



REGION 5
CHICAGO, IL 60604

Mayor Curtis McCall Sr.
City of Cahokia Heights
103 Main Street Cahokia,
Illinois 62206
ymccall@cahokiaillinois.org

Re: Cahokia Heights Revised Preliminary Design Report for the Interceptor Project

RESPONSES TO COMMENTS IN THIS LETTER ARE INDICATED HEREIN BY BOLD ITALICS, AND ARE ALSO INCLUDED IN THE REVISED PRELIMINARY DESIGN REPORT RE-SUBMITTED JUNE 6, 2025

Dear Mayor McCall:

The City of Cahokia Heights submitted the revised Preliminary Design Report for the Interceptor Sewer Project (revised Preliminary Interceptor Design Report) on April 21, 2025, for EPA review and approval pursuant to the proposed Consent Decree currently lodged with the District Court. The City's revised Preliminary Interceptor Design Report was submitted in response to EPA's March 19, 2025, letter commenting on the City's December 31, 2024, Preliminary Design Report. While the City's April 21st submittal mostly addressed EPA's comments, we have the following comments in response.

1. Cahokia Heights' response to EPA Comment #1 - The revised Preliminary Interceptor Design Report notes that the 63rd and Laura Lift Station (Pump Station #34 on Plan 2) is being evaluated to determine if it can be expanded to handle the increased flow it will receive in the alternate alignment or if a replacement pump station will be required. Four additional pump stations (#s 35, 37, 38, and 55) that are not impacted by the Plan 1 alignment appear to be impacted by Plan 2's alignment. Has the City determined whether all four of these additional lift stations can in fact be modified, or may replacement of one or more of these lift stations be required?

The proposed alignment of the interceptor sewer is being evaluated for revision per the alternate alignment such that the 71st & Ames, 75th & Clinton, and Willie Holmes Pill Box Lift Stations would no longer being considered for modification as they would not be impacted by the interceptor. The 63rd & Laura and 73rd Street Lift Stations would require larger capacity pumps and valves to accommodate the increased flow anticipated at these two lift stations. Any revised alignment will be reflected in the final design for the interceptor project.

2. Cahokia Heights' response to EPA Comment #2 -

- On pages 15 and 16, the City provides information regarding the expected materials of construction for piping in the proposed interceptor system. This information includes ASTM and ANSI/AWWA specification references for gravity and pressure pipe as well as the associated fittings. The City should note that the resin cell classification of 12454B is now outdated – the correct classification is now simply 12454. The City notes on page 16 that the number of bends in the force main will be minimized; however, the City should provide an explanation of how the City plans to minimize the number of 90 degree bends.

The resin cell classification should read 12454. Any reference to classification 12454B has been revised accordingly.

As stated above, the proposed interceptor sewer is being evaluated for revision to follow the alternate alignment along the old St. Louis and Belleville Railway (aka "Dayline") right-of way along the northern boundary between Cahokia Heights and East St. Louis, thereby straightening out the overall alignment and eliminating 90 degree bends in the proposed force main. Additional discussion is provided in the revised report.

- Although the City provided additional discussion about the anticipated impacts of the main trunkline rehabilitation on page 16, please provide more detailed discussion regarding how downstream, existing system capacity will be evaluated, including at what point in the final design process this will be completed.

All affected Cahokia Heights lift stations have been re-evaluated to consider any impacts resulting from the new interceptor system. At this time, no changes are anticipated to the existing main trunk line, which is the receiving sewer for the proposed interceptor system, due to the increased capacity being created by the cleaning TV and CIPP work done on the trunkline under the project with the USACE. This is discussed in the preliminary report, as mentioned above in the comment. That project is now complete, and funding of upper reaches of the trunkline through its northern terminus is being processed by the USACE at this time. In addition, the City recently installed a SmartCover device at a manhole on the trunkline near to the point where the interceptor would enter the system, and this data will be reviewed to help verify flow and capacity calculations. The design process to determine capacity will be finalized and included in the IEPA permit submittals, which are scheduled for August 2025.

3. Cahokia Heights' response to EPA Comment #6 - The City has provided a more detailed schedule in Appendix F. We note that the Day Total for the Final Design phase is incorrect at 268 days – it should be 374 days for the entire duration of the design phase (1/6/25 to 1/14/26), or 300 days for the Final Design items 2 through 8. The value of 268 is the number of days from the date of the revised Preliminary Design Report until the end of the design phase. Likewise, the construction duration total of 773 days (presented with a "?") is significantly less than the 1081 days between 1/14/26 and 12/29/28. The City should revise Appendix F to include the correct number of days for the design phase, the final design phase, and the number of days for construction.

Milestone schedule has been revised. MS Project automatically calculates duration in working days, but a column has been added to show calendar days also.

4. Cahokia Heights' response to EPA Comment #7 - The revised plan includes notification of 60% design completion and all right-of-ways secured, but did not include notification to EPA and IEPA, within 10 days of the event. Please revise the plan to include notification to EPA and IEPA within 10 days of 60% design completion and securing all right-of-ways.

Narrative plan has been revised to include this specific time frame reference.

Please revise the revised Preliminary Interceptor Design Report and submit it to Joan Rogers at rogers.joan@epa.gov by June 6, 2025.

Thank you for your continued efforts to bring the City into compliance with the Clean Water Act. If you have any questions, please contact Joan Rogers at (312) 886-2785 or rogers.joan@epa.gov or your legal counsel may contact Deborah Carlson at (312) 353-6121 or carlson.deborahA@epa.gov.

Sincerely,

Nefertiti DiCosmo, Manager
Water Enforcement and Compliance Assurance Branch
U.S. EPA Region 5 Enforcement and Compliance Assurance Division

cc: Lauren Grady, U.S. DOJ
Caitlin Kelly, IAGO
Mike Roubitchek, IEPA