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

City of Cahokia Heights
Code Enforcement
4300 Bond Ave
Cahokia Heights, IL 62207
(618) 337-9517

Curtis McCall Sr., Mayor
Richard Duncan, City Clerk

City of Cahokia Heights
Office of the City Engineer
4300 Bond Ave
Cahokia Heights, Illinois 62206
(618) 215-7225

City of Cahokia Heights
Water and Sewer Department
2525 Mousette Lane
Cahokia Heights, IL 62206
(618) 332-1222

Via Electronic Mail

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

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

Kristin Furrie
EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-761

RE: DJ # 90-5-1-1-12434, Cahokia Heights Revised Sewer Overflow and Emergency Response Plan (SORP)

Dear Ms. Rogers, Ms. Garl Smith, and Ms. Furrie,

Attached please find an update addressing EPA's October 1, 2025 comments on the City's August 25, 2025 revised Sewer Overflow and Emergency Response Plan (SORP) submission. Specifically, please note Section II. C. 2.a) 3 – Operating Systems and Equipment with Limited Functionality, and contact information listed in Section III, as each addresses EPA's comments.

The City remains committed to satisfying the requirements of the Consent Decree and looks forward to continuing our relationship with the EPA & DOJ. 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

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2525 Mousette Lane
Cahokia Heights, IL 62206
(618) 332-1222

Cc:
Christina Briggs - christina.briggs@ilag.gov
Andrea Wright - andrea.wright@ilag.gov
Caitlin Kelly - caitlin.kelly@ilag.gov
Joshua Leopold - joshua.leopold@Illinois.gov
Joe Stitely - joe.stitely@illinois.gov
Mike Roubitchek - mike.roubitchek@illinois.gov
Gregg Kinney - gregg.kinney@practus.com
Ann Barron - abarron@heylroyster.com
Yvonne McCall - ymccall@cahokiaillinois.org
LaMar Gentry - lgentry@cahokiaillinois.org
Sheldon Butler - sbutler@cahokiaillinois.org
Dennis Traiteur - dtraiteur@cahokiaillinois.org
Janae' Swanson - jswanson@cahokiaillinois.org
Erica Spitzig - espitzig@taftlaw.com
Laura Mwirigi - laura.mwirigi@lochgroup.com
Ethan Steinacher - ethan.steinacher@lochgroup.com

City of Cahokia Heights, IL

Sewer Overflow and Emergency Response Plan (SORP)

Submitted: April 1, 2025
Revised: June 6, 2025
Revised: July 10, 2025
Revised: November 17, 2025

Prepared By:

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

Table of Contents

I. Introduction

This document is prepared to provide procedures for City staff to respond to Sanitary Sewer Overflows (SSOs) in both routine and emergency situations. The goal of the procedures is to minimize the environmental impact and potential human health risks of SSOs.

This document will supplement the CMOM regarding additional specific information dealing with SSOs, and the SORP will be incorporated into the CMOM upon approval.

II. Definition, Identification, Categorization

A. Definition of SSOs

1. An SSO is any discharge of wastewater to waters of the United States or waters of the State from the sewer system that occurs at a location other than an NPDES permitted outfall, as well as any overflow, spill, or release of wastewater to public or private property from the sewer system that may not have reached waters of the United States or the State, including all Building Backups.

2. Building Backup or Backup means the release or backup of wastewater into a building that is caused in whole or in part by blockages, flow conditions, or other malfunctions in the Sewer System. A wastewater backup or release that is caused solely by blockages, flow conditions, or other malfunctions of a Private Lateral is not a Building Backup.

B. Identification of SSOs

An SSO can be identified by a number of different means, including visual observation, information regarding pumping systems, citizen reporting, regulatory inspection, etc.

1. Visual observations are performed by the City of all pump stations and bypass operations regularly. Bypass operations are visually inspected every day, and pump stations every other day, to ensure continuous compliant operations. In addition, as of December 2024 the City has interviewed vendors, designed a system, and received bids to install a Supervisory Control and Data Acquisition System (SCADA) in every sanitary sewer pump station in the system. The City has applied for funds to purchase and install the SCADA to the state Department of Commerce and Economic Opportunity (DCEO), and approval of those funds was granted in October 2025. Once installed, the SCADA will allow the City to monitor operations of its pump stations remotely, and allow for more rapid response to any interruptions in power or service that could lead to SSOs.

2. Citizens are encouraged to report any instances of observed sewer backups and overflows to the City through contact with the city's website, or phone calls 24/7 to either the Water and Sewer Department, or the Mayor's office. Details of these contact methods are below.

City Website	www.cahokiaheightsil.us
Water and Sewer Department	Daytime: (618) 332-1222

	After hours: (618) 398-1495
Mayor's Office	(618) 332-4258

C. Categorization of SSOs

An SSO can be categorized into one of two types, for purposes of this SORP.

1. Routine SSOs

These would include situations such as overflowing manholes from line backups, sewer line breaks, localized power outages, and other pump station malfunctions.

a) Routine SSO Response Procedures - Response will include the following steps:

a. **Identify**

- Within 24 hours of discovery or receipt of a customer complaint regarding an SSO, the City will dispatch crews to determine the cause by evaluating the sewers in the area for surcharged conditions, using sewer cleaning equipment, visual inspection of manholes, and followed by internal closed circuit TV inspection of sewer lines if needed.

b. **Notify**

- Contact local Illinois Environmental Protection Agency (IEPA) office within 24- hours of the event and submit a Sanitary Sewer Overflow or Bypass Notification Summary Report within 5 days of the occurrence. The contact number for the local IEPA office is (618) 346-5120.
- Post sign(s) where appropriate at the site of a release event immediately upon discovery and confirmation of such an event and leave them up for up to one (1) week after the source of the release has been corrected to warn affected parties of potential health hazards associated with the SSO, and install temporary fencing, barricades or other mechanisms around the SSO area, if possible, to deter pedestrian access.
- Contact residents in the area affected by phone (where available) and door/mailbox flyers, in addition to the signage, starting with the first day the SSO is reported, and concluding when the SSO is no longer occurring.
- Provide notice of any work being done on the Sewer System to any residents in the affected area, and to any other City residents who request to receive such notices, by email (where available), phone (where available), and door/mailbox flyers, in addition to signage. Notice will include pertinent information, such as the dates the work is expected to begin and conclude, location, description of the work to be completed, and any road closures.

c. **Contain**

- Capture the sewage where it can be recovered and returned to the sewer system
- Contain sewage in advantageous locations (flood control facilities, construction excavation locations, vacant lots, etc.)

- Use containment materials including sand, sand bags, poly sheeting, filter socks, etc.

d. **Control**
   - Bypass the obstructed sewer line by pumping the spillage into another non-restricted line or vacuum with the vactor truck
   - Set up barricades to prevent public contact with the spill

e. **Inspect**
   - Visually inspect the SSO area daily for any changes in conditions or additional actions needed for cleanup

f. **Cleanup**
   a) Private Properties
      i. Inside Buildings — The City will inform residents and businesses to contract with private cleanup companies to ensure complete and experienced cleaning.

      ii. Outside Buildings — The City will identify and inspect the SSO location and occurrence to confirm the cause.
         1. If caused by a problem with a private sewer lateral, the City will inform residents and businesses to contract with private plumbing companies to correct the lateral issue and perform containment and cleanup as necessary.
         2. If caused by a backup, blockage, or surcharge, or other problem with the City sewer system, the City will perform containment and cleanup of the area on private property after obtaining permission from the property owner.

   b) Public Right-of-Way
      i. Public Streets, Easements, Properties, etc. - City crews will perform the following tasks, as needed:
         1. Remove all visible debris.
         2. Wash down and contain run-off being careful not to wash sewage into any storm drains.
         3. Perform disinfection as needed using bleach or similar product.
         4. Consider the use and ownership of affected properties.
         5. Clean all surfaces and restore disturbed soil or planted areas.

      ii. Storm Sewers, Culverts, Drainage Ditches, etc. –
         1. Perform tasks listed above for Public Streets, Easements, Properties, etc. as appropriate.

2. Use jetter truck or fire hydrant discharge to thoroughly flush the area.

2. Emergency SSOs

These would include SSOs resulting from catastrophic emergencies, such as floods, severe thunderstorms, and widespread and prolonged power outages.

a) Emergency SSO Response Procedures

In addition to the above procedures for Routine SSOs, additional steps regarding identification, notification, and safety measures are outlined in the CMOM in Appendix J, which is an Emergency Response Plan for the Water and Sewer Department, with separate procedures listed according to the type of emergency or disaster event occurring (fire, flood, tornado, spill, etc.).

The additional emergency procedures for SSOs are repeated below:

Response will include the following steps in addition to those for Routine SSOs:

1. **Initiating Emergency Operations**
   If a pending emergency situation is identified in advance, crews and equipment are put on stand-by alert for quick deployment as needed. These resources are managed by the Water and Sewer Department Management team, and implemented by the dispatcher.

   If no advance notice is available for an unexpected emergency, the same procedures would be followed as above, as quickly as can be accomplished, 24/7.

2. **Identification and Prioritization of Emergency Actions**
   Emergencies that could affect sewer operations and potentially cause SSO's include severe storms, flooding, and widespread or prolonged power outages. Below are procedures to be followed in the case of these events.

   - Severe Storms — SSO's resulting from these events could be the result of flooding from the storm, damage to pump stations or lines from fallen trees or debris, or power outages. For these events, sewer department staff should monitor weather conditions for potential locations and impacts, and track system performance, initially by visual inspection, and ultimately by remote monitoring via the SCADA system. If impacts are detected, resources should be deployed to address the condition. (See below)

   - Flooding — SSO's resulting from these events would be the result of extensive surface water flooding from rainfall and runoff, causing surcharging of the sewer system from inflow. For these events, system performance tracking as described above would be followed by the deployment of stormwater pumps and crews from the Street Department,

and portable bypass pumps from the Water and Sewer Department to reduce the surcharging until normal conditions can be restored.

- Power Outages — SSO's resulting from these events could result from severe storms, or widespread utility power issues. For these events, system performance tracking as described above would be followed by deployment of portable generators for pump stations affected, and bypass pumps to handle interrupted flows, until normal conditions can be restored.

3. **Operating Systems and Equipment with Limited Functionality**
Certain types of emergencies may result in conditions that render equipment partially inoperable or limit the equipment's ability to function as intended. Below are procedures to be followed in such instances.

- Severe Storms — Lighting strikes can cause power surges that trip overcurrent protection systems or cause other sensitive pump station automatic control and SCADA monitoring systems to fail. Once emergency operations are activated and actions are identified & prioritized as described above, sewer department staff will deploy to affected pump stations. Staff will then assess the station's ability to operate, reset power as appropriate or reconfigure pumps to operate manually via float switches, Hand-Off-Auto controllers, etc. For instances of further triage, the City will utilize its in house electrician or 3rd party electrical contractors to provide temporary electrical reconfigurations (e.g. disconnecting burned-up pump, removing failed breakers, bypassing low level floats, etc.) to allow pump station to temporarily operate until the emergency subsides.

- Flooding – Some flooding emergencies can cause pump stations to convey more water than they were designed to carry, in turn surcharging downstream sewers, pump stations, and manholes. In instances such as these, City sewer staff will switch upstream pump stations to operate manually, inhibiting successive pumps from coming online or limit the maximum speed of pumps as to not inundate the downstream stations.

- Power Outages — Generally, system wide power outages render the complete pump station inoperable but do not necessarily yield induvial equipment failures. For these events, system performance tracking as described above would be followed by deployment of portable generators for pump stations affected. Similar to the actions taken during severe storm control-system emergencies, the City's in house electrician or 3rd party contractor will make necessary electrical reconfigurations for a portion of the affected pump station's pumps to be connected to a given generator, if an adequately sized generator is not available to power the entire pump station.

4. **Identification of Appropriate Repair Equipment and Sources**

In the event of an emergency affecting sewer systems, the most likely cause would be a power outage resulting in system operation interruption. In that event, work crews will contact their supervisor to obtain generator(s) available at the city operations building. Other available equipment in the city's inventory would include control panel components, electrical cables and breakers, pumps and hoisting equipment, and access control, (cones, fencing, etc.)

If an emergency occurs that could not be addressed by in- house resources, the following contacts would be utilized to provide outside assistance:

Contractors of Supplies and Services

Plumbing Contractors

Spengler Plumbing- Jason Spengler, Owner 1402 Frontage Rd, O'Fallon, IL 62269
618-632-4433 Office 618-632-8233 Fax

Belo Plumbing - Jim Lugge, Owner
5909 Cool Sports Rd, Belleville, IL 62223
618-235-6626 Office 618-398-9484 After Hours

Ehret Plumbing
111 Premier Dr, Belleville, IL 62220
618-233-1018 Office

Excavation & Mechanical Contractors

Baxmeyer Construction - David Baxmeyer
1034 Floraville Rd, Waterloo, IL 62298
618-939-3000 Office 618-939-4299 Fax

Hanks Excavating - Henry Rohwedder, President
5825 W State Rte 161, Belleville, IL 62223
618-398-5556 Office 618-398-2729 Fax
618-398-5056 After Hours

Electrical Contractors

Lowry Electric - Gary Bland
926 McDonough Lake Rd, Ste C, Collinsville, IL 62234
618-343-4200 ext 116 Office
618-779-2784 Cell 618-343-4201 Fax

J-F Electric - Josh Baker
100 Lakefront Parkway, Edwardsville, IL 62025
618-797-5353 Office 618-797-5354 Fax

Glaenzer Electric - Larry Glaenzer, Owner
10 Empire Dr, Belleville, IL 62223
618-277-2500 Office 618-277-2711 Fax

Pump Suppliers
Vandeventer Engineering — Charlie Mattern
1550 Larkin Williams Road
Fenton, MO 63026
314-409-7350 Cell

5. **Determination of Vulnerable Areas**
The vulnerable areas most likely to be affected by emergencies in regards to SSO's are indicated by the map attached as Appendix C. This map indicates the areas of the City sewer system that have experienced multiple SSO events of sewer backup complaints over the past few years, as reported by the City and/or logged by the EPA. This was included in the approved Wet Weather Investigation Plan. It should be noted, however, that many of these areas contain existing pump stations or known sewer breaks being bypassed, and as these locations are repaired and upgraded with new equipment, the frequency of incidents can be expected to be drastically reduced or eliminated. These areas can be further identified by the following characteristics, in order of greatest to least vulnerability:

a. Drainage and Flood-Prone Areas — These are the areas primarily in the north of the City — in the neighborhoods of Ping Pong, Parkside, and Piat Place. These areas are subject to frequent surface water flooding, and subsequent inundation/inflow of stormwater into sewers, causing surcharging, backups, overloading of capacity in the system, and resultant SSO's. These areas are also tributary to the City of East St. Louis' sewer system, which is also subject to frequent surcharging, further exacerbating capacity issues in the Cahokia Heights, system.

   Drainage infrastructure improvements and a new interceptor sewer are planned for these areas to mitigate these conditions, but in the meantime, these areas are the most vulnerable to emergency related SSO's. The main emergency threat to these areas is surface water flooding.

b. Areas Containing Pump Stations and/or Sewer Breaks and Bypasses Needing Repair or Replacement — The most vulnerable of these areas of disrepair are already under construction or have been repaired, including 22 known sewer breaks, and 16 of the most critically inoperable pump stations. There remains a number of pump stations still in need of repair as funding becomes available. These can be found on the list of projects from the Consent Decree Appendix A — Early Action Capital Improvement Projects,

attached as Appendix D. The main emergency threat to these locations is a power outage that would interrupt normal or bypass operations.

6. **Emergency Contacts**

City Contacts

Mayor
Curtis McCall, Sr.
62206 618-520-3533
618-337-9505
Dispatch

City Alderman
James Haywood
618-381-2009

City Alderman
Demario Weeden
618-223-0255

City Alderman
Gloria Ware
618-381-2403

City Alderman
Tiffany Pearce
618-381-2403

City Alderman
Lisa Van Meter
618-623-9501

Operator/Director Water & Sewer
Dennis Traituer
618-580-5271

Assistant Director of Operations & Billing
Janae' Swanson
618-305-6601

Office Personnel:
Amber Crum
Lakeshia White
Peggy Pierce
Latonzia Smith
Markitta Watson
618-332-1222

Electrician
Al Carter
618-604-6685

Field Director
Van McCall
618-444-1356

Field Director
Jason McMath
618-410-7808

Field Operations Personnel:
Patrick Belk
Curtis Belt
Roy Belt
Tyrone Crawford
Nicholas Gale
Travanti Hill
Sammy Richardson
Greg Radford
Joshua Ware
Torondo Williams
Alex Connor
Nathaniel McCall
Latisha Paisley
Jordan Vanetta
Ryan Collins

City Contacts – Continued

City Alderman
Clinton Lovett
618-722-6020

City Clerk
Richard Duncan
618-207-9463

Chief of Police
Dr. Thomas trice
618-337-6505

Fire Chief
Stephen Robbins
618-337-9505
Dispatch
618-337-5080 Fire House
618-531-3931 Cell

Emergency Disaster Services Coordinator
Marcus Jackson
618-791-4487

Field Operations Personnel:
Carlos Hannah Jr
Chase Hurley
Christopher Jackson
Drake Jackson
Kameron McCall
Justin Smith
Jerry Warhoover
Quienthion Wills
Shawn Blair
Deandre Clark

Local, State, Federal Agency Contacts

Emergency Management Agency
618-825-2683

St. Clair County Health Department
618-233-7703 Office

Illinois Rural Water Association
217-287-2115

Centreville Township Supervisor,
Curtis McCall, Sr.
618-874-1034

St. Clair County Highway Department
618-233-1392

IL State Police Troop 8
618-346-3990

Federal Bureau of Investigations
FBI Springfield
217-522-9675

FBI Chicago
312-421-6700

Law Enforcement Contacts

Police Department
City of Cahokia Heights Police Department
618-337-9505 Dispatch
911 - Emergencies

Fire Department
City of Cahokia Heights Fire Department
618-337-5080 Fire House
911 - Emergencies

Emergency Service and Disaster Agency
City of Cahokia Heights ESDA
Coordinator Marcus Jackson
618-337-9500 Work
618-791-4487 Cell

St. Clair County Sherriff's Department
618-277-3505 - non-Emergencies
911 - Emergencies

Media Contacts

Belleville News-Democrat
618-234-1000 Main Office
618-234-9597 Fax

KMOX, 1120 AM
314-621-2345 Main Office
314-588-1239 Fax

WIL, 92.3 FM
314-983-6000 Main Office
314-994-9447 Fax

WESL Radio
618-310-1054
314-436-5381

KTVI, FOX 2 News
314-213-7831 Main Office
314-213-7440 Fax
ktvinews@tvstl.com

KMOV, Channel 4 News
314-444-6333 Main Office
314-621-4775 Fax
kmovwebsite@kmov.com

KSDK, Channel 5 News
314-421-5055 Main Office
314-425-5348 Fax

KETC, Channel 9 News
314-512-9000 Main Office
314-512-9005 Fax
contactus@ninepbs.org

KPLR Channel 11 News
2250 Ball Dr.
St. Louis, MO 63146
314-447-6397
314-447-1111

Health Care Contacts

Memorial Hospital
618-233-7750 Office
618-257-6791 Fax

East Side Health District
618-271-8722
618-875-5038

St. Elizabeth Hospital
618-234-2120
618-222-4624 Fax

Cahokia SIHF Healthcare
618-337-3117 Office
618-874-4713 Office

Touchette Hospital
618-332-3060 ext.
5347
618-332-5256 Fax

Engineering Contacts

Mapping and Drawings of Collection System
City of Cahokia Heights
Water and Sewer Department
618-332-1222 – Office

Hurst-Rosche, Engineering Firm
Terry Sudholdt, Engineer
618-398-0890 - Office

City Engineer
City of Cahokia Heights
Sheldon Butler
618-215-7225

7. **Notification Actions and Contacts**
In the event of an emergency event that would involve sewer related issues, in addition to the procedures outlined above in section C.1.a)b. – Notify; the public will be made aware through the means described in said section C above to contact any of the following for assistance.

Director/Operator: Dennis Traiteur
(618) 410-7808 CeII

Field Director Van McCall
(618) 444-1356 Cell

Field Director Jason McMath
(618) 631-3840 Cell

Mayor's Office
(618) 337-9500 Dispatch
(618) 520-3533 Cell

8. **Ceasing Emergency Actions**
   Once normal operations have been restored and verified through visual confirmation and/or SCADA system verification, any necessary cleanup activity will be performed as described above in section C.1.a)f., crews and equipment will be returned to the department shop, and notifications will be issued as detailed above in section C.1.a)b., and below in section III, Recordkeeping and Reporting.

III. Recordkeeping and Reporting of SSOs

For all SSOs, regardless of the categorization as Routine or Emergency in nature, the following procedures will be followed to record the events and report them to the proper authorities.

Fill out and sign the Illinois Environmental Protection Agency (IEPA) "Sanitary Sewer Overflow or Bypass Notification Summary Report" which will contain the following information:

1. Location of the SSO.
2. Receiving water body, if any.
3. Estimate of the volume of the SSO.
4. A description of the sewer system component from which the release occurred, including, but not limited to, manholes, pipe, and pipe cracks.
5. Estimated date and time when the SSO began and stopped or will be stopped.
6. Cause or suspected cause of the SSO.
7. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the SSO.

This report will be filled out, submitted to the IEPA and others in the list below, kept on file at the Water and Sewer Department, and posted on the City's website for availability and review by the public. A copy of the report is attached to this SORP as Appendix A, along with the Customer Complaint Form, which contains additional information, including SSO identification and response times.

Below is the contact list for reporting of SSOs by the city, as of the date of this plan.

r5weca@epa.gov
James Adamiec - adamiec.james@epa.gov
Emma Garl Smith - garlsmith.emma@epa.gov
Gillian Asque - gillian@epa.gov
Joan Rogers - rogers.joan@epa.gov
Jim Blessman - james.t.blessman@Illinois.gov
Joseph Stitely - joe.stitely@Illinois.gov
Mike Roubitchek - mike.roubitchek@illinois.gov
Joshua Leopold - joshua.leopold@illinois.gov
Todd Bennett - todd.bennett@illinois.gov
Joseph Ahlvin - joseph.ahlvin@amwater.com
Rachel Bretz - rachel.bretz@amwater.com
Sam Saucier - sam.saucier@amwater.com
Chris Decker - chris.decker@amwater.com
Erica Spitzig - espitzig@taftlaw.com
Terry Sudholt - tsudholt@hurst-rosche.com
Zac York - zyork@hurst-rosche.com

James Nold - jnold@hurst-rosche.com
Mark Scoggins - mscoggins@crowderscoggins.com
Ann Barron - abarron@heyIroyster.com

In addition to the above, a Customer Complaint Form will be filled out and filed with any work orders for repairs and photographs of the SSO and area. See Appendix A for the Complaint Form.

IV. Training

Training of Sewer Department staff is ongoing, as staff individuals obtain and renew certification as sewer collection system operators, and as new personnel are added or replaced. The complete department training regimen, examples, and details are included in the CMOM, Appendix I, and are repeated herein as Appendix B.

Appendix A

IEPA Sanitary Sewer Overflow or Bypass Notification Summary Report

and

Customer Complaint Form

Illinois Environmental Protection Agency

Bureau of Water • 1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276

Sanitary Sewer Overflow or Bypass Notification Summary Report

Print Form

Reset Form

- Within 24 hours of the occurrence, notify the Illinois EPA regional wastewater staff by telephone, FAX, email or voice mail, if staff are unavailable.
- Within 5 days of the occurrence, provide a written report describing the overflow or bypass, including all information requested on this form. The permittee is required to submit this form or other equivalent written notification to the Illinois EPA at:

Bureau of Water/Compliance Assurance Section - MC #19
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

NOTE: You may complete this form online, save a copy locally, print, sign and submit it to the BOW/CAS MC #19, at the above address. You may also print the form before completing it by hand, signing and submitting it.

Failure to notify the Illinois EPA as specified may result in fines up to $10,000 for each day of violation.

Instructions: Use this form to report all unscheduled sanitary sewer overflow or bypass occurrences. Attach additional information as necessary to explain or document the overflow or bypass. For the purpose of this report, an overflow or bypass is defined as the discharge of untreated sewage from the sanitary sewer collection system to a surface water and/or ground due to circumstances such as those identified by the check boxes in the overflow or bypass details section of this form.

Use one form per occurrence. A single occurrence may be more than one day if the circumstances causing the overflow or bypass results in a discharge duration of more than 24 hours. If there is a stop and restart of the overflow or bypass within 24 hours, but it is caused by the same circumstances, report it as one occurrence. If the discharges are separated by more than 24 hours, they should be reported as separate occurrences.

24 Hour Notification Information

Permittee (Municipality or Facility Name): _____ Permit Number: _____ Person Representing Permittee Who Contacted IEPA: _____

Date: _____ Time: _____ AM ☐ PM ☐ IEPA Office Contacted: _____ Name of IEPA Employee Contacted: _____

Sanitary Sewer Overflow or Bypass Details

Date and Duration of Overflow or Bypass Occurrence (complete a separate form for each occurrence):

Start Date: _____ Time: _____ AM ☐ PM ☐ Duration of the overflow or bypass (hours and minutes): _____

Estimated Volume of Wastewater Discharged (gallons): _____ WWTP Flow During bypass (report in MGD): Not applicable for a collection system SSO. _____ Location of the Overflow or Bypass: _____

Circumstances Causing the Overflow or Bypass (check all that apply)

WPC 733
11/2011

☐ Rain ☐ Power Outage ☐ Equipment Failure ☐ Other (explain below)
☐ Snow Melt ☐ Broken Sewer ☐ Widespread Flooding

Provide a narrative description to further explain why the overflow or bypass occurred. For example, describe what equipment failed. What caused the power outage, or what plugged the sewer. Flooding should only be indicated, as a cause if there is significant flooding that is caused by high river, stream, or lake water levels, not just localized high water in the street.

Wet Weather (if applicable)

Date(s) and Duration of Rainfall:

Start Date: Time: AM PM End Date: Time: AM PM Amount of Rainfall (inches) Amount of Snow Melt (inches)

Contributing Soil Conditions (saturated, frozen, soil type)

Where Did the Discharge from the Overflow or Bypass Go? (check all that apply)

Provide the name of the local receiving water that the wastewater enters, which could be a nearby stream, river, lake, or wetland. If discharge does not enter directly into surface water, but indirectly by way of a ditch or storm sewer, trace the path of the ditch or storm sewer to find the receiving water.

- ☐ Runs on ground and absorbs into the soil
- ☐ Ditch: Name of surface water it drains to:
- ☐ Storm Sewer: Name of surface water it drains to:
- ☐ Surface water direct discharge:
- ☐ Basement Back-ups, (Number & use (i.e.residential, commercial) of buildings affected):
- ☐ Other, describe:

Actions to Correct This Occurrence and Prevent Future Owerflows or Bypasses

Describe what actions were taken to minimize the volume of wastewater discharged from the overflow or bypass reported on this form. Also describe what actions are planned to prevent or minimize future overflows or bypassess. Illinois law and NPDES permits prohibit overflows or bypasses, unless certain specified conditions are met. Sanitary sewer overflows and bypasses may be the subject of enforcement action.

Report Completed By

Contact Person:
Street Address:
PO Box:
City: State:
Zip Code: Phone:
County:

Authorized Representative Contact Information

Contact Person:
Title:
Street Address:
PO Box:
City: State:
Zip Code: Phone:
County:

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Authorized Representative Name (Print) Title

Authorized Representative Signature Date

City of Cahokia Heights Water & Sewer Dept.

Report #____

Sanitary Sewer Problem Reported

(circle) AM PM

Person receiving call: _____ Date _____ Time _____

Customers Name: _____

Address: _____

Ask the customer the following questions:

1. What is the location of the backup on the property or home?_____
2. Was the washing machine draining before backup started? _____
3. When did the sewer problem start? _____
4. Have you previously reported this same problem? _____(if yes) Who did you report it to and when did you report it?_____
5. Is there backup in the basement? ____ (if yes) about how much water?_____
6. Is the water clear? _____

Weather Conditions:	☐ Clear	☐ Cont. Rainfall	☐ Widespread Flooding
☐ Groundwater Infiltration	☐ Snow Melt	☐ Storms	
Complaint Results:	☐ Cust. Problem	☐ Broken Sewer	☐ Equipment Failure
☐ Other (explain below)	☐ Power Outage	☐ Blocked Line	

Person Responding to work order: _____

Action Taken: _____

Date and Time Resolved **Date:** **Time**

If sewage overflow occurs, this problem must be reported to the IEPA within 24 hours of the occurrence!

Contact: *Joseph D. Stitely, P.E.*
Illinois Environmental Protection Agency, Bureau of Water | Marion & Collinsville Regions
2309 West Main Street, Suite 116, Marion, Illinois 62959
Joe.Stitely@illinois.gov
Office: 618/993-7200 | Fax: 618/997-1281

Reported to Bureau: DATE: _____ TIME: _____

(If no contact is made, you must leave voice mail and fax report)

Type of Contact: **Agents Name** _____

Put a copy of work order in the customers file and in report binder. (Clerks Int.)_____

Appendix B

Training Information

Training for Response, Reporting, and Action for SSOs

1. Initial Actions

- **Assess the situation and ensure safety:** Determine the scope of the SSO and identify any immediate hazards like electrical risks or potential for spread to water systems. Secure the area to prevent unauthorized entry.

- **Protect yourself and others:** Wear appropriate Personal Protective Equipment (PPE) to minimize biohazard exposure. This may include gloves, masks, protective clothing, and boots.

- **Alert appropriate personnel:** Immediately notify your supervisor and coworkers in the affected area.
- **Contact the EPA:** The City has phone number for the contact in our area to report such incidents.

2. Documentation

- **Sanitary Sewer Overflow Report Form:** The City has an IEPA form to be completed for Sanitary Sewer Overflow or Bypass Notification Summary Report.

- **Key information to capture:**
  - **Date and Time:** The exact date and time the overflow was observed.

  - **Location:** Precise location of the overflow, including addresses, landmarks, or affected receiving waters (streams, rivers, etc.).

  - **Duration:** Estimated length of time the overflow continued.

  - **Estimated Volume:** An estimation of the amount of wastewater released. See Attachment 1 for volume estimation examples and chart.

  - **Cause:** The probable reason for the overflow, such as blockages, equipment failure, power outage, heavy rain, or system overload.

  - **Observed Environmental Impacts:** Any noticeable impact on the environment, such as contamination of waterways, soil, or property.

  - **Actions Taken:** Describe the steps taken to minimize the overflow, contain the spill, clean up the affected area, and prevent future recurrences.

  - **Cleanup Details:** Note the cleanup methods used, including the removal of contaminated materials and disinfection procedures.

  - **Photos:** Capture photographs or videos of the overflow and affected areas to provide visual documentation.

- **Maintaining Records:** Keep accurate records of all activities, including inspections, tests, and corrective actions taken.

3. Reporting

- **Internal Reporting:** Notify the designated internal personnel (e.g., supervisor, maintenance supervisor, Water & Sewer Director) as soon as possible, especially for major overflows.
- **Within 24 Hours:** Report SSO events that endanger health or the environment to the Illinois EPA regional wastewater staff via telephone, FAX, email or voice mail.
- **Within 5 Days:** Submit a written report containing the information gathered during documentation to the Illinois EPA.
- **Monthly Discharge Monitoring Report:** SSOs must be included on these reports, summarizing the date, time, duration, location, estimated volume, cause, environmental impacts, actions taken, and ultimate discharge location.

4. Training and Prevention

- **Employee Training:** Employees are trained to acknowledge:
  - The importance of prompt reporting and documentation.
  - Understanding the potential health and environmental risks associated with SSOs.
  - Proper use of PPE during cleanup and response efforts.
  - Emergency notification procedures and contact information.
  - Containment strategies to minimize the spread of spills.
  - Safe handling and disposal of sewage waste.
  - Decontamination and sanitization procedures.
  - Proper ventilation and air quality control.
  - Emergency response and contingency plans.
  - The use of standardized forms for data entry and recordkeeping.
- **Preventative Measures:** Implement strategies to minimize the occurrence of SSOs, such as:
  - Regular inspection and maintenance of plumbing and sewer systems.
  - Educating employees on proper disposal practices to prevent blockages.
  - Installing backflow prevention devices.

By following these procedures, employees can play a vital role in protecting public health, minimizing environmental impacts, and ensuring regulatory compliance related to sanitary sewer overflows.

Attachment 1

Volume Estimating Examples

Height of spout above M/H cover H in inches	SSO FLOW Q in gpm
1/8	1.0
1/4	1.4
3/8	1.7
1/2	1.9
5/8	2.2
3/4	2.4
7/8	2.8
1	2.7
1 1/8	2.9
1 1/4	3.1
1 3/8	3.2
1 1/2	3.4
1 5/8	3.5
1 3/4	3.6
1 7/8	3.7
2	3.9
2 1/8	4.0
2 1/4	4.1
2 3/8	4.2
2 1/2	4.3
2 5/8	4.4
2 3/4	4.5
2 7/8	4.6
3	4.7
3 1/8	4.8
3 1/4	4.9
3 3/8	5.0
3 1/2	5.1
3 5/8	5.2
3 3/4	5.3
3 7/8	5.4
4	5.5
4 1/8	5.6
4 1/4	5.6
4 3/8	5.7
4 1/2	5.8
4 5/8	5.9
4 3/4	6.0
4 7/8	6.0
5	6.1

Height of spout above M/H cover H in inches	SSO FLOW Q in gpm	
5 1/8	6.2	
5 1/4	6.3	
5 3/8	6.3	
5 1/2	6.4	
5 5/8	6.5	
5 3/4	6.6	
5 7/8	6.6	
6	6.7	
6 1/8	6.8	
6 1/4	6.8	
6 3/8	6.9	Unrestrained
6 1/2	7.0	M/H cover will
6 5/8	7.0	start to lift
6 3/4	7.1	
6 7/8	7.2	
7	7.2	
7 1/8	7.3	
7 1/4	7.4	
7 3/8	7.4	
7 1/2	7.5	
7 5/8	7.6	
7 3/4	7.6	
7 7/8	7.7	
8	7.7	
8 1/8	7.8	
8 1/4	7.9	
8 3/8	7.9	
8 1/2	8.0	
8 5/8	8.0	
8 3/4	8.1	
8 7/8	8.1	
9	8.2	
9 1/8	8.3	
9 1/4	8.3	
9 3/8	8.4	
9 1/2	8.4	
9 5/8	8.5	
9 3/4	8.5	
9 7/8	8.6	
10	8.7	

Note: This chart is based on a 7/8 inch diameter pick hole

Note: the above table was developed by Ed Euyen, Civil Engineer PE No. 33955, California, for the County Sanitation District 1. This table and charts below were included as part of the SORP plan for the City of Hemet, CA, dated February 2016.

SSCSC MANHOLE
OVERFLOW GAUGE
Overflow Simulation courtesy of
Eastern Municipal Water District
DISCLAIMER: This overflow simulation may appear differently from those in other systems because of the manhole lid pick hole configuration. Manhole lids with single or multiple pick holes may appear differently during overflow conditions. However, the volume of exfiltration and the footprint of the wet area should appear relatively the same under similar slope conditions.
5 gpm
25 gpm
50 gpm
100 gpm
150 gpm
200 gpm
300 gpm
400 gpm
PROVIDING QUALITY TRAINING
FOR COLLECTION SYSTEM PERSONNEL
SINCE 1991
Mission Statement: To continuously increase the level of professionalism of Collection Systems personnel involved in the operation, maintenance, design and construction of Wastewater Collection Systems, by providing education and training, taking an active role in promoting certification, and recognizing proficiency in our field.

City of Cahokia Heights Water & Sewer Department

On the job Safety Practices:

On a daily basis, employees report to the streets to maintain our critical infrastructure. In the course of doing their jobs, they contend with a variety of traffic risks, biohazards, hazards within confined spaces, and the dangers of excavating and trenching. Safety protocols have been established to protect these employees and customers in our City.

TRAFFIC SAFETY PROCEDURES FOR WASTEWATER EMPLOYEES

In order to protect workers in the public, the following steps should always be taken before beginning sewer work:

- Determine the best traffic control methods based on federal, state, and municipal guidelines.
- Submit a traffic control plan to the appropriate agency (local DOT, street department).
- Set up traffic control devices before parking vehicles or unloading equipment.
- Work with local businesses and residents to maintain access.
- Ensure that each work site has essentials such as signage, flags, high-visibility clothing, and barriers to ensure safety for workers and pedestrians.

SSO Safety Procedures

RESPONDING STAFF RESPONSIBILITIES

The first crew responding to a sewer backup has the immediate responsibility to protect people, property, and the environment from the effects of a sewage spill/overflow. To meet these objectives in a rapid, effective, and organized manner, staff will respond and fulfill the duties in the following categories as directed by this plan:

#1 CONTAIN splling sewage from entering waterways

- Capture the sewage where it can be recovered and returned to the sewer system.
- Contain sewage in advantageous locations (i.e. flood control facilities, construction excavation locations, vacant lots, etc.)
- Containment materials include sand, sand bags, poly sheeting, socks, etc.

#2 CONTROL the spill overflow and bypass area of failure

- Bypass the obstructed line by pumping the spillage into another non-restricted line or vacuum with VacCon truck.
- Set up barricades to prevent public contact with spill.

#3 CLEANUP the affected areas to ensure public health and safety

- Remove all visible debris.
- Wash down and contain run-off, being careful not to wash sewage into the storm drain system.
- Determine whether to disinfect or not to disinfect.
- Consider the uses and ownership of affected properties.
- Clean all hard slash soft surfaces.

PERSONAL PROTECTIVE EQUIPMENT

Wearing personal protective equipment (PPE) is a proactive way to guard against any harmful biohazards a sewer worker might come into contact with. The most significant step a wastewater worker can take towards protecting their health is to use appropriate PPE. The better your PPE, the less likely you are to contract a disease or infection from sewage. Recommended items for working around sewers are:

- Gloves. Keep bacteria and viruses off skin, and protect from abrasions, which are highly susceptible to infection.
- Boots. Protect feet and lower legs from contact with biohazards, and keep them at work to prevent the spread of dangerous bacteria to homes.
- Safety Glasses or Face Shield. Protect eyes from contact with biohazards via splashes and sprays.
- Respirator. Filter out airborne toxins, as well as splashes and sprays.
- Protect the body and clothing from contact with biohazards.

While this equipment helps protect sewer workers from exposure to biohazards, it can only be effective when used properly and consistently.

Clean Your Equipment

It is important to make sure the sewer equipment that is used every day is kept clean and sanitary. This can be done by:

- Wiping the cable and hoses with an antibacterial solution when retracting them.
- Cleaning the cameras, crawlers, and nozzles with an antibacterial solution.
- Sanitizing door handles, controls, keyboard/mice, and work surfaces.

Practice Safe Hygiene

At the end of the day, there is a simple list of dos and don'ts that could keep you safer and healthier:

- Wash hands thoroughly and frequently before eating, drinking, and smoking.
- Wash hands before and after using the bathroom and contacting contaminants.
- Wear PPE.
- Use barriers between skin and sewer surfaces.
- Use gloves to prevent skin abrasions.
- Keep wounds covered with clean, dry bandages.
- Thoroughly flush eyes with water if in contact with contaminants.
- Change into clean work clothing daily.
- Sanitize or change footwear before leaving work and before entering vehicles or buildings.
- Clean equipment.
- Eat in designated areas away from biohazards.
- Avoid inhalation of infectious agents and aerosols.
- Always wear a respirator.

And don’t:

- Touch any part of your face, genitalia, open sores, or cuts while working.
- Smoke or chew tobacco or gum while working.
- Wear work clothes at home or outside the work environment.
- Handle equipment without gloves.

Confined Space:

Is large enough for a worker to enter and perform the assigned tasks.

- Is not designed for continuous occupancy,
- Has a limited means of entry or exit.

There are three primary categories for confined space hazards:

- **Atmosphere**. A hazardous atmosphere is depleted of oxygen or contains toxic gases like hydrogen sulfide, or flammable gases like methane.
- **Engulfment.** Engulfment occurs when a substance, such as water or sand, overwhelms workers, suffocating or crushing them.

- Trapping. Trapping occurs when the configuration in a confined space prevents workers from leaving the space safely.

All of these hazards can be controlled and avoided through proper procedure and personal protective equipment.

PREVENTATIVE MEASURES BEFORE ENTERING A CONFINED SPACE:

Sometimes, entering confined spaces is unavoidable. During those times, there are a few things you can do to ensure your safety.

NEVER ENTER UNATTENDED

Remember, never enter a confined space alone. It's always necessary to station an attendant above ground to observe the operation. In the event of an emergency, an attendant can be the difference between life and death for a sewer worker and a confined space. Be sure that the attendant is equally informed about confined space hazards so they are aware of what specific hazards to monitor for, as well as what the evacuation procedure is.

USE THE RIGHT EQUIPMENT

In addition to standard personal protective equipment (PPE) such as face/eye protection, hard hats, steel-toed boots, and gloves, be sure to use:

- Ventilator fans and ducts. Ensures you have a steady air supply and minimizes exposure to potentially harmful gases.
- A winch and harness. Ensures that you enter and exit the confined space safely. In the event of an emergency, it enables the attendant to assist in removal.
- Communication - Maintain contact between the attendant and the worker within the confined space, allowing them to alert each other about hazards.
- Gas monitor. Monitors the air quality in a confined space. Remember, denser gases sink, so it is necessary to ensure the gas concentrations are within safe levels before entering the confined space and continue to monitor levels throughout to ensure safety.

BEWARE OF ENGULFMENT

Workers should never enter deteriorated structures or cavities with high flow or loose soil, as these have a higher risk of engulfment.

TRY TO AVOID CONFINED SPACE ENTRY

Confined spaces always present risks for sewer workers, and the only way to truly avoid these risks is to avoid entering a confined space whenever possible. Before entering a confined space, it's first necessary to perform a complete assessment of all hazards. Be sure to review the proper evacuation procedure and check that the unnecessary equipment is present and ready for use. Also, it is vital that anyone who enters a confined space has been trained on proper protocol.

In order to minimize personal endangerment, consider conducting your sewer inspection with video sewer inspection equipment. A manhole inspection camera, CCTV sewer inspection crawler, video nozzle, and zoom camera provide sewer workers with everything they need to quickly and effectively complete a sewer inspection without exposing themselves to potentially lethal atmospheric hazards and risks like engulfment and entrapment.

SAFETY PRECAUTIONS SEWER WORKERS SHOULD TAKE WHEN EXCAVATING AND TRENCHING:

The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) reports that “Excavating is recognized as one of the most hazardous construction activities,” and trench collapse is the primary danger. The consequences of improper trenching and excavation work can be fatal. The environmental, health, and safety magazine, EHS Today, reports that two excavation and trench workers are killed every month, “a fatality rate that is 112% higher than the rate for general construction.”

PUMP STATION SAFETY:

Pump maintenance is an ongoing and important facet of owning and operating a pump station. This means that at some point, it is likely the pump will have to be lifted from the wet well for maintenance. Although this is a common activity that occurs regularly in most maintenance departments, pulling pumps can pose a safety risk if the best practices are not followed.

- Use reliable file protection in the form of a safety harness.
- Practice safe hygiene and sanitary protection.
- Practice safe lifting, use winches, lifting hoists, and “come-alongs” as options to prevent hand-lifting pumps from a well.
- Wear gloves and eye protection.
- Clean the area after the removal of the pump or maintenance is completed.
- Secure the area of the pump station - making sure all gates and/or fences are locked.

Safety Council of Greater St. Louis
2330 Hampton Avenue
St. Louis, Missouri 63139
Phone: (314) 621-9200
Fax: (314) 621-9204
www.stlsafety.org

March 23, 20222

Sharlin K. Pfeffer
Asst. Director
Water & Sewer
City of Cahokia Heights

Dear Sharlin,

Enclosed please find the certificates of completion for the Confined Space, Lock-Out/Tag-Out, and Trenching Awareness classes held on March 11th.

We enjoyed working with your team and thank you for choosing the Safety Council of Greater St. Louis to assist with your team training.

Kind Regards,

Mary Beth Proost
Executive Director
Safety Council of Greater St. Louis
Cell: 314-808-7732

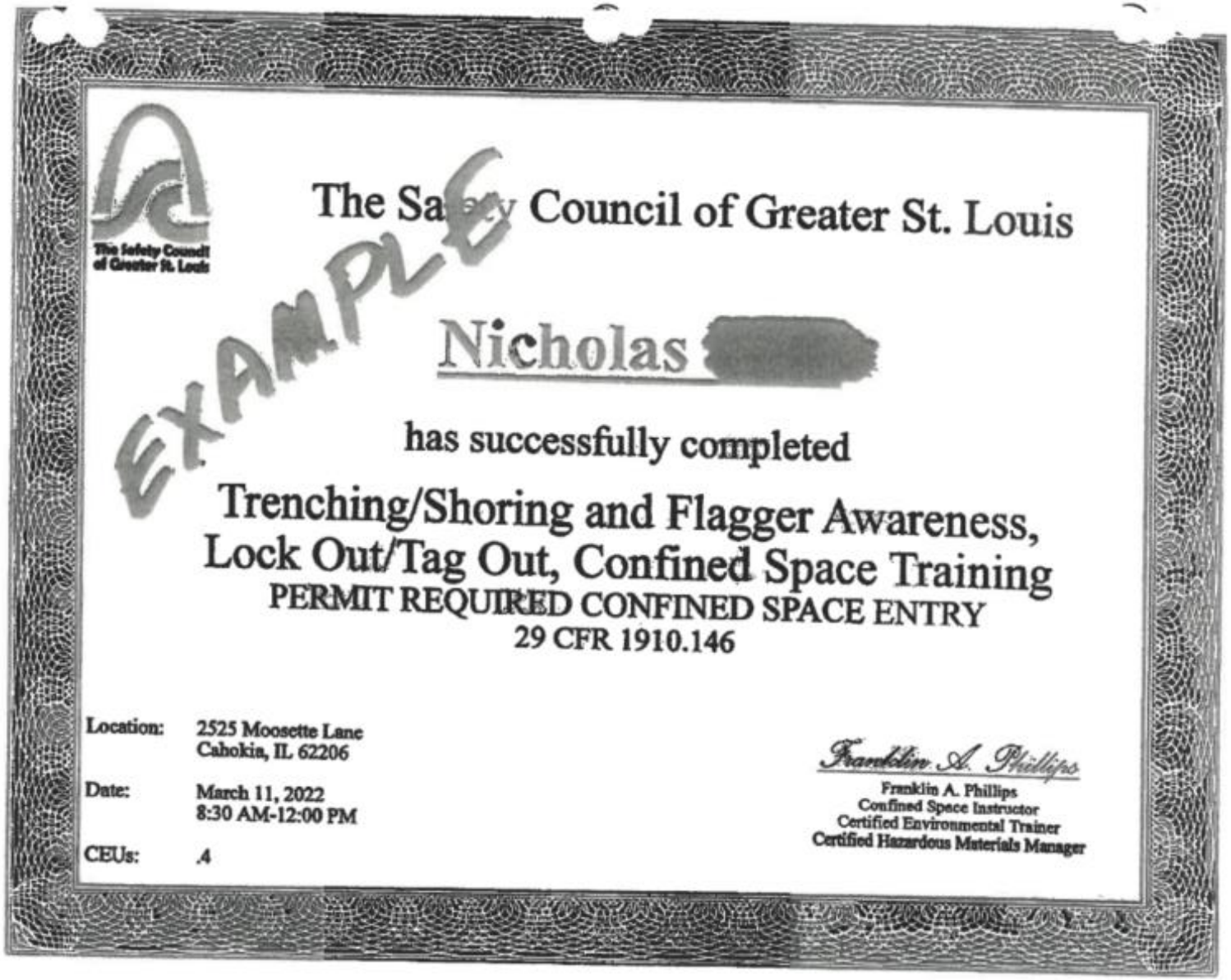
Enc: yes

NCWD 6.13.22

A Non-Profit 501 (c)(3), Non-Governmental, Public Service Organization

COURSE TITLE	LOCATION	DATE/TIME	INSTRUCTOR
Confined Spaces / Lock-Out/Tag-Out / Trenching	2525 Mooneyham Lane, Cahokia, IL	March 11, 2022 | 8:30 a.m. - 12:00 p.m.	Frank Phillips

LAST NAME	FIRST NAME	Company	Signature
[redacted]	Sean	Commonfield	
[redacted]	Nicholas	Commonfield	
[redacted]	Leo	Commonfield	
[redacted]	Joshua	Commonfield	
[redacted]	Travanti	Commonfield	
[redacted]	Jason	Common field	
[redacted]	Patrick	Common field	



The Safety Council of Greater St. Louis

EXAMPLE

Nicholas [redacted]

has successfully completed

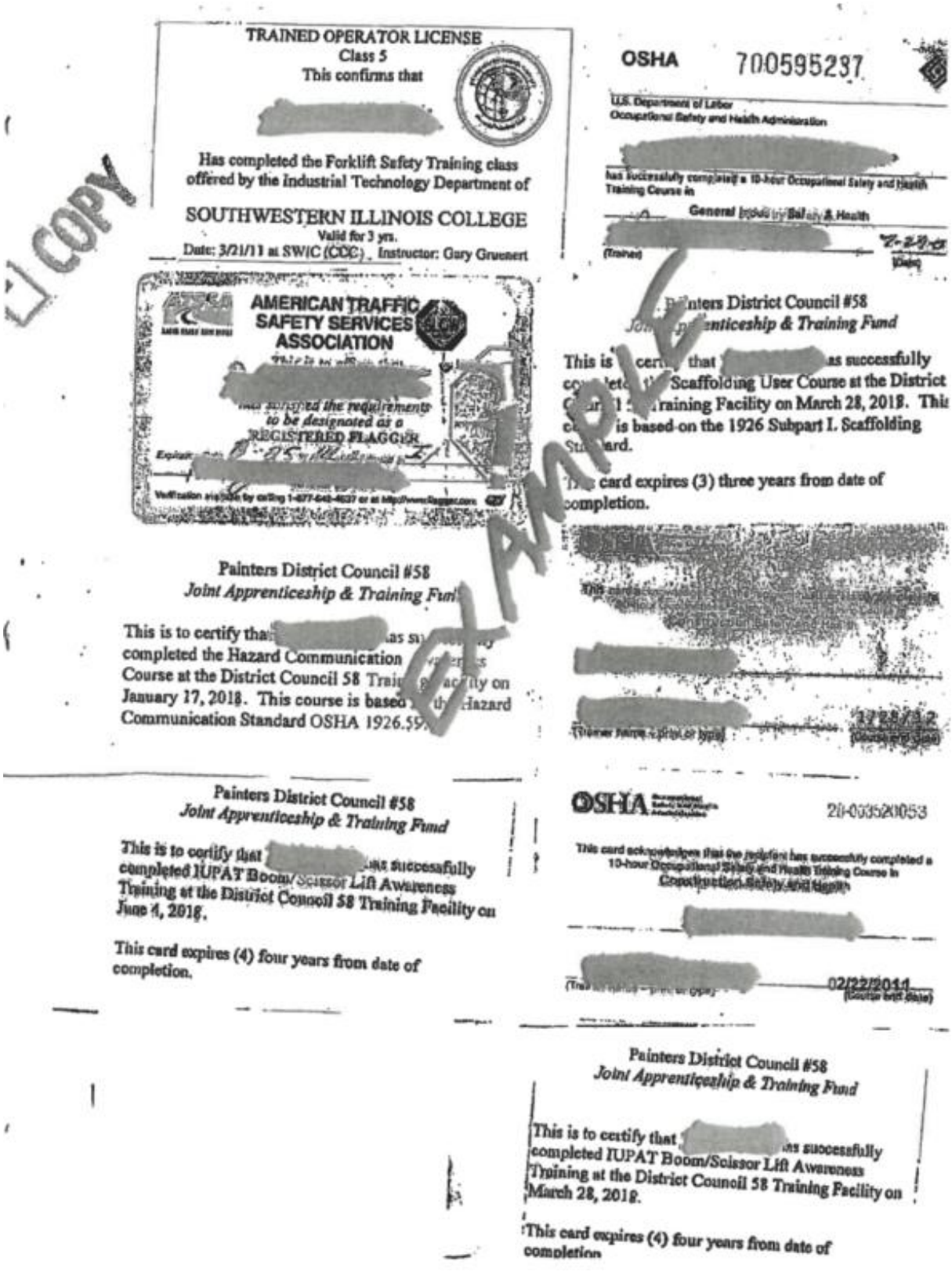
Trenching/Shoring and Flagger Awareness,
Lock Out/Tag Out, Confined Space Training
PERMIT REQUIRED CONFINED SPACE ENTRY
29 CFR 1910.146

Location: 2525 Moosette Lane
Cahokia, IL 62206

Date: March 11, 2022
8:30 AM-12:00 PM

CEUs: .4

Franklin A. Phillips
Franklin A. Phillips
Confined Space Instructor
Certified Environmental Trainer
Certified Hazardous Materials Manager



TRAINED OPERATOR LICENSE
Class 5
This confirms that

Has completed the Forklift Safety Training class offered by the Industrial Technology Department of

SOUTHWESTERN ILLINOIS COLLEGE
Valid for 3 yrs.
Date: 3/21/11 at SWIC (CDC) Instructor: Gary Gruenert

OSHA 700595237

U.S. Department of Labor
Occupational Safety and Health Administration

has successfully completed a 10-hour Occupational Safety and Health Training Course in

General Industry Safety & Health

(Trainer) (Date)

AMERICAN TRAFFIC SAFETY SERVICES ASSOCIATION

the requirements to be designated as a REGISTERED FLAGGER

Painters District Council #58
Joint Apprenticeship & Training Fund

This is to certify that as successfully completed the Scaffolding User Course at the District Council 58 Training Facility on March 28, 2018. This course is based on the 1926 Subpart L Scaffolding Standard.

This card expires (3) three years from date of completion.

Painters District Council #58
Joint Apprenticeship & Training Fund

This is to certify that as successfully completed the Hazard Communication Course at the District Council 58 Training Facility on January 17, 2018. This course is based on the Hazard Communication Standard OSHA 1926.59

OSHA 28-03520053

This card acknowledges that the person has successfully completed a 10-hour Occupational Safety and Health Training Course in Construction Safety and Health

02/22/2011
(Course Completion Date)

Painters District Council #58
Joint Apprenticeship & Training Fund

This is to certify that as successfully completed IUPAT Boom/Scissor Lift Awareness Training at the District Council 58 Training Facility on June 4, 2018.

This card expires (4) four years from date of completion.

Painters District Council #58
Joint Apprenticeship & Training Fund

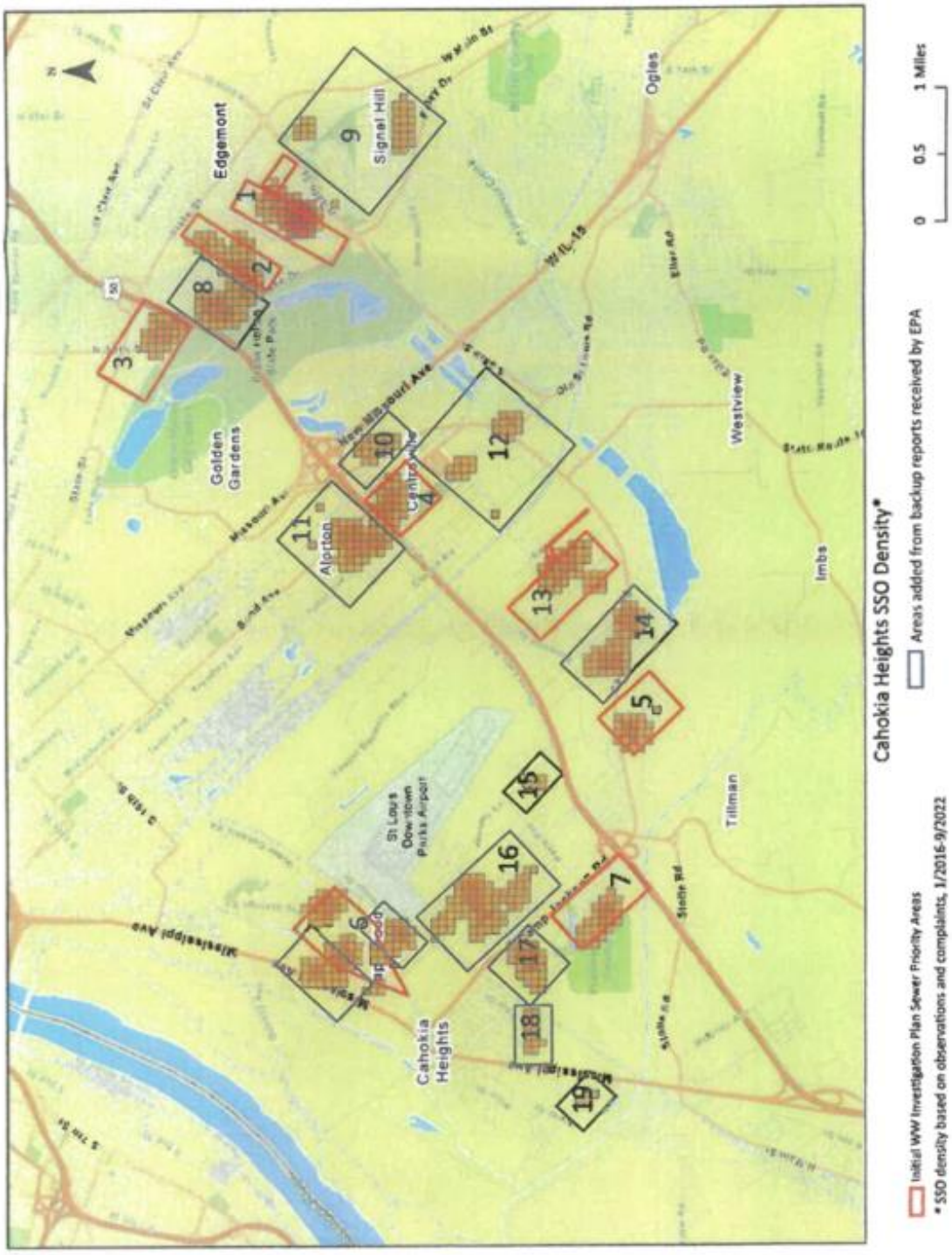
This is to certify that as successfully completed IUPAT Boom/Scissor Lift Awareness Training at the District Council 58 Training Facility on March 28, 2018.

This card expires (4) four years from date of completion

Appendix C

Map of Vulnerable Areas

WET WEATHER SSO INVESTIGATION PLAN – REVISED PRIORITY AREAS MAP



Appendix D

Consent Decree Appendix A
Early Action Capital Improvements

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

and

THE STATE OF ILLINOIS,

Plaintiffs,

v.

CITY OF CAHOKIA HEIGHTS, ILLINOIS,

Defendant.

CONSENT DECREE

APPENDIX A

CONSENT DECREE
Appendix A: Early Action Capital Improvement Projects

1. Group 1 Projects

The below schedule includes a large number of individual projects. If schedule delays are caused by events or third parties outside of the City's control, the City may submit a request to EPA for a one-time extension per project of up to 90 days. The City must request an extension under this provision at least 30 days prior to the listed project deadline. Extensions under this provision, including the length of the extension, may be granted in EPA's sole unreviewable discretion, after consultation with the State. This provision does not affect the City's ability to seek relief under Section XII of the Consent Decree (Force Majeure) or to seek a modification to the applicable schedule under Section IX (Funding) or Section XX (Modification).

No.	Project type	Location	Project Summary	Completion date	Estimated or Final Cost [final cost if finished; estimated if in future]	Anticipated funding source(s)
1	Lift Station Replace	Beachland	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 198,800.00	IEPA Grant
2	Lift Station Replace	63rd Street & Laura Avenue	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 198,800.00	IEPA Grant
3	Lift Station Replace	N. 73rd Street	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 205,900.00	IEPA Grant
4	Lift Station Replace	N. 73rd Street & Oakland Avenue	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 213,000.00	IEPA Grant
5	Lift Station Replace	N. 75th Street & Pershing (LS#39)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 205,900.00	IEPA Grant
6	Lift Station Replace	N. 71st Street & Ames Drive	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 213,000.00	IEPA Grant
7	Lift Station Replace	Park Place (Lake Drive Pill Box)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	12/31/2025	$ 213,000.00	IEPA Grant
8	Lift Station Rehab	Ames Drive (Willie Holmes Pill Box)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
9	Lift Station Rehab	Cooper Drive	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
10	Lift Station Rehab	Ellen & Richard Streets	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
11	Lift Station Rehab	Hutchings Street	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
12	Lift Station Rehab	Ellen & Williams Streets	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
13	Lift Station Rehab	Williams & Kay Streets	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2025	$ 42,600.00	IEPA Grant
14	Lift Station Rehab	LaSalle Drive	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	12/31/2025	$ 142,000.00	IEPA Grant
15	Lift Station Replace	Donald Street	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	12/31/2025	$ 85,200.00	IEPA Grant
16	Lift Station Replace	Miskell Boulevard	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	12/31/2025	$ 71,000.00	IEPA Grant
17	Lift Station Replace	82nd and Bluff	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	2023	$ 188,871.00	City/St. Clair County Intergovernmental Grant
18	Lift Station Replace	82nd and Belleview	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	2023	$ 188,871.00	City/St. Clair County Intergovernmental Grant
19	Lift Station Rehab	Pocket Rd	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	2023	$ 103,000.00	City/St. Clair County Intergovernmental Grant
20	Lift Station Replace	42nd and Market	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	2023	$ 163,902.44	City/St. Clair County Intergovernmental Grant
21	Lift Station Replace	Old Missouri and 59th (Lady of the Snows)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	2023	$ 199,231.25	City/St. Clair County Intergovernmental Grant
22	Lift Station Rehab	Jackson St	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	2023	$ 120,457.76	City/St. Clair County Intergovernmental Grant
23	Lift Station Rehab	Johnson Lane	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	2023	$ 116,347.62	City/St. Clair County Intergovernmental Grant
24	Lift Station Replace	Old Missouri Ave (Mary Ryans)	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	2023	$ 209,000.00	City/St. Clair County Intergovernmental Grant
25	Lift Station Rehab	53rd and Market	Minor Rehab - new guide rails, level probes, control panel components & repairs	7/1/2026	$ 14,200.00	TBD
26	Lift Station Rehab	43rd & Tudor	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant
27	Lift Station Rehab	56th & Russell	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant

28	Lift Station Replace	Falling Springs Rd (100 Block of Judith)	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	7/1/2026	$ 92,300.00	IEPA Grant
29	Lift Station Rehab	Judith Lane	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant
30	Lift Station Rehab	Judith Lane (Bruce Street)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant
31	Lift Station Rehab	School St. (Credit Union)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant
32	Lift Station Replace	St. John Dr. (DePaul)	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	7/1/2026	$ 85,200.00	Illinois Dept. of Commerce and Economic Opportunity
33	Lift Station Replace	Edgar Street	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	7/1/2026	$ 80,940.00	IEPA Grant
34	Lift Station Rehab	Falling Springs Rd. (Shack)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	Illinois Dept. of Commerce and Economic Opportunity
35	Lift Station Rehab	Hissrich Blvd. (Singer)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	Illinois Dept. of Commerce and Economic Opportunity
36	Lift Station Replace	St. Andrews Dr.	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	7/1/2026	$ 85,200.00	IEPA Grant
37	Lift Station Replace	St. Margaret Dr.	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	7/1/2026	$ 71,000.00	Illinois Dept. of Commerce and Economic Opportunity
38	Lift Station Replace	St. Monica Dr.	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	7/1/2026	$ 213,000.00	City/St. Clair County Intergovernmental Grant
39	Lift Station Rehab	David St. (State Lottery)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	IEPA Grant
40	Lift Station Replace	51st & Market	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	7/1/2024	$ 205,900.00	City/St. Clair County Intergovernmental Grant
41	Lift Station Replace	East Adams Dr. (Bridgedale)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	7/1/2024	$ 205,900.00	City/St. Clair County Intergovernmental Grant
42	Lift Station Rehab	Superior Dr.	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections	7/1/2026	$ 142,000.00	Illinois Dept. of Commerce and Economic Opportunity
43	Lift Station Replace	Lauralee & Violet	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main	6/1/2026	$ 1,192,800.00	Illinois Dept. of Commerce and Economic Opportunity
44	Lift Station Replace	75th and Clinton	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing	7/1/2025	$ 205,900.00	City/St. Clair County Intergovernmental Grant
45	Lift Station Rehab	City Hall (rear)	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 70,000.00	Illinois Dept. of Commerce and Economic Opportunity
46	Lift Station Rehab	David St. (Quickway)	Minor Rehab - new guide rails, level probes, control panel components & repairs	7/1/2026	$ 60,000.00	TBD
47	Lift Station Rehab	Upper Cahokia Rd. (VFW)	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 40,000.00	TBD
48	Lift Station Rehab	Blue Water Lane	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 20,000.00	TBD
49	Lift Station Rehab	Delores St. (Carol Rd.)	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 100,000.00	IEPA Grant
50	Lift Station Rehab	Greystone Dr. and Old Missouri Ave	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 130,000.00	TBD
51	Lift Station Rehab	Church Rd	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 20,000.00	TBD
52	Lift Station Rehab	Jerome & Mousette (Station 5a)	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 50,000.00	TBD
53	Lift Station Rehab	Jerome & Mousette (Station 5)	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 40,000.00	TBD
54	Sewer Repairs	St. Maud	Replace 30 linear feet, Clean TV, CIPP 330 linear feet	8/10/2025	$ 78,810.00	IEPA Grant
55	Sewer Repairs	N. 63rd Street	Replace 20 linear feet, Clean TV and CIPP 165 linear feet	5/1/2024	$ 96,000.00	IEPA Grant
56	Sewer Repairs	N. 73rd Street	Replace 20 linear feet, Clean TV and CIPP 402 linear feet	5/1/2024	$ 110,000.00	IEPA Grant

57	Sewer Repairs	St. Zita Lane	Replace 30 linear feet, Clean, TV, CIPP 244 linear feet	10/1/2024	$ 93,500.00	IEPA Grant
58	Sewer Repairs	Cooper Drive	Replace 20 linear feet, Clean, TV 262 linear feet (USACE project has the CIPP)	10/1/2024	$ 110,600.00	IEPA Grant
59	Sewer Repairs	Mildred	Replace 513 linear feet	10/1/2024	$ 303,300.00	IEPA Grant
60	Sewer Repairs	LaSalle	Replace 40 linear feet, Clean, TV, CIPP 613 linear feet	10/1/2024	$ 126,765.00	IEPA Grant
61	Sewer Repairs	Blue Water Lane	Replace 30 linear feet, Clean, TV, CIPP 263 linear feet	10/1/2024	$ 78,870.00	IEPA Grant
62	Sewer Repairs	Kenneth Street	Replace 90 linear feet, Clean, TV, CIPP 334 linear feet	10/1/2024	$ 176,385.00	IEPA Grant
63	Sewer Repairs	Parklane Drive	Replace 20 linear feet, Clean TV CIPP 75 linear feet	10/1/2024	$ 68,600.00	IEPA Grant
64	Sewer Repairs	Halloran Street	Replace 50 linear feet, Clean , TV CIPP 309 linear feet	10/1/2024	$ 123,380.00	IEPA Grant
65	Sewer Repairs	White Street	Replace 130 linear feet, Clean TV, CIPP 1026 linear feet	10/1/2024	$ 261,570.00	IEPA Grant
66	Sewer Repairs	Edwards Street (Rear Easement)	Replace 30 linear feet, Clean, TV, CIPP 350 linear feet	8/1/2025	$ 85,342.00	IEPA Grant
67	Sewer Repairs	Nadine Street	Replace 20 linear feet, Clean TV CIPP 170 linear feet	8/1/2025	$ 72,988.00	IEPA Grant
68	Sewer Repairs	St. Margaret Drive	Replace 80 linear feet, Clean, TV, CIPP 300 linear feet	8/1/2025	$ 153,076.00	IEPA Grant
69	Sewer Repairs	Edwards (Side Easement)	Replace 40 linear feet, Clean, TV, CIPP 660 linear feet	8/1/2025	$ 115,588.00	IEPA Grant
70	Sewer Repairs	St. Henry @ St. Margaret	Replace 20 linear feet, Clean, TV, CIPP 400 linear feet	8/1/2025	$ 85,910.00	IEPA Grant
71	Sewer Repairs	Edgar Street	Replace 70 linear feet, Clean, TV, CIPP 800 linear feet	8/1/2025	$ 172,388.00	IEPA Grant
72	Sewer Repairs	Mississippi Avenue	Replace 30 linear feet, Clean TV, CIPP 330 linear feet	8/1/2025	$ 80,372.00	IEPA Grant
73	Sewer Repairs	Judith Lane	Replace 40 linear feet, Clean, TV, CIPP 360 linear feet	8/1/2025	$ 87,756.00	IEPA Grant
74	Sewer Repairs	St. Patrick Blvd	Replace 10 linear feet, Clean, TV, CIPP 330 linear feet	8/1/2025	$ 87,756.00	IEPA Grant
75	Sewer Repairs	Bond Avenue	Replace 20 linear feet, Clean TV, CIPP 185 linear feet	2023	$ 63,758.00	Illinois Dept. of Commerce and Economic Opportunity
76	Sewer Repairs	Howell Avenue & Ellen Street (Range Ln)	Replace 30 linear feet, Clean TV, CIPP 300 linear feet	8/1/2025	$ 113,458.00	IEPA Grant
77	Interim Alternatives Evaluation	82nd Street Area	Complete the interim alternative investigation in accordance with the plan submitted under the Revised Dry-Weather SSO Corrective Action Plan dated 3/8/2024	7/31/2024	$ 25,000.00	City Funds
78	Interim Alternative Feasibility Study Report	82nd Street Area	In accordance with the June 2024 Revised Dry-Weather SSO Corrective Action Plan, develop and submit an interim alternative feasability study report, including the city's proposed interim alterative. The feasibility study report shall include cost estimates for all assessed alternatives and a detailed schedule to implement the city's proposed alternative, upon EPA's approval.	8/30/2024	Included in Interim Alternatives Evaluation	City Funds
79	Implement Interim Alternative(s)	82nd Street Area	Implement the selected alternative upon EPA's approval, in accordance with the approved schedule.	Per EPA approved schedule	TBD	TBD

2. Preliminary Group 2 Project Plan

Note: By December 31, 2024, Cahokia Heights shall complete and submit to EPA and IEPA, for review and approval, an updated Group 2 Project Plan, including a detailed list of projects under each category below. Cahokia Heights may propose, for EPA and IEPA approval, changes to the project categories and schedules provided below.

No.	Project category	Location	Project Summary	Completion date	Estimated Cost	Funding source(s)
80	Clean, TV, CIPP Lining	Jerome Lane to Racehorse Drive (Main Trun	Clean, TV, and CIPP 22,750 linear feet	TBD*	$ 2,300,000.00	TBD
81	East/West Interceptor -- Prelim Design		** See below	12/31/2024	$ 250,000.00	Expected in FY 2023 Congressionally Directed Spending
82	East/West Interceptor	Along northern boundary of City, and south along availableright of way to trunkline	10 new pump stations, 4 modified pump stations, 41,000 linear feet of new force main, RR and highway crossings/borings	12/31/2028	$ 13,415,000.00	Illinois Dept. of Commerce and Economic Opportunity, FY 2023 Congressionally Directed Spending, and Expected 2025 Congressionally Directed Spending
83	New Controls and Telemetry	All 69 lift stations		12/31/2026	$ 1,725,000.00	Illinois Dept. of Commerce and Economic Opportunity, Expected 2025 Congressionally Directed Spending
84	Lift Station Rehab or Replace	5 lift stations in various locations	Minor Rehab - new guide rails, level probes, control panel components & repairs	12/31/2026	$ 600,000.00	Illinois Dept. of Commerce and Economic Opportunity

* The Parties understand that the City has submitted funding requests for the cleaning, televising, and lining of the trunkline project in partnership with the U.S. Army Corps of Engineers. If such funding requests are legislatively approved, one or more components of the trunkline project may be constructed or managed by the U.S. Army Corps of Engineers. Any such components of the trunkline project constucted or managed by the U.S. Army Corps of Engineers shall not be subject to the requirements of this Consent Decree.

** East/West Interceptor:
The City shall complete preliminary design for an interceptor sewer to redirect flow from neighborhoods currently discharging to the sewer system owned by the City of East St. Louis. The project, conceptually, would consist of multiple new pump stations to intercept flows currently draining via gravity lines north into East St. Louis' sewer system, new force mains from these new pump stations to redirect these intercepted flows to the south into Cahokia Heights' sewer system, and modifications to existing pump stations in the Cahokia Heights system to accept the increased flows. By December 31, 2024, the City shall submit to EPA and the State for review and approval the preliminary design and proposed plan for construction of the interceptor sewer, including interim deadlines. The Parties understand that the City has submitted funding requests for the interceptor project in partnership with the U.S. Army Corps of Engineers. If such funding requests are legislatively approved, one or more components of the interceptor project may be constructed or managed by the U.S. Army Corps of Engineers. Any such components of the interceptor project constructed or managed by the U.S. Army Corps of Engineers shall not be subject to the requirements of this Consent Decree. Subject to the Adaptive Management provisions of Paragraph 43 of the Consent Decree, the City shall construct all other components of the interceptor, by December 31, 2028. The City shall meet the deadlines in this paragraph regardless of whether the Consent Decree has been entered by the Court and once the Consent Decree has been entered, shall be subject to stipulated penalties if it failed to meet the deadline.

3. Implementation of the Revised Targeted Dry-Weather SSO Corrective Action Plan, dated June 2024

Cahokia Heights shall complete implementation of the remaining actions required under the June 2024 Revised Targeted Dry-Weather SSO Corrective Action Plan, pursuant to the approved schedule. The June 2024 Revised Targeted Dry-Weather SSO Corrective Action Plan is included as Attachment 1 to this Appendix.

4. Other Projects

Sewer projects in Cahokia Heights implemented by other parties and included as information only.

	Project type	Location	Project Summary	Completion date	Estimated Cost	Funding source(s)
	Clean, TV, CIPP Lining	Levin Drive to Jerome & Mousette Ln	US Army Corps of Engineers	6/1/2025	$ 5,500,000.00	Federal Congressional Spending Request, City, IEPA