

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

and

THE STATE OF ILLINOIS,

Plaintiffs,

v.

CITY OF CAHOKIA HEIGHTS, ILLINOIS,

Defendant.

CONSENT DECREE

APPENDIX C

Appendix C

Advanced Monitoring Program Requirements

- I. Chronic SSO Advanced Monitoring Program.
 - A. Within 6 Months after the Effective Date of the Consent Decree, and in accordance with the requirements below, the City shall submit to EPA for review and approval, a list of chronic SSO locations in the Sewer System (“Chronic SSO List”). A location that has more than one wet-weather related SSO in the previous 12 Months shall be considered to be a chronic SSO and shall be included on the Chronic SSO List. The City shall install and maintain manhole surcharge detecting monitoring devices in manhole(s) that best represent sewer flow conditions contributing to each chronic SSO location in accordance with the provisions below. The Chronic SSO List shall also include descriptions of the type(s) of monitoring devices to be used, including the surcharge threshold elevations (“Thresholds”) to be established for the monitoring devices that will trigger real time alerts of a likely SSO event or events. The City shall install and maintain manhole surcharge detecting monitoring devices at the SSO locations so designated on the Chronic SSO List in accordance with the provisions of this Appendix within six Months of EPA approval of the Chronic SSO List.
 - B. The monitoring devices shall monitor sewer surcharge levels and shall send the City real time alerts of a likely SSO event or events when the Thresholds specified by the City are attained or exceeded.
 - C. The City shall inspect an SSO location within 2 hours after a monitoring device indicates that the applicable Threshold has been attained or exceeded for that SSO location.
 - D. If the City elects to monitor multiple SSO locations through a single monitoring device, the City shall inspect all related SSO locations within 4 hours of when the applicable monitoring device indicates that the specified Thresholds have been attained or exceeded.
 - E. Annual update to the Chronic SSO List. One year after EPA approval of the Chronic SSO List and each year thereafter, the City shall submit to EPA for review and approval an annual update to the Chronic SSO List that provides for the following:
 1. The identification of additional SSO locations in the Sewer System that experienced more than one wet-weather related SSO in the previous 12 Month period. The City shall designate on the updated Chronic SSO List which of these new SSO locations where it proposes to install and maintain manhole surcharge detecting monitoring devices in accordance with the provisions of this

Appendix. For those new SSO locations not designated for monitoring, the City shall include with the updated Chronic SSO List, a demonstration that such devices are not necessary because either the City has a definitive plan and expeditious deadline for remediating the cause of the SSO at that location, the SSOs at that location were the result of widespread overland flooding, or two or more SSO locations are related such that a single monitoring device can provide the required real time alert for likely SSOs at the multiple locations. The City shall then install and maintain manhole surcharge-detecting monitoring devices at the new SSO locations identified for monitoring within six Months after EPA approval of the updated Chronic SSO List.

2. If applicable, a demonstration that monitoring devices at a particular SSO location(s) on the Chronic SSO List should be removed from the list because the cause of the SSO at the particular location(s) has been appropriately remediated.
3. If applicable, a demonstration that, as an alternative to placing a monitor at each SSO location on the Chronic SSO List as otherwise required by this Appendix, monitoring devices should be removed because two or more SSO locations are related in such a manner that a single monitoring device can provide the required real-time alert for likely SSOs at the multiple SSO locations.

II. Flow, Rainfall, and Groundwater Monitoring Program.

- A. To support design of remedial alternatives, within 12 Months after the Effective Date of this Consent Decree, the City shall submit to EPA for review and approval a Flow, Rainfall, and Groundwater Monitoring Program Plan. The Plan shall include the criteria the City used to:
 1. Establish the location of additional flow, rainfall, and groundwater elevation monitoring equipment installation for evaluations of the Sewer System; and
 2. Determine whether the City will install the monitoring equipment either permanently or temporarily,in order to adequately characterize flow and identify areas with excess Infiltration/Inflow in the Sewer System;
- B. The Flow, Rainfall, and Groundwater Monitoring Program Plan shall include maps and schematic diagrams showing the location of each permanent and temporary flow, rainfall, and groundwater elevation monitoring site to be established in the Sewer System;
- C. The Flow, Rainfall, and Groundwater Monitoring Program Plan shall include a proposed schedule for the installation of and collection of data by all proposed monitoring equipment;
- D. The City shall implement the Flow, Rainfall, and Groundwater Monitoring Program Plan pursuant to the EPA-approved plan schedule.