



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

March 9, 2023

Mayor Curtis McCall
City of Cahokia Heights
103 Main Street
Cahokia Heights, Illinois 62206

RE: 21WWCTORR01 Operation and Maintenance Plan (O&M Plan)

Dear Mayor McCall:

Thank you for submitting the *Operation and Maintenance (O&M) Manual* and the *Operation and Maintenance Program - Sewer* document (together, the "O&M Plan") to Illinois EPA for review and approval to meet the O&M requirements of the Wastewater Collection and Transport Infrastructure Rehabilitation and Restoration Project Grant Agreement (21WWCTORR01) between the Illinois EPA and City of Cahokia Heights (City or Grantee). Per Exhibit E of the Grant Agreement, an O&M Plan is to be developed by the Grantee to ensure the long-term viability (no less than 50 years, unless otherwise approved by the Grantor) for all the construction activities implemented under Agreement.

Illinois EPA has determined that the proposed O&M Plan does not provide sufficient information to secure Illinois EPA's approval.

The City must align the O&M Plan with its Cahokia Heights Capacity, Management, Operation, and Maintenance (CMOM) document, which was approved by the United States Environmental Protection Agency on November 21, 2022. For some of the items below, the City may be able to copy and paste information directly from its approved CMOM. Sections 2-17 through 2-35 of the US EPA *Guide for Evaluating CMOM Programs at Sanitary Sewer Collection Systems* is a recommended reference for responding to the Agency's comments below. You can access it at the following link:

https://www3.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf

General Comments

- Combine the two documents into a single document with page numbers and document date in the footers.
- Include contact information (name, title, department, phone, email) for the primary person responsible for O&M of the sanitary sewer system.
- Change the term 'District' to 'City' throughout the O&M Plan.
- Adjust formatting of tables so that they fit within the margins.
- Add information in Table 2 for lines 56 – 69.
- Remove any references to tasks that are not relevant to sanitary sewer systems.

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

Comments Related to System Operation

System Description

- Describe the day-to-day operation of the collection and transport system in terms of overall activities, management and oversight, staff resources, etc.
- Describe how new construction will be incorporated and addressed by the O&M Plan.
- Add information regarding existing infrastructure maps and future mapping needs.
- Describe the use of modeling for current and future operation of sanitary sewer system.

Financial Information

- Include detailed budget information for current, mid- and long-term operation and maintenance of the system and any O&M equipment. Include the proposed source of funding to implement the O&M Plan.

Employee Training

- List the job titles and minimum qualifications of the O&M staff.
- Describe the contents of the employee training program, including a review of the O&M Plan, and minimum credentials for trainers.
- Limit use of any in-house instructors to staff that, at a minimum, have passed, the "Collection System Only" Illinois EPA Certified Operator exam.
- Include inspection Standard Operating Procedures for lift stations, manholes, and gravity sewers and for handling sanitary sewer overflows.

Equipment

- Describe the types and number of equipment available for O&M activities (e.g., Jetter, diesel driven pump, backhoe).
- Define the lifespan of the equipment and the plan for equipment replacement.
- Describe equipment safety protocols and any personal protective equipment requirements.

Comments Related to System Maintenance

Force Mains

- Provide the number and location of each force main to be inspected.
- Describe the process involved and who will be inspecting each force main.
- Provide a logbook and checklist for force main inspections.
- Provide the physical location where logbooks and checklists are to be stored.
- Describe how issues found during the inspection are reported to supervisors and issues are resolved.
- Describe how and when local residents are notified of force main issues.

Manholes and Gravity Sewers

- Describe the process involved and who will be inspecting manholes.
- Describe the process involved and who will be inspecting/jetting gravity sewers.
- Describe how and why some segments of pipe receive more frequent inspections.
- Provide a logbook and checklist for manhole and gravity sewer inspections.

- Provide the physical location where logbooks and checklists are to be stored.
- Describe how issues found during the manhole and gravity sewer inspection are reported to supervisors and issues are resolved.
- Describe how and when residents are notified of manhole and/or gravity sewer issues.

Emergencies

- Include the year that the City completed their Vulnerability Assessment and Emergency Response Plan (VA/ERP).
- Define the length of time that is considered an 'extended power outage'.
- Identify the steps to be taken, including the use of generators and trucks, if power is anticipated to be out for longer than a certain number of hours.
- Identify the notification and reporting process that is used when a lift station goes down.
- Provide the procedures for initial notification and updates during emergency situations. Provide a detailed description of the City's SSO Notification Program, including a schedule for evaluation and updates to the Program.

Logbooks and Checklists

- Include a copy of each checklist developed for all O&M activities in an appendix to the O&M Plan.
- All logbooks, and corresponding check lists, shall, at a minimum, identify:
 - which site and assets are involved,
 - who is performing the inspection and/or maintenance,
 - date of inspection and/or maintenance,
 - the follow-up steps that need to be taken, and
 - inspector's initials and date.
- Update the Corrective Action Log spreadsheet into more columns so that City can sort and track log entries and add a location ID in the table so that the history of the site can be sorted quickly on that column.

A revised O&M Plan incorporating the above-referenced comments must be submitted to the Illinois EPA within 14 days of your receipt of this letter. Illinois EPA staff are ready and willing to discuss any of the comments provided in this letter, or attachments thereto, so please do not hesitate to contact me if you would like to set up a meeting.

Sincerely,



Christine Davis
Manager, Watershed Management Section

CC (email)

James Nold – Hurst-Rosche, Inc.
Mat Missey; Thompson Civil, LLC

