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

September 29, 2026

VIA EMAIL

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Re: ***United States v. City of Cahokia Heights*, 3:24-cv-02591-DWD Consent Decree Chronic SSO List**

Dear Ms. Rogers and Ms. Garl Smith:

As you know, Paragraph 25 and Appendix C of the Consent Decree in the referenced case requires the City of Cahokia Heights ("City") to develop and submit a list of chronic SSO locations in the Sewer System ("Chronic SSO List") to EPA for review and approval, within 6 Months after the Effective Date of the Consent Decree. As discussed among counsel for the City, the United States, and the State, the City hereby submits this letter to confirm that there are no SSO locations meeting the definition of "chronic SSO," and therefore no Chronic SSO List is required to be submitted.

Appendix C defines "chronic SSO" to mean "[a] location that has more than one wet-weather related SSO in the previous 12 Months," and requires that any such location be included on the Chronic SSO List. The Consent Decree became effective on January 20, 2026, after it was entered by the U.S. District Court for the Southern District of Illinois on that date. Consent Decree Paragraph 7(s) defines "Month" to mean "one calendar month running from the numbered day to the same numbered day of the following calendar month, regardless of whether the particular month has 28, 29, 30 or 31 days." Thus, the Chronic SSO List was required to be submitted on July 20, 2026 (i.e., 6 Months after January 20, 2026) and to include any location with more than one wet-weather related SSO in the preceding 12 Months.

The City has reviewed its SSO reporting between July 20, 2025 and July 20, 2026, and there are no locations within the City meeting the definition of "chronic SSO" during that period. More specifically, there are no locations within the City that had more than one wet-weather related SSO in the 12 Months prior to July 20, 2026. As such, there are no locations to be included on the Chronic SSO List and therefore no Chronic SSO List is required.

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The City remains committed to satisfying the requirements of the Consent Decree and looks forward continuing our relationship with EPA and Illinois EPA. If you have any questions or concerns regarding the Chronic SSO List, please contact me, Mayor McCall, at (618) 332-4258 or mayor@cahokiaheightsil.us, or our legal counsel, Erica Spitzig, at (513) 357-9310 or erica.spitzig@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 perjury 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 have no personal knowledge that the information submitted is other than 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."

Cc:

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