

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

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



**Curtis McCall Sr., Mayor**  
**Richard Duncan, City Clerk**

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

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

April 08, 2026

**VIA EMAIL**

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  
Assistant Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**RE: Cahokia Heights NPDES ID #ILN000019**  
**August 16, 2021 Administrative Order on Consent**  
**Final Report and Certification of Completion**

Dear Ms. Rogers and Ms. Garl Smith,

The City of Cahokia Heights ("City") hereby submits its Final Report and Certification of Completion, pursuant to Paragraph 74 of the August 16, 2021 Administrative Order on Consent ("AOC"). As described in the table included below as Attachment 1, the City has satisfied all of the requirements of the AOC either by completion of the required work or because the relevant obligations have been incorporated into and will continue to be implemented under the Consent Decree entered by the Court in *United States v. City of Cahokia Heights*, No. 3:24-cv-02591-DWD (S.D. Ill.) on January 20, 2026. Because the requirements of the AOC have been met or otherwise incorporated into the Consent Decree, the City hereby requests termination of the AOC.

The City looks forward to continuing our relationship with the EPA as we transition to implementing the Consent Decree. If you have any questions or concerns, please contact me, Mayor McCall, (618) 332-4258, [ymccall@cahokiailinois.org](mailto:ymccall@cahokiailinois.org), or our legal counsel, Erica Spitzig, (513) 357-9310, [espitzig@taftlaw.com](mailto: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."*

**Attachment 1 – Documentation of Completion of AOC Requirements**

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Status	Notes	Remaining Obligations Incorporated into Consent Decree
Designate a Project Coordinator and Provide Contact Information	Paragraph 51	8/26/2021	Complete	Project Coordinator updated to Janae’ Swanson - effective 10/18/25	N/A
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 (Lauralee Dr.)</li> <li>• Lift Station #5 (Pocket Rd. &amp; Missouri Ave.)</li> </ul>	48.B.	9/15/2021	Complete	Approved by EPA 12/13/2021	N/A
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 (Lauralee Dr.)</li> <li>• Lift Station #5 (Pocket Rd. &amp; Missouri Ave.)</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.	N/A
Submit a “Targeted Dry-Weather SSO Corrective Action Plan” to eliminate dry-weather SSOs at:	48.C.	5/30/2022	Complete	Revised Dry Weather Plan approved by EPA 6/27/2024	N/A

<ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• Lift Station #22 (Lauralee Dr.)</li> <li>• Lift Station #5 (Pocket Rd. &amp; Missouri Ave.)</li> </ul>					
<p>Implement EPA-approved “Targeted Dry-Weather SSO Corrective Action Plan” for:</p> <ul style="list-style-type: none"> <li>• N 82<sup>nd</sup> St. Clean Out</li> <li>• Lift Station #22 (Lauralee Dr.)</li> <li>• Lift Station #5 (Pocket Rd. &amp; Missouri Ave.)</li> </ul>	48.C.c.	In accordance with the approved schedule and milestones	In-progress	<ul style="list-style-type: none"> <li>• N. 82<sup>nd</sup> St. – completed October 2023.</li> <li>• Lift Station #5 (Pocket Rd. &amp; Missouri Ave.) – completed June 2023</li> </ul> <p>Lift station #22 (Lauralee Dr.) – anticipated completion; Dec. 2026</p> <p>Plan revised and approved by EPA; June 27, 2024.</p> <p><i>*Expanded details provided in “Targeted Dry-Weather SSO Correction Action Plan Projects” section</i></p>	Paragraph 18; Attachment 1 to Appendix A.
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.	While this obligation has been met, additional training/certification requirements are

				Four (4) total employees have completed voluntary collection system certification training	incorporated in Paragraph 14 of the Consent Decree.
“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.	N/A
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.11 1.	12/14/2021	Complete	Completed Dec. 2021. Notice given to EPA on 1/3/2022. Routine inspections occur as part of plan.	N/A
“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.	N/A
“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.	N/A

<p>“Sanitary Sewer Staffing”: Complete assessment of the appropriate number of staff needed including job categories, expertise, and licensure.</p>	<p>48.A.b.v1.</p>	<p>12/14/2021</p>	<p>Complete</p>	<p>Staffing levels and positions established in EPA approved CMOM. Approval date – 11/21/2022.</p> <p>Field Staff = 8 Administrative Staff = 8</p>	<p>N/A</p>
<p><b>Name of Deliverable or Milestone</b></p>	<p><b>Main Ref. in Consent Decree</b></p>	<p><b>Due Date for Deliverable or Milestone</b></p>	<p><b>Status</b></p>	<p><b>Notes</b></p>	
<p>“Routine Inspection and Maintenance of City Lift Stations”: Train staff based on plan and procedure of 48.A.b.1v.</p>	<p>48.A.b.v1 1.</p>	<p>2/12/2022</p>	<p>Complete</p>	<p>Accomplished as part of Condition Status Inspections and Routine Inspection and Maintenance - 48.A.b.11. and 48.A.b.1v.</p>	<p>N/A</p>
<p>“Appropriate Staffing Levels”: Establish and maintain appropriate levels according to the assessment performed in 48.A.b.1v.</p>	<p>48.A.b.vu 1.</p>	<p>2/12/2022</p>	<p>Complete</p>	<p>Current Staffing Level:</p> <p>Field:</p> <ul style="list-style-type: none"> <li>• Supervisor = 1</li> <li>• Foreman = 1</li> <li>• Laborer = 12</li> </ul> <p>Administrative:</p> <ul style="list-style-type: none"> <li>• Director = 1</li> <li>• Assistant Director = 1</li> <li>• Billing Clerk = 4</li> </ul>	<p>N/A</p>

<p>“CMOM Program”: Submit for Review. Update one year after initial submission date.</p>	<p>48.A.a.</p>	<p>2/12/2022 Update req'd: 2/12/2023</p>	<p>Complete</p>	<p>EPA approved Program, 11/21/2022</p>	<p>Paragraph 41; Appendix G</p>
<p>“Wet-Weather SSO Investigation Plan”: Submit to identify and understand causes of Wet-Weather SSOs</p>	<p>48.D.</p>	<p>8/16/22</p>	<p>Complete</p>	<p>EPA approved revised plan, June 27, 2024.</p>	<p>Paragraph 23; Appendix B</p>