



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

REPLY TO ATTENTION OF
ECW-15J

VIA ELECTRONIC MAIL

Mayor Curtis McCall Sr.
City of Cahokia Heights
103 Main Street
Cahokia Heights, Illinois 62206
rwilliams@centownil.com

Subject: May 4-6, 2022 Inspection Trip Report for City of Cahokia Heights

Dear Mayor McCall:

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Trip Report that describes and documents the observation made by the EPA inspection team in the City of Cahokia Heights May 4, 2022 through May 6, 2022.

EPA observed locations in the City of Cahokia Heights where sanitary sewer overflows have happened in the past and documented their condition on the date of inspection. During the inspection, EPA observed wet wells of lift stations and manholes that either were missing a cover or were not secured. EPA also observed lift stations that were not secured with fencing and locks. Both situations are safety concerns for City of Cahokia Heights' citizens and personnel.

If you have any questions or concerns regarding this letter, or the inspection trip report, please contact Joan Rogers at (312) 886-2785 or at rogers.joan@epa.gov.

Sincerely,

Bahr, Ryan

Digitally signed by Bahr,
Ryan
Date: 2022.05.24
17:57:20 -05'00'

Ryan J. Bahr
Supervisor, Section 2 Water Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Bennett, Illinois EPA [Todd.Bennett@Illinois.gov]
Sanjay Sofat, Illinois EPA [Sanjay.Sofat@Illinois.gov]
Joe Stitely, Illinois EPA [Joe.Stitely@Illinois.gov]

Purpose: NPDES SSO Inspection Trip Report

Facility: City of Cahokia Heights, Illinois

NPDES ID Number (No NPDES Permit): ILN000019

Dates of Inspection: May 4, 2022 – May 6, 2022

Illinois EPA Inspectors: None

EPA Inspectors:

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

Joan Rogers, EPA Region 5; (312) 886-2785; rogers.joan@epa.gov

Ted Fletebo, EPA Region 5; (312) 886-9402; fletebo.ted@epa.gov

City of Cahokia Heights Representatives: None

Inspection Trip Report Prepared by:

Joan Rogers, EPA Region 5 Inspector

EPA Inspector Signature and Date: DINO MARALDO Digitally signed by DINO MARALDO
Date: 2022.05.23 14:30:10 -05'00'

EPA Inspector Signature and Date: JOAN ROGERS Digitally signed by JOAN ROGERS
Date: 2022.05.20 15:39:18 -05'00'

EPA Inspector Signature and Date: Fletebo, Theodore Digitally signed by Fletebo, Theodore
Date: 2022.05.23 12:02:44 -05'00'

Approver Name & Title:

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

Approval Signature and Date: Bahr, Ryan Digitally signed by Bahr, Ryan
Date: 2022.05.24 17:55:42 -05'00'

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Section 1: May 4, 2022

On May 4, 2022, EPA staff members Dean Maraldo, Joan Rogers, and Ted Flatebo traveled to Cahokia Heights (City) and observed locations in Cahokia Heights that have had previous Sanitary Sewer Overflows (SSOs) or where the City has to manually operate a lift station. EPA attorneys Deborah Carlson and Gillian Asque and Department of Justice attorneys Lauren Grady and Nick McDaniel accompanied the EPA inspectors. Collectively, the inspectors and attorneys will be referred to as the EPA Team in this trip report. EPA notified the City of the activities prior to the trip.

All photos taken by Joan Rogers, Environmental Scientist/Inspector, U.S. EPA

Table 1 describes the locations, times, and observations from May 4, 2022.

Table 1: May 4, 2022 Observations

<u>Location</u>	<u>Time</u>	<u>Observations</u>
Lauralee & Violet Lift Station	12:58 P.M.	The lift station was not overflowing. The lift station was enclosed with orange plastic fencing and not secured.
Block House Lift Station	1:15 P.M.	The door to the Block House was not locked. The wet well inside the Block House was partially covered with a plywood board.
Manhole near Block House Lift Station	1:20 P.M.	The manhole was unsecured and was full of water.
Lady of Snows Lift Station	1:37 P.M.	The lift station was unsecured. The pump was running at the time of observation. Water was actively being discharged via a rigid pipe into the manhole at the top of the hill.
Lake Drive and North 82nd Street intersection	1:54 P.M.	Erosional rills along the banks of Canal #1 near the overpass over the canal were observed. Mr. Joe Stitely, Illinois Environmental Protection Agency inspector, joined the EPA Team.
SSO from cleanout on North 82 nd Street		The cleanout was not overflowing. EPA Team spoke with the property owner who lives next door. He suggested that if the ditches were cleaned out, there would be less flooding in the area.

North 82nd Street & Bluff Street Lift Station	2:21 P.M.	The submersible pump in the manhole was not running but the EPA Team could hear water moving in the manhole. The EPA Team observed that the flow in the manhole was flowing to the southwest instead of to the northeast and to the East St. Louis Trunk line, as it was supposed to do.
North 82nd Street and Ridge Avenue manhole	2:26 P.M.	EPA did not hear any water movement from this manhole and there was no evidence of an overflow. Mr. Stitely stated that he heard a report that there was a debris blockage in the East St. Louis (ESL) sewer pipe on State Street and the ESL sewer workers removed it approximately one week ago.
Canal #1 and ditch from behind homes on North 82nd Street	2:44 P.M.	There was light flow in the ditch to Canal #1. The EPA Team observed both the inlet flow to the culverts under Lake Street and the outlet flow to Canal #1.
Lake Drive Pill Box Lift Station (Lake Drive and 71 st Street)	3:00 P.M.	The EPA Team observed that there was no warning light installed at this lift station. The wet well was full.
63 rd Street and Pittsburgh Drive intersection	3:10 P.M.	There is a water hydrant flusher attached to a hydrant near this intersection. The dripping from the flusher has eroded a hole beneath the flusher.
Beachland Lift Station (Lake Street and Beachland Place)	3:15 P.M.	The lift station structure is dented, and the cover is not secured. In the street, there is a hole where a drinking water line is exposed. The hole is not secured, and EPA observed a copper water tap line coming from the underground pipe.
East St. Louis' CSO Outfall 003 at Frank Holten State Park Lake (Lake Drive and North 47 th Street)	3:26 P.M.	The EPA Team observed evidence of fishing activity and no signage indicating that this was a CSO (Combined Sewer Overflow) Outfall.
4200 Missouri Avenue Lift Station (previously named the Pocket Road Lift Station in EPA reports)	3:53 P.M.	The gate around the lift station was closed and had a chain around the gates, but it was not locked. The EPA Team observed that the pump was continuously running, but water was coming back into the wet well from the location of the force main out of the station. Wet well was low, it contained approximately 6 inches of water.

401 Jackson Lift Station (Pocket Road and Jackson Street)	4:07 P.M.	There was a sheet of plywood and small wood pieces on top of the wet well, but it was not secured. Yellow caution tape was strung around the electric pole at the lift station.
600 Golden Road Lift Station (Golden Street and Dorsey Street)	4:15 P.M.	This lift station was recently renovated (October 2020). On the day of observation, the pumps were not functional and there was a tow-behind pump located at the site. The floats in the wet well were pulled out and were lying on the ground near the wet well. The level of water in the wet well was high. The electrical panel and gate were not secured. The red light on top of the control panel was flashing on and off.
Stormwater culvert for water from the bluff to go under Route 157.	4:37 P.M.	A large concrete culvert under Route 157 allows flow off the bluff to flow under the road and to the neighborhood ditches below.
Creston Drive Lift Station (Creston Drive near Hazel Avenue)	4:58 P.M.	This lift station is fenced, locked, and the fence has security tape through the slats.

Section 2: May 5, 2022

Beginning in the evening on May 4, 2022, and through the late morning of May 5, 2022, the region received approximately one inch of rain. On May 5, 2022, EPA inspectors Ted Flatebo and Joan Rogers (EPA) observed many of the same locations that the EPA Team observed on May 4, 2022. Below are the observations by EPA.

Table 2 describes the locations, times, and observations from May 5, 2022.

Table 2: May 5, 2022 Observations

<u>Location</u>	<u>Time</u>	<u>Observations</u>
SSO from cleanout on North 82 nd Street	9:33 A.M.	The clean out was flowing at the time of observation.
North 82nd Street & Bluff Street Lift Station	9:37 A.M.	Heard sound of flowing water coming from manhole in the center of the intersection. Water was observed flowing in the sanitary sewer system to the southwest, which is in the opposite direction of the City of East St. Louis collection system where this water is designed to drain to.
North 82nd Street & Belleview Avenue Lift Station	9:39 A.M.	Heard sound of flowing water coming from manhole in Belleview Avenue.

Lake Drive Pill Box Lift Station (Lake Drive and 71 st Street)	9:49 A.M.	<p>The EPA Team observed that there was no warning light installed at this lift station.</p> <p>Two City of Cahokia Heights employees were actively bypassing this lift station at the time of observation. They were using a pump in the back of a pickup truck and a three-inch hose. The employees stated it would take them a few hours to complete the bypass for this lift station and then they would continue to bypass additional inoperable lift stations in the afternoon.</p> <p>The hose the City employees were using to bypass had at least four small holes in it where sanitary waste was leaking out. Some of the sanitary waste was falling into the open manhole where the waste was being pumped out of, and some of the sanitary waste was being released into the roadside ditch. EPA did not observe this wastewater reach a Water of the United States.</p>
600 Golden Road Lift Station (Golden Street and Dorsey Street)	10:09 A.M.	<p>This lift station was recently renovated (October 2020). On the day of observation, the pumps were not functional and there was a tow-behind pump located at the site. The floats in the wet well were pulled out and were lying on the ground near the wet well. The electrical panel and gate were not secured. The red light on top of the control panel was flashing on and off.</p> <p>The wet well was approximately 30% full. City of Cahokia staff stated they would manually bypass this lift station on May 5, 2022, but it appeared they had not yet bypassed it.</p>
4200 Missouri Avenue Lift Station (previously named the Pocket Road Lift Station in EPA reports)	10:14 A.M.	<p>The gate around the lift station was closed and had a chain around the gates, but it was not locked. The EPA Team observed that the pump was continuously running, but water was coming back into the wet well from the location of the force main out of the station. Wet well was high, there was only about 6 inches between the water level and the top of the wet well. The water level in the wet well appeared to be steady at the time of observation.</p>

401 Jackson Lift Station (Pocket Road and Jackson Street)	10:24 A.M.	<p>There was a sheet of plywood and small wood pieces on top of the wet well, but it was not secured. Yellow caution tape was strung around the electric pole at the lift station.</p> <p>The wet well was approximately 30% full. City of Cahokia staff stated they would manually bypass this lift station on May 5, 2022, but it appeared they had not yet bypassed it.</p>
323 Pfieffer Road Lift Station (Pfieffer Road and Johnson Lane)	10:28 A.M.	<p>The gate around the lift station was closed and had a chain around the gates, but it was not locked. The open wet well was covered by a wooden pallet.</p> <p>The wet well was approximately 30% full. City of Cahokia staff stated they would manually bypass this lift station on May 5, 2022, but it appeared they had not yet bypassed it.</p>
Lady of Snows Lift Station	10:41 A.M.	The lift station was unsecured. The pump was running at the time of observation. Water was actively being discharged via a rigid pipe into the manhole at the top of the hill.
Lauralee & Violet Lift Station	10:50 A.M.	The lift station was not overflowing. The lift station was enclosed with orange plastic fencing and not secured. A strong sewage odor was noted near the wet well.
Diversion Station (Jerome Lane and Mousette Lane)	11:16 A.M.	Both lift stations were secured and no problems were observed. Adjacent to the station there is hole in the ground with a large concrete pipe exposed. The pipe had a crack in it but it was not leaking and there was no water in the hole.
City of East St. Louis Stormwater Pump Station	11:32 A.M.	The door to the pump station was secured. EPA could not readily identify if the pump station was operating.
SSO from cleanout on North 82 nd Street	11:42 A.M.	The clean out was flowing at the time of observation.
Lake Drive Pill Box Lift Station (Lake Drive and 71 st Street)	11:48 A.M.	At the time of observation, City of Cahokia Heights staff was no long present, and the lift station was no longer being actively bypassed.
City of East St. Louis' CSO Outfall 003 at Frank Holten State Park Lake (Lake Drive and North 47 th Street)	11:52 A.M.	The EPA Team observed fishing bobs and fishing line entangled in the vegetation around the CSO Outfall. This was evidence of fishing activity and there was no signage indicating that this was a CSO Outfall.

City of East St. Louis Pump Station (47 th Street and State Street)	11:56 A.M.	The door to the pump station was secured. EPA could not readily identify if the pump station was operating.
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1: BELL0001 (edited to remove Personally Identifiable Information (PII))

Description: SSO from the cleanout on North 82nd Street.

Location: North 82nd Street.

Camera Direction: Northwest and down

Date/Time: May 5, 2022/10:34 A.M.



2: BELL0002

Description: The non-functioning lift station at Lake Street and 71st Street was being bypassed by the City of Cahokia Heights personnel. The hose used to bypass the lift station leaked sewage. One of the leaks of sewage went into the ditch by the side of the 71st Street.

Location: Lake Street and 71st Street.

Camera Direction: Southeast

Date/Time: May 5, 2022/10:53 A.M.



3: BELL0003 (edited to remove PII)

Description: Two other hose leaks from the bypass hose dripped back into the wet well.

Location: Lake Street and 71st Street

Camera Direction: Down

Date/Time: May 5, 2022/10:53 A.M.



4: BELL0004

Description: The wet well at the Golden and Dorsey lift station was almost full.

Location: Golden and Dorsey Lift Station.

Camera Direction: Down

Date/Time: May 5, 2022/11:09 A.M.



5: BELL0005

Description: A tow behind pump was parked at the Golden and Dorsey lift station. City personnel manually turn it on to dewater the wet well.

Location: Golden and Dorsey.

Camera Direction: East

Date/Time: May 5, 2022/11:11 A.M.



6: BELL0006

Description: The wet well at the Pocket Road lift station was approximately 90% full.

Location: Pocket Road Lift Station.

Camera Direction: Down

Date/Time: May 5, 2022/11:18 A.M.



7: BELL0007

Description: Jackson Street lift station is non-functioning and needs to be manually dewatered by City personnel.

Location: Jackson Street lift station.

Camera Direction: North

Date/Time: May 5, 2022/11:24 A.M.



8: BELL0008

Description: The Pfeffer Street wet well level was low on the day of the inspection.

Location: Pfeffer Street Lift Station.

Camera Direction: Down

Date/Time: May 5, 2022/11:28 A.M.



9: BELL0009

Description: An overview of the Pfeffer Street Lift Station.

Location: Pfeffer Street Lift Station.

Camera Direction: North

Date/Time: May 5, 2022/11:30 A.M.



10: BELL0010

Description: Open erosional hole by a storm water pipe near the Diversion Station. There is a crack in the pipe that was first observed by EPA in April, 2022.

Location: Diversion Station.

Camera Direction:

Date/Time: May 5, 2022/12:16 A.M.

Section 3: May 6, 2022

On May 6, 2022, the EPA Team, without the DOJ attorneys present, drove past the SSO cleanout on North 82nd Street. It was overflowing.

The EPA Team then met with City of Cahokia Heights employees Dennis Traiteur, Sharlin Pfeffer, Van McCall and Hurst-Roche contractors Jim Nold, and Terry Sudholdt. The EPA Team relayed the observations from the previous two days. The EPA Team also discussed the deliverables submitted as a response to the Administrative Order on Consent, including the deliverables due on May 14th, 2022.

The EPA Team exited the City at approximately 10:30 A.M.