



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

**REPLY TO ATTENTION OF**  
**ECW-15J**

**VIA ELECTRONIC MAIL**

Mayor Curtis McCall Sr.  
City of Cahokia Heights  
103 Main Street  
Cahokia, Illinois 62206  
ymccall@cahokiaillinois.org

Subject: Notice of Clean Water Act Violations

Dear Mayor McCall:

I am writing to you regarding violations of the August 16, 2021 Administrative Order on Consent regarding sanitary sewer overflows (“SSO Order”), and the December 6, 2022 Administrative Order on Consent regarding the City of Cahokia Heights’ municipal separate storm sewer system (“MS4 Order”).

**SSO Order**

Pursuant to paragraph 48.C. of the SSO Order, on May 25, 2022, the City submitted the Targeted Dry-Weather SSO Corrective Action Plan. The plan, approved by the U.S. Environmental Protection Agency on June 21, 2022, included a schedule to complete work to eliminate dry-weather sanitary sewer overflows (“SSOs”) in three areas of the City. According to the City’s July 14, 2023, quarterly report, submitted pursuant to the SSO Order, the City did not complete work in two of the three areas (N. 82<sup>nd</sup> Street and Lauralee Drive areas) according to the approved schedule. Within 30 days of receipt of this Notice of Violation (“NOV”), please submit to EPA a revised Dry-Weather SSO Corrective Action Plan, describing the work remaining in the N. 82<sup>nd</sup> Street and Lauralee Drive areas, and including a revised detailed schedule with final completion dates.

**MS4 Order**

The MS4 Order set forth several requirements designed to bring the City into compliance with Section 402(p) of the Clean Water Act and EPA regulations pertaining to stormwater discharges from the City’s municipal separate storm sewer system (“MS4”). On July 11, 2023, EPA provided the City with notice, via electronic mail, of the following overdue requirements:

1. MS4 Storm Water Management Program Plan or “SWMPP” (para 47.B. of the MS4 Order): due on August 6, 2023;
2. Monitoring and Assessment Program Plan (para 47.C. of the MS4 Order): due on April 6, 2023;
3. Storm Sewer Maps (para 47.E. of the MS4 Order): due on March 6, 2023; and
4. Recordkeeping – web posting of permit Notice of Intent (para 47.F.1. of the MS4 Order): due on February 6, 2023).

To date, the City has not completed the above MS4 Order requirements which are now overdue. Please complete the above requirements, including submission of the SWMPP, Monitoring and Assessment Program Plan, and Storm Sewer Maps to EPA, within 30 days of receipt of this Notice of Violation.

Thank you for your efforts to bring the City into compliance with the Clean Water Act. If you have any questions or concerns regarding this NOV, please contact Dean Maraldo of my staff at (312) 353-2098 or [maraldo.dean@epa.gov](mailto:maraldo.dean@epa.gov), or your legal counsel may contact Deborah Carlson at (312) 353-6121, or [carlson.deborahA@epa.gov](mailto:carlson.deborahA@epa.gov).

Sincerely,

**MICHAEL  
HARRIS**

Digitally signed by  
MICHAEL HARRIS  
Date: 2023.09.15  
08:49:07 -05'00'

Michael D. Harris  
Director  
Enforcement and Compliance Assurance Division

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