

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 H

**Appendix H
Consolidated Listing of Consent Decree Deliverables and Any
Associated Work, and Reports¹**

Table 1. Phase 1 Sewer System Early Actions – Schedule of Deliverables and Milestones

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Agencies to Receive Copies
Development of Public Participation Plan	Paragraph 15	Within four months after Effective Date of Consent Decree	EPA and IEPA
Publication of schedule for sewer and stormwater-related meetings for following year	Paragraph 16	Within three months after approval of the Public Participation Plan	
Implementation of the Targeted Dry-Weather SSO Corrective Action Plan	Paragraph 18 and Att. 1 to App. A	Implement in accordance with the requirements and schedule in Attachment 1 to Appendix A (Early-Action Projects)	NA
Implementation of Early Action Capital Improvement Projects	Paragraph 19 and App. A	Implement in accordance with the requirements and schedules in Appendix A (Early-Action Projects)	NA
Emergency Power for Lift Stations	Paragraph 20	Mobile generators ordered on April 26, 2024.	NA
Implementation of Phase 1 Monitoring Program	Paragraph 21 and App. E	Implement upon completion of the Targeted Dry Weather SSO Corrective Action Plan and all Early Action Capital Improvement Projects	NA
Phase 1 Monitoring Report	App. E	Submit within 60 days after completion of the 12-month monitoring period conducted under Appendix E.II.B	EPA and IEPA
Sewer Cleaning	Paragraph 22	For areas not covered by the Wet-Weather SSO Investigation Plan or Appendix A: December 31, 2036	EPA and IEPA
Implementation of Wet-Weather SSO Investigation Plan	Paragraph 23 and App. B	Implement in accordance with the requirements and schedules in Appendix B (Wet-Weather SSO Investigation Plan)	NA
Sewer Mapping Program Plan	Paragraph 24	Submit within six Months after the Effective Date.	EPA and IEPA

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Agencies to Receive Copies
		Fully implement within 5 years after EPA program approval	NA
Advanced Monitoring Program	Paragraph 25; App. C	Submit Chronic SSO List within 6 Months after the Effective Date	EPA and IEPA
		Begin surcharge monitoring at all Chronic SSO locations within 6 months after approval of Chronic SSO list	
		Update and submit Chronic SSO List one year after EPA approval of the Chronic SSO List and each year thereafter	
		Submit Flow, Rainfall, and Groundwater Monitoring Program Plan within 12 Months after the Effective Date	
		Implement the Flow, Rainfall, and Groundwater Monitoring Program Plan pursuant to the EPA-approved plan schedule	NA
Phase 1 Sewer Condition Assessment Report	Paragraph 26; App. D	Submit by April 30, 2030.	EPA and IEPA
Integration of Results of Sewer Condition Assessment Report into GIS Program	Paragraph 27	Import results of Sewer Condition Assessment Report into Sewer System GIS system within 90 days of completing Report	NA
Phase 1 Sewer Condition Rehabilitation Plan	Paragraph 28; App. D	Submit by April 30, 2030.	EPA and IEPA
Implementation of Phase 1 Sewer Condition Rehabilitation Plan	Paragraph 29	Implement in accordance with the EPA approved Phase 1 Sewer Condition Rehabilitation Plan schedule	NA
Reporting Completion of Early Action Projects, Sewer Cleaning, and Phase 1 Sewer Condition Rehabilitation	Paragraph 30	Submit as part of the Semi-Annual Report due each January 31 and July 31	EPA and IEPA

Table 2. Sewer System Management, Operations and Maintenance – Schedule of Deliverables and Milestones

Name of Deliverable or Milestone	Main Ref. in Consent Decree	Due Date for Deliverable or Milestone	Agencies to Receive Copies
Implementation of CMOM	Paragraph 41 and App. G	Implement upon the Effective Date	NA
Annual CMOM updates	Paragraph 41 and App. G	Submit first annual update no later than 12 Months after the Effective Date, and submit each subsequent update no later than 12 Months after the previous year’s submittal	EPA and IEPA
Phase 1 CMOM Update	Paragraph 42 and App. G	Submit in first CMOM update after completion of Phase 1 work completed pursuant to Paragraphs 18, 19, and 29	EPA and IEPA
Sewer Overflow Response Plan	App. G	Submit by April 1, 2025 and implement upon approval	EPA and IEPA
Private Lateral Program	Paragraph 43	Submit plan no later than 36 Months after completion of the Phase 1 Monitoring Plan	EPA and IEPA
Illinois Environmental Project	Paragraph 45	Complete by December 31, 2026.	

ⁱ This Appendix is provided for the convenience of the Parties and is intended by the Parties for use as a reference document. In the event of any discrepancy between the provisions of Sections VI (Compliance Requirements) and X (Reporting Requirements) and this Appendix, the provisions of Sections VI (Compliance Requirements) X (Reporting Requirements) of the Consent Decree shall control.