



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

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 Consent Decree Semi-Annual Report (July - December 2025)

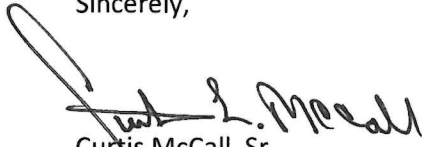
Dear Ms. Rogers, Ms. Garl Smith, and Ms. Furrie,

Attached please find a report describing actions the City of Cahokia Heights has taken, from July 2025 through December 2025, in regards to achieving compliance with the requirements set for in the Consent Decree.

The City remains committed to satisfying the requirements of the 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

Cc:

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City of Cahokia Heights, IL
Semi Annual Status Report for:
Consent Decree
Entered: January 20, 2026
Reporting Period: July 2025 – December 2025

Prepared By:



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

Introduction

The City of Cahokia Heights (City) entered into a Consent Decree (CD) with the United States of America on behalf of the United States Environmental Protection Agency (EPA) and State of Illinois on behalf of Illinois Environmental Protection Agency (IEPA) to address alleged violations to address violations of the Clean Water Act (CWA). The City submits this Semi-Annual Report pursuant to Paragraph 75 of the CD.

This status report has been composed to satisfy the reporting requirements described in CD Paragraphs 30, 34, 38, 57, & 75, and is structured as follows:

- Section 1: Actions associated with completion of Phase 1 work:
 - Implementation of Targeted Dry Weather SSO Corrective Action Plan
 - Early Action Capital Improvements Projects
 - Sewer Cleaning
 - Implementation of Wet Weather SSO Investigation Plan
 - Implementation of Phase 1 Sewer Condition Rehabilitation Plan
- Section 2: Actions associated with non-construction-based projects, including:
 - Capacity Management Operations and Maintenance (CMOM) Program
- Section 3: Sanitary Sewer Overflow (SSO) and Building Backup related incidents
 - Assessment of the effectiveness of completed projects in preventing occurrences
- Section 4: Funding
 - Funding Summary and Commentary

Section 1: Phase 1 and Prior Activities

The City continues to progress on work associated with the “Targeted Dry Weather SSO Corrective Action Plan”, “Early Action Capital Improvement Projects”, “Sewer Cleaning”, and “Wet-Weather SSO Investigation Plan Implementation”. Updates to projects included in these plans are described in Table 1.1 provided in Appendix A, with expanded commentary in the following paragraphs.

Table 1.2 in Appendix A provides details on projects included in the abovementioned plans that did not meet construction schedules as outlined in the Consent Decree Appendix A, dated 8/5/2025. (Consent Decree Appendix A is included in Appendix C of this Semi-Annual Report.)

An update on the “Implementation of Phase 1 Sewer Condition Rehabilitation Plan” will be given in future reports corresponding to its April 30, 2030 due date.

Phase 1 Completed Work

As shown in Appendix A, 21 projects were completed from June - December 2025. All of these projects were included in the “Early Action Capital Improvements Projects” list, and all but four were included in the “Wet Weather SSO Investigation Plan”. Indicated in the appendix table notes, Project 1 was completed on 9/12/2025. Following this however, a motor vehicle struck the station and equipment was damaged. Restoration of the damaged equipment is in progress. Additionally, Projects 2 through 16 have outstanding site restoration work that is scheduled to be completed in March 2026. The lift stations associated with each of these projects are fully operational and therefore marked as completed

projects within the context of this report.

Phase 1 Delayed Work

Several projects did not meet the scheduled completion date as indicated in Consent Decree Appendix A dated 8/5/2025. Each of these projects are included in the “Early Action Capital Improvements Project” list and the “Wet Weather SSO Investigation Plan”. Reasons for delay included the following: 1) the project scope was expanded to include a service upgrade to address inadequate power supply for the lift station rehabilitation as designed, 2) a change order was needed to repair an incoming manhole, which extended the anticipated construction schedule, 3) the design approval process exceeded the anticipated timeline, which resulted in pushing the construction schedule, and 4) the contractor schedule was delayed, resulting in the project not meeting the anticipated completion date. Each of these projects is anticipated to be completed in January 2026, with specific dates provided for each project in the Appendix A table. These delays will not impact other project schedules or milestones identified within the Consent Decree.

Sewer Cleaning

The area of Old Missouri Avenue, identified in the Wet Weather SSO Investigation Plan as Area 10 required cleaning, CCTV/visual inspection and smoke testing to be completed by December 31, 2025. The City purchased its own equipment to conduct cleaning and CCTV inspection work under the plan, and began work in Area 10 in May 2025. Equipment malfunctions and associated repairs in September, November, and December 2025 delayed these efforts.

The City engaged a private contractor in early December to assist with the CCTV and sewer cleaning work, in an effort to comply with the deadline, but work in this area was nonetheless delayed. . The City notified EPA and IEPA of the delay on January 2, 2026, with an expectation that work would be completed by January 31, 2026. As of the date of this report, work is approximately 98 percent complete, but heavy snows in the area have prevented completion of the remaining work. The City provided notice of the additional delay to EPA and IEPA on January 28, 2026, explaining that the completion schedule is to be determined due to the hazards created by the snow. Smoke testing of this area is complete.

Section 2: Non-Construction Based Activities

CMOM Program

EPA approved the City’s CMOM Program on 11/21/2022. The City is currently abiding by this approved Program and will update it annually as well as following completion of Phase 1 milestones. Updates describing these activities will be included in future Semi-Annual Reports.

In conjunction with the CMOM Program, the City also developed a “Sewer Overflow and Emergency Response Plan” (SORP) to address SSO response, management, and public communication. This plan, originally submitted 4/1/2025, was revised during July, August, and November of the June – December 2025 reporting period, to address EPA comments and questions. The SORP remains under EPA review as of 12/31/2025.

Section 3: SSO and Backup Related Incidents

Activities describing SSO and Building Backup occurrences, locations, areas, etc. for the June – December 2025 reporting period have been documented via quarterly status report requirements per Administrative Order on Consent, dated 8/16/21. 2025 Q3 and 2025 Q4 reports are attached in their entirety, under Appendix D of this report.

- Please reference 2025 Q3 Status Report – pages 6, 7, 8, 9, 10
- Please reference 2025 Q4 Status Report – pages 6, 7, 8, 9

As described in the quarterly reports, no SSOs occurred during the June – December reporting period. A single SSO report was submitted to EPA and IEPA during the reporting period on 9/29/2025, but this incident was the result of a malfunction in the Private Lateral at the property and therefore was not an SSO or Building Backup as those terms are defined in the CD. The City also received 103 of complaints from residents during the reporting period alleging sewer system issues; however, the majority of these complaints resulted solely from blockages, flow conditions, or other malfunctions of Private Laterals, and were therefore not Building Backups within the meaning of the CD.

Section 4: Funding

The most recent cost estimates provided to the City for the work described within the Early Capital Improvement Projects come to a total of \$42.9 million. The City of Cahokia Heights has secured and continues to pursue funding opportunities to address critical infrastructure needs:

Approved Grants:

\$10 Million IEPA Grant: Awarded by the Illinois Environmental Protection Agency to upgrade sanitary sewer infrastructure. The project aims to eliminate sanitary sewer overflows, reduce backups, minimize maintenance costs, and improve reliability. Construction is about 95% complete as of Q4 2025, with completion expected in early 2026.

\$8.5 Million Grants: Provided by the Department of Commerce and Economic Opportunity for repairs the sanitary sewer systems. The \$8.5 million grant agreement for sewer work has been executed and notice to proceed has been issued for the construction of projects awarded in December 2024.

\$2.5 Million Grant USEPA Grant: Congressionally-directed spending earmarked for the design work and purchase of equipment for the Interceptor Sewer System. The City has entered into a partial agreement with EPA for \$900,000 of these funds for design work, which will be reimbursed upon completion of the final design. The City is working to identify equipment that complies with the Buy America Build America Act (“BABA”) to secure the remainder of the funds.

\$7.297Million Grant was included in the Commerce, Justice, Science; Energy and Water Development; and Interior and Environment Appropriations Act, 2026 (“H.R. 6938”), signed into law on January 23, 2026, for construction of the East portion of the Interceptor project by the U.S. Army Corps. Additional construction funding is required to complete the work.

Pending Grants:

While not directly tied to sewer system improvements, the City also has several grants pending for work related to stormwater and flooding.

\$10 Million St. Clair County Grant: Targeting stormwater flooding in Piatt Place, with \$10 million approved. Environmental Assessment (EA) and Hydrology and Hydraulics Analysis that are locally funded are being completed ahead of grant execution, anticipated on be end of April 2026.

\$3.1 Million FEMA 4766 Disaster Grant: For stormwater infrastructure and flood mitigation in the Ping Pong neighborhood is pending approval.

\$2.5 Million FEMA 4819 Disaster Grant: For flood mitigation in various locations, pending approval.
\$650,000 DCEO Grants: Three separate applications for city drinking water infrastructure improvements, awaiting final approval.

\$5 Million IDOT Grant: Applied for local roadway and drainage improvements, pending approval.

Funding Pursuits:

\$20 Million Community Change Grant: The City applied for this grant to address environmental and climate inequities and pollution reduction through water and sewer infrastructure planning and improvement projects. However, the program was eliminated by the current administration. This pursuit will be removed in the next report.

The City continues to regularly coordinate with funding agencies including ILDNR, IEPA, DCEO and the USACE to respond to Notices of Funding Opportunities (NOFO's), a key component of the Metro East Flood Relief Collaboration meetings held monthly and led by ILDNR.

A summary table of the City's funding efforts is provided in Appendix E.

Appendix A

Table 1.1: Projects Completed July 2025 through December 2025

Table 1.2: Projects Behind Schedule for Completion in 2025

Table 1.1: Projects Completed July 2025 through December 2025

Appendix A Project Number	Location	Project Description	Early Action Capital Imp. Project	Targeted D-W SSO Corr. Act. Plan	Sewer Cleaning	W-W SSO Inv. Plan Imp.	Phase 1 Sewer Cond. Rehab. Plan Imp.	Completion Date	Final Project Cost	Miles of Gravity Sewer Cleaned	Miles of Gravity Sewer Lines Rehabilitated	Number of Manholes Rehabilitated	Notes
1	Beachland	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		9/12/2025	\$281,565	0	0	0	N1
2	63rd Street & Laura Avenue	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		7/28/2025	\$277,000	0	0	0	N2
3	N. 73rd Street	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		8/22/2025	\$267,000	0	0	0	N2
4	N. 73rd Street & Oakland Avenue	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		8/14/2025	\$267,000	0	0	0	N2
5	N. 75th Street & Pershing (LS#39)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		9/4/2025	\$267,000	0	0	0	N2
6	N. 71st Street & Ames Drive	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		8/29/2025	\$267,000	0	0	0	N2
10	Ellen & Richard Streets	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		12/9/2025	\$257,000	0	0	0	N2
11	Hutchings Street	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		12/12/2025	\$252,000	0	0	0	N2
12	Ellen & Williams Streets	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		10/3/2025	\$257,000	0	0	0	N2
14	LaSalle Drive	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		9/25/2025	\$252,000	0	0	0	N2
15	Donald Street	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main, SCADA	✓			✓		9/19/2025	\$257,000	0	0	0	N2
16	Miskell Boulevard	Replacement/Extensive Rehab - new wetwells, valve vault, pumps, control panels, valves, electrical connections, force main, SCADA	✓			✓		9/18/2025	\$262,000	0	0	0	N2
38	St. Monica Dr.	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		10/29/2025	\$280,300	0	0	0	
54	St. Maud	Replace 30 linear feet, Clean TV, CIPP 330 linear feet	✓		✓	✓		12/31/2025	\$200,283	0.0000	0.0445	3	N3
67	Nadine Street	Replace 20 linear feet, Clean TV CIPP 170 linear feet	✓		✓	✓		4/30/2025	\$61,690	0.0000	0.0053	0	
68	St. Margaret Drive	Replace 80 linear feet, Clean, TV, CIPP 300 linear feet	✓		✓			12/31/2025	\$147,705	0.0511	0.0788	0	N4
70	St. Henry @ St. Margaret	Replace 20 linear feet, Clean, TV, CIPP 400 linear feet	✓		✓			12/31/2025	\$44,473	0.0602	0.0653	0	N4
72	Mississippi Avenue	Replace 30 linear feet, Clean TV, CIPP 330 linear feet	✓		✓	✓		8/1/2025	\$123,799	0.0000	0.0030	0	
73	Judith Lane	Replace 40 linear feet, Clean, TV, CIPP 360 linear feet	✓		✓	✓		9/30/2025	\$118,714	0.0000	0.0299	1	N3
74	St. Patrick Blvd	Replace 10 linear feet, Clean, TV, CIPP 330 linear feet	✓		✓			8/1/2025	\$76,748	0.0564	0.0000	0	
76	Howell Avenue & Ellen Street (Range Ln)	Replace 30 linear feet, Clean TV, CIPP 300 linear feet	✓		✓			8/1/2025	\$101,649	0.0682	0.0093	0	

N1: Project was originally completed on 9/12/2025. The lift station was damaged by a hit & run driver on 9/14/25. Restoration of the damaged equipment is in progress.

N2: Lift Station is operational. Site surface restoration is still outstanding and is scheduled for completion by 3/31/2026.

N3: Project did not meet schedule but was completed by the end of the year.

N4: The sewer break was more extensive than originally anticipated.

Table 1.2: Projects Behind Schedule for Completion in 2025

Projects not Completed During this Reporting Period as Anticipated per Consent Decree Appendix A Schedule Dated 8/5/2025

Appendix A Project Number	Location	Project Description	Early Action Capital Imp. Project	Targeted D-W SSO Corr. Act. Plan	Sewer Cleaning	W-W SSO Inv. Plan Imp.	Phase 1 Sewer Cond. Rehab. Plan Imp.	Completion Date	Final Project Cost	Miles of Gravity Sewer Cleaned	Miles of Gravity Sewer Lines Rehabilitated	Number of Manholes Rehabilitated	Notes
7	Park Place (Lake Drive Pill Box)	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		1/22/2026	\$269,300	0	0	0	N1
8	Ames Drive (Willie Holmes Pill Box)	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		1/15/2026	\$264,300	0	0	0	N1
9	Cooper Drive	Full Rehab - new pumps, control panel, valves, guide rails, level probes, electrical connections, SCADA	✓			✓		1/6/2026	\$592,000	0	0	0	N2
13	Williams & Kay Streets	Minor Rehab - new guide rails, level probes, control panel components & repairs, SCADA	✓			✓		1/9/222026	\$259,300	0	0	0	N1
44	75th and Clinton	Replacement/Major Rehab - new wetwell, valve vault, pumps, control panel, valves, electrical connections, fencing, SCADA	✓			✓		1/22/2026	\$242,000	0	0	0	N3
66	Edwards Street (Rear Easement)	Replace 30 linear feet, Clean, TV, CIPP 350 linear feet	✓		✓	✓		Feb. 2026	\$57,000				N4
69	Edwards (Side Easement)	Replace 40 linear feet, Clean, TV, CIPP 660 linear feet	✓		✓	✓		Feb. 2026	\$74,000				N4

N1: Project scope was expanded to include a service upgrade to address inadequate power supply for the lift station rehabilitation

N2: Change order anticipated to repair an incoming manhole, which extended the anticipated construction schedule.

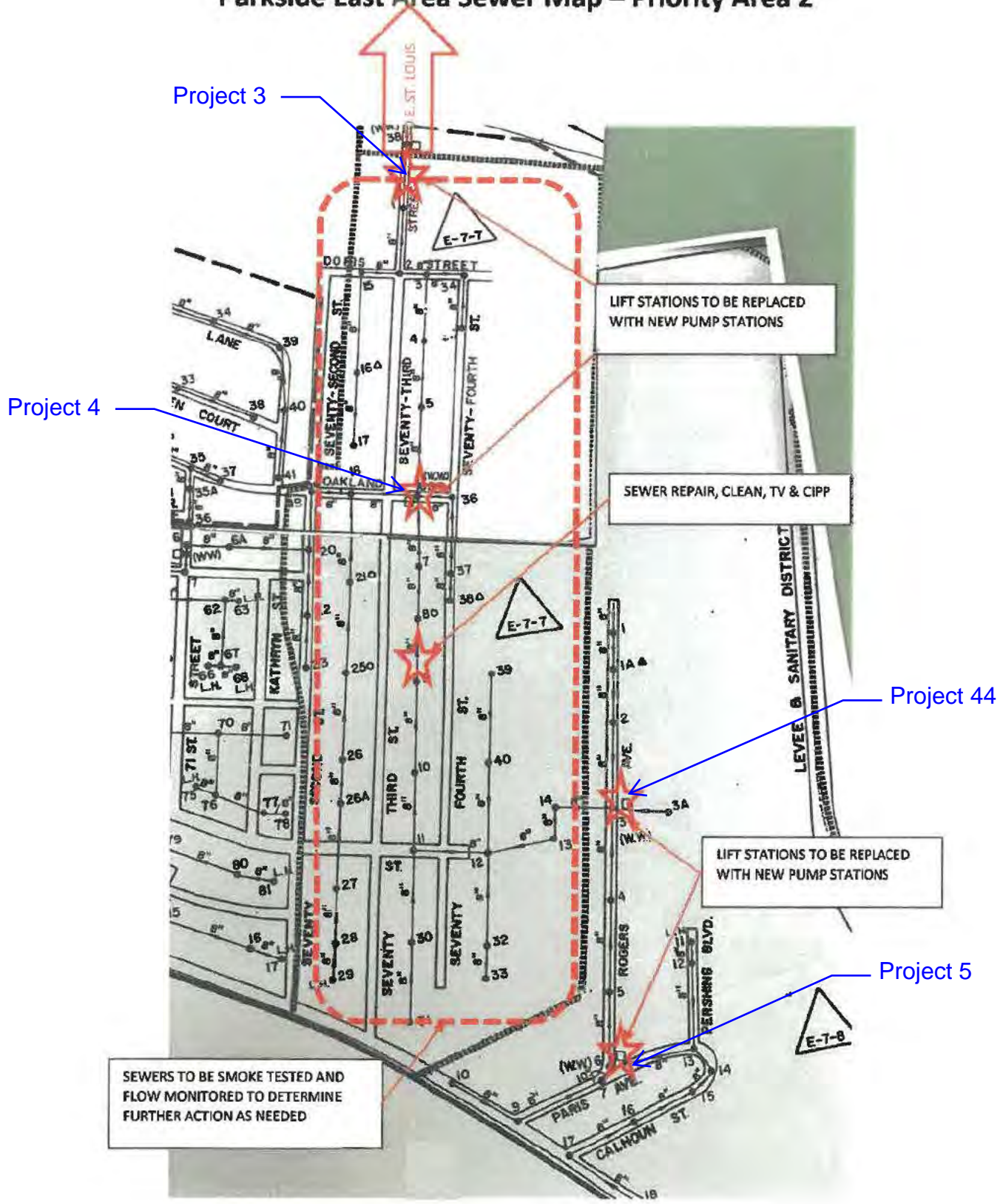
N3: Design approval process exceeded the anticipated timeline, which resulted in pushing the construction schedule.

N4: Contractor schedule was delayed.

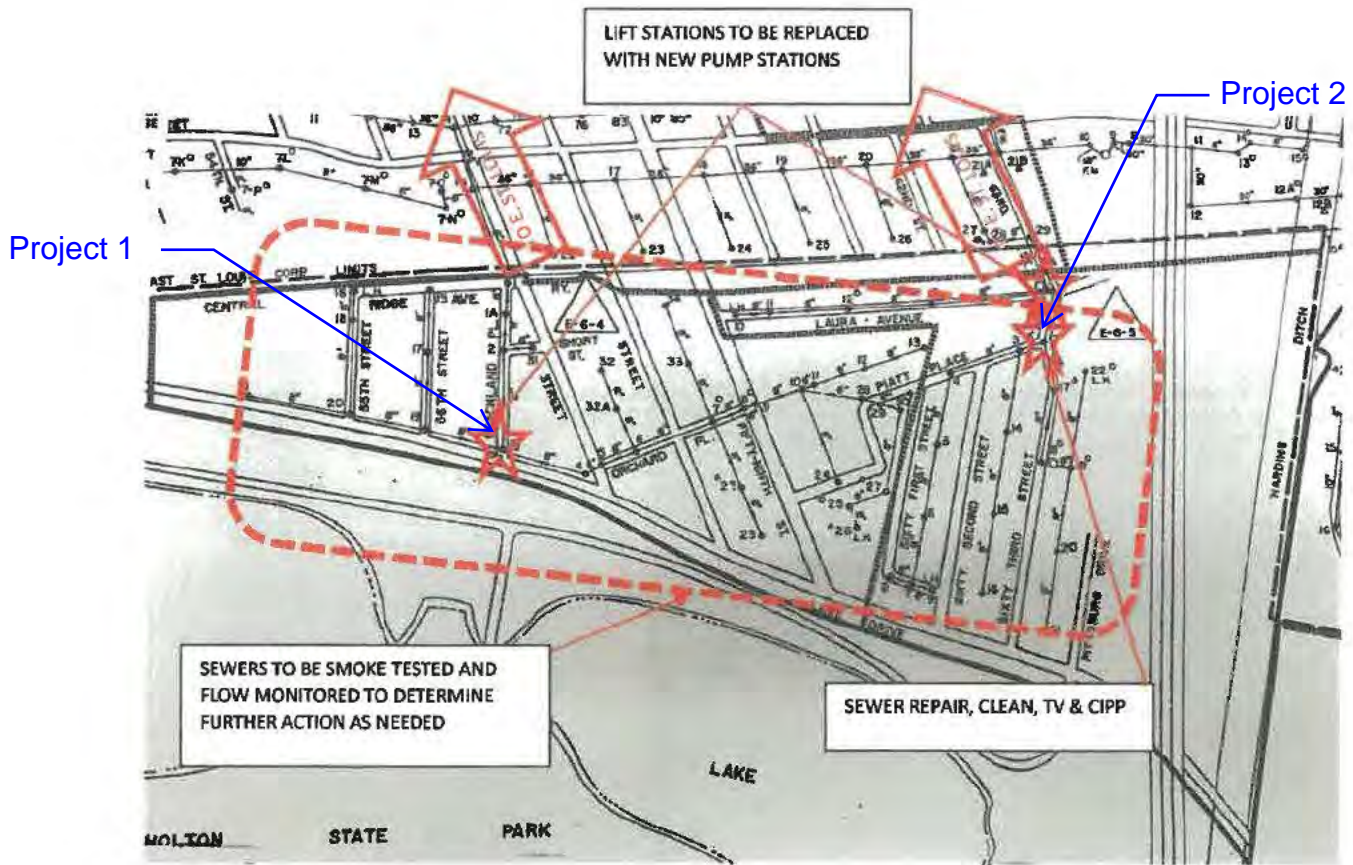
Appendix B

Project Location Mapping Based on Priority Area

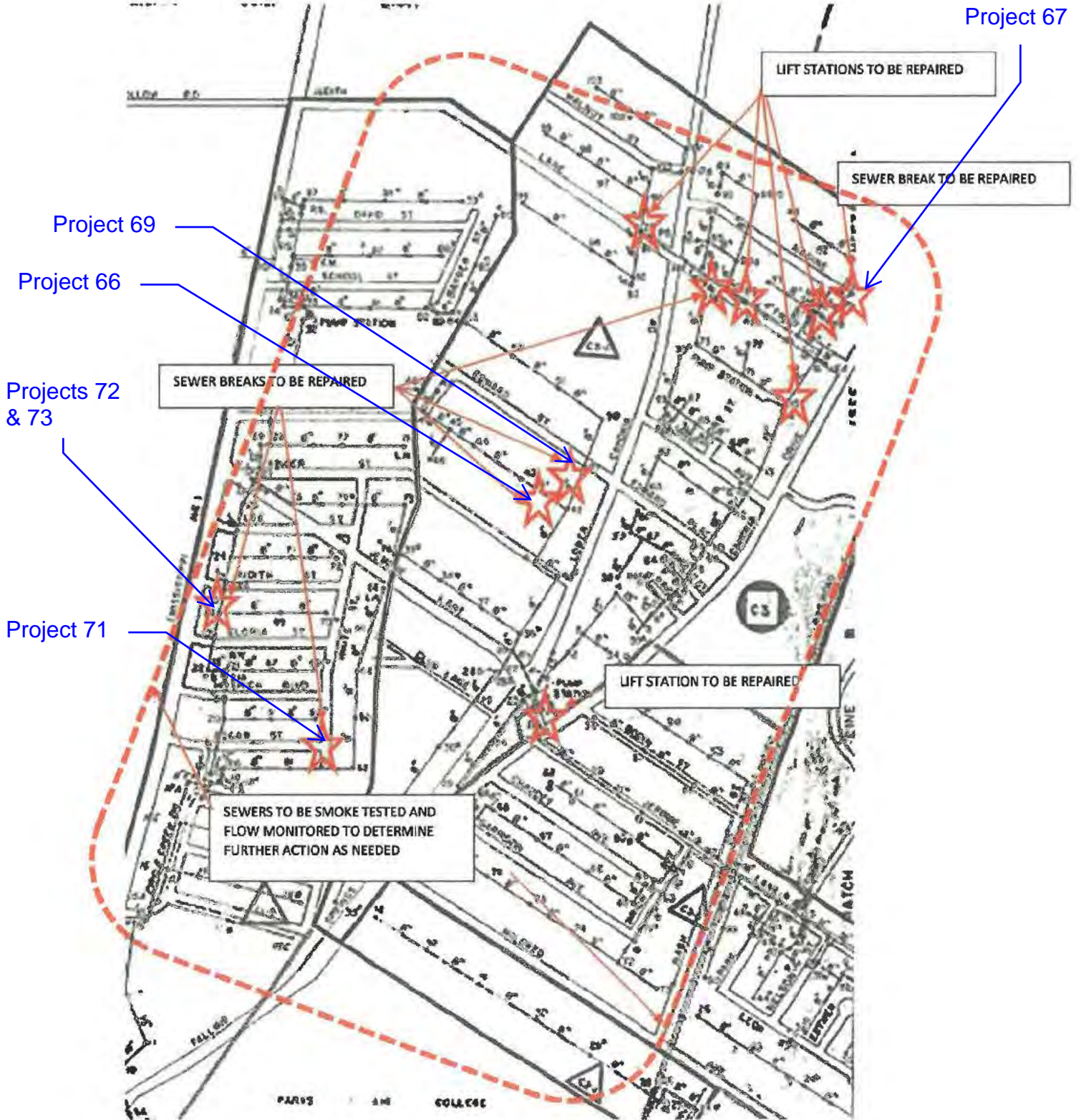
Parkside East Area Sewer Map – Priority Area 2



Piat Place Area Sewer Map – Priority Area 3



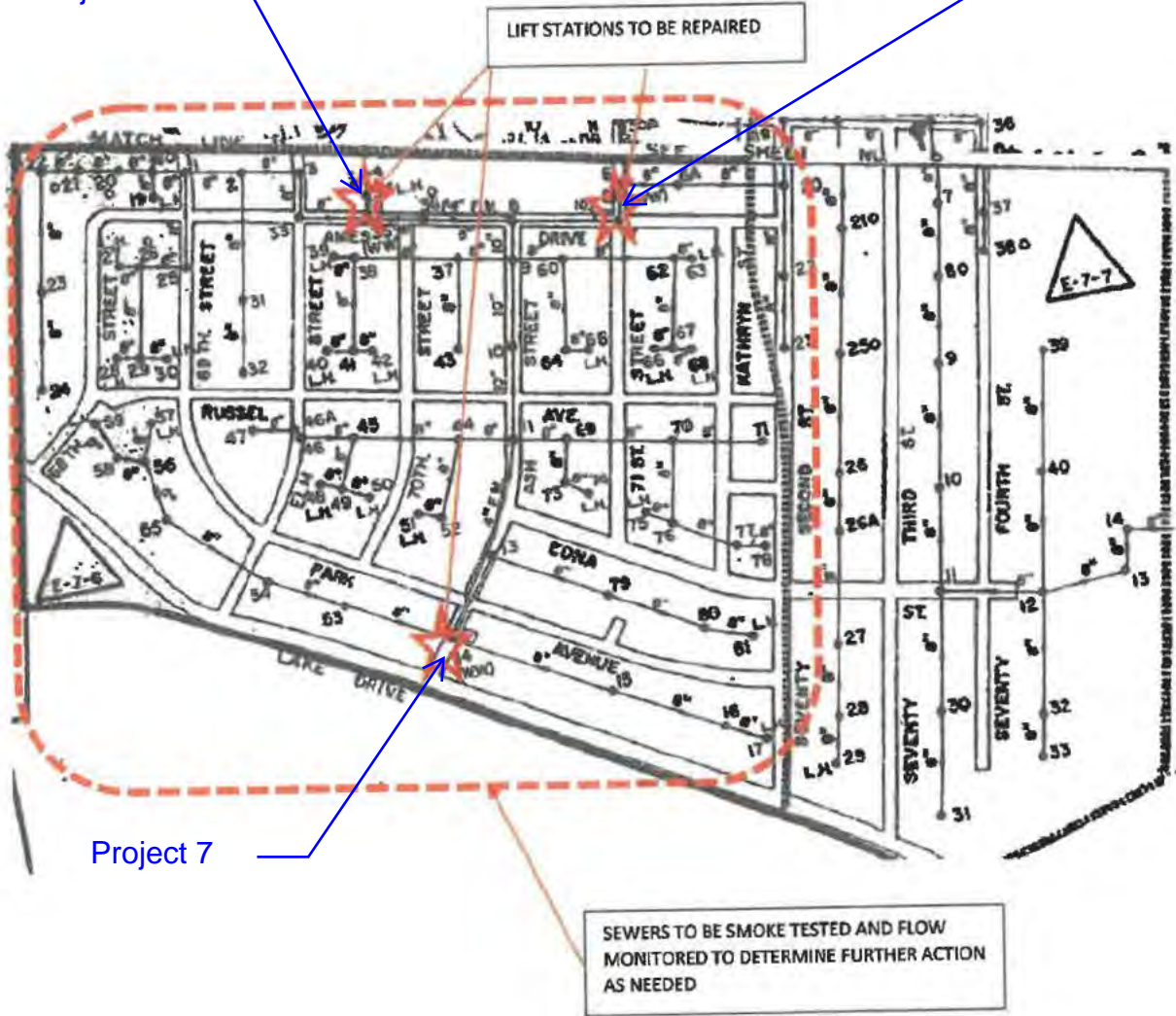
Falling Springs Area Sewer Map – Priority Area 6



Parkside South Area Sewer Map – Priority Area 8

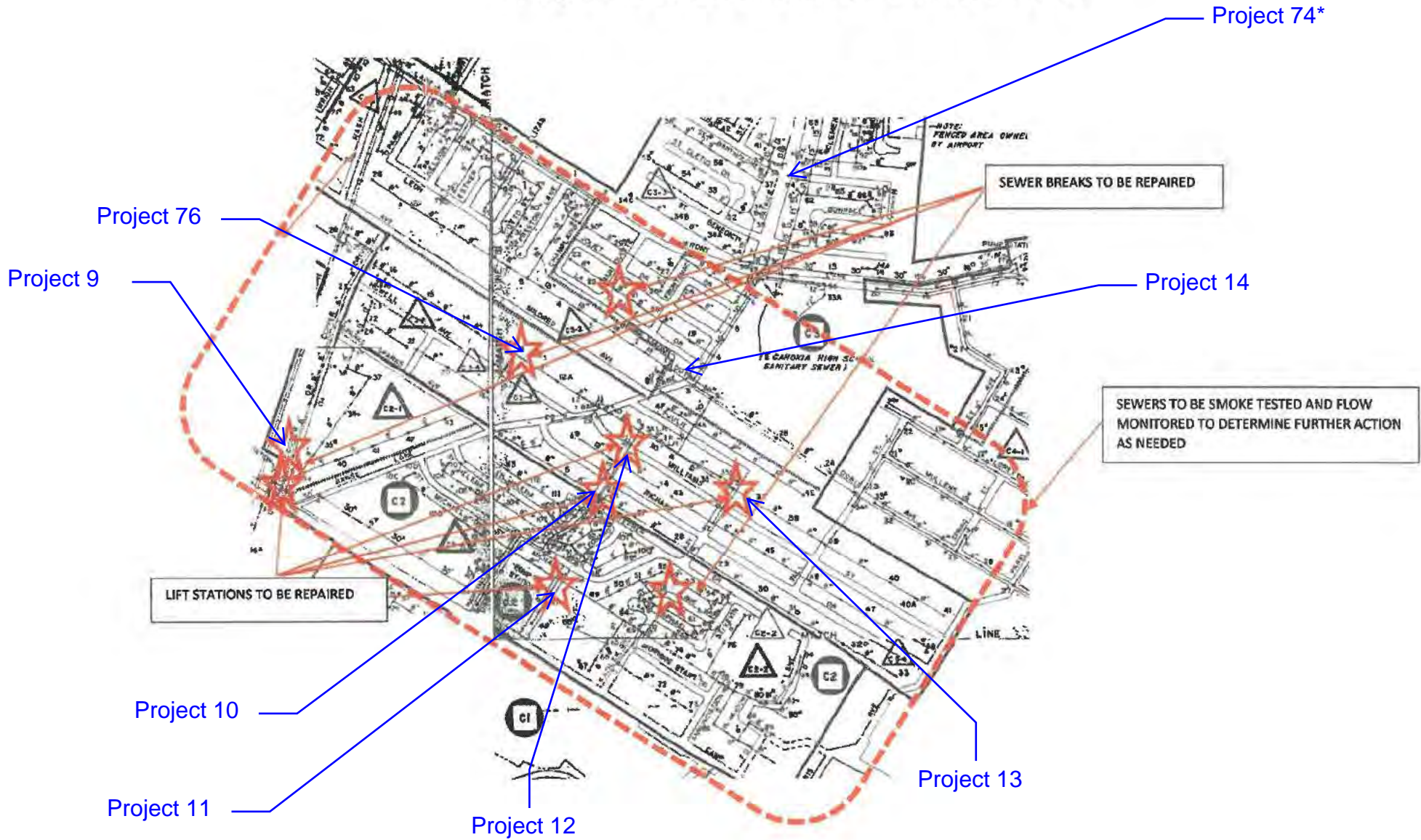
Project 8

Project 6



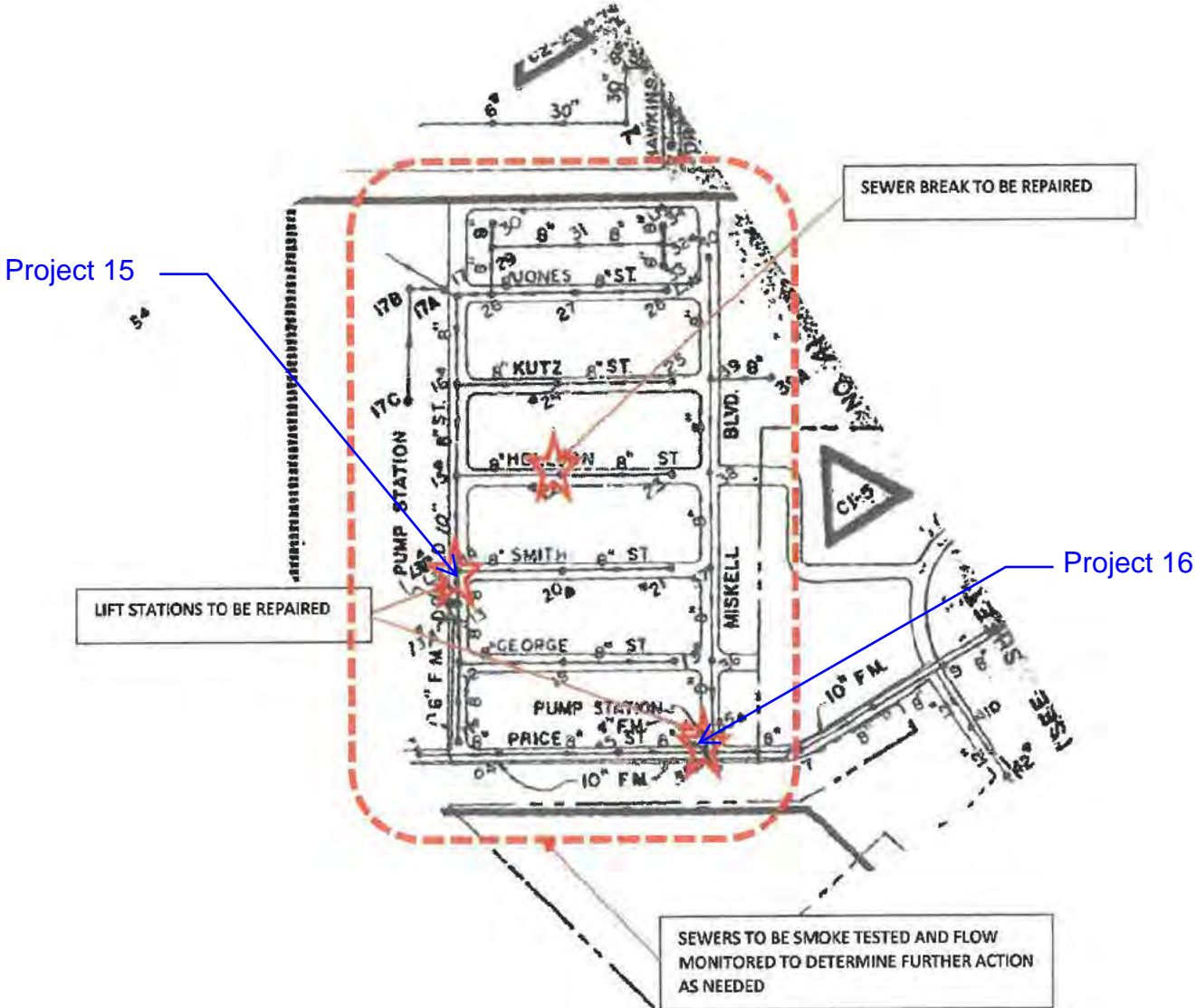
Project 7

Range Lane Area Sewer Map – Priority Area 16

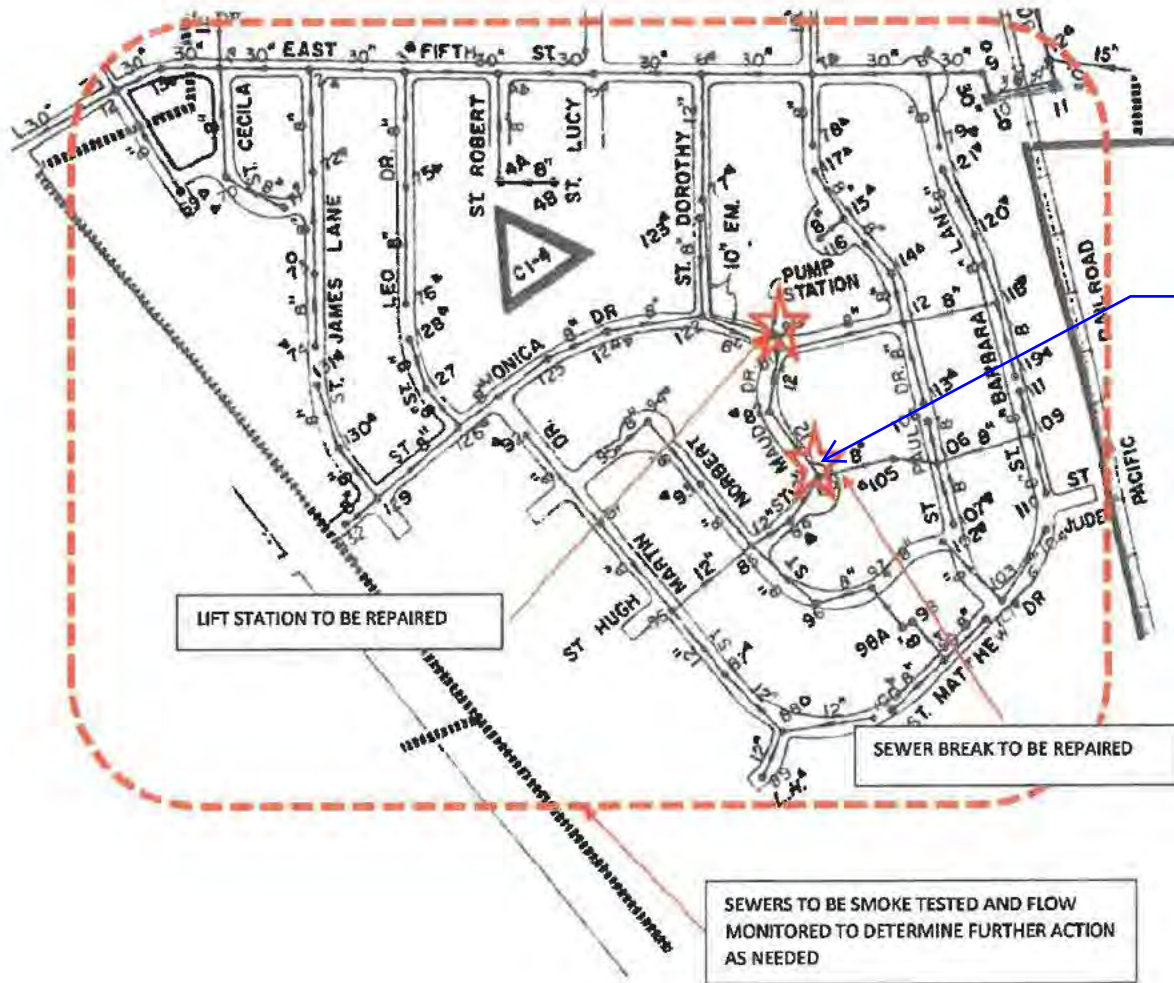


*Location is approximate

Donald St. Area Sewer Map – Priority Area 17

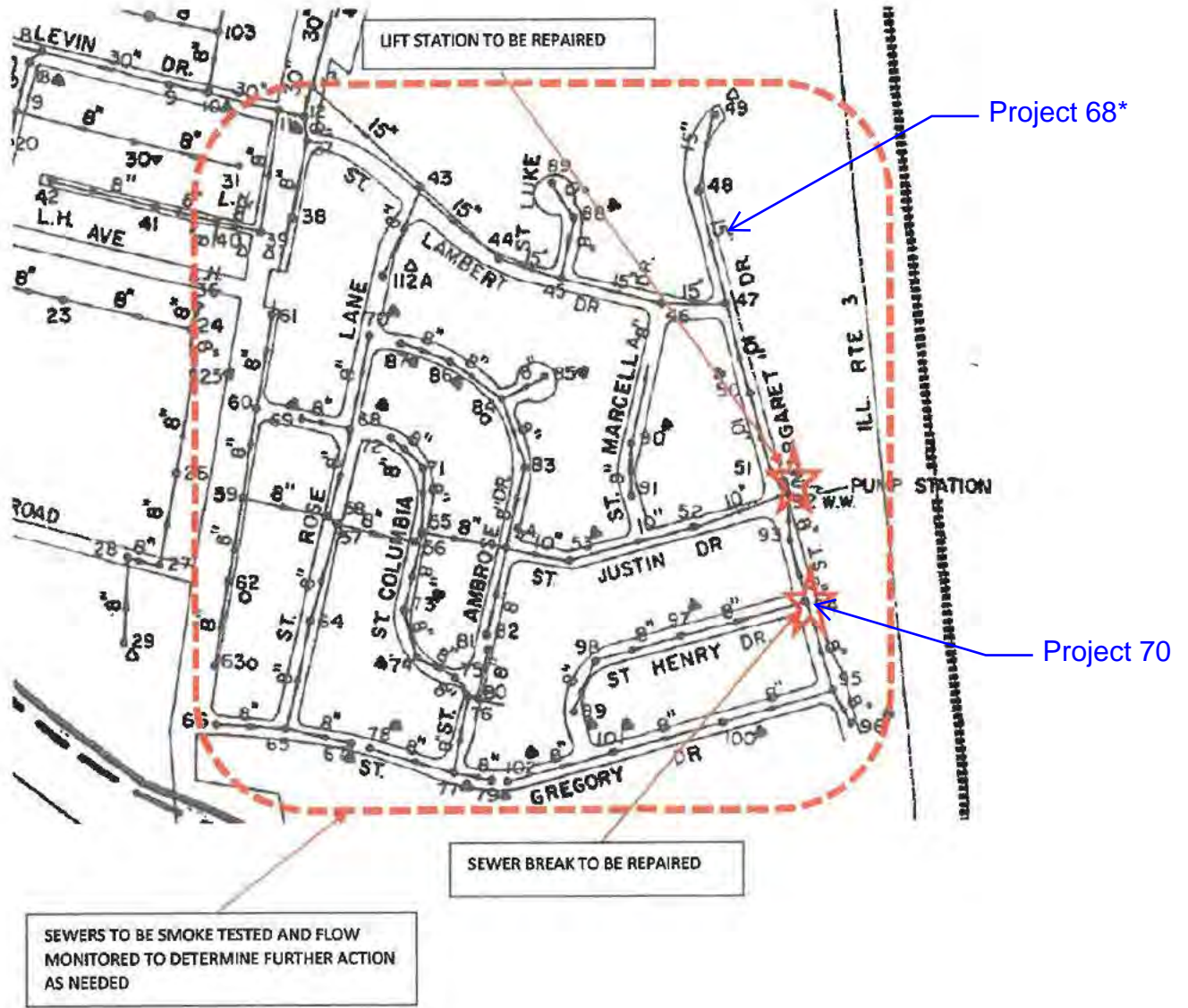


St. Monica Area Sewer Map – Priority Area 18



Project 54

Water St. East Area Sewer Map – Priority Area 19



*Location is approximate

Appendix C

Consent Decree Appendix A

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 feasibility study report, including the city's proposed interim alternative. 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 Trunkline)	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 available right 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 constructed 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

Appendix D

AOC Quarterly 2025 Q3 and 20245 Q4Status Reports
(attached in their entirety)



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

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 Revised Q3 Status Report

Dear Ms. Rogers and Ms. Carlson,

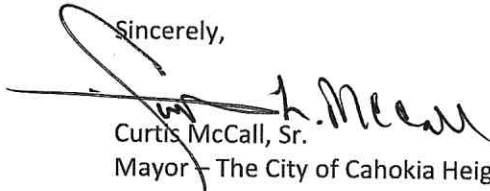
Attached please find the revised 2025 third quarter update for the 2021 Administrative Order on Consent (AOC) for the City of Cahokia Heights. Please note that as part of this update, the Project Coordinator has been updated to the below individual, effective October 18, 2025:

Janae' Swanson
Assistant Director of Operations & Billing
City of Cahokia Heights
103 Main Street, Cahokia Heights, IL 62206
jswanson@cahokiaillinois.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

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
2025 Q3 Status Report (Revised 11/24/2025) 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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • Lift Station #22 • Lift Station #5 	48.C.c.	In accordance with the approved schedule and milestones	In-progress	N. 82 nd 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"> • Supervisor = 1 • Foreman = 1 • Laborer = 12 Administrative: <ul style="list-style-type: none"> • Director = 1 • Assistant Director = 1 • Billing Clerk = 4
"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 82nd 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 82nd 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 82nd and Belleview and 82nd 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 40th 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)*

One incident, resulting solely from a private property owner's or operator's private lateral blockage was reported to IEPA during this period. This event is exempt from SSO reporting. No

incidents occurred during this reporting period that met the definition of Backup as set forth in the AOC.

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)

One incident, occurring in the 800 Block of Parks Street, resulting solely from a private property owner’s or operator’s private lateral blockage was reported to IEPA during this period and is included in the table below No incidents occurred during this reporting period met the definition of Backup as set forth in the AOC.

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.



**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

Via Electronic Mail

Joan Rogers, Environmental Scientist
Water Enforcement and Compliance Assurance Branch (ECW-15J)
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77 West Jackson Boulevard
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Emma Garl Smith
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Chicago, Illinois 60604-3590

RE: Cahokia Heights NPDES ID #ILN000019, 08/16/2021 AOC, 2025 Q4 Status Report

Dear Ms. Rogers and Ms. Garl Smith,

Attached please find the 2025 fourth quarter update for the 2021 Administrative Order on Consent (AOC) for the City of Cahokia Heights. Updates for this reporting period include a change in status for the Lift Station #22 -Lauralee Drive project, as well as updated information regarding SSO and Basement Backups for the reporting period.

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:

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City of Cahokia Heights, IL
2025 Q4 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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • List Station #22 • Lift Station #5 	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"> • N 82nd St. Clean Out • Lift Station #22 • Lift Station #5 	48.C.c.	In accordance with the approved schedule and milestones	In-progress	N. 82 nd St. – completed October 2023. Lift Station #5 – completed June 2023 Lift station #22 (Lauralee Dr.) – anticipated completion; Dec. 2026 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"> • Supervisor = 1 • Foreman = 1 • Laborer = 12 Administrative: <ul style="list-style-type: none"> • Director = 1 • Assistant Director = 1 • Billing Clerk = 4
"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 82nd 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 82nd 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 82nd and Belleview and 82nd 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 40th 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 has been approved by 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 and the City is currently working through issuing the Notice to Proceed to the contractor.

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

No SSOs were experienced during this reporting period.

Similar to the third quarter, the fourth quarter of 2025 can be described as a generally dry period, with one day of rainfall greater than 1.0 inch and another 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 & collection system inspections and maintenance activities have aided in minimizing SSO instances in conjunction with low rainfall conditions.

City Sewer Staff responded to 49 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. Four of these 49 instances did prove to be the City’s responsibility at which time City Sewer Staff either jetted and/or vacuumed the sewer line or manhole to remove a blockage 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	49

[Analysis of the Cause of Each SSO and Backup from Quarter - Reference AOC paragraph 49\(d\)](#)

No SSOs were experienced during this reporting period.

The following tables describes Basement Backups for the reporting period including the analysis and remedy each was given.

General Location	Volume of All Activations (gallons)	Area of City and Feature Receiving SSO Discharge	Cause
5000 Block of Lake Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Sump in rear of property has a bad pump - Vac'd out to provide relief.
1st Block of Marydale Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Station and manhole water level down - Blockage in lateral line.
2000 Block of Delores St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - reconnection made - No backup - Lateral line repaired - Manually pumped to clear line .
800 Block of Park Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Lateral clean out open - Lateral cap placed on cleanout.
100 Block of Lazarcheff Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked cleanout it was empty - Customer notified.
800 Block of Wesley Ave.	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.
800 Block of Saint Cletus 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.
1st Block of Drexel Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1100 Block of Saint Bernadette Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked clean out in backyard, water level down and flowing - Customer notified.
1500 Block of Doris Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Our problem - Jetted customer line.
400 Block of St. Nicholas	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and down stream manholes both had water level down and flowing - Customer notified.
100 Block of Lazarcheff Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked clean out empty - Customer notified.
100 Block of Leonard 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.
1200 Block of Saint Stephen 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.
100 Block of Leonard Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing.
2000 Block of Delores St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Landlord completed the work in backyard.
1100 Block of Saint Boniface Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Took customer sewer line off the main and ran into the manhole next door.
1200 Block of Saint Stephen 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.
2000 Block of Jerome Ln.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked manhole up stream, water level down and flowing - Customer notified.
1st Block of Lakewood Pl.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Station and manhole water level down and flowing.
1200 Block of Richard Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Customer has roots in their line - Contractor notified.
1300 Block of Richard 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.
5800 Block of Old Missouri Ave.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
700 Block of Upper Cahokia Rd. D	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole, water level down and flowing - Customer did not answer door.
1700 Block of Parklane 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.

General Location	Volume of All Activations (gallons)	Area of City and Feature Receiving SSO Discharge	Cause
1st Block of E Adams Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
2100 Block of Sandy Ridge Rd.	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.
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 & flowing - Customer notified.
1300 Block of Williams St.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up and down stream manhole, water level down and flowing - Customer notified.
1100 Richard Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked the cleanout they were both empty - Customer notified.
100 Block of St Paul	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Jetted the line at intersection of St. Paul and St. Dorothy.
2400 Block of Donna Dr.	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1st Block of Signal Hill Blvd	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Line blocked in main line - Manholes jetted to remove blockage - Flow returned.
400 Block of Jerome Ln	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked upstream manhole, water level down and flowing - Customer notified.
1st Block of Westwood Dr	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Station and manhole checked.
100 Block of Saint Boniface Dr	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked cleanout in the backyard it was empty - Customer notified.
100 Block of Jerome Ln	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Sewer down and flowing - Customer had leaves in their cleanout.
800 Block of St. Benedict 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.
1st Block of School	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked dead end manhole, water level down and flowing - Customer notified.
300 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.
800 Block of Park St	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked manhole upstream down and flowing.
1700 Block of Parklane Dr	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1st Block of St Gregory	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem.
1700 Block of Theodore Ln	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Checked up stream manhole down and flowing Customer notified.
1st Block of Hanover Ln	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Blockage in main line - Jetted and vaced line - Blockage removed - Customer notified.
1700 Block of Parklane Dr	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Blockage under sink, shower, and toilet - Cleanout empty.
2300 Block of jerome Ln	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Station and manhole, water level down - Block in lateral line - Customer notified to contact plumber.
200 Block of Kathryn St	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Blockage in lateral - Station and manhole checked good.
400 Block of Green	undetermined	Resident's basement, crawl-space, or lowest level.	Possible sewer backup - Customer problem - Manholes down and flowing - Customer notified.

Appendix E

Funding Summary Table

Funding Summary Table – Drinking Water, Wastewater, and Stormwater Infrastructure

City of Cahokia Heights (January 2026)

Funding Amount	Funding Source	Purpose / Project Area	Current Status	Timeline
\$10,000,000	Illinois Environmental Protection Agency (IEPA)	Sanitary sewer system upgrades to eliminate SSOs, reduce backups, and improve reliability	Grant awarded; construction ~95% complete	Construction ongoing; completion projected Spring 2026
\$6,000,000	DCEO - 22-203787 Drinking Water Infrastructure	Drinking water system improvements	Grant agreement executed; distribution pending	Design Complete Spring 2026, Construction began on some projects following agreement 2026
\$8,500,000	DCEO - 24-413044 – Sewer Infrastructure	Sanitary Sewer system repairs and upgrades	Grant Agreement Signed; \$935,000 disbursed	Notice to Proceed Issued January 2026 , Grant execution extended to October 2027
\$6,000,000	DCEO - 24-416011 – CURE / ARPA (Project No. AO230003)	Water, sewer, and broadband infrastructure	Grant agreement executed; Designed, bid and awarded 2024; \$660,000 disbursed	Construction underway 2025 - 2026
\$650,000	DCEO – Multiple Infrastructure Grants	City drinking water infrastructure improvement costs	Applications submitted; pending approval	Design complete and permits secured for projects 2025 . Construction Pending grant approvals and environmental review status.
\$200,000	DCEO – 20-203097 - Local Facility & Environmental Improvements	Converting an existing sewage lift station located at 352 N. 82nd Street in Cahokia Heights to a submersible duplex lift station	Funding awarded; distribution pending	Design & Construction Expires 4/30/2026
\$125,000	DCEO – 22-203175 - Planning	Comprehensive Plan Development	Funding awarded; distribution pending	Services by PGAV, a consulting firm based out of St. Louis, Missouri - Expires 6/30/2026
\$3,000,000	DCEO-23-203089 - Community Development Administrative Grant	Support community development and violence prevention by enhancing public safety and improving city facilities.	Agreement executed 11.13.2025	Pending disbursement. Quarterly Report due 4/15/2026 Expires 6/30/2027
\$2,500,000	U.S. EPA (Congressionally Directed – Sen. Duckworth)	Interceptor Sewer System improvements	Funding awarded; \$900,000 disbursed for engineering design	Remainder requires procuring BABA compliant lift station equipment 2026
\$7,297,000	U.S.A.C.E (Congressionally Directed – Sen. Duckworth)	Funding for the Army Corps’ work on the City’s East Interceptor System	Funding awarded; distribution pending	Final design in progress; Full construction requires additional funding in excess of the (2.5 +7.297 (9.736)M) Award 2026
\$500,000	U.S.A.C.E (Congressionally Directed – Sen. Duckworth)	GIS Sewer Mapping Environmental Assistance Projects (GGR)	Funding Approved	Award estimated Spring 2026
\$10,000,000	St. Clair County – CDBG-DR	Stormwater flooding mitigation (Piatt Place)	Approved; Awaiting grant agreement following EA approval	Environmental Assessment (EA) and H/H Analysis, ongoing Spring 2026
\$3,100,000	FEMA Disaster Grant (DR-4766)	Stormwater infrastructure and flood mitigation (Ping Pong neighborhood)	Application under FEMA/IEMA review	Design complete; construction pending approval
\$2,500,000	FEMA Disaster Grant (DR-4819)	Stormwater and flood mitigation (July 2024 flood response)	Application under FEMA/IEMA review	Design & construction pending approval
\$5,000,000	Illinois Department of Transportation (IDOT)	Roadway and associated drainage improvements	Application submitted; pending approval	TBD upon award
\$20,000,000	EPA – Community Change Grant	Environmental inequities, climate resilience, pollution reduction	Program eliminated (May 2025)	Not moving forward