



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

Emma Garl Smith  
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 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"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.B.	9/15/2021	Complete	Approved by EPA 12/13/2021
Complete the "Targeted Dry-Weather SSO Investigation Plan" for: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.B.c.	3/31/2022  (90 days after EPA approval of 48.B.)	Complete	Sewer inspections ongoing as construction projects alleviate chronically surcharged collection system.
Submit a "Targeted Dry- Weather SSO Corrective Action Plan" to eliminate dry-weather SSOs at: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• List Station #22</li> <li>• Lift Station #5</li> </ul>	48.C.	5/30/2022	Complete	Revised Dry Weather Plan approved by EPA 6/27/2024
Implement EPA-approved "Targeted Dry-Weather SSO Corrective Action Plan" for: <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• Lift Station #22</li> <li>• Lift Station #5</li> </ul>	48.C.c.	In accordance with the approved schedule and milestones	In-progress	N. 82 <sup>nd</sup> St. – completed October 2023.  Lift Station #5 – completed June 2023  Lift station #22 (Lauralee Dr.) – anticipated completion; 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"> <li>• Supervisor = 1</li> <li>• Foreman = 1</li> <li>• Laborer = 12</li> </ul> Administrative: <ul style="list-style-type: none"> <li>• Director = 1</li> <li>• Assistant Director = 1</li> <li>• Billing Clerk = 4</li> </ul>
"CMOM Program": Submit for Review. Update one year after initial submission date.	48.A.a.	2/12/2022  Update req'd: 2/12/2023	Complete	EPA approved Program, 11/21/2022
"Wet-Weather SSO Investigation Plan": Submit to identify and understand causes of Wet-Weather SSOs	48.D.	8/16/22	Complete	EPA approved revised plan, June 27, 2024.

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

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

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

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

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

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

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

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

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

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

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

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