

January 30, 2026

Via Electronic Mail

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**RE: DJ #90-5-1-1-08725/1 (City of Lakewood, OH0026018)**

**Subject: City of Lakewood's Semi-Annual Report, Reporting Period July 1, 2025 – December 31, 2025.**

Dear Regulators:

Enclosed please find the City of Lakewood's Semi-Annual Report pursuant to Section VIII of the Consent Decree lodged in October 2022 with the United States District Court, Northern District of Ohio, Case No. 1:22-cv-01964, by the United States and the State of Ohio, which was approved by the Court January 31, 2023.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of

the person or persons who manage the system, or those persons directly responsible for gather the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact me if you have any questions or require further information at this time.

Sincerely,

**THE CITY OF LAKEWOOD OHIO**



Mark K. Papke, PE, CPESC  
City Engineer

Copy to: Lakewood Director of Law via email: [Law@lakewoodoh.gov](mailto:Law@lakewoodoh.gov)

## Overview

In October 2022, the United States and the State of Ohio lodged a Consent Decree (CD) regarding the City of Lakewood’s sewer system. The CD requires Lakewood to submit semi-annual reports to U.S. Environmental Protection Agency (EPA) and Ohio EPA by January 31 and July 31, for the prior six months. The report must contain all information necessary to determine Lakewood’s compliance with its CD requirements.

## Semi-Annual Report Requirements

The CD requirements for the Semi-Annual Report are summarized in Table 1 along with their reference sections.

Table 1. Lakewood’s Semi-Annual Report Requirements

CD Section Reference	Reporting Requirements
<b>Section VIII ¶ 37.a</b>	A description of the projects and activities conducted during the reporting period to comply with the requirements of this Decree, a projection of work to be performed pursuant to this Consent Decree during the next reporting period, a table showing the approved projects from the IWWIP (including the project number, short description, projected and actual dates of all items listed in the implementation schedule column of Appendix A of this Consent Decree), and notice of any anticipated failures to meet future requirements of the Consent Decree or approved plans.
<b>Section VIII ¶ 37.b</b>	Information that Lakewood obtained or received (e.g., customer complaints) regarding discharges from private Connection laterals, including any information received specifying the location of the discharge, and a description of the circumstances of the discharge.
<b>Section VIII ¶ 37.c</b>	A description of any non-compliance with the requirements of this Consent Decree and an explanation of the violation’s likely cause and of the remedial steps taken, or to be taken, to prevent such violation.

## Overview Of Projects and Activities Conducted and Planned

### Activities Conducted Required by the CD

Lakewood completed all required activities in the prior six months in a timely manner. Table 2 outlines the specific CD requirements, section citation, and dates completed or approved by EPA within the reporting period, July 1, 2025 to December 31, 2025.

Table 2. Consent Decree Requirements Completed by Lakewood

Requirements	CD Citation	Date Submitted
<b>Semi-Annual Report</b>	Section VII.	July 31, 2025

## Projects Approved from the IWWIP & Projection of Work for the Next Reporting Period

The current reporting period covers July 1, 2025, to December 31, 2025. The next reporting period will cover January 1, 2026, to June 30, 2026. Table 3 outlines the outlines the approved projects from the IWWIP and the projection of work for the future reporting period.

Table 3. Approved Projects from IWWIP and Project of Projects

Project Number	Control Measure	Description	Projected Implementation Schedule	Actual Implementation Schedule	Projected Work for the Next Reporting Period
1	High-Rate Treatment Facility (HRT)	HRT facility for control of CSO 002	Construction Complete.  Substantial Completion of Construction: 9/1/22  Achievement of Full Operation: 12/31/24	Achievement of full operation complete.	None: Project achieved full operation on 12/31/2024.
2	052 Storage	Design and construct storage for CSO 052 and below river crossing sewer to an above ground storage at WWTP	Complete Design: 6/1/25  Initiate Construction: 6/1/26  Substantial Completion of Construction: 12/31/28  Achievement of Full Operation: 12/31/2030	Bid and award completed.	Initiate construction.
3	059 Storage	Evaluate land use requirements, Design and construct storage for CSO 059 and related interceptor overflow storage facilities	Complete Design: 12/31/29  Initiate Construction: 6/1/30  Substantial Completion of Construction: 12/31/31  Achievement of Full Operation: 7/1/2033	Flow data and pollutant sampling collection for preliminary engineering and design.	On-going flow data and pollutant sampling collection.
4	Pipelining and replacements	Completed with annual watermain replacements, as necessary and hydraulically feasible		See Additional Activities specified below	See Projected Additional Activities specified.

## Additional activities completed between July 1, 2025, to December 31, 2025

- **2025 Watermain Replacement (Northland and Norton)** – Conducted resident and business public meeting. Construction of watermain, sewer improvements, and pavement improvements on Norton completed. Construction of watermain on Northland was completed. Began watermain service connections and sewer lateral connections on Northland.
- **Lewis Sewer Improvements** – Relocation of utility poles completed. Project completed.
- **Interceptor Rehabilitation** – Completed slip lining, grouting, and site restoration. Began design for additional shaft at West Clifton and Riverside to replace deteriorated drop manhole.
- **CUY-Bunts Rehabilitation** – Completed final design with Stage 3 and PS&E submissions to ODOT. Completed Right-of-Way, Utility Clearance, and Environmental Document approval work required per FHWA. Completed analysis of pre-construction sewer flow monitoring/sampling and data collection analysis for IWWIP improvements. Advertising the project for bids. Began gas line utility work.

## Projected additional activities for the reporting period January 1, 2026, to June 30, 2026

- **2025 Watermain Replacement (Northland and Norton)** – Continue waterline service and sewer lateral replacements. Perform manhole separations for Northland North. Begin pavement restoration for Northland. Perform cured-in-place pipelining of sanitary mainline for Northland and Norton.
- **Interceptor Rehabilitation** – Complete design and begin construction of additional shaft at West Clifton and Riverside to replace deteriorated drop manhole. Complete manhole rehabilitations.
- **CUY-Bunts Rehabilitation** – Award project and begin first phase of construction.

## Notice of Anticipated Failures

Lakewood does not anticipate any failures in meeting the requirements of the CD for the coming reporting period, January 1, 2026 to June 30, 2026.

## Private Discharges

Lakewood is required to submit to Ohio EPA an annual report on discharges and backups on private property. This report covers the relevant reporting period and is attached as Attachment A.

## Section VIII 37.b

- Edgewater Drive (LEWS 1080)

Work has been satisfactorily completed, and the property is in compliance.

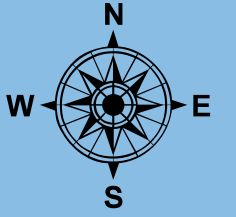
## Non-Compliance

The City of Lakewood has met all requirements for the July 1, 2025, to December 31, 2025, reporting period related to IWWIP projects.

# Water in Basement Occurrences

Permit Number: 3PE00004\*SD  
 Facility Name: City of Lakewood  
 Reporting Period: From 7/1/2025 to 12/31/2025

Sewershed	WIB Occurrences	Causes (choose all that apply)	Other Cause Description
One	6	Other Blockages	wipes
One	3	Roots	
One	0	Grease	
One	0	Debris in Line	
One	1	Line Deterioration	
One	0	Extreme Weather	
Two	4	Other Blockages	wipes
Two	1	Roots	
Two	0	Grease	
Two	0	Debris in Line	
Two	0	Line Deterioration	
Two	0	Extreme Weather	
Three	3	Other Blockages	wipes
Three	9	Roots	
Three	1	Grease	
Three	0	Debris in Line	
Three	1	Line Deterioration	
Three	0	Extreme Weather	
Four	2	Other Blockages	wipes
Four	3	Roots	
Four	1	Grease	
Four	1	Debris in Line	
Four	0	Line Deterioration	
Four	2	Extreme Weather	



SEPTEMBER 2020

