



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF
ECW-15J

VIA ELECTRONIC MAIL

Scott Hillman, Superintendent
Stormwater Maintenance and Operations
Metro East Sanitary District
6200 Forest Blvd.
Washington Park, Il 62204

Email: scott@mesdonline.org

Re: Recon Inspection Report – MESD Harding Ditch stormwater outfalls

Dear Scott Hillman:

On April 1, 2021, the U.S. Environmental Protection Agency conducted an NPDES stormwater reconnaissance inspection of Metro East Sanitary District's stormwater outfalls along Harding Ditch in Centreville, Illinois. During the inspection, a few areas of concern were noted. Please refer to Section III (page 4) of the enclosed inspection report for a summary of the areas of concern.

If you have questions or concerns regarding this letter or believe any part of the report is not accurate, please contact Dean Maraldo of my staff at (312) 353-2098 or maraldo.dean@epa.gov.

Sincerely,

RYAN BAHR
Digitally signed by RYAN
BAHR
Date: 2021.04.09 15:32:28
-05'00'

Ryan Bahr, Chief
Water Enforcement and Compliance Assurance Branch, Section 2

Enclosure

cc: Joe Stitely, Illinois EPA [Joe.Stitely@Illinois.gov]
Todd Bennett, Illinois EPA [Todd.Bennett@Illinois.gov]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Purpose: Metro East Sanitary District (MESD) – Recon Inspection Report

Facility: MESD’s Harding Ditch Stormwater Outfalls, Centreville, Illinois

Date of Inspection: April 1, 2021

U.S. EPA Inspectors:

Dean Maraldo, EPA Region 5; (312) 353-2098; maraldo.dean@epa.gov
Joan Rogers, EPA Region 5; (312) 886-2785; rogers.joan@epa.gov
Ted Flatebo, EPA Region 5; (312) 886-9402; flatebo.ted@epa.gov

Metro East Sanitary District Representative:

Scott Hillman, Stormwater Maintenance and Operations Superintendent, (618) 452-9400

Inspection Report Prepared by:

Dean Maraldo, U.S. EPA Region 5 Inspector

U.S. EPA Inspector Signature: Maraldo, Dean
Digitally signed by Maraldo, Dean
Date: 2021.04.09
15:17:26 -05'00'

Approver Name & Title:

Ryan Bahr, Chief, Section 2, Water Enforcement and Compliance Assurance Branch

Approver Signature: RYAN BAHR
Digitally signed by RYAN
BAHR
Date: 2021.04.09
15:27:21 -05'00'

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I. INTRODUCTION

On April 1, 2021, I conducted an announced reconnaissance inspection of stormwater outfalls on Metro East Sanitary District's ("MESD") properties along Harding Ditch in Centreville, Illinois. The inspection was conducted as part of the U.S. Environmental Protection Agency's ongoing efforts to investigate sanitary sewage overflows and potential pathways for sewage discharges to reach surface waters in the East Saint Louis area. I participated in the following inspection activities:

- Inspection opening conference;
- Physical inspection of MESD's stormwater outfalls along Harding Ditch; and
- Closing conference.

The following personnel were involved in the inspection:

U.S. EPA: Dean Maraldo, Inspector
 Joan Rogers, Inspector
 Ted Flatebo, Inspector

MESD: Scott Hillman, Superintendent

MESD owns several properties along Harding Ditch in Centreville, Illinois. The properties include a berm along the north/northwest side of Harding Ditch. The berm spans all of the MESD properties inspected on April 1, 2021 and provided for vehicle access to the outfalls to Harding Ditch (see map of MESD property boundary and outfall inspection stations in Attachment A). This report summarizes my inspection observations.

II. INSPECTION ACTIVITY SUMMARY

II. A. Opening Conference

I arrived at MESD's access road to Harding Ditch, at the end of Delano Drive, in Centreville at 11:51 a.m. on April 1, 2021, and met with EPA inspectors Joan Rogers and Ted Flatebo. We then met Scott Hillman, MESD's Stormwater Maintenance and Operations Superintendent. The inspection opening conference began with introductions and Joan Rogers, Ted Flatebo and I presented our U.S. EPA Inspector credentials to Scott Hillman and then discussed the inspection's intended scope. We provided Mr. Hillman with a map of potential stormwater outfalls of interest prior to the inspection. He explained that some of the outfalls may drain stormwater along Illinois Rt. 157 (Camp Jackson Road). I asked if there were any maps and easements related to the stormwater outfalls, conveyance, and inlets. Mr. Hillman said that he thought there may be maps and possibly easements with Illinois Department of Transportation and would look for them when returning to his office. He said he would provide any maps and documentation if found. I asked about permitting for the stormwater outfalls and Mr. Hillman

replied that he thought MESD is a co-permittee under the Saint Clair County MS4 permit, but would confirm. Following the inspection, on April 6, 2021, Mr. Hillman informed me via phone and by electronic mail that MESD does not have NPDES permit coverage for the stormwater outfalls along Harding Ditch. He added that MESD believes the outfalls “might be covered under this: Nationwide Permits (NWP) authorize certain activities under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899.” He added that MESD is working with Illinois EPA regarding the issue of permit coverage for the stormwater outfalls.

I mentioned to Mr. Hillman that the main purpose of the inspection was to assess the stormwater outfalls for accessibility for sampling during wet weather, to help determine if sanitary sewer overflows are reaching Harding Ditch via MESD’s stormwater outfalls. I also asked if MESD would allow access to the outfalls for sampling during wet weather. He said MESD would allow access with notice in advance and would want to attend any sampling inspection. At this point, we walked to the berm along the northwest bank of Harding Ditch to observe the first stormwater outfall at the end of Delano Drive.

II. B. Reconnaissance inspection of MESD’s Harding Ditch stormwater outfalls

The physical inspection of the stormwater outfalls began at 12:00 p.m. on April 1, 2021. The weather was cool and sunny. According to National Weather Service records for Cahokia, Illinois, the last day of recorded precipitation in the area was March 25, 2021. Mr. Hillman led the tour, and inspectors Joan Rogers and Ted Flatebo joined us. The physical inspection is summarized below. Photos referenced below are included in the Photo Log (Attachment B). Mr. Hillman was not aware of any numbering or identification for the outfalls so I refer to each outfall as a numbered inspection station for the purposes of this report.

Inspection Station #1

We walked to the berm along the north side of Harding Ditch and began the inspection at the stormwater outfall at Inspection Station 1 (see Attachment A for a map of the outfall inspection stations). First we observed the stormwater pump station at the end of Delano Drive. (Photograph 1; MESD0001.jpg). The pump station sends stormwater flow to an outfall to Harding Ditch (Photograph 2; MESD0002.jpg). The outfall appeared to be partially blocked by rocks and debris. The outfall was not visibly discharging but it appears that once stormwater discharges from the outfall it flows through a short gully to Harding Ditch (Photograph 3; MESD0003.jpg). At this point in the inspection, Joan Rogers and Ted Flatebo departed to attend another meeting. Mr. Hillman and I walked back to our vehicles on Delano Drive and drove along the berm on the north side of Harding Ditch to Inspection Station #2.

Inspection Station #2

The outfall at this location discharges to a short gully to Harding Ditch (Photograph 4; MESD0004.jpg). The outfall itself appeared to be damaged and was not discharging (Photograph 5; MESD0005.jpg). The outfall pipe runs under the berm (Photograph 6; MESD0006.jpg) and conveys stormwater from a ditch and field north of the berm.

Inspection Station #3

We continued along the berm to Inspection Station #3. The outfall at this station discharges directly to Harding Ditch and was partially submerged. The outfall pipe runs under the berm (Photograph 7; MESD0007.jpg) and conveys stormwater from a ditch north of the berm (Photograph 8; MESD0008.jpg). I observed flowing water in the ditch.

Inspection Station #4

At Inspection Station #4, a corrugated metal outfall was discharging (Photograph 9; MESD0009.jpg) to a short gully to Harding Ditch (Photograph 10; MESD0010.jpg). The outfall pipe runs under the berm and conveys stormwater from a ditch north of the berm (Photograph 11; MESD0011.jpg). The corrugated pipe inlet appeared damaged and partially buried in sediment.

Inspection Station #5

We continued to Inspection Station #5. An outfall was observed in a ditch along the base of the north side of berm and appeared to be coming from the upland area towards Camp Jackson Road (Photograph 12; MESD0012.jpg). The outfall was not discharging and I noted heavy litter and debris in the ditch. No outfall was observed on the south side of the berm along Harding Ditch at this inspection station.

Inspection Station #6

We continued along the berm to Inspection Station #6. An outfall was observed at this station and was discharging to a short ditch to Harding Ditch (Photograph 13; MESD0013.jpg). Mr. Hillman noted a sewage smell near the area of the discharge. I also noted the odor. The last section of the outfall pipe was separated from the pipe heading under the berm (Photograph 14; MESD0014.jpg). The outfall pipe runs under the berm and neither the other end of the pipe or an inlet was visible on the north side of the berm.

Inspection Station #7

We continued along the berm to Inspection Station #7. In this area there is no drop off in elevation on the north side of the berm. I observed an outfall along the south side (Harding Ditch side) of the berm and it was not discharging (Photograph 15; MESD0015.jpg). The outfall pipe runs under the berm and neither the other end of the pipe or an inlet was visible on the north side of the berm.

Inspection Station #8

We continued to along the berm to the last station, Inspection Station #8. Similar to Inspection Station #7, there is only a small drop off in elevation on the north side of the berm. I observed a ditch between the two facilities and Camp Jackson Road to the north, and the inlet of a metal pipe (Photograph 16; MESD0016.jpg) that leads under the berm to the outfall on the south side (Harding Ditch side) of the berm. The outfall was not visibly discharging but a small pool of rust-colored water was observed under the outfall (Photograph 17; MESD0017.jpg). The outfall discharges to a short ditch that flows into Harding Ditch.

III. CLOSING CONFERENCE AND PRELIMINARY AREAS OF CONCERN

Mr. Hillman and I conducted the closing conference at Inspection Station #8. I started by going over the list of items Mr. Hillman agreed to look for upon returning to his office, including maps of the stormwater outfalls and any related conveyances, and any records regarding easements for the outfalls. I then reviewed some preliminary areas of concern, including the observed dry weather discharges from some of the outfalls, the poor condition of some of the outfalls, and the potential sewage odor noted at the discharging outfall at Inspection Station #6. I noted that other areas of concern may be identified after further review of inspection notes and documents received as part of the inspection.

After sharing the preliminary areas of concern, I asked Mr. Hillman if he had any questions. With no questions from Mr. Hillman, I provided an estimated timeframe for completion of the inspection report, and we concluded the closing conference. I departed Inspection Station #8 and MESD's property at 1:35 p.m. on April 1, 2021.

Note that on April 6, 2021, Mr. Hillman informed me via phone and by electronic mail that MESD does not have NPDES permit coverage for the stormwater outfalls along Harding Ditch. He added that MESD believes the outfalls "might be covered under this: Nationwide Permits (NWP) authorize certain activities under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act of 1899." This is a potential area of concern as MESD may not have NPDES permit coverage for stormwater outfalls discharging from its properties along Harding Ditch.

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ATTACHMENT B - PHOTOLOG
Metro East Sanitary District - Harding Ditch Outfalls
EPA Inspection April 1, 2021
All photos taken by Dean Maraldo, Inspector, U.S. EPA
Camera: Ricoh WG-4
[Note photograph timestamps did not account for daylight savings and are one hour behind actual time of photographs]



1: MESD0001

Description: stormwater pump station.

Location: end of Delano Dr., Centreville, Illinois, 90.1403055°W; 38.5451954°N

Camera Direction: 350°

Date/Time: April 1, 2021; 12:00 CT



2: MESD0002

Description: outfall to Harding Ditch. The outfall appeared to be partially blocked by rocks and debris.

Location: Station #1. MESD parcel along Harding Ditch, 90.1401806°W; 38.5449245°N

Camera Direction: 41°

Date/Time: April 1, 2021; 12:01 CT



3: MESD0003

Description: short gully from outfall to Harding Creek.

Location: Station #1. MESD parcel along Harding Ditch, 90.1401806°W; 38.5449245°N

Camera Direction: 119°

Date/Time: April 1, 2021; 12:02 CT



4: MESD0004

Description: outfall discharges to a short gully to Harding Ditch.

Location: Station #2. MESD parcel along Harding Ditch, 90.1329908°W; 38.5461629°N

Camera Direction: 193°

Date/Time: April 1, 2021; 12:29 CT



5: MESD0005

Description: outfall appeared to be damaged and was not flowing.

Location: Station #2. MESD parcel along Harding Ditch, 90.1329908°W; 38.5461629°N

Camera Direction: 328°

Date/Time: April 1, 2021; 12:30 CT



6: MESD0006

Description: outfall pipe inlet under the berm. Conveys stormwater from a ditch and field north of the berm to Harding Ditch.

Location: Station #2. MESD parcel along Harding Ditch, 90.1331545°W; 38.5463076°N

Camera Direction: 182°

Date/Time: April 1, 2021; 12:32 CT



7: MESD0007

Description: The outfall at this station discharges directly to Harding Ditch and was partially submerged.

Location: Station #3. MESD parcel along Harding Ditch, 90.1258373°W; 38.5473930°N

Camera Direction: 191°

Date/Time: April 1, 2021; 12:50 CT



8: MESD0008

Description: outfall pipe inlet under the berm. Conveys stormwater from a ditch north of the berm to Harding Ditch.

Location: Station #3. MESD parcel along Harding Ditch, 90.1248354°W; 38.5475859°N

Camera Direction: 248°

Date/Time: April 1, 2021; 12:51 CT



9: MESD0009

Description: corrugated metal outfall. Discharging to a short ditch to Harding Ditch.

Location: Station #4. MESD parcel along Harding Ditch, 90.1203844°W; 38.5487171°N

Camera Direction: 18°

Date/Time: April 1, 2021; 13:06 CT



10: MESD0010

Description: Outfall discharging to a short ditch to Harding Ditch.

Location: Station #4. MESD parcel along Harding Ditch, 90.1203844°W; 38.5487171°N

Camera Direction: 201°

Date/Time: April 1, 2021; 13:06 CT



11: MESD0011

Description: inlet to outfall pipe running under the berm, conveying stormwater from a ditch north of the berm. The inlet appeared damaged and partially buried in sediment.

Location: Station #4. MESD parcel along Harding Ditch, 90.1204352°W; 38.5488284°N

Camera Direction: 263°

Date/Time: April 1, 2021; 13:07 CT



12: MESD0012

Description: outfall observed in a ditch along the base of the north side of berm and appeared to be coming from the upland area towards Camp Jackson Road. Note heavy litter and debris.

Location: Station #5. MESD parcel along Harding Ditch, 90.1185833°W; 38.5495744°N

Camera Direction: 344°

Date/Time: April 1, 2021; 13:14 CT



13: MESD0013

Description: outfall observed discharging at this station to a short ditch to Harding Ditch.

Location: Station #6. MESD parcel along Harding Ditch, 90.1167107°W; 38.5506571°N

Camera Direction: 294°

Date/Time: April 1, 2021; 13:17 CT



14: MESD0014

Description: outfall pipe was separated from the pipe heading under the berm.

Location: Station #6. MESD parcel along Harding Ditch, 90.1167107°W; 38.5506571°N

Camera Direction: 162°

Date/Time: April 1, 2021; 13:18 CT



15: MESD0015

Description: outfall along the south side (Harding Ditch side) of the berm.

Location: Station #7. MESD parcel along Harding Ditch, 90.1140339°W; 38.5524794°N

Camera Direction: 308°

Date/Time: April 1, 2021; 13:25 CT



16: MESD0016

Description: inlet of metal pipe heading under the berm and to the outfall on Harding Ditch.

Location: Station #8. MESD parcel along Harding Ditch, 90.1128622°W; 38.5533183°N

Camera Direction: 85°

Date/Time: April 1, 2021; 13:27 CT



17: MESD0017

Description: outfall to Harding Ditch not visibly discharging but a small pool of rust-colored water was observed under the outfall.

Location: Station #8. MESD parcel along Harding Ditch, 90.1128053°W; 38.5532863°N

Camera Direction: 312°

Date/Time: April 1, 2021; 13:27 CT

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