



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Purpose: Commonfields of Cahokia – SSO Recon Inspection Trip Report

Facility: Commonfields of Cahokia Sewer District

Date of Inspection: January 26, 2021

Illinois EPA Inspectors:

Joe Stitely (618) 993-7200

Wayne Caughman

Ingrid Acevedo

U.S. EPA Inspector:

Dean Maraldo, EPA Region 5; (312) 353-2098; maraldo.dean@epa.gov

Commonfields of Cahokia Sewer District Representative:

Dennis Traiteur, Manager, (618) 337-3302

Inspection Trip Report Prepared by:

Dean Maraldo, U.S. EPA Region 5 Inspector

U.S. EPA Inspector Signature: Maraldo, Dean
Digitally signed by Maraldo, Dean
Date: 2021.02.05 14:48:02 -06'00'

Approver Name & Title:

Ryan Bahr, Chief, Section 2, Water Enforcement and Compliance Assurance Branch

Approver Signature: RYAN BAHR
Digitally signed by RYAN BAHR
Date: 2021.02.05 16:31:28 -06'00'

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I. INTRODUCTION

On January 26, 2021, I conducted a reconnaissance inspection of portions of the Commonfields of Cahokia Sewer District's ("District") sanitary sewer conveyance system, and participated in an Illinois EPA ("IEPA") led meeting with the District to discuss sewer issues. During the inspection, I observed several lift stations and locations in the sewer system with reported operational issues and sanitary sewer overflows ("SSOs"). I participated in the following inspection activities:

- Reconnaissance inspection of select lift stations and areas of the sewer system with reported operational issues and/or SSOs;
- Participated in a meeting with IEPA inspectors and the District to discuss sewage issues; and
- After the meeting with the District, joined IEPA in an inspection of a lift station, a chronic SSO location, and other key points in the system.

The following personnel were involved in the inspection of the sewer system:

IEPA:	Joe Stitely, Inspector Wayne Caughman, Inspector Ingrid Acevedo, Inspector
U.S. EPA Inspector:	Dean Maraldo, Inspector/Enforcement Officer
Commonfields of Cahokia Sewer District:	Dennis Traiteur, Manager

The District manages a sanitary sewer collection system in portions of Centreville, Illinois, including 27 lift stations; and approximately 40 miles of gravity sewers, 3,000 feet of force mains, and 900 manholes (Commonfields of Cahokia Sewer District CMOM Program, 2014). I conducted a reconnaissance inspection of select lift stations and areas of the District's sewer system with reported operational issues and SSOs. The inspection was conducted to investigate sewage issues in the Centreville area. EPA has received complaints¹ and is aware of media reports² regarding chronic sewage issues in the Centreville area. EPA also reviewed District work orders, other reports, and IEPA violation notices documenting SSOs on seven occasions between July 18, 2016 and September 9, 2020 on N. 82nd St. (Attachment A). This trip report summarizes my inspection observations.

¹ *Request for Informal Investigation by the Illinois Environmental Protection Agency (IEPA) (with Exhibits)* provided by Centreville Citizens for Change

² - *'We're living in raw sewage, we need help' | Centreville residents fed up with the filth'*
<https://www.ksdk.com/article/news/local/centreville-raw-sewage-residents/63-7fe29bbf-eac0-4f3d-9d5e-c99c4f6dda51>
- *Centreville residents bring attention to chronic flooding and sewer issues*
<https://www.youtube.com/watch?v=FPQh5mAwcQA>
- *Centreville residents left in a lurch over faulty sewage system*
<https://fox2now.com/news/you-paid-for-it/centreville-residents-left-in-a-lurch-over-faulty-sewage-system/>

II. INSPECTION ACTIVITY SUMMARY

II. A. Reconnaissance inspection of select lift stations and reported SSOs

On Friday, January 22, 2021, I provided Dennis Traiteur, the manager of the District, with an electronic notice of my plans to join Illinois EPA for the meeting scheduled with the District for noon on January 26, 2021. I also informed Mr. Traiteur of my plans to observe known sewage problem areas in Centreville before the noon meeting on January 26th. On January 22, 2021, Mr. Stitely (IEPA) confirmed that he notified Mr. Traiteur of my plans to attend the January 26, 2021, meeting with the District.

I arrived in Centreville, Illinois at 09:15 on January 26, 2021. The area received 1.21 inches of precipitation on January 25, and a trace of precipitation on January 26th (National Weather Service Forecast Office, St. Louis, Missouri). Before the scheduled noon meeting with IEPA and the District, I observed eleven locations, from the public right-of-way, across the District's conveyance system, including select lift stations and reported SSO locations. Attachment B summarizes observations (including inspection locations and coordinates) for the lift stations, SSO locations, and other areas I inspected on January 26, 2021. Photos referenced below and in Attachment B are included in the Photo Log (Attachment C). Attachment D includes a map of inspection site locations.

SSO at [REDACTED] N. 82nd St:

I observed raw sewage flowing from a cleanout located in the front yard of the residence at [REDACTED] N. 82nd St. in what is referred to the "Ping-pong area" in Centreville (photographs COMF0001, COMF0002, COMF0003). I noted toilet paper debris in the ditch receiving the sewage and a strong sewage odor. I observed the sewage discharging to the ditch running along the front of the residence and then west toward the residence's backyard continuing to the twin culverts under N 80th Street (photograph COMF0004 and COMF0005). The twin culverts discharge to perennial Canal #1 (photograph COMF0020), which flows into Harding Ditch, a perennial stream, which flows to Prairie du Pont Creek, a perennial stream and tributary to the Mississippi River.

I concluded the morning field inspection activities at 11:40 and headed to the District office at 2525 Mousette Lane in East St. Louis to join IEPA for the scheduled noon meeting with the District.

II. B. Meeting with Illinois EPA inspectors and the District to discuss sewage issues

I met IEPA inspectors Stitely, Caughman, and Acevedo at the District office at 11:50. We entered the building and met with Mr. Traiteur in a conference room. I presented my U.S. EPA Inspector credentials to Mr. Traiteur. After introductions, Mr. Stitely began the meeting by discussing plans for the merger of Centreville, Cahokia, and Alorton into a new municipality called "Cahokia Heights." He added that the official merger may occur by May 1, 2021. I asked if the Commonfields of Cahokia Sewer District would still maintain sewers within the new municipality. Mr. Traiteur said he didn't think so and added that the responsibility for sewer operations would become the responsibility of Cahokia Heights.

Mr. Stitely also relayed information obtained during an earlier meeting with the District's engineering consultant regarding a potential FEMA BRIC grant award for Cahokia Heights. He mentioned that the new municipality hopes to secure a 22 million-dollar grant to rehabilitate all 69 lift stations in Cahokia Heights (including all lift stations currently operated and maintained by Centreville, Village of Cahokia, Alorton, and the Commonfields of Cahokia Sewer District). Mr. Stitely said the potential grant would also help fund construction of a new trunk line to convey Cahokia Heights sewage directly to American Bottoms WWTP, rather than through the East St. Louis sewer system. Mr. Traiteur added that the new trunk line would help alleviate situations where East St. Louis surcharges (restricts) flow to the upstream communities during wet weather events.

Mr. Stitely reminded Mr. Traiteur about the January 31, 2021, deadline for the District to respond to IEPA's recent violation notice (see Attachment A) regarding SSOs on N. 82nd Street and other sewage issues. Mr. Stitely then went over plans for the afternoon, including inspection of the SSO at [REDACTED] N. 82nd St., the lift station at 82nd and Bluff, and the culverts under N. 80th St. which convey sewage and stormwater flows from the area around the SSO on N. 82nd St. to Canal #1. Mr. Traiteur said he had a meeting to attend and could not join us for the afternoon inspection.

At this point, we concluded the meeting and departed the District office.

II. C. Continue Reconnaissance inspection of select lift stations and reported SSOs

Lift Station at N. 82 St. and Bluff: At 13:00, I met up with IEPA inspectors at Lift Station 11 on N. 82 St. and Bluff (photograph COMF0006). According to Mr. Stitely, this is the last lift station prior to entering the East St. Louis sewer system in this area. He added that the lift station had a history of operations and maintenance issues and was operated manually by District staff until recently. Mr. Stitely lifted the lift station's cover and observed an uncovered electrical panel, indicative of poor maintenance (photograph COMF0015).

SSO at [REDACTED] N. 82nd St:

I then met the IEPA inspectors at the SSO I observed earlier in the morning in front of [REDACTED] N. 82nd St. Raw sewage was still flowing from the relief point into the ditch (photograph COMF0017; and video COMF0018). Mr. Stitely confirmed that the sewage flowed into the yard behind the residence and through the twin culverts under N. 80th St. then discharging to Canal #1.

Culverts under N. 80th St. to Canal #1:

We then drove around the corner to the culverts under N. 80th St. Mr. Stitely explained that the culverts may be too low at the outlet to Canal #1 (photograph COMF0020) which may create opportunity for back flow, under high water conditions, towards the Ping-pong area, including the N. 80th and N. 82nd St. neighborhood.

Overview of Canal #1 from Lake Dr. overpass:

We stopped at the Lake Dr. overpass to view Canal #1 downstream of the culverts draining the Ping-pong area. Photograph COMF0021 captures the view north from the overpass. Photograph COMF0022 captures the southwest view of Canal #1 from the overpass.

SSO at Lift Station at Lauralee and Violet:

The IEPA inspectors departed to respond to a citizen complaint and I continued to Lift Station 22 at Lauralee and Violet. Upon arrival at 14:20, I immediately noticed a strong sewage odor and observed raw sewage overflowing from the lift station (photograph COMF0024). I also captured video of the SSO (video COMF0025). I noted that the manhole cover on the top of the lift station was missing, exposing the lift station to rainwater. A black hose was coming out of the manhole, apparently to facilitate a bypass (photograph COMF0027 and video COMF0026). I noted that the level of sewage in the lift station was just below the lip of the manhole. I did not have access to the field receiving the sewage overflow. As a result, I could not verify the downstream path or impacts of the ongoing sewage overflow.

At this point, I concluded the inspection and departed Centerville at 14:42.

REFERENCES

Specific resources included by reference:

- *Request for Informal Investigation by the Illinois Environmental Protection Agency (IEPA)* (with Exhibits) provided by Centerville Citizens for Change
- Commonfields of Cahokia Public Water District Sanitary Sewer System Capacity, Management, Operation and Maintenance (CMOM) Program, August 2014

ATTACHMENT A: District work orders, other reports, and IEPA violation notices regarding SSOs on N. 82nd St.

WO Number

CYCLE: _____ ROUTE # _____

MISC

INFORMATION ASSIGNED BY OFFICE

NAME:
SERVICE ID:
ACCOUNT NO.:
SERVICE ID:
ADDRESS: [REDACTED]
METER NUMBER:

Reading Seq.

N. 82nd

PHONE NO.: _____
ISSUE DATE: 11
PROCESS DATE: 11
PROCESS TIME: _____
REQUESTED BY: _____
ASSIGNED TO: FRANK

WORK ORDER CODE & DESCRIPTION:

3 Water coming out Manhole COVER

INFORMATION FROM THE FIELD

METER TYPE:
OLD METER #: _____

NEW METER TYPE: _____
NEW METER #: _____

OLD METER READING: 0.00000

NEW METER READING: _____

WORK DONE BY: B.S. - F.P.

DATE: 7-18-16

Comments: Turned off Bluff Station Due to Bellevue Breaker kicked out

DATE COMPLETED: _____

FINAL BILL INFORMATION:

NAME:
ADDRESS:
CITY/STATE/ZIP:

cahworko.frx

212197

WO Number

Misc

CYCLE: _____ ROUTE # _____

INFORMATION ASSIGNED BY OFFICE

NAME:
SERVICE ID:
ACCOUNT NO.:
SERVICE ID: Reading Seq.
ADDRESS:
METER NUMBER:

PHONE NO.: _____
ISSUE DATE: 11/28/16
PROCESS DATE: 11
PROCESS TIME: _____
REQUESTED BY: Alexia
ASSIGNED TO: Frank

WORK ORDER CODE & DESCRIPTION:

*Blind and Bluff WATER COMING UP IN
MIDDLE OF STREET OUT OF MAN HOLE*

INFORMATION FROM THE FIELD

METER TYPE:
OLD METER #: _____
OLD METER READING: 0.00000
WORK DONE BY: C.P.

NEW METER TYPE: _____
NEW METER #: _____
NEW METER READING: _____
DATE: 12-28-16

Comments: *BELLEVUE STATIONS BREAKER WAS KICKED
OUT - RESET BREAKER & SHUT OFF BLUFF STATION
DUE TO SURCHARGING MANHOLE IN STREET*

DATE COMPLETED: _____

FINAL BILL INFORMATION:

NAME:
ADDRESS:
CITY/STATE/ZIP:

cahworko.frx

WO Number

CYCLE: _____ ROUTE # _____

INFORMATION ASSIGNED BY OFFICE

NAME:
SERVICE ID:

ACCOUNT NO.:
SERVICE ID:

ADDRESS:
METER NUMBER:

Reading Seq.

N. 82nd St

PHONE NO.: _____

ISSUE DATE: 11/06-19-2017

PROCESS DATE: 11

PROCESS TIME: _____

REQUESTED BY: melody

ASSIGNED TO: FRANK

WORK ORDER CODE & DESCRIPTION:

Customer called and said that on N. 82nd St that she see a lot of water coming up

INFORMATION FROM THE FIELD

METER TYPE:

NEW METER TYPE: _____

OLD METER #: _____

NEW METER #: _____

OLD METER READING: 0.00000

NEW METER READING: _____

WORK DONE BY: K.M.

DATE: 6-19-17

Comments: Due to Bellview station had kicked out Breaker - Re-set Breaker

DATE COMPLETED: _____

FINAL BILL INFORMATION:

NAME:

ADDRESS:

CITY/STATE/ZIP:

cahworko.frx

Caughman, Wayne

W1638020002

From: Caughman, Wayne
Sent: Thursday, May 24, 2018 11:40 AM
To: Myla Oliver-Blandford
Subject: RE: Cahokia Commonfields

Dennis Traiteur called and advised that one of his biggest problems he is having is with the East St. Louis collection system that he empties his sewage into from his system. Girthal Clemons, the Public Works Director there has blockage in the city lines(usually tree roots, etc.) which she was supposed to have a contractor clean out. With the blockage, flow is restricted and backs up in the Commonfields system such as you and the residents have been seeing. He was to contact her again this morning about the status of the cleanout.

From: Myla Oliver-Blandford [mailto:MBlandford@eshd.org]
Sent: Wednesday, May 23, 2018 5:43 PM
To: Caughman, Wayne <Wayne.Caughman@Illinois.gov>
Subject: [External] Cahokia Commonfields

Hi Wayne,

In summary for today, with regard to the ongoing situation around 80th Street:
[REDACTED] residence: Sewage in yard [REDACTED] reported that there was some improvement after efforts by Cahokia Commonfields during Feb/March timeframe. She now has sewage in the yard and difficulty flushing toilets. Man hole in front of residence is seeping clear water and flooding ditches

80-82nd: Spoke with 4 residents. ¾ reported difficulty flushing toilets. Several manholes in the area with visible seeping water. Man hole on 82nd shooting water with surfactant –like foam surfacing. Underground pressure causing manhole to rise with water shooting action.

Resident on North 73rd street complained to ESHD of not being able to flush toilets/drain sinks since last week. Resident reported that Commonfields had been out 2 times last week & again on Monday with manhole in street off-filled to top with water/liquid. Resident called EHRET plumbing. Ehret's technician indicated to resident that the mainline to the houses was backed up.

Please let me know the course of action.
Thanks!

Myla Oliver-Blandford, M.P.H., L.E.H.P., R.E.H.S.
Assistant Administrator
Environmental Health Programs
East Side Health District
650 N. 20th Street
East St. Louis, IL. 62205
Office: (618) 271-8722, EXT. 112
Cell: (618) 409-7855
mblandford@eshd.org

DWPC INSPECTION DIGITAL PHOTOGRAPH PHOTOCOPIES

Photo # 001
Date: August 5, 2020
Time: 1:25 p.m.
Taken By: Joe Stitely,DWPC/FOS
Facility: Village of Centerville
Location: Adjacent to Lift Station
Notes: This is a photograph of the lift station near the intersection of N. 82nd street and Bluff Street. The pump station is inoperable, and no bypass pumping has been provided.



Photo #: 002
Date: August 5, 2020
Time: 1:29 p.m.
Taken By: Joe Stitely,DWPC/FOS
Facility: Village of Centerville
Location: Adjacent to Clean Out
Notes: This is a photograph of the removed clean out cap on the service line at [REDACTED] N. 82nd Street. Note the raw sewage discharging from the clean out.



DWPC INSPECTION DIGITAL PHOTOGRAPH PHOTOCOPIES

Photo # 003
Date: August 5, 2020
Time: 1:37 p.m.
Taken By: Joe Stitely,DWPC/FOS
Facility: Village of Centerville
Location: Adjacent to Clean Out
Notes: This is another photograph of the removed clean out cap on the service line at [REDACTED] N. 82nd Street. Again, note the raw sewage discharging from the clean out.



Photo #: 004
Date: August 5, 2020
Time: 1:38 p.m.
Taken By: Joe Stitely,DWPC/FOS
Facility: Village of Centerville
Location: Adjacent to Clean Out
Notes: This is a photograph of the roadside ditch immediately downstream of the removed clean out cap.





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

(217) 524-6308

CERTIFIED MAIL # 7019 1120 0001 3037 9134
RETURN RECEIPT REQUESTED

September 30, 2020

Commonfields of Cahokia Sewer District
2525 Mousette Lane
East St. Louis, IL 62206
Attn.: Dennis Traiteur, Manager

**Re: Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179**

Dear Facility Owner:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(a)(1), and is based upon a review of available information and an investigation by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in Attachment A to this notice. Attachments A and B include explanations of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this letter. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not the facility wishes to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If the facility wishes to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
2009 Mall Street Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179

The Illinois EPA will review the proposed terms for a CCA provided by the facility and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, the facility must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that the facility rejects the terms of the proposed CCA.

If a timely written response to this Violation Notice is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Division of Water Pollution Control
Attn: Cathy Siders / CAS#19
P.O. BOX 19276
Springfield, IL 62794-9276

All communications must include reference to this Violation Notice number, **W-2020-50179**.

Questions regarding this Violation Notice should be directed to **Cathy Siders at 217/524-6308** or catherine.siders@illinois.gov.

Sincerely,



Cathy Siders, Manager
Compliance Assurance Section
Division of Water Pollution Control
Bureau of Water

Attachments: A & B

ATTACHMENT A

Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179

Questions regarding the violations identified in this attachment should be referred to **Cathy Siders** at (217) 524-6308.

On August 5, August 26, and September 9, 2020; collection system, CMOM and MS4 inspections were conducted by representatives of the Illinois EPA for the Commonfields of Cahokia and the City of Centreville collection systems, lift stations, etc. During these inspections the following significant issues were observed; deteriorated conditions of the concrete sewer mains, severe infiltration and inflow (I & I), inoperable lift stations, and sanitary sewer overflows (SSO) occurring from a sewer lateral cleanout at [REDACTED] N. 82nd Street.

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Overflows from Sanitary Sewers are Expressly Prohibited

Determine the cause of the overflows and investigate corrective actions to eliminate the possibility of any further raw sewage discharges. Submit a detailed response including a timetable for each corrective measure proposed. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020 Rule/Reg.:	Overflow of sanitary sewers Section 12(a) of the Act, 415 ILCS 5/12(a) (2018); 35 Ill. Adm. Code 306.304

Systems Reliability

Review the operational and maintenance procedures in order to correct the deficiencies which caused the violations. Compliance with this requirement is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	All treatment works and associated facilities shall be so constructed and operated as to minimize violations of applicable standards during such contingencies as flooding, adverse weather, power failure, equipment failure, or maintenance, through such measures as multiple units, holding tanks, duplicate power sources, or such other measures as may be appropriate.

Rule/Reg.: Section 12(a) of the Act, 415 ILCS 5/12(a) (2018);
35 Ill. Adm. Code 306.102(a)

Excess Infiltration

Review the operational and maintenance procedures in order to correct the deficiencies which caused the violations. Compliance with this requirement is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Excess infiltration into sewers shall be eliminated, and the maximum practicable flow shall be conveyed to the treatment facility
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018); 35 Ill. Adm. Code 306.303

Discharge of Contaminants

Cease and desist from discharging contaminants that cause or threaten to cause water pollution. Review operational and maintenance procedures and correct the deficiencies which caused the violation. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	No person shall cause, threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018)

Deposited Contaminants

Cease and desist from depositing contaminants that cause or threaten to cause water pollution. Compliance is expected to be pursued immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Deposited contaminants on the ground in such a manner that caused or threatened to cause a water pollution hazard.
Rule/Reg.:	Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d) (2018)

Offensive Conditions

Review and evaluate operational procedures in order to correct the deficiencies which caused the violations. Discharges must not cause a violation of water quality standards. Compliance is expected to be achieved immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	Waters of the State shall be free from sludge or bottom deposits, floating debris, visible oil, odor, plant, oil, odor, plant or algal growth, color or turbidity of other than natural origin.
Rule/Reg.:	Section 12(a) of the Act, 415 ILCS 5/12(a) (2018), 35 Ill. Adm. Code 302.203

Offensive Discharge

Review and evaluate the operational procedures in order to correct the deficiencies which caused the violations. Discharges must not cause a violation of water quality standards. Compliance is expected immediately.

<u>Violation Date</u>	<u>Violation Description</u>
08/05/2020, 08/26/2020, & 09/09/2020	No effluent shall contain settleable solids, floating debris, visible oil, grease, scum or sludge solids. Color, odor and turbidity must be reduced to below obvious levels.
Rule/Reg.:	Section 12(a) and (d) of the Act, 415 ILCS 5/12(a) and (d) (2018), 35 Ill. Adm. Code 304.106

ATTACHMENT B

Violation Notice: Commonfields of Cahokia Sewer District
Violation Notice No.: W-2020-50179

In order to assist your facility in attaining compliance with the apparent violations listed in Attachment A, the following recommendations are offered:

1. Immediately cease all overflows from your sanitary sewer collection system. At the time of the investigation, there was sanitary sewer overflow (SSO) occurring from a lateral cleanout at [REDACTED] North 82nd Street.
2. Repair or replace all nonfunctioning pumps within the lift station located near the intersections of North 82nd Street and Bluff Street.
3. Provide an automatic float system within the lift station located near the intersections of North 82nd Street and Bluff Street.
4. Repair or replace the electronic controls for the lift station located near the intersections of North 82nd Street and Bluff Street. These controls were in poor condition and appear to have reached the end of their design life.
5. Televis the section of sewer main from the lift station located near the intersections of North 82nd Street & Bluff Street and the cleanout SSO, which is approximately 670 feet southwest of the station.
6. Based upon the television data, repair or replace the collapsed section(s) of sewer main from the lift station located near the intersections of North 82nd Street & Bluff Street and the lateral cleanout SSO.
7. Immediately initiate efforts to reduce inflow and infiltration into your wastewater collection system to minimize operation and maintenance problems during periods of significant rainfall. These efforts should include smoke testing of the sewer mains tributary to the North 82nd Street and Belleview Street lift station.
8. Based upon the smoke testing data, conduct point repairs and sewer main replacement of the sewer collection system tributary to the Belleview lift station.
9. Provide sealed manhole lids or elevate manholes in low lying areas to minimize stormwater inflow into the sewer collection system.

WASTEWATER DISTRIBUTION LIST

Facility Name: Commonfields of Cahokia

WW VN #: W-2020-50179

Letter Type: VN

<u>Reviewed/Approved</u>	<u>Initial</u>	<u>Date</u>
WWCMU Staff:	<u>JS</u>	_____
WWCMU Supervisor	<u>J</u>	_____

SUMMARY OF CONTACTS MADE IN COORDINATION OF CONCURRENCE OF LETTER:

FOS personnel contacted: <u>Jim Miles/Dae Stiteley</u>	Date of contact: <u>9/29 + 30/2020</u>
DLC personnel contacted: <u>Mike Roubitchek</u>	Date of contact: _____
Permits personnel contacted: _____	Date of contact: _____
Other contact: <u>Sanjay Syal & Todd Pettig</u>	Date of contact: _____

OUTGOING CORRESPONDENCE: (VNs, Proposed CCAs, Acceptance/Rejection/Meeting Letters, etc.)

Bcc: WW VN File Cathy Siders Greg Spencer Caleb Ruyle Roger Callaway
 Jay Patel Jim Miles

Regional Offices:

Rockford (Region 1) Des Plaines (Region 2) Peoria (Region 3) Champaign (Region 4) Springfield (Region 5) Collinsville (Region 6) Marion (Region 7)

Field Contact: _____

Division of Legal Counsel:

Christine Zeivel Chuck Gunnarson DLC
 Jacob Smith Mike Roubitchek _____

Other:

Tom Reuter (Records Unit) Sharon Dowson (FOIA)

ADMINISTRATIVE:

New File Needed: Yes No
Has correspondence been scanned and sent to project manager? Yes No
Comments: _____

Administrative Support Initials: SD Date: 10/1/2020

Commonfields of Cahokia Sewer District
SSO Inspection Trip Report

ATTACHMENT B: Summary of observations (including inspection site numbers, locations and coordinates) for the lift stations, SSO locations, and other locations inspected on January 26, 2021

Site No.	Type	Community	Lift station ID	Location	Date	Time	Notes	Photos	Long	Lat
2	SSO Sewer cleanout	Commonfields	NA	N 82nd St	1/26/2021	9:20	Observed sewage flowing from cleanout in front yard of home. Noted toilet paper and strong sewage odor. Flow drains west in ditch between homes.	COMF0001 (NW view); COMF0002 (SW view); COMF0003 (NE view)	-90.074304	38.584962
41	Culverts	Commonfields	NA	N 80th St.	1/26/2021	9:40	Culverts drain "Ping-Pong" area between 82nd and 80th Sts to Canal #1 which flows to Harding Ditch.	COMF0004 (North); COMF0005 (East)	-90.076926	38.584899
6	Lift station	Commonfields	11	82nd and Bluff Lift Station_IEPA reported as inoperable	1/26/2021	9 50	No discharges observed.	COMF0006	-90.072832	38.586358
7	Lift station	Commonfields	10	83rd and Belleview Lift Station	1/26/2021	9 56	No discharges observed. High flows in adjacent manhole but no discharges to surface observed.	COMF0007	-90.070869	38.587857
22	Lift Station	Commonfields	9	75th and Pershing	1/26/2021	10:12	No discharges observed. Recent construction adjacent to LS.	COMF0008	-90.081112	38.586499
42	Lift Station	Commonfields	8	75th St	1/26/2021	10:17	No discharges observed.	COMF0009	-90.079000	38.589000
13	Lift Station	Commonfields	5	71st and Ames	1/26/2021	10:35	No discharges observed.	COMF0010	-90.082097	38.593778
21	Lift Station	Commonfields	4	63rd and Laura	1/26/2021	10:46	No discharges observed. LS covered with blue tarp.	COMF0011	-90.087878	38.601051
37	Lift Station	Centreville	7	Golden and Dorsey	1/26/2021	11 08	No discharges observed. Adjacent to park.	COMF0012	-90.111417	38.598584
11	Lift Station	Commonfields	3	53 and Market	1/26/2021	11:34	No discharges observed.	COMF0013	-90.114577	38.575721
16	Lift Station	Commonfields	16	Police Station 5800 Bond	1/26/2021	11:38	No discharges observed.	COMF0014	-90.109223	38.571623
6	Lift station	Commonfields	11	82nd and Bluff Lift Station_IEPA reported as inoperable	1/26/2021	13 08	Return to LS with IEPA. Photo documents lack of maintenance, no cover on electrical panel. No discharges observed.	COMF0015	-90.072832	38.586358
2	SSO Sewer cleanout	Commonfields	NA	N 82nd St	1/26/2021	13:12	Returned with IEPA inspectors. Observed sewage flowing from cleanout in front yard of home. Noted toilet paper and strong sewage odor. Flow drains west in ditch between homes.	COMF0017 (W-NW view); COMF0018 (video)	-90.074304	38.584962
41a	Culverts	Commonfields	NA	N 80th St.	1/26/2021	13:21	Return with IEPA inspectors to "Ping-Pong" area culverts draining area between 82nd and 80th Sts to Canal #1 which flows to Harding Ditch.	COMF0020 (culvert outlets to Canal #1)	-90.077430	38.584949
41b	View of Canal #1	Commonfields	NA	Lake Dr overpass	1/26/2021	13:48	View from Lake Dr overpass of Canal #1 area downstream of Ping-pong area culverts.	COMF0021 (view N); COMF0022 (view S)	-90.078391	38.580099
12	Lift Station	Commonfields	22	Lauralee and Violet	1/26/2021	14:23	Overflowing lift station. Strong sewage odor. IEPA inspectors departed before I arrived at this location.	COMF0024 (discharge); COMF0025 (video of discharge); COMF0026 (video of top of LS, note uncovered manhole); COMF0027 (view of top of LS)	-90.122873	38.557332

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Attachment C: Photo Log
Commonfields of Cahokia Sewage District
EPA Inspection January 26, 2021
All photos taken by Dean Maraldo, Inspector, U.S. EPA
Camera: Ricoh WG-4



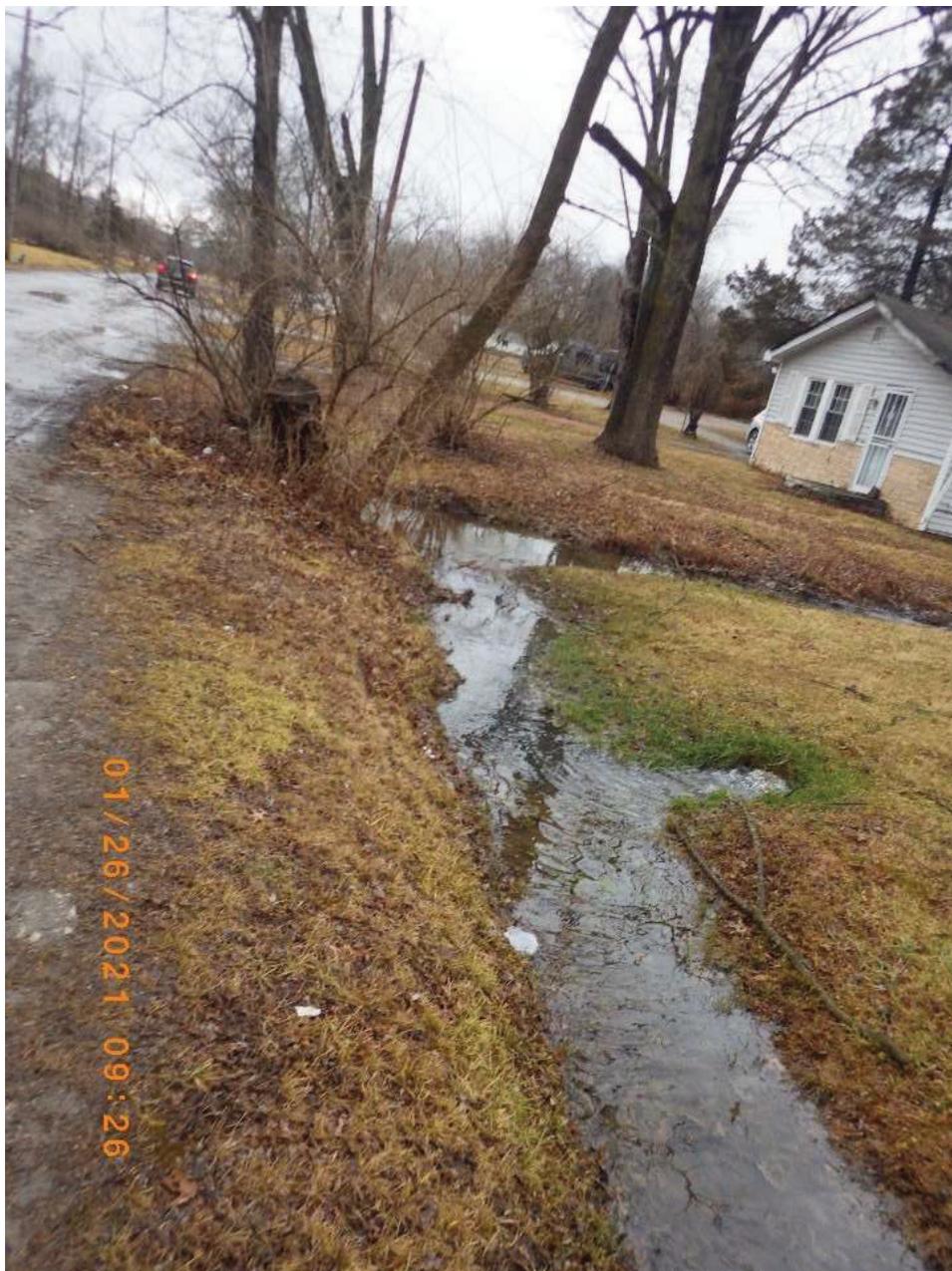
1: COMF0001

Description: Sewage observed flowing from cleanout in front yard of home. Sewage drains west in ditch between homes toward backyard and to culverts discharging to Canal #1.

Location: [Inspection location No. 2] [REDACTED] N 82nd St. Centreville [REDACTED])

Camera Direction: 288°

Date/Time: January 26, 2021; 09:26



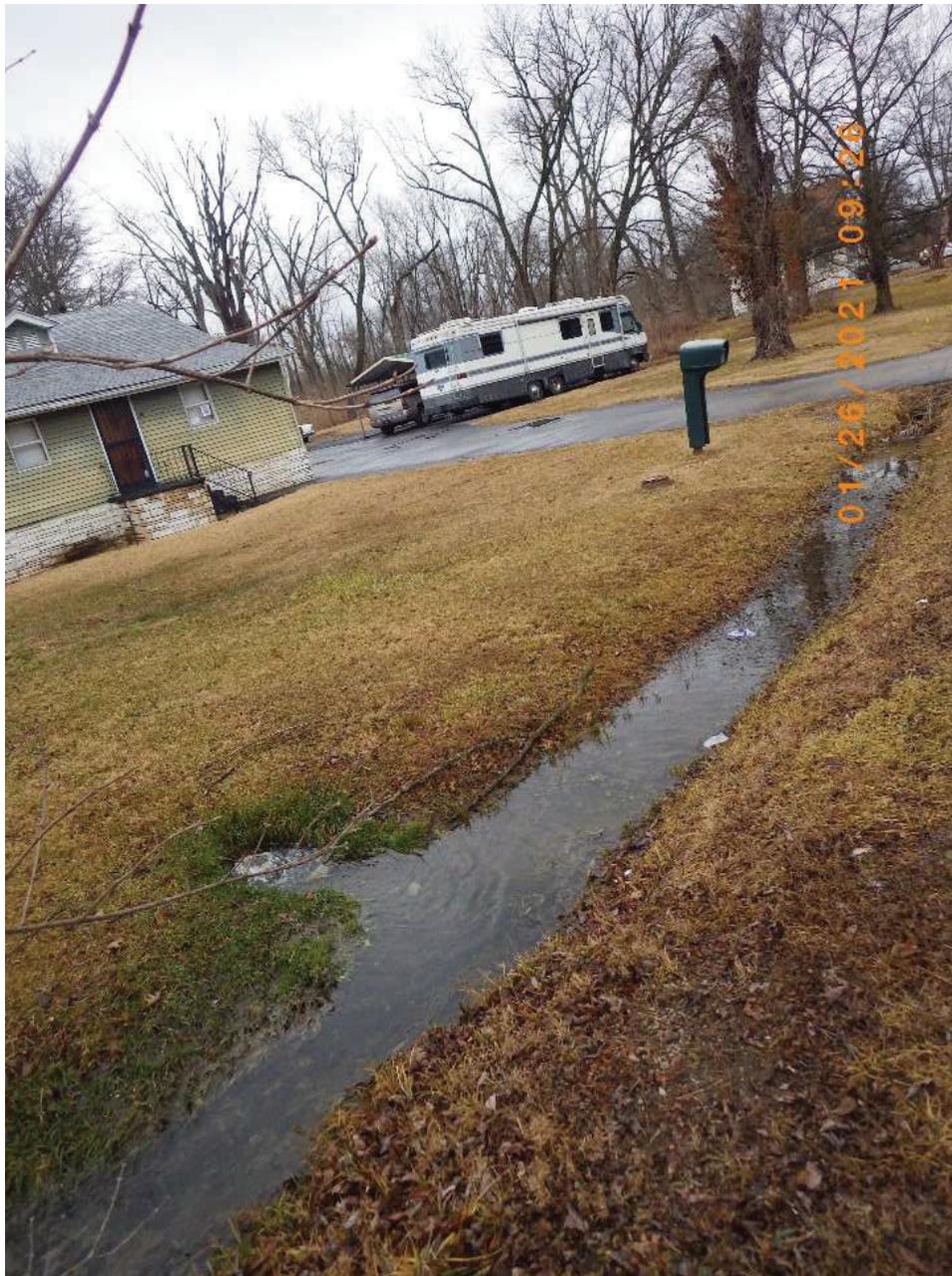
2: COMF0002

Description: Sewage observed flowing from cleanout in front yard of home.

Location: [Inspection location No. 2] [REDACTED] N 82nd St. Centreville [REDACTED])

Camera Direction: 253°

Date/Time: January 26, 2021; 09:26



3: COMF0003

Description: Sewage observed flowing from cleanout in front yard of home.

Location: [Inspection location No. 2] [REDACTED] N 82nd St. Centreville [REDACTED])

Camera Direction: 26°

Date/Time: January 26, 2021; 09:26



4: COMF0004

Description: Culverts draining "Ping-Pong" area between N 82nd and N 80th Sts. to Canal #1 which flows to Harding Ditch.

Location: [Inspection location No. 41] N 80th St., Centreville [REDACTED]

Camera Direction: 29°

Date/Time: January 26, 2021; 09:42



5: COMF0005

Description: Culverts draining "Ping-Pong" area between N 82nd and N 80th Sts. to Canal #1 which flows to Harding Ditch.

Location: [Inspection location No. 41] N 80th St., Centreville [REDACTED]

Camera Direction: 122°

Date/Time: January 26, 2021; 09:42



6: COMF0006

Description: Lift station #11

Location: [Inspection location No. 6] N 82nd St. and Bluff [REDACTED])

Camera Direction: 163°

Date/Time: January 26, 2021; 09:50



7: COMF0007

Description: Lift station #10. High flows in adjacent manhole but no discharges to surface observed.

Location: [Inspection location No.7] 83rd and Belleview [REDACTED]

Camera Direction: 205°

Date/Time: January 26, 2021; 09:56



8: COMF0008

Description: Lift station #9. Recent construction adjacent to LS.

Location: [Inspection location No. 22] 75th St. & Pershing, Centreville

Camera Direction: 106°

Date/Time: January 26, 2021; 10:12



9: COMF0009

Description: Lift station #8.

Location: [Inspection location No. 42] 75th St., Centreville ([REDACTED])

Camera Direction: 139°

Date/Time: January 26, 2021; 10:17



10: COMF0010

Description: Lift station #5

Location: [Inspection location No. 13] 71st and Ames, Centreville ([REDACTED])

Camera Direction: 167°

Date/Time: January 26, 2021; 10:35



11: COMF0011

Description: Lift station #4. Note lift station covered with blue tarp.

Location: [Inspection location No. 21] 63rd and Laura, Centreville [REDACTED])

Camera Direction: 328°

Date/Time: January 26, 2021; 10:46



12: COMF0012

Description: Lift station #7 (operated by Centreville). Adjacent to park.

Location: [Inspection location No. 37] Golden and Dorsey, Centreville

Camera Direction: 56°

Date/Time: January 26, 2021; 11:08



13: COMF0013

Description: Lift station #3.

Location: [Inspection location No. 11] 53rd and Market, Centreville [REDACTED])

Camera Direction: 241°

Date/Time: January 26, 2021; 11:34



14: COMF0014

Description: Lift station #16.

Location: [Inspection location No. 16] 5800 Bond (behind Police Station), Centreville (-90.109223; 38.571623)

Camera Direction: 35°

Date/Time: January 26, 2021; 11:38



15: COMF0015

Description: Lift station #11. Returned to lift station with IEPA inspectors. Note lack of maintenance, no cover on electrical panel.

Location: [Inspection location No. 6] N 82nd St. and Bluff ()

Camera Direction: 258°

Date/Time: January 26, 2021; 13:08



16: COMF0017

Description: [Returned to location with IEPA inspectors] Observed sewage flowing from cleanout in front yard of home. Noted toilet paper and strong sewage odor.

Location: [Inspection location No. 2] [REDACTED] N 82nd St. Centreville ([REDACTED])

Camera Direction: 295°

Date/Time: January 26, 2021; 13:12



17: COMF0020

Description: Culvert outlets draining "Ping-Pong" area between N 82nd and N 80th Sts. to Canal #1.

Location: [Inspection location No. 41a] East bank of Canal #1, Centreville (-90.077430; 38.584949)

Camera Direction: 222°

Date/Time: January 26, 2021; 13:21



18: COMF0021

Description: View north from Lake Dr. overpass of Canal #1 area downstream of “Ping-pong area” culverts.

Location: [Inspection location No. 41b] Centreville (-90.078391; 38.580099)

Camera Direction: 71°

Date/Time: January 26, 2021; 13:48



19: COMF0022

Description: View south from Lake Dr. overpass of Canal #1 area downstream of “Ping-pong area” culverts.

Location: [Inspection location No. 41b] Centreville (-90.078391; 38.580099)

Camera Direction: 203°

Date/Time: January 26, 2021; 13:49



20: COMF0024

Description: Lift station 22. Lift station was overflowing. Noted strong sewage odor.

Location: [Inspection location No. 12] Lauralee and Violet, Centreville (REDACTED)

Camera Direction: 188°

Date/Time: January 26, 2021; 14:23



21: COMF0027

Description: Lift station 22. View of top of list station with uncovered manhole. Note black hose and level of sewage just below lip of the manhole.

Location: [Inspection location No. 12] Lauralee and Violet, Centreville ()

Camera Direction: 155°

Date/Time: January 26, 2021; 14:24

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ATTACHMENT D: January 26, 2021 inspection site location map

