



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, Illinois 62206
ymccall@cahokiaillinois.org

Subject: July 25-28, 2022, MS4 Inspection Report for the City of Cahokia Heights

Dear Mayor McCall:

The U.S. Environmental Protection Agency conducted an NPDES Municipal Separate Storm Sewer System (MS4) Inspection at the City of Cahokia Heights on July 25-28, 2022. Enclosed, please find a copy of EPA's MS4 Inspection Report that documents the observations made by the EPA inspection team during the inspection. Pages 9-11 of the enclosed report summarize the areas of concern identified during the inspection.

If you have any questions or concerns regarding this letter, or the inspection report, please contact Dean Maraldo of my staff at (312) 353-2098 or maraldo.dean@epa.gov.

Sincerely,

Bahr,

Digitally signed by Bahr,
Ryan
Date: 2022.08.05
08:57:26 -05'00'

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

Enclosure

cc: Corey Allen, City of Cahokia Heights [callen@cahokiaillinois.org]
Keith Nolden, City of Cahokia Heights [knolden@cahokiaillinois.org]
Todd Bennett, Illinois EPA [Todd.Bennett@Illinois.gov]
Wayne Caughman, Illinois EPA [Wayne.Caughman@Illinois.gov]
Joe Stitely, Illinois EPA [Joe.Stitely@Illinois.gov]

MS4 Inspection Report

Inspection Date(s):	07/25/2022 - 07/28/2022	Announced: Yes			
Time:	Entry: 01:30 PM (CT)	Exit: 09:10 AM (CT)			
Media:	Water				
Statute(s)/Program(s):	Clean Water Act, NPDES				
Type of inspection:	MS4 - Municipal Separate Storm Sewer System Inspection				
Access:	Granted				
Permittee Name:					
City of Cahokia Heights					
Facility or Site Name:					
Cahokia Heights Public Works Department					
Facility/Site Physical Address:					
726 S. 50th Street					
(City, state, zip code)					
Cahokia Heights, IL 62207					
County/Parish:					
St. Clair					
Facility GPS Coordinates:					
38.57490, 90.12032					
Mailing address: (If different)					
(City, state, zip code)					
Facility/Site Identifier:					
ILU330001					
Permit Number:					
Unpermitted Facility					
SIC or NAICS:					
Persons Participating in Inspection:					
Title	Name	Phone	Email	Present at Opening Conf.	Present at Closing Conf.
Lead Inspector	Dean Maraldo	3123532098	Maraldo.Dean@epa.gov	Yes	Yes
Inspector	Joan Rogers	(312) 886-2785	rogers.joan@epa.gov	Yes	Yes
Inspector	Ted Flatebo	(312) 886-9402	Flatebo.Ted@epa.gov	Yes	No
City Public Works Director	Corey Allen	(618) 610-7961	callen@cahokiaillinois.org	Yes	Yes
City Assistant Public Works Director	Keith Nolden	(618) 530-7544	knolden@cahokiaillinois.org	Yes	No

Cahokia Heights MS4

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Storm Water Coordinator	Wayne Caughman	(618) 346-5125	Wayne.Caughman@Illinois.gov	Yes	No
St. Clair County	James Harms	(618) 233-1392-18	James.Harms@co.st-clair.il.us	Yes	No
City Assistant Public Works Director	Tom Hill			Yes	No
Hurst-Rosche, Inc.	Terry Sudholt	(618) 398-0890	tsudholt@hurst-rosche.com	Yes	No
Gonzalez Companies LLC	Tony Schenk	(618) 222-2221-101	tschenk@gonzalezcos.com	No	No
Gonzalez Companies LLC	John Schaller			No	No

Lead Inspector:

Dean Maraldo	<i>[Signature]</i>	DINO MARALDO	Digitally signed by DINO MARALDO Date: 2022.08.04 09:57:56 -05'00'
	REGION 5	maraldo.dean@epa.gov	(312) 353-2098

Supervisor Review:

Ryan Bahr	<i>[Signature]</i>	Bahr, Ryan	Digitally signed by Bahr, Ryan Date: 2022.08.05 08:56:10 -05'00'
	REGION 5	bahr.ryan@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

The City of Cahokia Heights operates a small municipal separate storm sewer system (MS4). In May 2021, the former communities of Centreville, Alorton, and the Village of Cahokia merged into the City of Cahokia Heights. The purpose of the inspection was to determine the status of MS4 permit coverage for the newly formed City of Cahokia Heights, and to review the City's implementation of MS4 permit program requirements.

The Phase II National Pollutant Discharge Elimination System (NPDES) regulations automatically cover, on a nationwide basis, any MS4 “located in an urbanized area as determined by the latest Decennial Census by the Bureau of the Census” (unless the MS4 qualifies for a waiver) 40 CFR § 122.32(a)(1). “Urbanized areas,” as defined by the Census Bureau when the Phase II regulations were issued, comprise areas “that together have a minimum population of 50,000 people.” 64 Fed. Reg. 68722, 68751 (December 8, 1999).

The universe of regulated small MS4s in urbanized areas expands every 10 years, according to the 1999 stormwater Phase II final rule. A “small MS4” is any MS4 not already covered under Phase I of the NPDES stormwater program. The City of Cahokia Heights is within the St. Louis, MO-IL urbanized area (UACE#77770), as defined by the U.S. Census Bureau, and subject to NPDES stormwater regulation as a small MS4.

Cahokia Heights MS4

Inspection Date(s):

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I, U.S. EPA inspector Dean Maraldo, arrived at the Cahokia Heights Public Works Department (the "City" or "Facility"), located at 726 S. 50th Street, at 01:30 PM (CT) on 07/25/2022 for an announced inspection. I presented my inspector credentials to Corey Allen and informed him that this was a U.S. EPA inspection to determine compliance with the Clean Water Act (CWA) and the NPDES permit program. I was joined by U.S. EPA inspectors Joan Rogers and Ted Flatebo. I led the inspection under the authority of the Federal CWA, Section 308. The table above identifies the attendees that participated in the inspection. This report is based on information supplied by the City of Cahokia Heights Department of Public Works representatives, observations made by U.S. EPA inspectors, and records and reports maintained by the City and U.S. EPA inspectors, including: direct observations made by the U.S. EPA inspectors, photographs taken by U.S. EPA inspectors, verbal or written statements made by or information supplied by City representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the U.S. EPA inspectors by the City during or subsequent to the on - site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of U.S. EPA, State, and public records may be included in this report.

Facility/Site Description

The inspection opening conference was held in the garage of the City of Cahokia Heights Public Works building, located at 726 S. 50th Street. I began the inspection by reviewing the inspection plan, including review of MS4 permit status and the physical inspection of the Public Works facility at 726 S. 50th Street. Prior to the inspection, I requested the City provide the most recent notice of intent ("NOI") for coverage under Illinois EPA's NPDES General Permit for Discharges from Small MS4s ("GP ILR40", see Appendix 3), and any program plans developed pursuant to the permit. I asked the City representatives if the City applied for coverage under GP ILR40 since the May 2021 merger. Corey Allen ("Director") said the City has not submitted an NOI for the MS4 permit. With this information, I asked if the City developed any of the storm water management programs required under GP ILR40. The Director said they have not. Wayne Caughman added that on July 13, 2021, Illinois EPA sent a letter notifying the City of its obligation to seek coverage under GP ILR40. He provided the Director with a copy of the letter (see Appendix 3).

Inspection Units

Unit/Area	Description
General Permit NOI Process	Interview questions
Operations	
Review of Illinois General MS4 Permit Minimum Control Measures	
Stormwater System Conveyance and Mapping	
Pollution Prevention/Good Housekeeping for Municipal Operations	Physical inspection
Stormwater Observations	
73rd Street, Cahokia Heights	
N 82 and Belleview Ave, Cahokia Heights	
N. 82nd Street, Cahokia Heights	

Cahokia Heights MS4

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Without an MS4 program to evaluate, I suggested we revise the inspection plan to include a review of the general permit NOI process and go over the requirements of GP ILR40. I asked if the City still uses the City Public Works facility on Levin Drive. The Director said the Levin Drive facility is no longer used and all Public Works operations are now managed from the 726 S.50th Street location. I proposed to conduct the physical inspection of the Public Works facility at 726 S. 50th Street to assess Pollution Prevention and Good Housekeeping measures for the City’s municipal operations. The City representatives agreed and we concluded the opening conference and began the interview portion of the inspection.

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

Location: Interview/General Permit NOI Process	Contains CBI: No
Observation #: DM1-OB-001	Date: 07/25/2022
<p>I reviewed the requirement to submit an NOI under Illinois EPA's NPDES General Permit for Discharges from Small MS4s ("GP ILR40"). Wayne Caughman (Illinois EPA) mentioned that St. Clair County has a MS4 Co-permittee group that includes many communities. He was not sure if the City of Cahokia Heights officially joined the group. However, James Harms (St. Clair County) later confirmed that the City of Cahokia Heights has officially joined the St. Clair County MS4 Co-permittee group. Wayne Caughman added that the Co-permittee group has quarterly meetings and the Director added that City of Cahokia Heights representatives attended the last meeting. James Harms mentioned that the St. Clair County MS4 Co-permitteegroup has a new consultant charged with assisting members with implementation of parts of the MS4 program.</p>	
Location: Interview/Operations	Contains CBI: No
Observation #: DM1-OB-004	Date: 07/25/2022
<p>I started the discussion on operations with a question about ditch maintenance. The Director said the ditches are maintained on a regular basis, along with culverts. The City obtained a vacuum truck as a result of the merger with the Village of Cahokia which helps with culvert cleaning. I asked if there were written plans and schedules regarding ditch and culvert maintenance. The Director said there are no written plans or schedules and maintenance is based on “trouble areas”. I asked about the City's "Fresh Start" program. The Director described the program which is designed to clear vacant properties of abandoned personal property and waste. The program relies entirely on City personnel and equipment. The goal is to focus on one area then move to the next.</p> <p>I asked about hours of operation and staffing levels. The Director said normal operating hours are between 8:30am-4:30pm, Monday thru Friday. The department currently has 11 total staff including the Director and Assistant Directors. However, they normally operate with a total of 12 staff. The operations staff are divided by area and job function, with four staff designated for the former Centreville and Alorton portions of the City, four staff designated for the former Village of Cahokia portion of the City, and four staff dedicated to demolition work. The staff work across these operational areas as needed. The department is responsible for maintaining streets and drainage, plowing, and demolition. The Director reports to the Mayor.</p> <p>Complaints are few, according to the Director. He added that complaints are often received through City Hall, and in written form or via phone. Lately, complaints and any related work orders are recorded on paper and</p>	

Cahokia Heights MS4

Inspection Date(s):

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stored in the Director's office.

U.S. EPA inspector Joan Rogers asked what resources the department might need to improve operations. The Director mentioned a few items, including more staff (ideally a total of 18 staff), road resurfacing equipment, and a new street sweeper to replace the old Village of Cahokia sweeper, which is out of operation due to lack of available parts.

Location: Interview/Review of Illinois General MS4 Permit Minimum Control Measures **Contains CBI:** No

Observation #: DM1-OB-002

Date: 07/25/2022

I went over each of the Illinois EPA General Permit for Small MS4 Minimum Control Measure requirements. The Public Works Director's provided the information below.

- 1) Public Education and Outreach: The City has no MS4 Public Education and Outreach program.
- 2) Public Involvement/Participation: The City has no MS4 Public Involvement/Participation program. However, they hope to benefit from St. Clair County Co-permittee group resources in this area.
- 3) Illicit Discharge and Elimination: The City has no MS4 Illicit Discharge and Elimination program and no past experience with Illicit Discharge and Elimination. The Director mentioned known illicit discharges on 82nd Street and Pocket Road.
- 4) Construction Site Storm Water Runoff Control: The City has no Construction Site Storm Water Runoff Control program, and the Director was not sure if the City has construction stormwater-related ordinances.
- 5) Post-Construction Storm Water Management in New Development and Redevelopment: The City has no Post-Construction Storm Water Management in New Development and Redevelopment program. James Harms (St. Clair County) mentioned that the Co-permittee group provides some annual MS4 training.
- 6) Pollution Prevention/Good Housekeeping for Municipal Operations: The City has no formal Pollution Prevention/Good Housekeeping program for Municipal Operations.

In summary, the City is not implementing any of the Illinois EPA GP ILR40 MS4 Minimum Control Measure requirements.

Location: Interview/Stormwater System Conveyance and Mapping **Contains CBI:** No

Observation #: DM1-OB-003

Date: 07/25/2022

I asked the City representatives about the availability of MS4 system maps. Keith Nolden stated he believed paper maps of the former Village of Cahokia storm sewer exist. The Director said he was not aware of any maps of the former Centreville and Alorton storm sewers. James Harms (St. Clair County) mentioned the former Co-permittee consultant may have some digital maps of storm sewers but wasn't sure. He said he would look into it. I asked about areas in the City with piped storm sewers and inlets. The Director said that most of the City's system consists of ditches. I asked about sewer inlets observed in the community north of Canal #1. The

Director said that storm water is collected through pipes in the area around Pittsburgh, 63rd Street, Piat Place, and Laura. This system drains toward I-255. Keith Nolden added that the former Village of Cahokia has lots of storm water pipes and inlets. Last, I asked about the former Village of Alorton. The Director said the area around Alcoa has some storm water pipes and inlets, along with areas around 47th and Market and 41st and Market.

Location: Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations

Contains CBI: No

Observation #: DM1-OB-005

Date: 07/25/2022

Physical inspection of Pollution Prevention/Good Housekeeping for Municipal Operations.

We began the physical inspection of the City of Cahokia Heights Public Works facility, located at 726 S. 50th Street, at 2:55 pm on July 25, 2022. I asked the Director if it was ok to take photographs and if there were any confidential business information concerns. The Director granted permission to take photographs with no concerns.

We observed staining on the gravel ground beneath a public works truck. At the time of the inspection there was a pan underneath the truck collecting oil dripping from the rear of the vehicle (see Photo Log image CCHM001).

The group walked over to the salt storage area and I observed a corrugated metal pipe inlet in front of the salt storage structure (see Photo Log image CCHM004). The salt storage structure was covered, but the front of the structure was exposed and salt debris was observed within the inlet of the corrugated metal pipe. The pipe led to a ditch running along the southwest boundary of the facility. I observed the outlet of the metal corrugated pipe and noticed white staining and debris on the gravel at the outlet and leading into and along the ditch (see PhotoLog image CCHM002). The ditch continued southeast toward the rear of the facility and I-255. The white staining and debris continued along the ditch (see Photo Log image CCHM003).

We walked toward the rear of the public works yard and noticed some large debris and waste piles (See Photo Log images CCHM005). U.S. EPA inspector Joan Rogers asked about the Public Works department's waste and debris collection practices. The Director said the crews pick up trash all day and deliver all waste here to the Public Works yard. They haul waste daily to a nearby landfill. The Director said they separate tires and twice a year send tires to the County as part of a state tire recycling program. Inspector Rogers noted that they may want to consider shredding or covering tires while temporarily stored on site to minimize potential insect breeding.

Walking along the southwest boundary of the facility, I observed the ditch running along the boundary. I took a photograph of the ditch (see Photo Log image CCHM006) looking southeast and downgradient from the point we observed the corrugated metal pipe from the salt storage structure.

The group then headed across the yard toward the northeast and observed another large debris pile and two uncovered dumpsters filled with debris (see Photo Log images CCHM007 and CCHM 008).

As we walked back toward the facility garage I observed three above-ground tanks (two diesel and one gas tank) in the center of the lot (see Photo Log image CCHM009). The Director said the tanks are abandoned and no longer used. He said the diesel tanks are empty and they are waiting for a pump to drain whatever is

remaining in the gas tank.

The last area observed was the new fuel storage area. The area is covered and contains two new above-ground fuel tanks (see Photo Log image CCHM010). The Director said the tanks were installed within the last three months. The new above-ground fuel tanks did not have secondary containment, but the Director believed they were double-walled tanks.

I also observed two damaged, uncapped, and nearly filled drums in the new fuel storage area (see Photo Log image CCHM 011). I asked the Director if he knew what was in the drums. Public Works Assistant Director Tom Hill dipped the drums and noted that the liquid appeared to be waste oil.

We concluded the physical inspection of the City of Cahokia Heights Public Works facility, located at 726 S. 50th Street, at 3:25 pm on July 25, 2022. We agreed to meet and close out the MS4 inspection the next day (July 26) in the afternoon, as the U.S. EPA inspection team had a meeting in the morning regarding another matter outside of Cahokia Heights.

During the early hours of July 26, 2022, a severe rain event occurred in the St. Louis area, including Cahokia Heights. Over 6 inches of rain fell over Cahokia Heights over a 12 hour period from 1:00 am to noon on July 26 (based on National Weather Service data for the St. Louis Downtown Airport, located in Cahokia Heights). As a result of the storm, which caused widespread flooding throughout the region, the City's Public Works staff were deployed to respond to emergencies throughout the City on July 26 and July 27. We postponed the inspection close out conference (conducted via telephone) to the morning of July 28, 2022.

Photo(s)

1. [CCHM001.JPG](#)
2. [CCHM002.JPG](#)
3. [CCHM003.JPG](#)
4. [CCHM004.JPG](#)
5. [CCHM005.JPG](#)
6. [CCHM006.JPG](#)
7. [CCHM007.JPG](#)
8. [CCHM008.JPG](#)
9. [CCHM009.JPG](#)
10. [CCHM010.JPG](#)
11. [CCHM011.JPG](#)

Cahokia Heights MS4

Inspection Date(s):

07/25/2022 - 07/28/2022

Location: Stormwater Observations/73rd Street, Cahokia Heights	Contains CBI: No
Observation #: DM1-OB-007	Date: 07/26/2022
On July 26, 2022, I observed a surcharging sanitary sewer manhole (see Photo Log image CHWW0030) on 73rd Street in Cahokia Heights. The roadside ditches along the street were completely inundated with floodwater, along with sanitary sewage discharging from the manhole. I also captured video of the surcharging manhole and inundated ditches on 73rd Street.	
Photo(s) 1. CHWW0030.JPG	
Location: Stormwater Observations/N 82 and Belleview Ave, Cahokia Heights	Contains CBI: No
Observation #: DM1-OB-008	Date: 07/26/2022
On July 26, 2022, I observed inundated roadside ditches and a partially submerged lift station structure on Belleview Ave (see Photo Log CHWW0038).	
Photo(s) 1. CHWW0038.JPG	
Location: Stormwater Observations/N. 82nd Street, Cahokia Heights	Contains CBI: No
Observation #: DM1-OB-006	Date: 07/26/2022
On July 26, 2022, I observed a sanitary sewer overflow (SSO) from sewer cleanout along N. 82nd Street. The SSO discharges into a roadside ditch (see Photo Log image CCWW0055) that discharged to a ditch that flowed through the backyards of a several homes and then through twin culverts under N. 80 th Street and into Canal #1 (see Photo Log image CHWW0047). I also captured video of both the SSO discharge and the ditch discharge to Canal #1.	
Photo(s) 1. CHWW0055.JPG 2. CHWW0047.JPG	

Location: Interview/Call with St. Clair County Co-Permittee Consultant		Contains CBI: No	
Observation #: DM1-OB-009		Date: 07/27/2022	
<p>On July 27, 2022, I arranged for a close out conference call for 1pm with the City, Illinois EPA, St. Clair County representatives, and representatives of Gonzalez Companies, LLC (St. Clair County Co-permittee group consultant). However, the City Public Works representatives were still occupied with flood emergencies and could not attend. During the call, Gonzalez Companies LLC representative Tony Schenk clarified his company's role in supporting St. Clair County's Co-permittee MS4 permit implementation efforts. In general, Gonzalez Companies LLC provides the member communities with technical support and assistance in implementing the various MS4 program responsibilities. However, the cities are responsible for implementing most program requirements. The company helps to prepare the annual reports required under the MS4 permit and can also conduct sampling tasks. Tony Schenk believed they could prepare an MS4 general permit NOI for the City of Cahokia Heights within 30 days, assuming the City is willing to coordinate efforts in a timely fashion. We concluded the call and then I contacted Keith Nolden (City Assistant Director of Public Works) to reschedule the MS4 inspection close out conference for 9am the next morning (Thursday, July 28, 2022).</p>			

SECTION III – AREAS OF CONCERN

Areas of Concern may not be in sequential order. The presentation of areas of concern does not constitute a formal compliance determination or violation.

Location: Opening Conference	Area: Permitting
DM1-OC-FD	
The Director said the City has not submitted an NOI for Illinois MS4 General Permit ILR40. The City has not developed any of the storm water management programs required under GP ILR40.	Citations: Illinois EPA GP ILR40; 40 CFR § 122.32(a)(1)
Location: Interview	Area: Review of Illinois General MS4 Permit Minimum Control Measures
DM1-OB-002	
The City is not implementing any of the Illinois EPA GP ILR40 MS4 Minimum Control Measure requirements.	Citations: Illinois EPA GP ILR40; 40 CFR § 122.32(a)(1); 40 CFR § 122.33

<p>Location: Public Works Facility, 726 S. 50th Street, Cahokia Heights</p>	<p>Area: Pollution Prevention/Good Housekeeping for Municipal Operations</p>
<p>DM1-OB-005</p>	
<p>I observed two damaged, uncapped, and nearly filled drums in the new fuel storage area (see Photo Log image CCHM011). Public Works Assistant Director Tom Hill dipped the drums and noted that the liquid appeared to be waste oil.</p>	<p>Citations: Illinois EPA GP ILR40; 40 CFR § 122.33</p>
<p>I observed two uncovered dumpsters filled with debris in northeast portion of the yard (see Photo Log images CCHM007 and CCHM008).</p>	
<p>Inspector Rogers noted that they may want to consider shredding or covering tires while temporarily stored onsite to minimize potential insect breeding.</p>	
<p>I observed a corrugated metal pipe inlet in front of the salt storage structure (see Photo Log image CCHM004). The salt storage structure was covered, but the front of the structure was exposed and salt debris was observed with the inlet of the corrugated metal pipe. The pipe led to a ditch running along the southwest boundary of the facility. I observed the outlet of the metal corrugated pipe and noticed white staining and debris on the gravel at the outlet and leading into and along the ditch (see Photo Log image CCHM002).</p> <p>The ditch continued southeast toward the rear of the facility and I-255. The white staining and debris continued along the ditch (see Photo Log image CCHM003).</p>	
<p>We observed staining on the gravel ground beneath a parked public works truck. At the time of the inspection there was a pan underneath the truck collecting oil dripping from the rear of the vehicle (see Photo Log image CCHM001).</p>	

Location: Stormwater Observations	Area: N. 82nd Street, Cahokia Heights
DM1-OB-006	
On July 26, 2022, I observed a sanitary sewer overflow (SSO) from sewer cleanout along N. 82nd Street. The SSO discharges into a roadside ditch (see Photo Log image CCWW0055) that discharged to a ditch that flowed through the backyards of a several homes and then into Canal #1 (see Photo Log image CHWW0047).	Citations: Section 301(a) of the Clean Water Act, 33 U.S.C. Section 1311(a)
Location: Stormwater Observations	Area: 73rd Street, Cahokia Heights
DM1-OB-007	
On July 26, 2022, I observed a surcharging sanitary sewer manhole (see Photo Log image CHWW0030) on 73rd Street in Cahokia Heights. The roadside ditches along the street were completely inundated with floodwater, along with sanitary sewage discharging from the manhole.	Citations: Section 301(a) of the Clean Water Act, 33 U.S.C. Section 1311(a)
Location: Stormwater Observations	Area: N 82 and Belleview Ave, Cahokia Heights
DM1-OB-008	
On July 26, 2022, I observed inundated roadside ditches and a partially submerged lift station structure on Belleview Ave (see Photo Log CHWW0038).	Citations: Section 301(a) of the Clean Water Act, 33 U.S.C. Section 1311(a)

SECTION IV – CLOSING CONFERENCE

Closing Conference

The MS4 inspection closing conference was held via telephone on July 28, 2022, at 9am CT. The Director represented the City. I reviewed the preliminary areas of concern, including the need for MS4 permit coverage and the lack of a City municipal stormwater program. I recapped the discussion with Gonzalez Companies LLC, including the possibility of submitting an NOI for the City for the IEPA general permit for small MS4 within 30 days. I also summarized the consultant's ability to support the members of the co-permittee group, and emphasized that the City will be responsible for meeting the MS4 permit requirements. The Director had no questions, so I provided an estimated timeframe for preparing an inspection report, and concluded the close out conference.

Observations and Areas of Concern have not yet been evaluated for a formal compliance determination. No follow up items were requested by the inspector at the time of the inspection.

Communication Log

No additional information received by EPA after concluding the inspection on 07/28/2022.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log
3. Reference Documents

APPENDIX 1: PHOTOLOG

Staining on gravel parking lot beneath Public Works truck.
CCHM001.JPG
07/25/2022 02:56 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII



Outlet of corrugated metal pipe draining salt storage area.
CCHM002.JPG
07/25/2022 02:58 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII



Ditch along southwest boundary of the facility.

CCHM003.JPG

07/25/2022 02:58 PM (CT)

Dean Maraldo

Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations

No CBI

No PII

Note white staining and debris along ditch.



Front of salt storage structure and inlet of corrugated pipe.

CCHM004.JPG

07/25/2022 02:59 PM (CT)

Dean Maraldo

Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations

No CBI

No PII

Note salt observed within the corrugated metal pipe which drains to the ditch along the southwest boundary of the facility.



Debris pile in rear of facility.

CCHM005.JPG

07/25/2022 03:03 PM (CT)

Dean Maraldo

Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations

No CBI

No PII



Ditch running along the southeast boundary.
CCHM006.JPG
07/25/2022 03:06 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII
View looking southeast toward rear of property and I-255, and downstream from the point we observed the corrugated metal pipe from the salt storage structure.



Debris pile and uncovered dumpster.
CCHM007.JPG
07/25/2022 03:08 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII



Uncovered dumpster.
CCHM008.JPG
07/25/2022 03:13 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII



Abandoned diesel and gas tanks.
CCHM009.JPG
07/25/2022 03:14 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII



New Fuel Tank Storage Area.
CCHM010.JPG
07/25/2022 03:14 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII
The area is covered and contains two new above-ground fuel tanks.



New Fuel Storage Area - waste oil drums
CCHM011.JPG
07/25/2022 03:16 PM (CT)
Dean Maraldo
Public Works Facility /Pollution Prevention/Good Housekeeping for Municipal Operations
No CBI
No PII
I observed two uncapped, filled, and damaged waste oil drums.



Cahokia Heights MS4

Inspection Date(s):

07/25/2022 - 07/28/2022

Surcharging sanitary sewer manhole on 73rd Street in Cahokia Heights.
CHWW0030.JPG
07/26/2022 07:48 AM (CT)
Joan Rogers
Stormwater Observations/73rd Street, Cahokia Heights
No CBI
No PII
The roadside ditches along the street were completely inundated with floodwater, along with sanitary sewage discharging from the manhole.



N82nd and Belleview Ave.
CHWW0038.JPG
07/26/2022 08:11 AM (CT)
Dean Maraldo
Stormwater Observations/N 82 and Belleview Ave, Cahokia Heights
No CBI
No PII
Inundated roadside ditches and a partially submerged lift station structure on Belleview Ave.



Cahokia Heights MS4

Inspection Date(s):

07/25/2022 - 07/28/2022

Stormwater discharge to Canal #1
CHWW0047.JPG
07/26/2022 11:23 AM (CT)
Dean Maraldo
Stormwater Observations/N. 82nd Street, Cahokia Heights
No CBI
No PII
Photo of stormwater discharge to Canal #1. Stormwater discharges through a pair of culverts under N. 80th Street. The stormwater collects from roadside ditches throughout the area, and includes discharge from a sanitary sewer overflow location on N. 82nd Street.



Sanitary sewer overflow (SSO) from sewer cleanout along N. 82nd Street
CHWW0055.JPG
07/26/2022 02:20 PM (CT)
Dean Maraldo
Stormwater Observations/N. 82nd Street, Cahokia Heights
No CBI
No PII
The SSO discharges into a roadside ditch that discharged to a ditch that flows through the back yards of a several homes and then into Canal #1 (see Photo Log image CHWW0047).



APPENDIX 2: DOCUMENT LOG (Documents included in Appendix 3)

Document Type	Document Name	Contains CBI	Contains PII	Pages	Date Received
MS4 Permit ILR40	general-ms4-permit.pdf	No	No		07/25/2022
Communications	ILU330001_IEPA_MS4Letter_20210713.pdf	No	No	1	07/27/2022