAL SERVICES	$ 448.00
INTERSTATE BATTERIES OF	BATTERIES	$ 273.90
VERIZON WIRELESS	CELL PHONE SERVICE	$ 280.60
IDEXX DISTRIBUTION, INC.	LAB SUPPLIES	$ 1,228.99
WINDSTREAM	SERVICE	$ 96.56
STEVE CELANIA	REIMBURSE DEPOT PURCHASES	$ 104.51
J.W. GUY	REIMBURSE CDL	$ 33.50
LIBERTY UTILITIES MIDSTATES	SERVICE	$ 10,393.22
INTERSTATE BILLING SERVICE,INC	PARTS	$ 34.33
LYNCH DALLAS, PC.	PROFESSIONAL SERVICES	$ 449.00
JEFFREY JOE HERR	CLEAN UP MULTIPLE PROPERTIES	$ 710.00
CINTAS CORPORATION #342	UNIFORM SERVICES	$ 2,959.42
COMMERCIAL CONTRACTING	LABOR/MATERIALS	$ 788.95
ICONNECTYOU	SERVICE	$ 1,049.40
ELM USA INC.	LIBRARY SUPPLIES	$ 6.44
GS SYSTEMS, INC	WPC SOFTWARE ANNUAL RENEWAL	$ 3,290.00
RICOH USA, INC.	KEOKUK PUBLIC LIBRARY	$ 126.00
JOHNSON CONTROLS	SERVICE CALL/MATERIALS	$ 1,474.40
KEOKUK BROADCASTING, INC.	ADVERTISING	$ 300.00
LIONS CLUB INTERNATIONAL	MEMBERSHIP DUES	$ 100.00
JOSEPH FIERCE	DEPOT JANITORIAL	$ 100.00
STEVEN R LONG	CITY HALL JANITORIAL SERVICE	$ 600.00
SCHICKEDANZ CONSTRUCTION	FINAL PAY CITY HALL	$ 15,934.07
SANDRA SEABOLD	REIMBURSE DEPOT PURCHASES	$ 14.00
AIRMEDCARE NETWORK	MEMBERSHIP RENEWAL POLICE DEPT	$ 1,365.00
GREATAMERICA FINANCIAL SVCS.	POLICE DEPT LEASE AGREEMENT	$ 246.08
ASCENT AVIATION GROUP INC	AIRPORT SERVICE FEE	$ 30.00
QUADIENT FINANCE USA, INC	REFILL POSTAGE METER	$ 1,000.00
STUEFEN MANUFACTURING	AIRPORT DOWN PAYMENT	$ 4,000.00
VERTICAL COMMUNICATIONS	SERVICE	$ 198.89
SOUTHEAST IOWA REGIONAL	MEDICAL SERVICES	$ 1,325.20
MUNICIPAL EMERGENCY SVCS	POLICE DEPT SUPPLIES/MATERIALS	$ 20.00
NICHOLAS SMIDT	REIMBURSE ILEA TRAVEL	$ 42.52
SCOTT'S ULTRA CLEAN LLC	LIBRARY JANITORIAL SERVICES	$ 1,375.00
IPEG	WPC LABOR/MATERIALS	$ 1,600.00
SHANA L. STUART	LIBRARY CONSULTATION	$ 3,000.00
		$ 376,217.12

COUNCIL ACTION FORM

Date: January 20, 2022

Presented By: O'Donnell

Subject: Agreement for Services- Askew Scientific Agenda Item: _____

Description:

In September of 2021, the City hired Askew Scientific to conduct a preliminary review of wastewater treatment procedures. This was related to the CSO issue. During the course of the review, Askew found deficiencies within the City's pretreatment program. These deficiencies are significant and require a more extensive review and corrective action. This comprehensive review requires specialized experience and Askew Scientific is uniquely qualified for the project. The firm is currently completing the same program for the City of Fort Madison. The quoted price for services is $42,000 and will come from Wastewater Treatment operations. The quote is allowable under sole source services.

FINANCIAL

Is this a budgeted item? YES ☐ NO ☑

Line Item #: 610-815-6490 Title: Professional Fees

Amount Budgeted: $0.00 (there is $75,000 budgeted w/o item)

Actual Cost: $42,000

Under/Over: ($42,000)(will cause line item to exceed bud)

Funding Sources:

Wastewater Collection Fees

Departments:

Wastewater Treatment

Is this item in the CIP? YES ☐ NO ☑ CIP Project Number: _____

COUNCIL ACTION FORM

Any previous Council actions:

Action	Date

Recommendation:

Staff recommends approval.

Required Action

ORDINANCE ☐ RESOLUTION ☑ MOTION ☐ NO ACTION REQUIRED ☐

Additional Comments:

MOTION BY: _____ SECONDED BY: _____

TO _____

_____

_____

CITY COUNCIL VOTES

VOTES	Altheide	Andrews	Bryant	Crenshaw	Garcia	Greenwald	Helenthal	Marsden	Winn
YES	☐	☐	☐	☐	☐	☐	☐	☐	☐
NO	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSENT	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSTAIN	☐	☐	☐	☐	☐	☐	☐	☐	☐

RESOLUTION NO.

RESOLUTION APPROVING AGREEMENT FOR SERVICES WITH ASKEW SCIENTIFIC

WHEREAS, the City of Keokuk, Iowa operates a wastewater treatment facility and regulates pretreatment of certain waste streams that enter the facility; and

WHEREAS, a preliminary study of the City of Keokuk, Iowa's pretreatment program found deficiencies and correction of said deficiencies requires a full review of the pretreatment program; and

WHEREAS, the City of Keokuk, Iowa has determined that Askew Scientific is the most qualified firm to complete said review.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF KEOKUK, IOWA, that the agreement for services between the City of Keokuk, Iowa and the Askew Scientific is hereby approved.

PASSED, APPROVED AND ADOPTED this 20th day of January 2022.

_____
Kathie Mahoney, Mayor

ATTEST:

_____
Jean Ludwig, City Clerk

CITY OF KEOKUK PRETREATMNT UPDATE STATEMENT OF WORK

DUTIES AND COMPENSATION

DUTIES: The Consultant will advise, oversee and assist City of Keokuk with the updating and implementation of additional improvements of their industrial pretreatment program as per Federal Regulations, State of Iowa Administrative Code, and City of Keokuk Ordinances. This Statement of Work will cover updating the areas identified in the 2021 Askew Scientific report, "Preliminary Review of City of Keokuk Pretreatment Program".

Table 1: Keokuk Initial Pretreatment Study Askew Scientific Statement of Work			
Keokuk Pretreatment Program Policies Modernization.	**Hours ****	**Cost per Hour**	**Sub Total ****
Meet on site for initial work session which will include review existing program paper files and documentation and collaborative work on the policy manual.	8	$100.00	$800.00
Create City of Keokuk Pretreatment Program Policy Manual to include sections:	24	$100.00	$2,400.00
• Intro and Overview			
• Introduction and Schedule for Review and Updates			
• Organization Chart			
• Training Program			
• Applicable Regulations and References			
• Regulations Overview			
• Section specific to pretreatment program streamlining rule,			
• Section specific to dental amalgam point source categorical standards implementation			
• Notification to industrial users of applicable standards and requirements			
Monitoring Program	24	$100.00	$2,400.00
• Scheduled Monitoring			
• Unscheduled Monitoring			
• Demand and Investigative Monitoring			
• Industrial Self-Monitoring			
• Determination of Monitoring Frequency			
• Industrial Inspections			
Industrial Waste Survey and Updates	40	$100.00	$4,000.00
Laboratory Procedures	16	$100.00	$1,600.00
• Sample Collection and Handling			
• Chain Of Custody Procedures			

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Table 1: Keokuk Initial Pretreatment Study Askew Scientific Statement of Work (cont.)			
Keokuk Pretreatment Program Policies Modernization.	**Hours ****	**Cost per Hour**	**Sub Total ****
Self-Monitoring Reports and Review	16	$100.00	$1,600.00
Enforcement Response Plan: Noncompliance Incidents and Investigations ADM and Roquette	80	$100.00	$8,000.00
The Pretreatment Program Policy Manual will be issued as electronic (pdf) draft for Client review and comment.	24	$100.00	$2,400.00
The Pretreatment Program Policy Manual will be finalized based on Client comments. The final manual will be provided to Client in electronic (pdf and Microsoft Word) file formats and one hard copy – three-ring bound for easy insertions.	8	$100.00	$800.00
Prepare Draft Municipal Code Updates for Client Review and Consideration:	20	$100.00	$2,000.00
• Prepare initial proposed code updates based on pretreatment program modernization and incorporation of streamlining rule requirements. The draft codes updates will be provided as electronic (pdf and Word) for Client use in finalizing and approval by Council.			
• Provide Online and in-person consultation meeting with Client and Client's attorney to discuss proposed code updates.			
• Prepare draft proposed municipal code modifications to incorporate the updated IDNR approved local limits. The draft codes updates will be provided as electronic (pdf and Word) for Client use in finalizing and approval by Council.			
Industrial Assessment.	60	$100.00	$6,000.00
• Update Industrial Survey Form and provide to Client in electronic pdf and Microsoft Word file formats.			
• Review results of 2021 Industrial Survey performed by Client.			
• Individual Industry Inspections			
• Consultant will accompany Client on industrial assessments to coach Client staff on key aspects of industrial assessments.			
• Consultant will also accompany Client on industrial assessment of industrial facilities. Consultant will prepare the industrial assessments.			
• Prepare draft permits for all industries for Client review and use.			
• Consultant will review industrial assessments performed by Client for conformance and in preparation of performing the local limits update study.			

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Table 1: Keokuk Initial Pretreatment Study Askew Scientific Statement of Work (cont.)			
Keokuk Pretreatment Program Policies Modernization.	**Hours ****	**Cost per Hour**	**Sub Total ****
Training Program.	100	$100.00	$10,000.00
• Consultant will provide training with certificates of completion for the Client staff who need in-depth knowledge of the pretreatment requirements. The training will be conducted in a Client conference room, or other suitable location as agreed upon.			
• Introduction to the National Pretreatment Program			
• Industrial User Waste Survey Procedures			
• Overview of Pretreatment Standards			
• POTW Procedures for Conducting Compliance Inspections			
• POTW Procedures for Conducting Compliance Monitoring			
• Pretreatment Standards – Local Limits Development			
• Industrial User Permitting			
• POTW Pretreatment Considerations and Permitting Programs for Hauled Waste			
• Consultant will update the training requirements into the Pretreatment Program Policy Manual.			
• A training matrix will be provided to include training requirements for Client staff based on their roles and responsibilities. The training program will provide guidance for initial and refresher training, with recommended frequency, for each staff position. In addition, training will include a pretreatment awareness training for all new employees that can be conducted by the site superintendent or designee.			
• Other updates to include incorporation of pretreatment program streamlining rule, dental amalgam point source categorical standards implementation, and enforcement response plan.			
• Provide as many On-site and On-line training on Client's Pretreatment Program and the Pretreatment Program Policy Manual as requested by City of Keokuk staff.			
Total	**420 ****		**$42,000.00 ****

** Not to Exceed without Approval from City of Keokuk.

The City of Keokuk shall provide all equipment, expendable supplies and technical support necessary to complete the project. Such equipment, expendable suppliers and technical support shall be provided at no charge.

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Primary consultant shall be Dr. Edward Askew. Dr. Edward Askew shall report directly to the designated City of Keokuk representative and to any other party designated by the City of Keokuk in connection with the performance of the duties under this Agreement and shall fulfill any other duties reasonably requested by the City of Keokuk and agreed to by the Consultant.

COMPENSATION: The Consultant shall provide consulting services to the City of Keokuk according to the above estimate and on an "as needed" basis. Consulting Hours shall be defined as follows:

> "Regular" consulting hours shall consist of any time Consultant works for City of Keokuk on-site or off-site during regular business hours. Regular business hours are defined as 8:00 AM to 5:00 PM Monday through Friday excluding national holidays. All Regular consulting hours will be provided at a rate of one hundred dollars ($100.00) per hour rounded to the nearest hour.

The City of Keokuk shall pay Consultant the Consultant's actual costs of travel and lodging. Time spent traveling to shall be billed as regular consulting hours.

The exact amount of time needed to complete the project is unknown. It is estimated that the project will take 10 hours to complete. This agreement shall not exceed the costs listed in Table 1 above without express written approval from the City of Keokuk.

The Consultant will issue an itemized invoice for time and expenses on a monthly basis. Payment is due within 30 days of billing. A finance charge of 3% per month will be added after 30 days. Costs of collection including reasonable attorney's fees shall be borne by the City of Keokuk. Consultant reserves the right to suspend service to the City of Keokuk if unpaid invoices exceed the net 30 day terms. Consultant also reserves the right to withhold any work product including reports, raw data, certificates and letters or reliance until invoices are paid in full.

DRAFT

Preliminary Review of City of Keokuk Pretreatment Program

Askew Scientific Consulting

Edward F. Askew PhD

December 15, 2021

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Executive Summary

The preliminary review of the City of Keokuk's Pretreatment Program has identified the following problems that need to be addressed expeditiously before IDNR or USPA assesses regulatory penalties and fines against the city. The identified areas that need immediate corrections are:

- Identify all industries that are causing the WPCP to violate their NPDES discharge permit limits.
- Assess regulatory action against those industries as per the Industrial Pretreatment Enforcement Response Plan.
- Review compliance of permittees for a 5-year period from 2017-2021 (5-Year Statute of Limitations)
- Train WPCP Staff and evaluate their performance.
- Update **ALL** industrial pretreatment permits to keep TSS loading below the allowed industrial contribution to the WPCP Total Design Load of 13,000 lbs. per day for the whole city.
- Update all industrial pretreatment permits to meet the requirements of:
    - 40 CFR § 403
    - 40 CFR § 403 Sub-Chapter N
    - IAC 567.62
    - City of Keokuk Ordinances
- Perform Industrial User Surveys on all current and suspected industrial dischargers.
- Perform Industrial Inspections on all current and suspected industrial dischargers.
- Issue updated permits on all current and suspected industrial dischargers.
- Create and enforce an Industrial Wastehauler Program on all current and suspected industrial wastehaulers.
- Correct irregularities in the city ordinances.
- **Perform an in-depth review of the industrial pretreatment program to identify all problems and perform the corrective actions. That Means Boots on the Ground**

Introduction

The following report is a preliminary review of Keokuk Industrial Pretreatment Program. The City of Keokuk maintains a sanitary sewer collection system and a wastewater treatment plant that has a design flow that requires the city to have a United States Environmental Protection Agency (USEPA) and Iowa Department of Natural Resources (IDNR) approved Industrial Pretreatment Program.

The City's Pretreatment Program was originally approved on August 4, 1983, and the NPDES permit was modified on July 24, 1984 to require the City to implement its approved program. The Sewer Use Ordinance (SUO), and the list of significant industrial users (SIUs) were originally established and approved in 1992 and 1993 .These pretreatment requirements are summarized in the National Pollution Discharge Elimination system (NPDES) permit, Iowa NPDES Permit Number: 5640001 and EPA Number: IA0042609 on Page 15. These requirements are listed in detail in Figure 1 below.

Reports and data provided by USEPA Region 7, Iowa DNR and the City of Keokuk were used to generate this preliminary report. This report is not to be considered an in-depth evaluation of the City of Keokuk's Industrial pretreatment program or a detailed corrective action plan. What this report does is identify some of the major issues with the pretreatment program and the regulatory risks faced by the City of Keokuk.

Facility Name: KEOKUK CITY OF STP

Permit Number: 5640001

SIGNIFICANT INDUSTRIAL USER LIMITATIONS, MONITORING AND REPORTING REQUIREMENTS

1. You shall require all users of your facility to comply with Sections 204(b), 307, and 308 of the Clean Water Act.

   Section 204(b) requires that all users of the treatment works constructed with funds provided under Sections 201(g) or 601 of the Act to pay their proportionate share of the costs of operation, maintenance and replacement of the treatment works.

   Section 307 of the Act requires users to comply with pretreatment standards promulgated by EPA for pollutants that would cause interference with the treatment process or would pass through the treatment works.

   Section 308 of the Act requires users to allow access at reasonable times to state and EPA inspectors for the purpose of sampling the discharge, reviewing, and copying records.

2. You shall continue to implement the pretreatment program approved July 27, 1984 and any amendments thereto.

3. An annual report in the form prescribed by the Department is to be submitted by March 1st of each year describing the pretreatment program activities for the preceding calendar year.

4. WRA shall evaluate the adequacy of its local limits to meet the general prohibitions against interference and pass through listed in 40 CFR 403.5(a) and the specific prohibitions listed in 40 CFR 403.5(b). At a minimum this evaluation shall consist of the following:

   (a) Identify each pollutant with the potential to cause process inhibition, pass through the treatment plant in concentrations that will violate NPDES permit limits of water quality standards, endanger POTW worker health and safety or degrade sludge quality.

   (b) For each treatment plant, determine the maximum allowable headworks loading for each pollutant identified in item #4(a). that will prevent interference or a pass through.

   (c) After accounting for the contribution of each pollutant from uncontrolled (i.e.: domestic/commercial) sources to each treatment plant, determine the maximum allowable industrial loading for each pollutant identified in item #4(a).

   (d) Complete the evaluation and submit to the Department, by **9-1-2019** a report containing the following information:
      1) A list of pollutants identified in item #4(a). For each pollutant, state the reason(s) for its inclusion (e.g. potential to cause interference, potential to cause pass through, etc.).
      2) The report shall contain all calculations used to determine the maximum allowable headworks loadings and shall identify the source(s) of all data used (e.g. literature value, site specific measurement, etc.).
      3) The contribution of each pollutant identified in item #4(d)1 to each treatment plant from uncontrolled sources and an explanation of how each contribution was determined.
      4) The allocation of the maximum allowable headworks loading for each pollutant to each treatment plant, and an explanation of how the allowable loadings will be allocated to significant industrial users regulated by the City's pretreatment program.

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Figure 1: NPDES Permit Requirement for an Industrial Pretreatment Program in Keokuk

City of Keokuk Wastewater Plant NPDES Discharge Violations

The City of Keokuk was issued an NPDES permit for the operation and discharge of treated wastewater to the Mississippi River. Figure 2 below lists the maximum allowed concentration (mg/L) and mass (lbs.) that can be discharged to the Mississippi River for Carbonaceous Biochemical Oxygen demand (CBOD) and Total Suspended solids (TSS).

001 DISCHARGE FROM ACTIVATED SLUDGE WASTEWATER TREATMENT PLANT.			
Outfall: 001 Effective Dates: 09/01/2018 to 08/31/2023			
Parameter	Season	Limit Type	Limits
CBOD5			85% Removal Required
	Yearly	7 Day Average	77 MG/L 3211 LBS/DAY
	Yearly	30 Day Average	35 MG/L 1460 LBS/DAY
TOTAL SUSPENDED SOLIDS			85% Removal Required
	Yearly	7 Day Average	82 MG/L 3419 LBS/DAY
	Yearly	30 Day Average	40 MG/L 1664 LBS/DAY

Figure 2: Keokuk Wastewater Plant NPDES Permit Limits

The Keokuk Water Pollution Control Plant's (WPCP) Monthly Operational Report (MOR) data is summarized in Table 1 below. This data has been reported to Iowa Department of Natural Resources (IDNR) and the monthly NPDES discharge requirements are consistently out of compliance with the NPDES permit.

The Keokuk WPCP is required to do the following when they are significantly out of compliance with their NPDES permit requirements:

1. Notify IDNR immediately
2. Identify the source of non-compliance.
3. Start corrective action to eliminate the problem.
4. Provide IDNR with a written report of the corrective action within 5-days of the initial notification to IDNR.
5. Correct the problem and don't do it again.

Unfortunately, the Keokuk WPCP could only provide one notice sent to IDNR for part of the violations that happened August, 2021 (Figure 3). What was not done was:

1. Generate written notices and corrective actions to be sent to IDNR for all violations in Table 1. Specifically for the Year 2021.
2. Perform corrective action on the ADM's interference in the WPCP operations.
3. Issue Notices of Violations (NOV) to ADM as per the Industrial Pretreatment Enforcement Response Plan (ERP) for each month's violations.
4. Issue Significant Non-Compliance (SNC) to ADM as per the Industrial Pretreatment Enforcement Response Plan (ERP) for each month's violations.

5. Issue fines for continued NOV/SNC violations to ADM as per the Industrial Pretreatment Enforcement Response Plan (ERP).

These WPCP NPDES violations and failure to follow the Pretreatment ERP have placed the City of Keokuk at risk for Administrative Consent Orders (ACO) and monetary fines being issued from both the IDNR and the USEPA.

Table 1: Keokuk NPDES CBOD-TSS NPDES Exceedances (In Red)									
Month	Year	Max 7-Day Average (mg/L)	30-Day Average (mg/L)	Max 7-Day Average (Pounds)	30-Day Average (Pounds)	Max 7-Day Average (mg/L)	30-Day Average (mg/L)	Max 7-Day Average (Pounds)	30-Day Average (Pounds)
		NPDES Limit 77 mg/L	NPDES Limit 35 mg/L	NPDES Limit 3211 lbs./day	NPDES Limit 1460 lbs./day	NPDES Limit 82 mg/L	NPDES Limit 40 mg/L	NPDES Limit 3419 lbs./day	NPDES Limit 1664 lbs./day
November	2021	180.9	103.8333333	3109.389273	1457.28105	297.95	192.9611111	3965.643938	2533.234736
October	2021	121.8	67.9625	3689.597235	1450.922675	192.5	88.8375	2461.299549	1494.523726
September	2021	20.325	10.26111111	225.9499905	108.857572	35.75	29.23333333	397.953525	304.497014
August	2021	257.75	137.5333333	3776.908695	2254.795404	587.5	274.4055556	8608.86075	4410.17444
July	2021	17.375	9.629411765	309.1298145	201.1712495	14.675	11.75882353	393.9137124	273.5322784
June	2021	2.725	2.288888889	63.785571	50.01057833	4.8	3.955555556	94.4231865	81.11757367
May	2021	2.025	1.5	103.5542355	49.26295729	5.05	3.388235294	308.8829505	121.615548
April	2021	6.525	3.382352941	216.744507	101.7231272	8.7	5.047058824	210.439467	125.1770224
March	2021	26.375	15.565	1038.018918	439.098915	50.5	28.31	1714.00344	797.4250968
February	2021	37.475	23.7625	1372.55967	596.7390409	52.375	40.025	1730.602125	977.9873374
January	2021	101.525	46.62941176	3216.337055	1122.532995	135	89.99375	2655.182448	1563.849715
December	2020	15.275	10.145	237.423954	180.7239219	23.5	20.51	370.857282	394.2830076
November	2020	8.075	5.311111111	299.8348845	120.475887	28.8	19.18888889	851.9727	402.2407947
October	2020	4.75	3.494117647	94.936305	55.98048388	26.7	17.48823529	486.886698	275.3882718
September	2020	3.25	2.95	63.572901	50.87543633	7.1	5.966666667	108.02385	98.61151133
August	2020	1.875	1.458823529	30.408474	23.30161659	5.75	3.470588235	86.090067	56.08954165
July	2020	4.275	2.494444444	68.3148165	47.656428	11.35	6.794444444	197.2391235	127.9458397
June	2020	2.525	2.242105263	63.4663575	45.01225295	5.66	5.057894737	134.375331	102.0627692
May	2020	2.6	2.24375	67.6597095	52.38426975	16.25	7.69375	587.118069	227.0694791
April	2020	9.275	5.115789474	183.8555085	110.7681051	23.82	16.43684211	525.86619	351.4480389
March	2020	21.675	16.53333333	861.3900195	491.726122	65.375	50.08333333	1828.582947	1424.367889

Table 1: Keokuk NPDES CBOD-TSS NPDES Exceedances (In Red)									
Month	**Year**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**
		NPDES Limit 77 mg/L	**NPDES Limit 35 mg/L**	**NPDES Limit 3211 lbs./day**	**NPDES Limit 1460 lbs./day**	**NPDES Limit 82 mg/L**	**NPDES Limit 40 mg/L**	**NPDES Limit 3419 lbs./day**	**NPDES Limit 1664 lbs./day**
February	**2020**	43.55	33.4375	818.364585	652.4987693	122.625	86.1875	2585.488613	1688.114777
January	**2020**	32.175	19.04444444	576.7741755	334.5693397	138.675	77.15555556	2491.983035	1359.432464
December	**2019**	12.775	9.333333333	211.441935	154.78067	46.125	33.60555556	764.62371	570.62419
November	**2019**	15.075	8.741176471	275.0004495	155.6768929	59.2	31.71176471	966.571806	553.0222112
October	**2019**	3.4	3.126315789	151.621617	112.7564049	21.225	11.31578947	930.962508	404.9344781
September	**2019**	2.075	1.811764706	32.339601	30.29485376	6.925	5.582352941	95.078502	97.66296988
August	**2019**	4.1	2.241176471	91.749174	42.48469588	23.55	12.22941176	468.440286	222.7537468
July	**2019**	2.8	2.2	53.3520225	41.37035053	10	8.336842105	205.766148	151.0194471
June	**2019**	3.825	3.288235294	195.967065	111.6820193	20.3	16.03529412	1004.251926	513.2030284
May	**2019**	13.975	4.866666667	1016.025504	318.0159687	205.85	49.88888889	15309.30599	3615.728094
April	**2019**	4.15	3.163157895	112.1561115	116.7853273	11.375	9.078947368	281.125971	343.0662951
March	**2019**	7.5	5.675	263.7489555	155.4406073	19.4	13.1375	547.331682	342.1648673
February	**2019**	15.475	10.75625	450.923367	299.5305266	41.125	26.44375	1035.271722	721.3296233
January	**2019**	6.433333333	4.606666667	244.991392	121.0518196	19.55	17.27368421	622.399188	386.4471562
December	**2018**	6.225	5.058823529	138.8833095	130.8676496	24.75	16.15294118	527.614254	401.6198626
November	**2018**	9.2	7.99375	266.689431	182.8408954	31.3	25.7125	961.252554	591.6799448
October	**2018**	14.725	7.863157895	367.801923	228.0768771	26.1	19.76315789	1610.335572	681.1781473
September	**2018**	2	1.8625	71.6883465	51.76273125	6.15	4.80625	211.1731785	145.7885168
August	**2018**	7.675	4.816666667	150.2690775	85.63044033	13.6	7.816666667	180.011394	133.9011557
July	**2018**	3.95	2.888888889	65.09787	49.931719	7.6	5.916666667	124.44531	98.639543
June	**2018**	4.35	3.623529412	112.734282	71.34737541	9.6	6.7	257.014614	140.096571

Table 1: Keokuk NPDES CBOD-TSS NPDES Exceedances (In Red)									
Month	**Year**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**
		NPDES Limit 77 mg/L	**NPDES Limit 35 mg/L**	**NPDES Limit 3211 lbs./day**	**NPDES Limit 1460 lbs./day**	**NPDES Limit 82 mg/L**	**NPDES Limit 40 mg/L**	**NPDES Limit 3419 lbs./day**	**NPDES Limit 1664 lbs./day**
May	**2018**	5.575	5.589473684	118.921728	103.0659834	14.2	11.92631579	330.326133	225.3175661
April	**2018**	10.825	5.535294118	172.7236935	125.2061142	14.05	12.34705882	433.485678	319.4428991
March	**2018**	7.15	4.970588235	189.3223785	124.4062101	14.55	11.6	559.874208	327.1049061
February	**2018**	42.1	12.94375	3079.56731	827.7542783	224.5	65.18125	16667.82277	4370.965436
January	**2018**	5.15	3.610526316	132.5615895	65.77187368	19.2	11.18947368	514.467495	221.1160058
December	**2017**	3.65	2.4625	58.5378345	36.2817105	12.15	8.30625	189.637839	122.4896843
November	**2017**	2.28	2.010526316	31.6704828	26.84246558	6.8	5.168421053	97.6083576	70.25229726
October	**2017**	11.125	5.333333333	181.28658	76.774982	11.275	6.366666667	184.4363895	87.26216133
September	**2017**	5.5	3.4625	60.6482715	41.200017	13.175	8.34375	164.72334	104.012727
August	**2017**	7.4	4.326315789	144.078504	78.82454432	11.65	10.01052632	224.4487905	182.9021258
July	**2017**	3.625	2.982352941	61.9280445	49.95022235	11.75	7.288235294	185.997012	122.0007088
June	**2017**	52.025	21.74705882	987.109473	410.3322681	148.125	57.09411765	2819.14935	1072.700808
May	**2017**	6.125	33.39473684	162.399816	673.1751711	17.35	102.2894737	455.7536865	2015.994357
April	**2017**	23.575	10.15	1009.200674	375.2784724	116.15	42.73125	5038.974207	1661.138786
March	**2017**	3.875	8	86.012922	414.5930297	7.6	40.35555556	135.582546	2472.212671
February	**2017**	4	3.5875	72.269019	67.3944975	7.225	6.1625	137.9346345	115.0454003
January	**2017**	4.825	3.333333333	181.931679	81.51414067	11.05	7.761111111	418.041666	185.492581
December	**2016**	4.875	2.894117647	95.575149	54.17124353	18	10.50588235	374.950554	201.4572134
November	**2016**	3.7	2.8	97.3146645	59.90418133	7.65	6.411111111	206.804478	131.9870793
October	**2016**	7.475	2.876470588	446.3624295	131.9617595	11.4	5.652941176	603.097509	211.0465945
September	**2016**	2.45	1.917647059	62.0648205	41.05580859	6.075	4.105882353	128.0262975	84.68499776

Table 1: Keokuk NPDES CBOD-TSS NPDES Exceedances (In Red)									
Month	**Year**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**	**Max 7-Day Average (mg/L)**	**30-Day Average (mg/L)**	**Max 7-Day Average (Pounds)**	**30-Day Average (Pounds)**
		NPDES Limit 77 mg/L	**NPDES Limit 35 mg/L**	**NPDES Limit 3211 lbs./day**	**NPDES Limit 1460 lbs./day**	**NPDES Limit 82 mg/L**	**NPDES Limit 40 mg/L**	**NPDES Limit 3419 lbs./day**	**NPDES Limit 1664 lbs./day**
August	**2016**	3.3	1.85	67.105586	39.28983267	12.2	4.677777778	253.428692	100.6290037
July	**2016**	2.9	1.7375	68.0700375	36.37569188	4.15	3.75625	101.412315	82.12465763
June	**2016**	2.8	2.661111111	48.042987	50.42980233	7.275	6.216666667	141.845052	117.514075
May	**2016**	6.075	4.211111111	140.6297055	140.6297055	10.175	7.055555556	208.329864	182.503247
April	**2016**	11.975	9.11875	359.634978	252.374238	30.1	14.525	1286.26569	476.4406916
March	**2016**	20.4	8.721052632	382.198014	188.5016457	14	11.025	318.2550672	248.4222039
February	**2016**	23.4	10.31764706	432.376041	214.3515402	28	13.32941176	521.664498	298.0105218
January	**2016**	12.25	8.6	221.274378	164.7984	11.95	10.025	246.479943	200.7742931

Make It Yours
KEOKUK
IOWA
CITY OF KEOKUK

TO: Terry Jones, IDNR

FROM: Tom Wills, City of Keokuk, WRRF

DATE: August 25, 2021

SUBJECT: Noncompliance

The city of Keokuk WWTP has been in noncompliance with its NPDES Permit removing less than 85% of CBOD and TSS caused by excessive amounts of CBOD and TSS coming into the plant from Archer Daniels Midland. We have also exceeded our 7-day average permitted amount of CBOD and TSS limits due to the same problems from ADM.

We failed to achieve 85% removal of CBOD on August 9th, 10th, 11th, 16th, and 17th.

We failed to achieve 85% removal of TSS on August 9th, 10th, 11th ,16th, 17th, 18th, and 19th.

We exceeded our 7-day average limit of CBOD for the weeks of August 8th thru the 14th and August 15th – 21st.

We exceeded our 7 day average limit of CBOD for the weeks of August 8th thru the 14th and August 15th - 21st.

We exceeded our 7 day average limit of TSS for the weeks of August 8th thru the 14th and August 15th thru the 21st. We observed improvements in our influent and turbidity over the last 3 days and we anticipate the violations to be corrected sometime this week.

We are in contact with ADM. Their chemists and plant personnel are working on correcting their overages. I have requested a detailed report on how the problem developed, what has been done to correct it, and what they will do to prevent re-occurrence.

P.O. BOX 400 KEOKUK, IA 52632
PHONE 319-524-2050 • FAX 319-524-1365 • WWW.CITYOFKEOKUK.ORG

Figure 3: Letter to IDNR on August NPDES Violations

City of Keokuk Industrial User Surveys

During the USEP Pretreatment Audits in 2015 and 2020, the WPCP Superintendent indicated that an Industrial User Survey was completed in 2014 and 12 entities were contacted, but none were issued a permit. (Figures 4-5)

SIGNIFICANT INDUSTRIAL USERS (SIUs)

Currently, the City regulates one significant industrial user which is located within the City limits. ADM is a wheat starch processor that is a heavy contributor of conventional pollutants.

According to Mr. Pietscher, the City conducted a formal industrial waste survey in 2014. The City collected names and location of entities from the City's Building Department and Chamber of Commerce. Based on that, the City contacted 12 entities but no industries were added to the SIU's list.

Figure 4: 2015 USEPA Pretreatment Audit Findings

SIGNIFICANT INDUSTRIAL USERS AND INDUSTRIAL WASTE SURVEY

The last formal industrial waste survey (IWS) was completed in 2014. The City's industrial community remained fairly stable and the one regulated industry is located within the city limits. ADM Milling remains the only significant Industrial User (SIU) on the City list. ADM pretreats its waste stream (digester, lagoon) prior to discharge to the City's sanitary collection system.

Figure 5: 2020 USEPA Pretreatment Audit Findings

The industrial user survey report consisted of a single page with no supporting documents. (Figure 6) This failure to identify Federal Categorical Industries and issue permits was not corrected until 2020 or 2021. The permits that have been issued are reviewed in the next section. They are incomplete and do not meet the requirements of 40 CFR § 403, 40 CFR § 403 Subchapter N, Iowa Administrative Code IAC 567.62 and the City of Keokuk Ordinance 13.10.050.

INDUSTRIAL WASTE SURVEY
MAY 2014

The City conducted a survey to maintain a current list of potential sources of high strength or incompatible wastes.

Sources for the survey were:
1. Current pretreatment IUs
2. Chamber of Commerce
3. Community Development Director Pam Broomhall
4. Jerry McCredie, owner of industrial type building rentals
5. Mayor Tom Marion

The following businesses were surveyed:
ADM - Matt Herrs/Robert Rupp
Allied Blending - Tara Perry
Carry Transit - Jack Blackman
Griffin Wheel - Chris Riegel
Gully Transport - Bob Gillpin
Henniges Automotive - Bryan Kielbania
IO Mega LLC - Ravi Pottathil
Keokuk Steel Castings - Gary Stimpson
Morse Rubber - Pat Boyd
St. Louis Gear - Dan Hodges
W2 Fuels - Rick Black

All participants were interviewed by phone or during the annual pretreatment inspections.

Conclusions:
Six industries have current pretreatment permits. Three industries have dry processes with no process discharges. Allied Blending is a dry process facility which will be expanding in 2015 and will be reevaluated. W2 Fuels and IO Mega have no current process discharges but the potential for growth which could result in future discharges.

Figure 6: Keokuk WPCP 2014 Industrial Survey

City of Keokuk Pretreatment Permits

Current Issued Pretreatment Permits

Table 2 below contains permits issued by the Keokuk Pretreatment Coordinator sometime in 2020 or 2021. The copies of these permits provided by the Keokuk WPCP did not have the issue date clearly identified. All industrial discharges with the exception of ADM Milling do not have CBOD or TSS limits in their permit. This lack of enforceable CBOD and TSS limits will not be looked upon favorably by USEPA or IDNR when they assess regulatory action on the Keokuk WPCP for violating their NPDES discharge limits. All discrepancies of these permits are summarized in Table 5 below.

Table 2: Industries With Pretreatment Permits

Industry	Federal Categorical Industry CFR	Significant Industry (Yes/No)	Permit Issued (Yes/No)
ADM Milling	None	Yes	Yes
Amstead Rail	40 CFR § 420	Yes	Yes
Carry Transit	40 CFR § 442	Yes	Yes
Ferrosil Landfill	40 CFR § 445	Yes	Yes
Gully Transport	40 CFR § 442	Yes	Yes
Henniges Automotive	40 CFR § 428 40 CFR § 463	Yes	Yes
Keokuk Landfill	40 CFR § 445	Yes	Yes
Keokuk Mills	40 CFR § 442	Yes	Yes

Industries That Need To Be Investigated

Table 3 lists the industries identified from:

1. The 2014 Industrial User Survey in Figure 6.
2. Review of the Keokuk Chamber of Commerce website.
3. Conversations with City of Keokuk staff.
4. Historical investigations of suspected industrial dischargers.

What Table 3 illustrates that there are at least 16 industries that must be investigated by both an Industrial User Survey and a Site Audit to determine their pretreatment status and what additional sewer use revenue can be captured.

Table 3: Industries That May Need Pretreatment Permits			
Allied Blending	Unknown	Unknown	May Need Permit
Arc Mechanical	Unknown	Unknown	May Need Permit
Decker Manufacturing	Unknown	Unknown	May Need Permit
Ewarts Fab & Custom Cutting	Unknown	Unknown	May Need Permit
Frank Millard & Co.	Unknown	Unknown	May Need Permit
Griffin Wheel	Unknown	Unknown	May Need Permit
Hendricks River Logistics	Unknown	Unknown	May Need Permit
Iowa Fertilizer Company	Unknown	Unknown	May Need Permit
IO Mega LLC	Unknown	Unknown	May Need Permit
Morse Rubber	Unknown	Unknown	May Need Permit
Roquette	Unknown	Unknown	May Need Permit
Seither & Cherry	Unknown	Unknown	May Need Permit
St. Louis Gear	Unknown	Unknown	May Need Permit
Tristate Sheet Metal	Unknown	Unknown	May Need Permit
W2 Fuels	Unknown	Unknown	May Need Permit
Ziegler Industries	Unknown	Unknown	May Need Permit

Wastehaulers That May Need To Be Regulated

Table 4 lists the known wastewater haulers that either discharge legally at the Keokuk WPCP or illegally at inside floor drains, other city manholes, Combined Sewer Overflow (CSO) catch basins or storm sewer catch basins. These discharges are of unknown composition as the city does not have a Waste Hauler Program in place to regulate all of these types of discharges. This

uncontrolled discharging to CSO catch basins will directly affect the changes requested by city from USEPA for modification of the city's CSO Long Term Control Plan.

Table 4: Wastehaulers That May Need Pretreatment Permits	
1	Bates Sanitation & Asphalt Inc
2	Commercial Contracting Services
3	Decker Manufacturing
4	Hempen Mobile Wash
5	HK Solutions
6	Industrial Marine Services
7	Iowa Fertilizer Company
8	Keokuk Contractors
9	Meyers Septic
10	Midwest Service Enterprise
11	Service Masters
12	Shorty Portys
13	Waggoner Solution Company

Issued Pretreatment Permit Compliance With City of Keokuk's Ordinance 13.10.050

Table 5 below summarizes the currently issued permits compliance with City of Keokuk Ordinance 13.10.050 requirements. The current permits have met the minimum requirements identified in Red, Yellow, and Green sections. Those requirements listed in Blue sections are for specific enforcement actions and will be added as need with enforcement actions by the pretreatment program in the future.

Table 6 is a review of issued permits as to their compliance with City of Keokuk Ordinance 13.10.030 local limits requirements and the applicable Federal CFR categorical regulatory permits limits.

None of the permits met the applicable requirements. These permits are not enforceable as written and must be corrected or the city could face enforcement action by either IDNR or USEPA.

Table 5: City of Keokuk Ordinance 13.10.050 Regulations								
Did the Industrial Permit Meet the City Ordinance Requirements for an Industrial Pretreatment Permit								
City Ordinance Permit Requirement	**ADM Milling**	**Amstead Rail**	**Carry Transit**	**Ferrosil Landfill**	**Gully Transport**	**Henniges Automotive**	**Keokuk Landfill**	**Keokuk Mills**
A statement that indicates the wastewater discharge permit issuance date, expiration date and effective date;	No	No	No	No	No	No	No	No
A statement that the wastewater discharge permit is nontransferable without prior notification to the city in accordance with this chapter, and provisions for furnishing the new owner or operator with a copy of the existing wastewater discharge permit;	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial
Limits on the monthly average and daily maximum wastewater constituents and characteristics. This includes requirements for implementation of best management practices, based on applicable pretreatment standards;	No	No	No	No	No	No	No	No
Specifications for monitoring programs which shall include identifying sampling locations, sampling frequency, number, types, and standards for tests, and reporting schedule;	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial
Compliance schedules, if applicable. Such schedule may not extend the time for compliance beyond that required by applicable federal, state, or local law;	????	????	????	????	????	????	????	????
Requirements to control slug discharge, if determined by the city to be necessary;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
The process for seeking a waiver from monitoring for a pollutant neither present nor expected to be present in the discharge in accordance with this chapter;	No	No	No	No	No	No	No	No
Any grant of the monitoring waiver by the city;	????	????	????	????	????	????	????	????
Requirements for maintaining and retaining plant records relating to wastewater discharge as specified by the city and affording city access thereto;	No	No	No	No	No	No	No	No
Requirements for notification of the city of any new introduction of wastewater constituents or substantial change in the volume or character of the wastewater constituents being introduced into the POTW;	No	No	No	No	No	No	No	No

Table 5: City of Keokuk Ordinance 13.10.050 Regulations								
Did the Industrial Permit Meet the City Ordinance Requirements for an Industrial Pretreatment Permit								
City Ordinance Permit Requirement	**ADM Milling**	**Amstead Rail**	**Carry Transit**	**Ferrosil Landfill**	**Gully Transport**	**Henniges Automotive**	**Keokuk Landfill**	**Keokuk Mills**
Requirements for the notification of city within twenty-four hours of becoming aware of a violation, and to require such nondomestic users to resample and submit results of the resampling to the city within thirty days;	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial
A statement of applicable, civil and criminal penalties for violations of pretreatment standards and requirements.	Partial	Partial	Partial	Partial	Partial	Partial	Partial	Partial

Table 5: Industries With Pretreatment Permits				
Industry	**Federal Categorical Industry CFR**	**Local Limits Applied to the Permit (Yes/No)**	**40 CFR § 403 Limits Applied to the Permit (Yes/No)**	**Federal Categorical Industry CFR Limits Applied to the Permit (Yes/No)**
ADM Milling	None	**No**	**No**	***Not Required***
Amstead Rail	40 CFR § 420	**No**	**No**	**No**
Carry Transit	40 CFR § 442	**No**	**No**	**No**
Ferrosil Landfill	40 CFR § 445	**No**	**No**	**No**
Gully Transport	40 CFR § 442	**No**	**No**	**No**
Henniges Automotive	40 CFR § 428 and § 463	**No**	**No**	**No**
Keokuk Landfill	40 CFR § 445	**No**	**No**	**No**
Keokuk Mills	40 CFR § 442	**No**	**No**	**No**

City of Keokuk Industrial Inspections

- Only Three (3) industrial inspections of current permittees were provided by the WPCP. They were ADM (Inspected 2008), Carry Transit (Inspected 2008), and Henniges Automotive (Inspected 2008).
- Griffin Wheel Company was inspected also in 2008, but the company does not currently have an industrial pretreatment permit issued.
- A permit application for Keokuk Steel castings was also provided. Permit applications are not inspections.

40 CFR § 403.8 (f)(1)(v) requires the pretreatment program: *"Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of in information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users."*

The inspections supplied failed to meet the minimum requirement of the Federal regulations and puts the pretreatment program in severe non-compliance with state and Federal requirements.

Industrial Pretreatment Violations

The some of the ADM permit violations for January, 2021 through November, 2021 are summarized in Figures 7-11 below. These violation summaries are not complete and do not include ADM violations for the 5-year statute of limitations or other permittee violations such as the City of Keokuk Landfill or the Ferrosil Landfill.

What figures 7 through 11 show are that ADM Mills has:

1. Consistently discharged pH below the permit limit of 6.0 (Figure 7)
2. Consistently discharged pH below the Federal limit of 5.0 SU (Figure 7)
3. Consistently discharged pH above the permit limit of 11.5 SU (Figure 8)
4. pH violations have happened over a consecutive 48-hour period (Figure 9)
5. Consistently violated the Monthly Average CBOD Pounds limit (Figure 10)
6. Has violated the Monthly Average TSS Pounds limit.

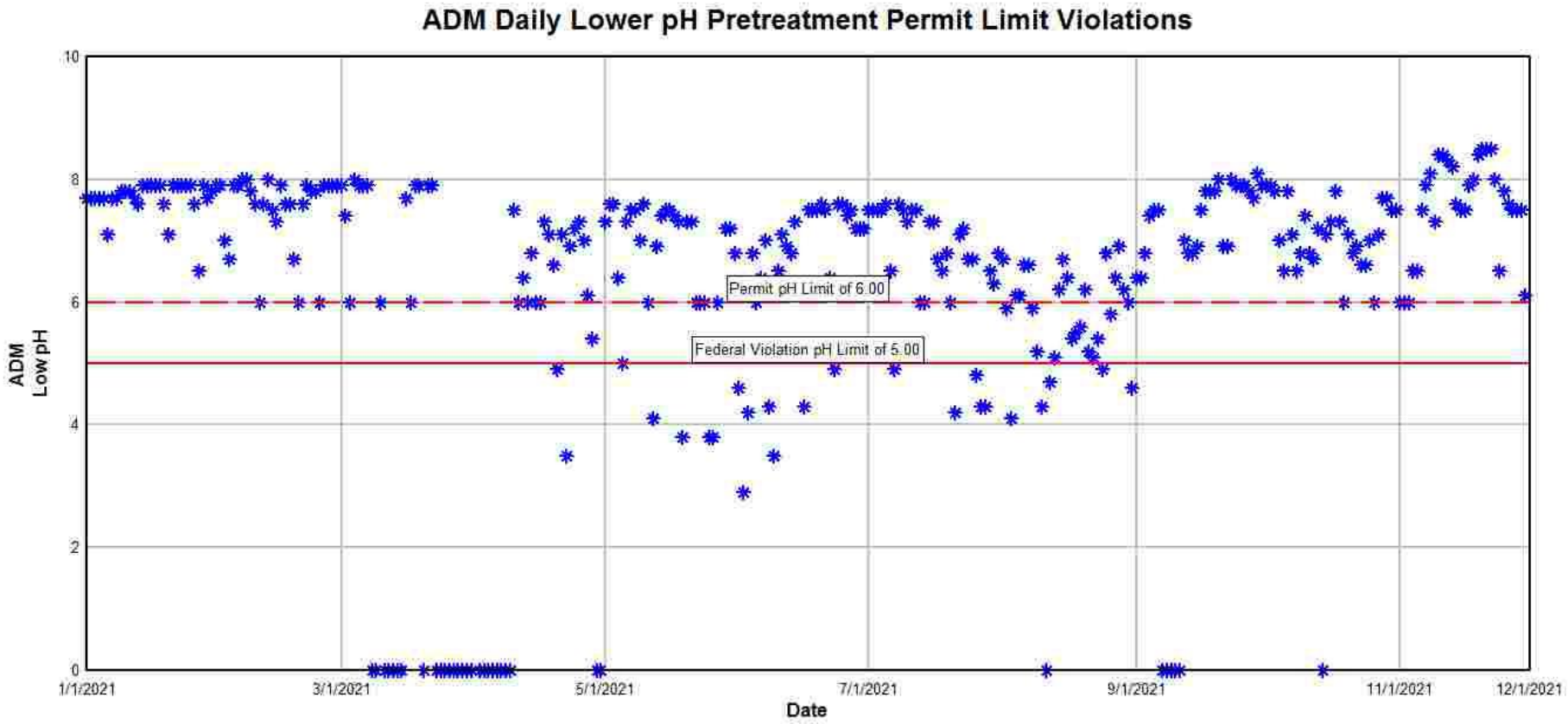

Figure 7: ADM Low pH Violations

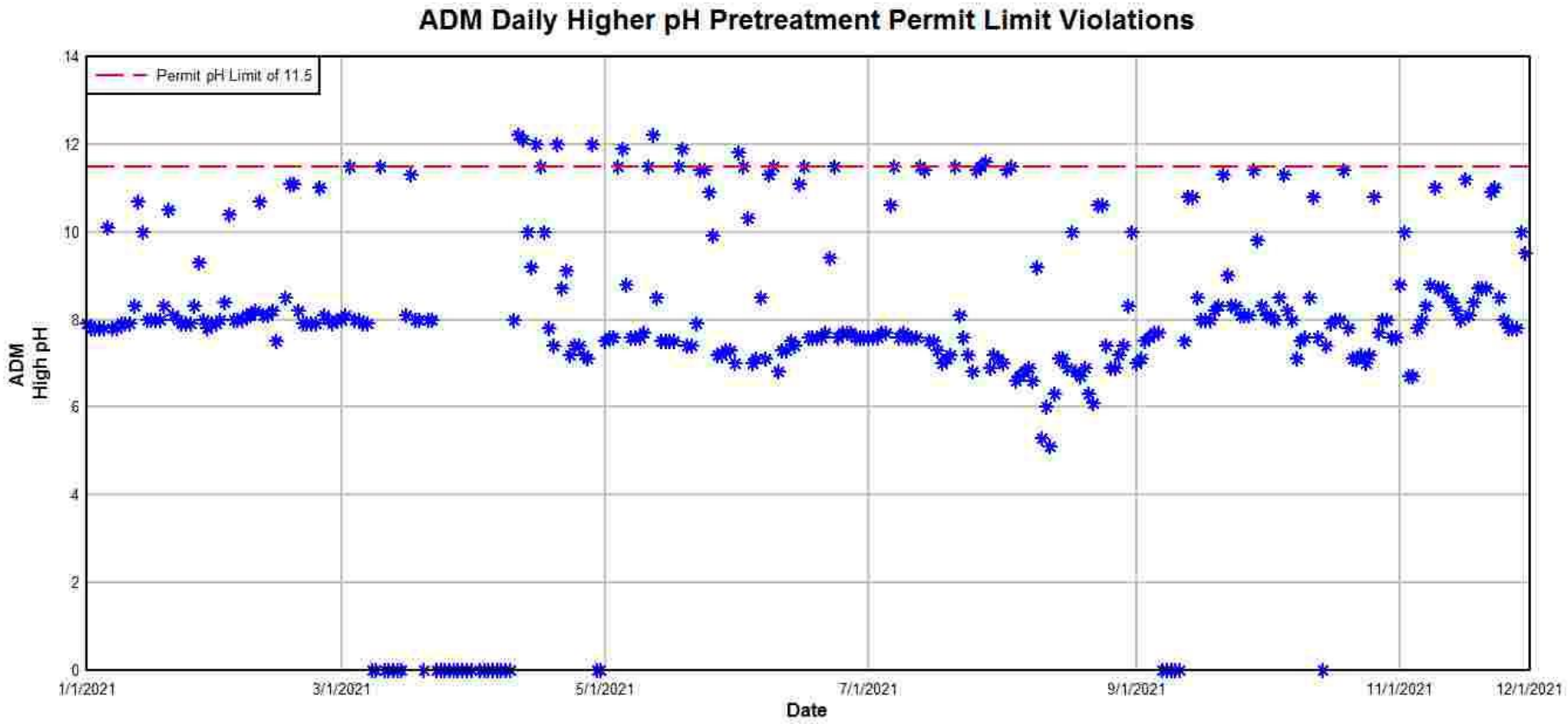

Figure 8: ADM High pH Violations

From: Eward, Melvin <Melvin.Eward@adm.com>
Sent: Friday, August 13, 2021 8:55 AM
To: Tom Wills <twills@cityofkeokuk.org>
Cc: Cochran, Brian <Brian.Cochran@adm.com>; Buerklin, James <James.Buerklin@adm.com>; Brownlee, Allen <Allen.Brownlee@adm.com>; Martin, Jerod <Jerod.Martin@adm.com>; Shipley, Franklin <Franklin.Shipley@adm.com>
Subject: Low PH Excursion 8/12 - 8/13 - 2021

Good Day Tom.

- Our PH has been low, hovering around 5.0 since Tues 8/10 and continuing through today 8/13.
- We had a computer program glitch occur late Tues 8/10. This was not immediately detected due to how the glitch presented itself i.e. all looked ok on the screen.
  The glitch was discovered Wed morning 8/11. Corrective actions were taken but it took us till today to get everything sorted out and gain confidence that everything is working correctly. During this time period, we have not been able to capture readings correctly until this morning 8/13. The glitch has been fixed and the program is operating correctly now.

- Additionally, we had three subject matter experts on site this week. We found a few key manufacturing process errors which greatly affected our input to the waste water system.
  The process issues have been corrected. This should result in better PH control and our low PH issue being corrected.

Wed 8/11:

1. 00:00 – 24:00 = 1440 min. below 6.0. Peak approx. 4.9. Flow 45 GPM = 64,800

Thurs 8/12:

1. 00:00 – 00:00 = 1440 min. below 6.0. Peak approx. 4.7. Flow 55 GPM = 79,200.

Fri 8/13:

1. 00:00 – 07:00 = 420 min. below 6.0. Peak approx.. 4.7. Flow 55 GPM = 23,100.

Please let me know if you have any further questions.

8/13/2021, 9:38 AM

Figure 9: Email from ADM Indicating Degree of pH Violations

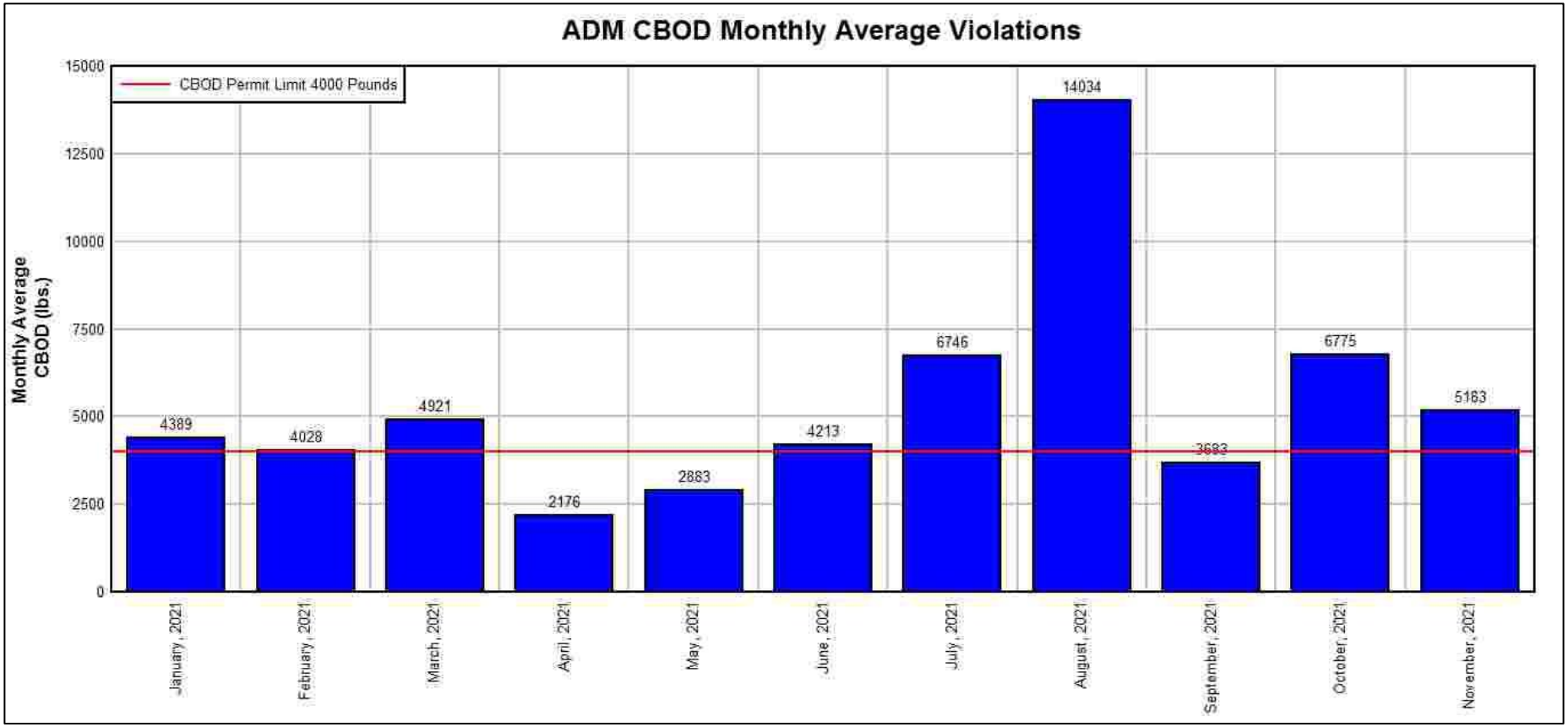

Figure 10: ADM CBOD Violations

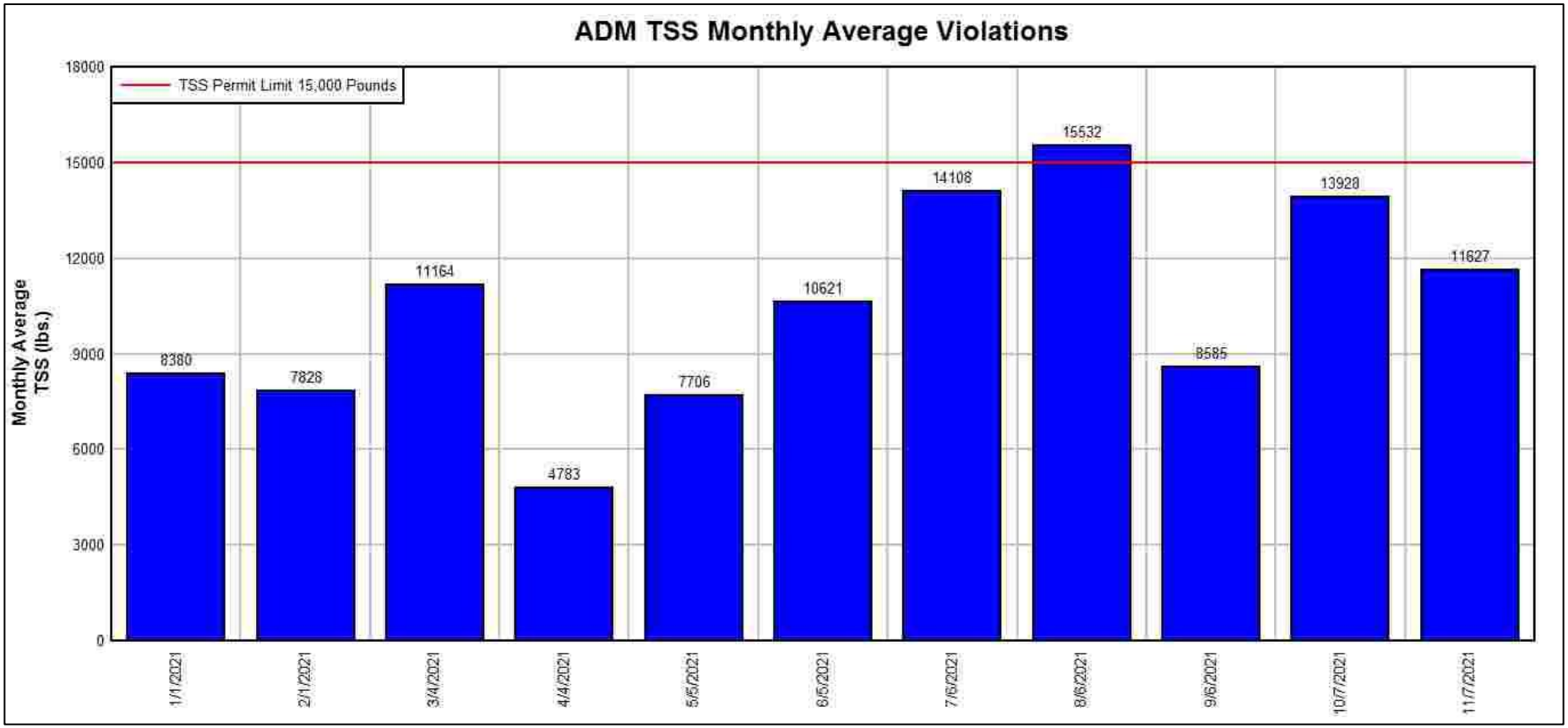

Figure 11: ADM TSS Violations

Other Concerns

TSS Design Loading for the WPCP Plant

The current NPDES permit for the WPCP does not have a TSS Design Load identified. (Figure 12)

Facility Name: KEOKUK CITY OF STP
Permit Number: 5640001

Design Capacity

Design: 1

The design capacity for the treatment works is specified in Construction Permit Number 92-84-S, issued Thursday, December 12, 1991.
The treatment plant is designed to treat:
* An average dry weather (ADW) flow of 3.43 Million Gallons Per Day (MGD).
* An average wet weather (AWW) flow of 5.00 Million Gallons Per Day (MGD).
* A maximum wet weather (MWW) flow of 7.500 Million Gallons Per Day (MGD).
* A design 5-day biochemical oxygen demand (BOD5) load of 11,900 lbs/day.
* A design Total Kjeldahl Nitrogen (TKN) load of 2,088 lbs/day.

Figure 12: Keokuk NPDES Design Loading

This allowed the ADM permit to be written with TSS limits of 17,500 lbs. per day (daily maximum) and 15,000 lbs. per day (monthly average). But, investigations by IDNR found engineering design studies performed during the plant upgrade in 2015 that sets in influent TSS Design Load for the WPCP at 13,000 lbs./day.

3. Organic Design Loadings		Present Year (2012)			Design Year (2032)	
Design Condition→		Max. 30 day (#/day)	Max. Day (#/day)		Max. 30 day (#/day)	Max. Day (#/day)
Domestic/Commercial	BOD_5	11,900	11,900		11,900	11,900
	TSS	13,000	13,000		13,000	13,000
	TKN	2,088	2,088		2,088	2,088
Industrial	BOD_5					
	TSS					
	TKN					
Other (Specify)	BOD_5					
	TSS					
	TKN					
Total	BOD_5	11,900	11,900		11,900	11,900
	TSS	13,000	13,000		13,000	13,000
	TKN	2,088	2,088		2,088	2,088

Figure 13: 2015 IDNR Design Loading Updates for Keokuk WPCP

Therefore, the TSS NPDES discharge violations and ADM Millings permit violations are directly due to over allocation of TSS poundage to ADM Milling in their permit. This information can be used by IDNR or USEPA to assess Administrative Consent Orders or fines against the City of Keokuk.

City of Keokuk Ordinance Irregularities

Two sections in the city ordinance are conflicting with other parts of the city ordinance or the USEPA and IDNR approved Industrial Pretreatment Enforcement Plan. These irregularities are:

1. Billing for organic loading.in 13.08.040 charges CBOD at $0.207 per pound, but 13.08.045 calculates surcharge on BOD poundage. CBOD and BOD are not the same test. In fact CBOD is usually lower that BOD. Also, all of the permittees are regulated on CBOD, not BOD. These ordinances must be corrected to either use CBOD or BOD. Failure to do that can allow an industry to challenge any surcharge bill in court.
2. Show Cause Hearing is listed in ordinance 13.10.060 as being managed and run by the City Council. But the Industrial Pretreatment Enforcement Response Plan lists the Plant Superintendent, Pretreatment Coordinator or City Attorney as the only staff involved in a Show Cause Hearing. There is no mention of transferring that authority to the City Council. As the Industrial Pretreatment Enforcement Response Plan was approved by IDNR and USEPA, this difference needs to be corrected in favor of the Industrial Pretreatment Enforcement Response Plan.

Summary and Conclusions

The preliminary review of the City of Keokuk's Pretreatment Program has identified the following problems that need to be addressed expeditiously before IDNR or USPA assesses regulatory penalties and fines against the city. The identified areas that need immediate corrections are:

1) Identify all industries that are causing the WPCP to violate their NPDES discharge permit limits.
2) Assess regulatory action against those industries as per the Industrial Pretreatment Enforcement Response Plan.
3) Review compliance of permittees for a 5-year period from 2017-2021 (5-Year Statute of Limitations)
4) Train WPCP Staff and evaluate their performance.
5) Update ALL industrial pretreatment permits to keep TSS loading below the allowed industrial contribution to the WPCP Total Design Load of 13,000 lbs. per day for the whole city.
6) Update all industrial pretreatment permits to meet the requirements of:
    a) 40 CFR § 403
    b) 40 CFR § 403 Sub-Chapter N
    c) IAC 567.62
    d) City of Keokuk Ordinances
7) Perform Industrial User Surveys on all current and suspected industrial dischargers.
8) Perform Industrial Inspections on all current and suspected industrial dischargers.
9) Issue updated permits on all current and suspected industrial dischargers.
10) Create and enforce an Industrial Wastehauler Program on all current and suspected industrial wastehaulers.
11) Correct irregularities in the city ordinances.
12) **Perform an in-depth review of the industrial pretreatment program to identify all problems and perform the corrective actions. <u>That Means Boots on the Ground</u>**

COUNCIL ACTION FORM

Date: January 20, 2022

Presented By: O'Donnell

Subject: ARPA Funding Allocations Agenda Item: _____

Description:

See attached memo.

FINANCIAL

Is this a budgeted item? YES ☐ NO ☐

Line Item #: _____ Title: _____

Amount Budgeted: _____

Actual Cost: _____

Under/Over: _____

Funding Sources:

_____ _____

_____ _____

Departments:

_____ _____

_____ _____

Is this item in the CIP? YES ☐ NO ☐ CIP Project Number: _____

COUNCIL ACTION FORM

Any previous Council actions:

Action	Date

Recommendation:

Staff recommends approval.

Required Action

ORDINANCE ☐ RESOLUTION ☑ MOTION ☐ NO ACTION REQUIRED ☐

Additional Comments:

MOTION BY: _____ SECONDED BY: _____

TO _____

_____

_____

CITY COUNCIL VOTES

VOTES	Altheide	Andrews	Bryant	Crenshaw	Garcia	Greenwald	Helenthal	Marsden	Winn
YES	☐	☐	☐	☐	☐	☐	☐	☐	☐
NO	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSENT	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSTAIN	☐	☐	☐	☐	☐	☐	☐	☐	☐

TO: Mayor and Council

FROM: Cole S. O'Donnell

DATE: January 17, 2021

RE: ARPA Funding Recommendations

As part of the American Rescue Plan Act (ARPA), Keokuk will receive $1,513,634 in aid to local governments. The funds are distributed over two years with half received August 6, 2021, and the other half to be received August 6, 2022. Funds must be expended by August 6, 2024. There are limits on what the funds can be used for. Infrastructure investments are limited to water, sewer, and broadband. Additional permitted uses are tied to lost city revenue, business recovery/development, tourism, and assistance to low- and moderate-income citizens.

The City Council created the ARPA Committee to review possible uses of these funds. The Committee is making the following recommendations:

- $567,634 to the General Fund as revenue replacement. The Act provides for revenue replacement based upon a formula using revenue data from FY 19. The amount recommended is less than the maximum that could be used for revenue replacement and is being recommended to lessen the FY 22 shortfall.
- $300,000 for dilapidated housing removal. This is permissible, provided that the target properties are within a low to moderate income section of the city.
- $300,000 to provide financial incentives to potential developers of the City owned buildings on the 600 block of Main St. The use is permissible under business development.
- $200,000 for housing rehabilitation loans or grants. SEIRPC could administer the loans/grants through existing programs.
- $50,000 for the River Front Trail. As tourism is allowed use and one purpose of the trail is to attract tourist, the allocation is permissible.
- $32,000 to assist in paying past due garbage fees. Homeowners who fall behind in their city utility bills can receive assistance from Community Action to pay the water and sewer portions of the bills. What is not covered in the garbage fees. The money would be transferred to Community Action for the purpose of paying the past due garbage fees.
- $50,000 for repairs to the Verity Museum. Like the trail, this is a tourist attraction.
- $10,000 for the Library Park. Tourism.
- $4,000 to bat proof the Grand Theater. Tourism.

Cole S. O'Donnell · City Administrator
501 Main St, Keokuk, IA 52632
(319)524-2050 x 2205 · codonnell@cityofkeokuk.org

RESOLUTION NO. _____

A RESOLUTION ALLOCATING AMERICAN RESCUE PLAN ACT FUNDS

WHEREAS, the Congress of the United States of America passed the American Rescue Plan Act (ARPA) allocating specific funds to assist state and local government recover from the COVID-19 pandemic; and

WHEREAS, the City of Keokuk, Iowa, has been allocated $1,513,634 of ARPA funds; and

WHEREAS, said funds must be spent on activities and projects within the scope of the Act; and

WHEREAS, all appropriated funds must be expended no later than the 6th day of August, 2024.

NOW, THEREFORE BE IT RESOLVED that the City Council for the City of Keokuk, Iowa hereby allocates the American Rescue Plan Act funds for the following purposes:

1. Replacement of Lost Revenues (General Fund): allowed under the Act with amounts limited by formula. Amount allocated: $567,634.
2. Dilapidated Housing Renovation/Demolition: allowed under the Act provided the houses are within an area of the City with low/moderate income residents. Amount allocated $300,000.
3. Redevelopment Grants for 619, 623, 625, and 629 Main St: allowed under the Act for business development and economic recovery. Amount allocated: $300,000.
4. Housing Rehabilitation Grants: allowed under the Act provided recipients are low to moderate income. Funds will be transferred to Southeast Iowa Regional Planning for administration per established guidelines. Amount allocated: $200,000.
5. River Front Trail Project: allowed under the Act as recovery of tourism. Amount allocated $50,000.
6. Assistance to Low Income Residents to Pay Delinquent Sanitation Fess: allowed under the Act as assistance to low- and moderate-income residents. Funds will be transferred Southeast Iowa Community Action to be administered under their assistance guidelines. Amount allocated : $32,000.
7. Repairs to the Verity Museum: allowable under the Act as recovery of tourism. Amount allocated: $50,000.
8. Bat infestation Prevention of Grand Theater: allowed under the Act as recovery of tourism. Amount allocated: $4,000.
9. Library Park: allowed under the Act as tourism recovery. Funds will be disbursed to the Keokuk Library foundation. Amount allocated: $10,000.

PASSED, APPROVED, AND ADOPTED this 20th day of January, 2022.

_____

Kathie Mahoney, Mayor

Attest: _____

Jean Ludwig, City Clerk

COUNCIL ACTION FORM

Date: January 20, 2022

Presented By: O'Donnell

Subject: MOU with KEDC Agenda Item: _____

Description:

Since the completion of the Southeast Iowa Development Center (SIDC), KEDC has developed marketing materials, researched leasing options, finished certain spaces, and recruited tenants. The City has maintained the building and grounds and provided advice on KEDC's activities regarding the SIDC. In order to formalize the current relationship, KEDC is proposing a Memorandum of Understanding (MOU). A committee will be formed to insure that the care, marketing, and management of the facility is proceeding properly. Lease payments will be paid to KEDC to pay for marketing and finishes. Should occupancy become sufficient to meet the cost associated with management of the facility, excess funds will be used to pay debt and or provide income for KEDC.

FINANCIAL

Is this a budgeted item? YES ☐ NO ☐

Line Item #: _____ Title: _____

Amount Budgeted: _____

Actual Cost: _____

Under/Over: _____

Funding Sources:

_____ _____

_____ _____

Departments:

_____ _____

_____ _____

Is this item in the CIP? YES ☐ NO ☐ CIP Project Number: _____

COUNCIL ACTION FORM

Any previous Council actions:

Action	Date

Recommendation:

Staff recommends approval.

Required Action

ORDINANCE ☐ RESOLUTION ☐ MOTION ☐ NO ACTION REQUIRED ☐

Additional Comments:

MOTION BY: _____ SECONDED BY: _____

TO _____

_____

_____

CITY COUNCIL VOTES

VOTES	Altheide	Andrews	Bryant	Crenshaw	Garcia	Greenwald	Helenthal	Marsden	Winn
YES	☐	☐	☐	☐	☐	☐	☐	☐	☐
NO	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSENT	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSTAIN	☐	☐	☐	☐	☐	☐	☐	☐	☐

RESOLUTION NO.

RESOLUTION APPROVING MEMORANDUM OF UNDERSTANDING WITH KEOKUK AREA DEVELOPEMNT CORPORATION (KEDC)

WHEREAS, the City of Keokuk, Iowa owns and operates the Southeast Iowa Development Center (SIDC); and

WHEREAS, the Keokuk Area Development Corporation (KEDC) has been marketing and managing the SIDC; and

WHEREAS, both the City of Keokuk, Iowa and KEDC desire to formalize their relationship on the SIDC.

NOW THEREFORE, BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF KEOKUK, STATE OF IOWA: that Memorandum of Understanding with the Keokuk Economic Development Corporation is hereby approved.

PASSED, APPROVED, AND ADOPTED this 20th day of January 2022.

_____
Kathie Mahoney, Mayor

ATTEST:

_____
Jean Ludwig, City Clerk

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) establishes a joint venture between Keokuk Economic Development Corporation (KEDC) and the City of Keokuk (City) for the purpose of general management of tenant recruitment, occupancy, grounds, and physical plant of the Southeast Iowa Development Center (SIDC).

I. BACKGROUND

KEDC and the City have jointly supported common of economic development activities in Keokuk and southeast Lee County.

II. PURPOSE

This MOU defines a relationship between KEDC and the City and the roles each Party is expected to carry out. The goal of this joint venture is to manage occupancy and maintain the building physical plant, and grounds.

III. STATEMENT OF MUTUAL BENEFIT, INTEREST AND RESPONSIBILITY

The Parties to this MOU have separate missions and commensurate objectives for which they are committed; yet each Party's individual objectives includes the success of the SIDC through shared responsibility. These responsibilities include but are not limited to the following:

1. KEDC will provide the following services and resources:
    A. Functional property management committee
    B. Tenant recruitment
    C. Occupancy management, including customary improvements of leased and common
    D. Development of general lease terms and negotiation of exceptions
    E. Engagement with agencies and services such as ISU Extension, SBDC & SEIRPC
    F. Real-time information for cooperative web presence with LCEDG
    G. Annual progress report to City administration

2. The City will provide the following services and resources:
    H. Maintenance of physical plant
    I. Grounds maintenance
    J. Project management of maintenance and improvements of ancillary buildings and grounds
    K. Receipt of lease payments and flow-through disbursement to KEDC for tenant recruitment and occupancy management.

The above parties agree that it is to their mutual benefit and interest to work cooperatively.

IV. EACH PARTY SHALL:

1. Agree to the formation of a committee to provide expertise and oversight activities
2. Provide necessary information to achieve agreed upon goals.
3. Agree that the parties will have goals, objectives, and actions that are aligned with SIDC success. Agree to coordinate priorities, actions, and resources for the economic development of the City of Keokuk.
4. Recognize that other organizations may be involved but are not listed as parties to this agreement, and maybe required to assist in endeavors critical to the purposes of this MOU

under separate formal arrangements. Such assistance may include but not be limited to, writing grant applications, professional services, providing consultation, education, and facilitation.

V. TERMS OF UNDERSTANDING

The term of this MOU is for a period of 3 years from the effective date of this agreement and may be extended upon written mutual agreement. It shall be reviewed at least annually to ensure that it is fulfilling its purpose and to make any necessary revisions.

Either party may terminate this MOU upon sixty (60) days written notice without penalties or liabilities.

VI. AUTHORIZATION

The signing of this MOU is not a formal undertaking. It implies that the signatories will strive to reach, to the best of their ability, the objectives stated in the MOU.

On behalf of the organization I represent, I wish to sign this MOU and contribute to its further development.

Signature _____ Date _____
(Susan Dunek, President)
Keokuk Economic Development Corporation

Signature _____ Date _____
(Shelly Oltmans, Executive Director)
Keokuk Economic Development Corporation

Signature _____ Date _____
(K.A. Mahoney, Mayor)
City of Keokuk

Signature _____ Date _____
(Cole S. O'Donnell, City Administrator
City of Keokuk

COUNCIL ACTION FORM

Date: January 20, 2022

Presented By: O'Donnell

Subject: IEDA Grant Applications Agenda Item: _____

Description:

Staff has been working with Main Street Keokuk to secure grants for the 600 block buildings. Two grant applications are due in January. The Catalyst Grant is for $100,000 with dollar for dollar match. The grant can be used for any improvement to the buildings. The Upper Story Housing Grant is up to $600,000 for at least ten units. The funds can be used for any expense necessary to create the housing units. The City will be applying for the grants while considering proposals from potential developers. While it would be advantageous to have a developer on board before applying for the grants, it is not necessary. If the City is awarded the grants and a developer has not been named, the grants can be refused.

Community Development Director Broomhall is requesting a committee of four council members to review developer proposals and make a recommendation to the Council.

FINANCIAL

Is this a budgeted item? YES ☐ NO ☐

Line Item #: _____ Title: _____

Amount Budgeted: _____

Actual Cost: _____

Under/Over: _____

Funding Sources:

_____ _____

_____ _____

Departments:

_____ _____

_____ _____

Is this item in the CIP? YES ☐ NO ☐ CIP Project Number: _____

COUNCIL ACTION FORM

Any previous Council actions:

Action	Date

Recommendation:

Staff recommends approval.

Required Action

ORDINANCE ☐ RESOLUTION ☑ MOTION ☐ NO ACTION REQUIRED ☐

Additional Comments:

MOTION BY: _____ SECONDED BY: _____

TO _____

_____

_____

CITY COUNCIL VOTES

VOTES	Altheide	Andrews	Bryant	Crenshaw	Garcia	Greenwald	Helenthal	Marsden	Winn
YES	☐	☐	☐	☐	☐	☐	☐	☐	☐
NO	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSENT	☐	☐	☐	☐	☐	☐	☐	☐	☐
ABSTAIN	☐	☐	☐	☐	☐	☐	☐	☐	☐

RESOLUTION NO. _____

RESOLUTION AUTHORIZING THE FILING OF AN APPLICATIONS WITH THE IOWA ECONOMIC DEVELOPMENT AUTHORITY

WHEREAS, the City of Keokuk is a duly recognized municipal corporation acting under the laws of the State of Iowa; and

WHEREAS, the City Council is the duly elected government body of Keokuk; and

WHEREAS, the City of Keokuk, Iowa owns property located at 619, 623, 25, and 629 Main Street; and

WHEREAS, the City Council of Keokuk, Iowa desires to redevelop said property and return said property to the tax rolls; and

WHEREAS, the Iowa Economic Development Authority (IEDA) has grants available to assist in the redevelopment of business district property and development of upper story housing; and

WHEREAS, in order to avail itself of possible reimbursement of funds pursuant to any grant under said program, an application must be filled by the City of Keokuk; and

WHEREAS, the filing of an application is in the best interests of the citizens of the City of Keokuk, Iowa, and should be approved.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF KEOKUK, IOWA:

That the City of Keokuk fully supports the project to redevelop 619, 623, 625, and 629 Main Street through the Iowa Economic Development Authority's Catalyst and Upper Story Housing grant programs assures a local funding match of $100,000 as part of the Catalyst Grant Program and a minimum of 25% local match for the Upper Story Grant Program and hereby authorizes the City of Keokuk to apply for funding the improvements through the Southeast Iowa Regional Planning Commission (SEIRPC).

PASSED, APPROVED and **ADOPTED** this 20th day of January 2022.

_____
Kathie Mahoney, Mayor

Attest: _____
Jean Ludwig, City Clerk

TO: Mayor and Council

FROM: Cole S. O'Donnell

DATE: January 17, 2022

RE: Committee Nominations

PLANNING COMMISSION (Second notification. No vote required.)
(5 YEAR TERM)
Devon Dade Term to expire 05/14/2025

DEPOT COMMISSION (Second notification. No vote required.)
(4 YEAR TERM)
Dustin Wade Term to expire 06/01/2022

Cole S. O'Donnell · City Administrator
601 Main St, Suite 3, Keokuk, IA 52632
(319)524-2050 x 111 · codonnell@cityofkeokuk.org

TO: Mayor and City Council

FROM: Cole S. O'Donnell

DATE: January 17, 2022

RE: Administrator's Report

1. Iowa League od Cities Legislative Policy Committee: The Committee has started its weekly legislative update meetings. The first week of the legislative session was uneventful, but the second week saw several bills that would preempt local authority over certain things. Currently this includes regulation of home occupation businesses and storm water mitigation.

   Another area of great concern is not actually in bill form, as of yet. The chair of the Senate Ways and Means Committee has indicated that he will be proposing comprehensive tax reform. This would include funding the Iowa Water and Land Legacy (IWILL) trust. This can only be done by the State raising its sales tax by $0.01. Since the majority party is not willing to propose a tax increase, the rumor is that the state will remove local option sales taxe from local control, raise the state stales tax, take 3/8 of the tax for IWILL and redistribute the remaining back to cities and counties. Any reduction in revenues would be "backfilled" by the State. There are multiple red flags with this concept. As more information becomes available, I will be asking Council Members to help with any discussions with legislators.

2. Airport Infrastructure Funding: Staff has received word that the Municipal Airport will receive $159,000 from the Federal infrastructure bill. The Airport Commission will be recommending that the funds be directed to upgrade and improve the terminal building. Since the change in management structure, the airport has seen increased usage and terminal improvements will provide another attraction for pilots.

3. Budget Sessions: Reminder of the budget sessions to be held January 25th and February 1st. The sessions will begin at 5:30 with each department being given 15 minutes, though this could be longer or shorter depending upon questions from the Council. The schedule for the session is as follows:

Tuesday, January 25th:

Library
Airport
Street Department
Sewer Department
Parks Department
Cemetery Department
Sanitation
Bridge Department
Public Works Administration (including Traffic Lights and Street Lighting)

Cole S. O'Donnell · City Administrator
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(319)524-2050 x 111 · codonnell@cityofkeokuk.org

Tuesday, February 1st:

Animal Services
Police Department
Fire Department
Housing
Inspections
Water Pollution Control
Mayor Council
Non-Departmental Accounts
Revenues