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CHRIS GORDON
Director of Public Works

MARK K. PAPKE, PE, CPESC
City Engineer

Via Electronic Mail

July 31, 2024

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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 January 1, 2024 – June 30, 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, January 1, 2024 – June 30, 2024.

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

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

The current reporting period covers January 1, 2024 – June 30, 2024. The next reporting period will cover July 1, 2024 – December 31, 2024. 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 Next Reporting Period
1	High Rate Treatment Facility (HRT)	HRT facility for control of CSO 002	Currently being built. Substantial Completion of Construction: 9/1/22 Achievement of Full Operation: 12/31/24	Substantial Complete of Construction: 4/14/2022 (Note that Semi-Annual Report submitted October 14, 2022 to Erm Gomes). Lakewood began shakedown and operational integration with plant.	Projected to continue working through optimization and plant integration throughout the next reporting period. Provide required reporting to Erm Gomes. Submission of Wet Weather Operating Plan (WWOP) per NPDES permit.
2	052 Storage	Design and construct storage for CSO 052 and aerial sewer to 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	Final Design and permitting underway.	Continuation of Final Design and 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>	Completed additional survey work and lot split for Planning Commission approval. Relocated utilities water and sewer utilities.	Lot split approved by Planning Commission in process of being recorded at the county.
4	Pipe lining 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 January 1, 2024 – June 30, 2024 include,

- **2022 Watermain Replacement and Sewer Improvements Andrews/Gladys** – All water, sewer, and pavement work completed. Post-construction sewer flow monitoring/sampling and data collection is underway for Andrews.
- **2023 Watermain and Sewer Improvements Parkwood, Reveley, and Elmwood** – Watermain work completed on all three streets with the exception of one (1) water service connection on Parkwood. Sewer point repairs were completed on all three streets. Cured-in-Place Pipe (CIPP) sewer lining of the under-sewer main completed on Reveley and Elmwood. Parkwood manhole separations and Right-of-Way new storm and sanitary sewer laterals with cleanouts installed. Curb, apron, sidewalk and pavement improvements initiated. Website and updates can be found at <https://www.lakewoodoh.gov/elmwood-reveley-parkwood-project/>.
- **2024 Watermain and Sewer Improvements Glenbury, Mars and Marlowe** – Bid and awarded construction contract. Developed project specific website with informative materials. Website is <https://www.lakewoodoh.gov/glenbury-mars-marlowe/>.
- **2025 Watermain Replacement (Northland and Norton)** – Design contract awarded. Cleaning and televising of sewer mains completed. 90% of field surveying work completed. Pre-construction sewer flow monitoring/sampling and data collection has been initiated. Geotechnical investigation and soil borings completed.
- **Lewis Sewer Improvements** – Bid and awarded construction contract. Public informative meeting held prior to construction. Developed project specific website. Visit <https://www.lakewoodoh.gov/lewis-project/>. Gas and electric utilities have been relocated. Sewer construction has commenced.
- **Interceptor Rehabilitation** – Heavy cleaning and templating of interceptor completed for approximately 88% of the entire interceptor length. Shafts #1, 2, and 3 have been completed and restored. A total of 5,603 feet of interceptor has been lined and grouted. Shafts #4, 6, 7, 8, 9, 10, 11A and 12 are excavated. Utility relocations are ongoing at remaining two shaft sites. Project progress can be found at <https://www.lakewoodoh.gov/lakewood-interceptor/>.
- **CUY-Bunts Rehabilitation** – Design contract awarded. Field surveying 90% complete. Conceptual plans developed and a public meeting held with a 30-day public comment period provided. Cleaning and televising of sewer mains completed. Televising of Right-of-Way sewer laterals with the IWWIP project portion (Madison to Clifton) completed. Pre-construction sewer flow monitoring/sampling and data collection has been initiated. Further project information can be found at: <https://www.lakewoodoh.gov/bunts-rehab/>.

Projected additional activities for the reporting period July 1, 2024 - December 31, 2024 include,

- **2022 Watermain Replacement and Sewer Improvements Andrews/Gladys** – Continuing 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. Continue pavement and site restoration on all three streets. Install post-construction sewer flow monitoring/sampling upon project completion (weather pending).
- **2024 Watermain and Sewer Improvements Glenbury, Mars and Marlowe** – Install new watermains on all three streets. Complete sewer point repairs. Perform CIPP lining of the under-sewer mains.
- **2025 Watermain Replacement (Northland and Norton)** – Continue design process and associated IWWIP improvements. Continue pre-construction sewer flow monitoring/sampling and data collection analysis.
- **Lewis Sewer Improvements** – Continue sewer construction. Upon completion of sewer construction, perform pavement and site restoration.
- **Interceptor Rehabilitation** – Continue heavy cleaning and templating of interceptor for remaining 12% of the interceptor. Continue utility relocations and installation of shafts. Continue sliplining, grouting, and site restoration as work is completed.
- **CUY-Bunts Rehabilitation** – Perform geotechnical investigation with soil borings and pavement cores. Complete surveying. Stages 1 and 2 plan submission to ODOT for review. Perform environmental work required per FHWA. Continue 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, July 1, 2024 – December 31, 2024.

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)

Two properties with cross connections were identified on Webb Road and subsequently the city issued a Notice of Violation to each property owner.

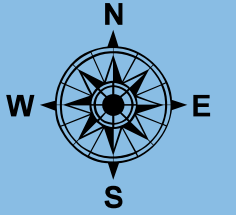
III. NON-COMPLIANCE

The City of Lakewood has met all requirements for the January 1, 2024 – June 30, 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	1/1/2024
To	6/30/2024

Sewershed	WIB Occurrences	Causes (choose all that apply)	Other Cause Description
One	2	Other Blockages	wipes
One	16	Roots	
One	0	Grease	
One	2	Debris in Line	
One	2	Line Deterioration	
One	5	Extreme Weather	
Two	5	Other Blockages	wipes
Two	14	Roots	
Two	1	Grease	
Two	1	Debris in Line	
Two	2	Line Deterioration	
Two	2	Extreme Weather	
Three	1	Other Blockages	wipes
Three	12	Roots	
Three	2	Grease	
Three	0	Debris in Line	
Three	0	Line Deterioration	
Three	1	Extreme Weather	
Four	5	Other Blockages	wipes
Four	9	Roots	
Four	0	Grease	
Four	0	Debris in Line	
Four	1	Line Deterioration	
Four	5	Extreme Weather	



SEPTEMBER 2020

