



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

January 26, 2023

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

RE: 21WWCTIRR01 Construction Activities Strategy (version 2) comments

Dear Mayor McCall:

Thank you for submitting version 2 of the draft Construction Activities Strategy (CAS) document to Illinois EPA for review and approval to meet the requirements of the Wastewater Collection and Transport Infrastructure Rehabilitation and Restoration Project Grant Agreement (21WWCTIRR01) between the Illinois EPA and City of Cahokia Heights (City or Grantee). Per the Grant Agreement, the CAS is to be developed by the Grantee to define the process and activities to be implemented under the Agreement, including a proposed schedule, outline, and budget.

Illinois EPA has determined that version 2 of the CAS needs additional work to secure Illinois EPA's approval. Please see below for a list of Illinois EPA's general comments. Additionally, an edited copy of the version 2 draft CAS is also included to capture minor comments and to help identify the locations for some of the following general comments.

1. Exhibit E of the Grant Agreement requires that the CAS include a schedule of implementation; however, Version 2 of the draft CAS does not include a schedule of implementation. A schedule for implementation must be included in the CAS. In addition, the CAS must also address the following requirements:
  - o The majority of work shall be completed within the first 24 months of the Grant Agreement.
  - o Implementation of the Construction Activity Designs developed in accordance with Item 3 of Exhibit E of the Grant Agreement must begin by July 1, 2023. However, if construction will not begin by that date, the City must request a waiver from the Illinois EPA (prior to June 1, 2023) to extend the construction activities start date.
2. The CAS must include additional details on how the project design and engineering activities will be conducted in accordance with industry standards, as well as the process to obtain all necessary permits prior to construction.
3. The CAS must include a detailed impact analysis that will consider how the improvements at one location (e.g., installation of a functioning lift station) will impact downstream locations, including anticipating future failure points that may not be apparent due to the upstream failure location(s), and designing potential SSO points that will have the minimum impact on the community and environment.
4. In the "Pre-Construction Activities Implementation" section, provide additional details for the first bullet, including which office and who would be contacted, and the number of days those activities should occur.

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

5. Create a separate paragraph for the information regarding the signage. The paragraph should include detailed information regarding the number of signs and a timeline for submittal of the draft sign design, final sign design, sign installation, and sign removal.
6. Include a timeline for the "Potential Changes in Scope" section.
7. Describe the City's plan to track and report change orders. Explain what type and when activities would be allowed to be continued while a change order is being requested/considered.
8. Under the "Potential Changes in Scope" section, add 'Update the Construction Activities Strategy and submit to Illinois EPA for approval' as the first bullet. This must be prior to any submittal of a change request...
9. Limit the funds for the Outreach Program Strategy implementation to 50% of their total budget until the Grantee shows progress toward the successful implementation of an IEPA-approved Outreach Program Strategy.
10. Prior to bullets for the "Up-Front Payment for Outreach Program Strategy," include a statement that the Outreach Program will acknowledge that the project will not fully eliminate SSO events throughout the implementation of that Strategy.
11. Include a specific address location and/or latitude/longitude for the start and end point of the main trunk line work to be completed under this Grant Agreement.
12. In Appendix B., identify which work is to be done by City employees and which work is to be done by contractors.

Please submit a revised CAS incorporating the above-referenced and attached comments within 14 days. Illinois EPA staff are ready and willing to discuss any of the comments provided in this letter and in the attached document for the version 2 draft CAS.

Sincerely,



Christine Davis,  
Watershed Management Section Manager  
Bureau of Water

CC: James Nold, Hurst-Roche, Inc.  
Joe Stitely, Illinois EPA

Attachments: CAS Version 2