



City of Lakewood
Department of Public Works

Chris Gordon, Director
Mark Papke, PE, CPESC, City Engineer

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January 31, 2025

Via Electronic Mail

Chief, Water Enforcement and
Compliance
Assurance Branch (ECW-15J)
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77 West Jackson Boulevard
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Via email: r5weca@epa.gov

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U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Via email: eescdcopy.enrd@usdoj.gov

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

Subject: City of Lakewood's Semi-Annual Report, Reporting Period July 1, 2024
– December 31, 2024.

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 Northeast Ohio District Court, 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

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.

I. 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
Section VIII ¶ 37.a	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.
Section VIII ¶ 37.b	Information that Lakewood obtained or received (<i>e.g.</i> , 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.
Section VIII ¶ 37.c	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.

II. OVERVIEW OF PROJECTS AND ACTIVITIES CONDUCTED AND PLANNED
a. 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, 2024 – December 31, 2024.

Table 2. Consent Decree Requirements Completed by Lakewood		
Requirements	CD Citation	Date Submitted
Semi-Annual Report	Section VII.	July 31, 2024

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

The current reporting period covers July 1, 2024 – December 31, 2024. The next reporting period will cover January 1, 2025 – June 30, 2025. 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 & 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. Wet Weather Operating Plan (WWOP) submitted to Erm Gomes at Ohio EPA on July 29, 2024. Semi-annual report submitted to Erm Gomes on October 15, 2024.	Provide required semi-annual reporting to Erm Gomes by April 15, 2025.
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	90% Final Design completion, USACE NWP 58 permit received, and apply for 401 permits.	Completion of Final Design and PTI and NOI permitting.

3	059 Storage	Evaluate land use requirements, Design and construct storage for CSO 059 and related interceptor overflow storage facilities	<p>Complete Design: 12/31/29</p> <p>Initiate Construction: 6/1/30</p> <p>Substantial Completion of Construction: 12/31/31</p> <p>Achievement of Full Operation: 7/1/2033</p>	Lot split recorded at the county.	Flow data and pollutant sampling collection beginning for preliminary engineering and design.
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, 2024 – December 31, 2024, include,

- **2022 Watermain Replacement and Sewer Improvements Andrews/Gladys** – Completed post-construction sewer flow monitoring/sampling and data collection for Andrews.
- **2023 Watermain and Sewer Improvements Parkwood, Reveley, and Elmwood** – CIPP line the under-sewer main for Parkwood. Pavement and site restoration on all three streets are complete. Project is completed.
- **2024 Watermain and Sewer Improvements Glenbury, Mars and Marlowe** – Installed new watermains on all three streets. Completed sewer point repairs. Pavement and tree lawn restoration completed. Website and updates can be found at: <https://www.lakewoodoh.gov/glenbury-mars-marlowe/>.
- **2025 Watermain Replacement (Northland and Norton)** – Continued design process and associated IWWIP improvements design. Completed pre-construction sewer flow monitoring/sampling and data collection and began analysis. Completed CCTV of sewer lines.
- **Lewis Sewer Improvements** – Completed sewer construction. Completed roadway pavement and tree lawn restoration. Website and updates can be found at: <https://www.lakewoodoh.gov/lewis-project/>.
- **Interceptor Rehabilitation** – Heavy cleaning and templating of interceptor completed for approximately 88% of the entire interceptor length. A total of 15,511 feet of interceptor has been lined and grouted. Six (6) shafts have been completely restored, two (2) shafts are nearly restored to grade, two (2) shafts are ready for restoration, and one (1) added shaft is currently excavated halfway. Fifteen (15) of 25 manholes have been rehabilitated. Project progress can be found at <https://www.lakewoodoh.gov/lakewood-interceptor/>.
- **CUY-Bunts Rehabilitation** – Stage 1 plans submitted to ODOT. Pre-construction sewer flow monitoring/sampling and data collection has been completed for IWWIP portions. Further project information can be found at: <https://www.lakewoodoh.gov/bunts-rehab/>.

Projected additional activities for the reporting period January 1, 2025 – June 30, 2025, include,

- **2022 Watermain Replacement and Sewer Improvements Andrews/Gladys** – Analysis and final report of results from post-construction sewer flow monitoring/sampling and data collection for Andrews.
- **2024 Watermain and Sewer Improvements Glenbury, Mars and Marlowe** – Complete Cured In Place Pipe (CIPP) Lining of the under sewers and CIPP spot repairs of storm lines. Rehabilitate manholes and complete tree plantings. Project closeout.
- **2025 Watermain Replacement (Northland and Norton)** – Complete Plans, Specifications, and Final Estimate. Bid and award project. Develop project specific website. Conduct resident and business public meeting prior to construction beginning.
- **Lewis Sewer Improvements** – Complete concrete restoration and tree plantings. Relocation of utility poles. Project closeout.

- **Interceptor Rehabilitation** – Continue heavy cleaning and templating of interceptor for remaining 12% of the interceptor. Continue utility relocations and installation of shafts of the remaining two (2) shafts. Continue progressing sliplining, grouting, manhole rehabilitations, and site restoration as work is completed.
- **CUY-Bunts Rehabilitation** – Continue design and Stage 2 plan submission to ODOT for review. Perform environmental work required per FHWA. Analysis of pre-construction sewer flow monitoring/sampling and data collection analysis for IWWIP improvements.

c. Notice of Anticipated Failures

Lakewood does not anticipate any failures in meeting the requirements of the CD for the coming reporting period, January 1, 2025 – June 30, 2025.

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)

The city issued a Notice of Violation to the property owner for a cross connection identified. The property owner is currently working with the adjacent property owner to obtain an easement to connect their sewer lateral to the sanitary sewer main across a private drive.

- Webb Road (LEWS 1295)

Previously reported two properties on Webb Road with cross connections have been corrected.

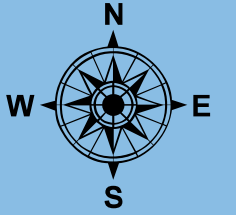
III. NON-COMPLIANCE

The City of Lakewood has met all requirements for the July 1, 2024 – December 31, 2024, reporting period related to IWWIP projects.

Water In Basement Occurrences - Data Entry Spreadsheet

Permit Number	3PE00004*SD
Facility Name	City of Lakewood
Reporting Period	
From	7/1/2024
To	12/31/2024

Sewershed	WIB Occurrences	Causes (choose all that apply)	Other Cause Description
One	1	Other Blockages	wipes
One	9	Roots	
One	0	Grease	
One	2	Debris in Line	
One	4	Line Deterioration	
One	4	Extreme Weather	
Two	0	Other Blockages	wipes
Two	4	Roots	
Two	0	Grease	
Two	3	Debris in Line	
Two	1	Line Deterioration	
Two	6	Extreme Weather	
Three	1	Other Blockages	wipes
Three	6	Roots	
Three	0	Grease	
Three	1	Debris in Line	
Three	1	Line Deterioration	
Three	3	Extreme Weather	
Four	0	Other Blockages	wipes
Four	5	Roots	
Four	0	Grease	
Four	2	Debris in Line	
Four	0	Line Deterioration	
Four	5	Extreme Weather	



SEPTEMBER 2020

