



City of Cahokia Heights  
Office of the Mayor  
103 Main Street  
Cahokia Heights, Illinois 62206  
(618) 337-9500

**Curtis McCall Sr, Mayor**

**Richard Duncan, City Clerk**

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**Via Electronic Mail**

Joan Rogers, Environmental Scientist  
Water Enforcement and Compliance Assurance Branch (ECW-15J)  
U.S. Environmental Protection Agency, Region 5 77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Deborah Carlson  
Office of Regional Counsel (C-14J)  
U.S. Environmental Protection Agency, Region 5 77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**RE:** Cahokia Heights NPDES ID #ILN000019, 08/16/2021 AOC, 2025 Q3 Status Report

Dear Ms. Rogers and Ms. Carlson,

Attached please find the 2025 third quarter update for the 2021 Administrative Order on Consent (AOC) for the City of Cahokia Heights. Please note that as part of this update, the Project Coordinator has been updated to the below individual, effective October 18, 2025:

Janae' Swanson  
Assistant Director of Operations & Billing  
City of Cahokia Heights  
103 Main Street, Cahokia Heights, IL 62206  
jswanson@cahokiailinois.org  
(618) 305-6601

The City remains committed to satisfying the requirements of the AOC and looks forward to continuing our relationship with the EPA. If you have any questions or concerns, please contact me, Mayor McCall, (618) 332-4258, mayor@cahokiaheightsil.us, or our legal counsel, Erica Spitzig, (513) 357-9310, espitzig@taftlaw.com.

I look forward to your review and response.

Sincerely,

  
Curtis McCall, Sr.

Mayor – The City of Cahokia Heights

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Enclosure

Cc:

Mayor McCall - [ymccall@cahokiaillinois.org](mailto:ymccall@cahokiaillinois.org)

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City of Cahokia Heights, IL  
2025 Q3 Status Report for:  
Administrative Order on Consent  
Dated: August 16, 2021

Prepared By:



103 West Vandalia St., Suite 100  
Edwardsville, IL 62025  
PHONE: 618.667.1400

## Introduction

The City entered into an Administrative Order on Consent (AOC) with the U.S. Environmental Protection Agency on August 16, 2021, to address violations of the Clean Water Act (CWA), particularly associated with certain chronic dry-weather sanitary sewer overflows (SSOs) occurring in the City's sewer system. This status report is intended to document actions that have been taken, in the previous calendar-year quarter that demonstrate progress towards achieving compliance with the Clean Water Act through the AOC.

This status report has been composed and formatted to align with the report requirements described in AOC Paragraph 49, parts (a), (b), (c), and (d), as follows:

- Table 1 and associated project narratives – provides update to Paragraph 49(a)
- Assessment of the Effectiveness of Actions to Preventing SSOs and Backups – provides update to Paragraph 49(b)
- Summary of all SSOs and Backups from Quarter – provides update to Paragraph 49(c)
- Analysis of the Cause of Each SSO and Backup from Quarter – provides update to Paragraph 49(d)

Table 1 - Deliverable or Milestone Status for Compliance with Order  
Reference AOC paragraph 49(a)

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Status	Notes
Designate a Project Coordinator and Provide Contact Information	Paragraph 51	8/26/2021	Complete	Project Coordinator updated to Janae' Swanson - effective 10/18/25
Submit a "Targeted Dry-Weather SSO Investigation Plan" for: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.B.	9/15/2021	Complete	Approved by EPA 12/13/2021
Complete the "Targeted Dry-Weather SSO Investigation Plan" for: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.B.c.	3/31/2022  (90 days after EPA approval of 48.B.)	Complete	Sewer inspections ongoing as construction projects alleviate chronically surcharged collection system.
Submit a "Targeted Dry-Weather SSO Corrective Action Plan" to eliminate dry-weather SSOs at: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.C.	5/30/2022	Complete	Revised Dry Weather Plan approved by EPA 6/27/2024
Implement EPA-approved "Targeted Dry-Weather SSO Corrective Action Plan" for: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• Lift Station #22</li> <li>• Lift Station #5</li> </ul>	48.C.c.	In accordance with the approved schedule and milestones	In-progress	N. 82 <sup>nd</sup> St. – completed October 2023.  Lift Station #5 – completed June 2023  Lift station #22 (Lauralee Dr.) – anticipated completion; April 2027  Plan revised and approved by EPA; June 27, 2024.  <i>*Expanded details provided in "Targeted Dry-Weather SSO Correction Action Plan Projects" section</i>

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Status	Notes
Interim O&M Action: Train sewer staff regarding lift stations and lift station bypass stations inspection.	48.A.b.1.	11/14/2021	Complete	Initial training completed 11/5/21 with ongoing training provided to new hires.  Four (4) total employees have completed voluntary collection system certification training
"Condition Status Report". Inspect all City lift stations and temporary lift station bypass stations and submit report.	48.A.b.11.	12/14/2021	Complete	Going forth, lift stations are inspected every other day and bypass pumping locations are inspected daily.
Address conditions with the potential to cause accidental injury to workers and residents at City lift stations and temporary lift station bypass stations.	48.A.b.111.	12/14/2021	Complete	Completed Dec. 2021. Notice given to EPA on 1/3/2022. Routine inspections occur as part of plan.
"Routine Inspection and Maintenance Plan": Submit plan for lift station and temporary lift station bypass stations.	48.A.b.1v.	12/14/2021  Extension of deadline to 1/14/22 granted	Complete	Initial plan submitted 1/14/2022. Revisions submitted: 5/2/2022, 5/16/2022, 5/26/2022, 6/13/2022, 6/17/2022. Approved 6/24/2022.
"Interim Plan to Manage and Track Work Orders, Complaints, Preventative Maintenance, Safety Incidents, and Overflows and Backups"	48.A.b.v.	12/14/2021	Complete	Plan Approved 6/24/2022.
"Sanitary Sewer Staffing": Complete assessment of the appropriate number of staff needed including job categories, expertise, and licensure.	48.A.b.v1.	12/14/2021	Complete	Staffing levels and positions established in EPA approved CMOM. Approval date – 11/21/2022.  Field Staff = 8 Administrative Staff = 8

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Status	Notes
"Routine Inspection and Maintenance of City Lift Stations": Train staff based on plan and procedure of 48.A.b.1v.	48.A.b.v11.	2/12/2022	Complete	Accomplished as part of Condition Status Inspections and Routine Inspection and Maintenance - 48.A.b.11. and 48.A.b.1v.
"Appropriate Staffing Levels": Establish and maintain appropriate levels according to the assessment performed in 48.A.b.1v.	48.A.b.vu1.	2/12/2022	Complete	Current Staffing Level: Field: <ul style="list-style-type: none"> <li>• Supervisor = 1</li> <li>• Foreman = 1</li> <li>• Laborer = 12</li> </ul> Administrative: <ul style="list-style-type: none"> <li>• Director = 1</li> <li>• Assistant Director = 1</li> <li>• Billing Clerk = 4</li> </ul>
"CMOM Program": Submit for Review. Update one year after initial submission date.	48.A.a.	2/12/2022  Update req'd: 2/12/2023	Complete	EPA approved Program, 11/21/2022
"Wet-Weather SSO Investigation Plan": Submit to identify and understand causes of Wet-Weather SSOs	48.D.	8/16/22	Complete	EPA approved revised plan, June 27, 2024.

### Targeted Dry-Weather SSO Corrective Action Plan Projects

#### N 82<sup>nd</sup> Street Clean Out Pipe - *Complete*

This area consists of an 8" gravity sewer line in the middle of 82nd St., coupled with two lift stations, one located at the northeast corner of 82nd St and Bellevue Ave., and one located on Bluff Ave. between 82nd St. and 81st St.

A portion of the gravity line on 82<sup>nd</sup> Street, approximately 370 feet from Bluff Street south, immediately adjacent, and downstream of the yard cleanout cited in the AOC, was excavated, and repaired in July 2021. Work included replacement of the entire reach of sewer from manhole to manhole, CCTV of this repair, backfill, and surface restoration. This work repaired the blockage causing backups in this area, that were directly related to the SSO's coming from the broken yard cleanout. Plans for rehab/replacement of the two lift stations are complete and bids were received on July 16, 2022. Bids were within range of the engineers estimate of cost, and award to the low responsive bidder had been awaiting finalization of the funding grant from IEPA, which was imminent as of the end of July, but was

still pending review of initial documentation by IEPA as of January 31, 2023. Due to the delay in funding from IEPA, the City made an award and contract approval with the contractor using local funds. Completion of construction was projected to require approximately six months, with the primary lag time attributable to delivery of pump and controls equipment. Equipment submittals have been approved and equipment has been delivered. Contractor began sitework on July 13, 2023. Both 82<sup>nd</sup> and Belleview and 82<sup>nd</sup> and Bluff Ave. locations were complete and fully operational, as of the end of October 2023.

#### Lift Station #5 (Pocket Road and Missouri Ave.) - Complete

This area consists of a shared 6" service line from two small motels, the DeLux Inn and the Relax Inn, feeding into the small duplex submersible pump station and a 21" force main running flow out to Pocket Road, and then north to a discharge into a manhole in Pocket Road near the intersection with 40<sup>th</sup> Street.

Inspection of the lift station (wet well, pumps, valve vault, site) have been conducted, with the results incorporated into preliminary engineering plans and estimates for rehabilitation of the lift station, as part of a funding request via a grant application to the St. Clair County Intergovernmental Grants Department. The construction project has been completed and the new pump station is operating as of June 1, 2023.

#### Lift Station #22 (Lauralee Drive) – In-progress

This area consists of two pump stations and associated gravity tributary sewers between Lauralee Drive and Renois Blvd.

Preliminary engineering, to evaluate options and compile cost estimates, was completed. The preliminary plan endeavored to combine and replace the two existing Lauralee Drive pump stations with a single new pump station and install one new pump station on Renois Blvd. The Renois Blvd. station will remove flow from this area, that currently contributes to Lauralee, directing it south to an existing gravity line on Renois Blvd that flows south into the main trunkline on IL Rt. 157.

Final design and construction funding was included in an IEPA grant, with final design being completed in December 2024. Due to its large size and complexity, this project was originally deferred to Phase 2 of the IEPA grant. The decision was made to shift this project's funding to a grant through the Illinois DCEO, with an original application date of August 13, 2024. This funding shift was intended to capitalize on the expediency of the DCEO grant, which is ARPA funded requiring commitment of funds before the end of 2024. As of this quarterly status update, the grant agreement for this work is still pending with the DCEO.

In an effort to maintain progress, this project was bid and awarded on December 30, 2024, to Hank's Excavating. Final contract bonds, insurance, and agreement will be finalized after receipt of the grant agreement. The project is anticipated to be completed by December 2026.

## Assessment of the Effectiveness of Actions in Preventing SSOs and Backups *Reference AOC paragraph 49(b)*

No SSOs were experienced during this reporting period. Although, the third quarter can be described as a generally dry period, there were three days with rainfall totals greater than 1.0 inch and a single day

with accumulation greater than 2.0 inches. (Rainfall data taken from St. Louis Downtown Airport Weather via NOAA. Airport located between 1 and 4 miles from Dry-Weather SSO locations.) It is reasonably concluded that routine pump station and collection system inspections and maintenance activities have aided in minimizing SSO instances.

City Sewer Staff responded to 54 instances of reported basement backups for the quarter. The bulk of response and investigations concluded that private sewer laterals were plugged, broken, disconnected, etc., not allowing flow to leave the premise and enter the City’s sewer system. Seven of these 54 instances did prove to be the City’s responsibility at which time City Sewer Staff either jetted the sewer line to remove a blockage or vacuumed out a manhole to clear debris and restore flow. Acquiring and training on proper equipment has given the City the ability to appropriately address and minimize backups occurring within the City’s sewer network.

**Summary of all SSOs and Backups from Quarter - Reference AOC paragraph 49(c)**

Event	Total Quantity for Quarter
Sanitary Sewer Overflow	0
Basement Backup	54

**Analysis of the Cause of Each SSO and Backup from Quarter - Reference AOC paragraph 49(d)**

Zero (0) SSOs occurred during this reporting period thus the following tables includes basement backup information, only.

General Location	Volume of All Activations (gallons)	Area of City and Feature Receiving SSO Discharge	Cause
100 Block of Jones St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem- Jetted line water level down and flowing.
100 Block of Judith	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream manhole, water level down and flowing.
1000 Block of St. Margaret	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Plumber was out there pulling roots out of their line - City's sewer line water level down and flowing.
1100 Block of Kutz	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem - Jetted line - Line is open sewer is flowing.
1100 Block of Kutz St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and down stream manholes water level down and flowing Customer notified.
1100 Block of Saint Clement Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing - Customer notified.
1100 Block of Saint Michael Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Manhole water level down and flowing.
1100 Block of St Marcella	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and downstream manholes, water level down and flowing .
1300 Block of Richard Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and down stream manholes, water level down and flowing - Customer notified.
1300 Block of Richard Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup Customer problem - Checked upstream manhole, water level down and flowing - Customer was not home.
1300 Block of Saint Stephen Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem Checked the clean out in backyard, water level down and flowing - Customer notified.
1300 Block of Williams Street	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem - Jetted the line. Sewer is open and sewer is flowing.
1400 Block of Camp Jackson Rd.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked clean out, water level down and flowing Customer notified.
1700 Block of Harvest Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Dead end manhole in front of their house- water level down and flowing Customer notified.
1700 Block of Parklane Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Checked upstream manhole, water level down and flowing - Customer notified.
1700 Block of Parklane Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream manhole water level down and flowing - Customer notified.
1700 Block of Parklane Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem Checked cleanout water level down and flowing - Customer notified.
1700 Block of Parklane Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked clean out in back yard water level down and flowing - Customer notified.
1900 Block of Florence St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing - Customer notified.
1900 Block of Oak Tree Ln.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Storm drain not sewer.

General Location	Volume of All Activations (gallons)	Area of City and Feature Receiving SSO Discharge	Cause
1st Block of Denovian	undetermined	Resident's basement, crawl-space, or lowest level.	Manholes water level down and flowing.
1st Block of Drexel Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Blockage in lateral line - Station and manholes not backed up - Main line jetted 340 ft, no blockage.
1st Block of Jarvis Pl.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Line jetted 160ft Blockage in main line cleared.
1st Block of Lauralee Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1st Block of Louise Ln.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1st Block of School	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem - Vac'd out manhole behind customer home.
1st Block of School	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem, Vac out manhole behind the house.
1st Block of School	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem - Had to Vac out manhole behind house.
1st Block of Signal Hill Blvd.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Blockage in main line - Line jetted 220ft - Blockage removed.
1st Block of Westwood Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
2000 Block of Delores St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream manhole water level down and flowing.
2000 Block of Doris Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem The clean out was water level down and flowing.
2400 Block of Lorraine	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Storm drain problem.
2400 Block of Lorraine Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Station and manhole water level down - Customer issue, roots in lateral lines.
2400 Block of Lorraine Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Sinkhole from broken culvert - Street department or highway department needed to be contacted. Station and manholes water levels down.
300 Block of East 5th	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Manholes are flowing - Smell could be coming from A/C unit drain. Customer was notified.
4900 Block of Lake Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Line jetted 120 ft to blockage - Blockage removed and flow returned.
500 Block of Green	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Upstream manhole water level down and flowing - Customer notified.
5700 Block of Bond Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked manhole everything (water) is low.
600 Block of St. Cecelia	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Checked manhole in front of the house - Their line comes into manhole water level down and flowing.

General Location	Volume of All Activations (gallons)	Area of City and Feature Receiving SSO Discharge	Cause
600 Block of St. Monica	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing.
6800 Block of Russell Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - 4" diesel pump bypassing station at 71st and Russell due to open manhole on 71st street.
700 Block of Leon	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - City's problem - Jetted line from dead end - Roots in the line need cleaned.
700 Block of St. Maud	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole water level down and flowing.
700 Block of St. Maud	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream manhole, water level down and flowing.
700 Block of St. Paul	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - City's sewer line is open, water level down and flowing - City sewer is not backed up.
7100 Block of Lake Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Station and manholes water level down - Blockage in lateral line.
7100 Block of Old Missouri Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
800 Block of East 5th	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing - Customer notified.
800 Block of Park St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream and downstream manholes water level down and flowing.
800 Block of Saint Benedict	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked clean out in back yard water level down and flowing.
800 Block of Saint Cletus Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Bypass pump was unplugged - Plugged back up and started to drain.
900 Block of East 5th	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and downstream manholes water level down and flowing - Customer notified.
900 Block of Howell Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and downstream manholes, water level down and flowing - Customer notified.