



City of Lakewood
Department of Public Works

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July 31, 2025

Via Electronic Mail

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Megan Bobb
Section 1
Water Enforcement and Compliance
Assurance Branch
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Via email: Bobb.Megan@epa.gov

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

Subject: City of Lakewood's Semi-Annual Report, Reporting Period January 1,
2025 – June 30, 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

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, 2025 – June 30, 2025.

Table 2. Consent Decree Requirements Completed by Lakewood		
Requirements	CD Citation	Date Submitted
Semi-Annual Report	Section VII.	January 31, 2025

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

The current reporting period covers January 1, 2025 – June 30, 2025. The next reporting period will cover July 1, 2025 – December 31, 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.	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	100% Final Design completion, USACE NWP 58 permit received, received 401 permits, PTI and NOI obtained.	Bid and award project.
3	059 Storage	Evaluate land use requirements, Design and	Complete Design: 12/31/29	Flow data and pollutant sampling collection beginning	On-going flow data and pollutant sampling collection.

		construct storage for CSO 059 and related interceptor overflow storage facilities	<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>	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 January 1, 2025 – June 30, 2025, include,

- **2022 Watermain Replacement and Sewer Improvements Andrews/Gladys** – Completed analysis and final report of results from post-construction sewer flow monitoring/sampling and data collection for Andrews. Project completed.
- **2024 Watermain and Sewer Improvements Glenbury, Mars and Marlowe** – Completed Cured In Place Pipe (CIPP) Lining of the under sewers and CIPP spot repairs of storm lines. Rehabilitate manholes and complete tree plantings. Project completed.
- **2025 Watermain Replacement (Northland and Norton)** – Complete Plans, Specifications, and Final Estimate. Bid and awarded construction project. Developed project specific website (<https://www.lakewoodoh.gov/northland-norton-project/>).
- **Lewis Sewer Improvements** – Completed concrete restoration and tree plantings. Project completed with the exception of relocation of utility poles.
- **Interceptor Rehabilitation** – Heavy cleaning and templating of interceptor completed for approximately 90% of the entire interceptor length. A total of 17,988 feet of interceptor has been lined and grouted. Eleven (11) shafts have been completely restored, one (1) shaft is nearly restored to grade, and the last shaft is currently being worked out of to complete the remaining work. Twenty (20) of twenty-seven (27) manholes have been rehabilitated. Project progress can be found at <https://www.lakewoodoh.gov/lakewood-interceptor/>.
- **CUY-Bunts Rehabilitation** – Completed Stage 2 plan submission to ODOT for review and comment. Performed environmental work required per FHWA. Continued analysis of pre-construction sewer flow monitoring/sampling and data collection analysis for IWWIP improvements. Further project information can be found at: <https://www.lakewoodoh.gov/bunts-rehab/>.

Projected additional activities for the reporting period July 1, 2025 – December 31, 2025, include,

- **2025 Watermain Replacement (Northland and Norton)** – Conduct resident and business public meeting. Begin construction of watermain, sewer improvements, and pavement improvements on Norton and after completion of that work, start construction on Northland.
- **Lewis Sewer Improvements** –Relocation of utility poles.
- **Interceptor Rehabilitation** – Complete heavy cleaning and templating of interceptor for remaining 10% of the interceptor. Complete sliplining, grouting, manhole rehabilitations, and site restoration. Project closeout.
- **CUY-Bunts Rehabilitation** – Complete final design with Stage 3 and PS&E submissions to ODOT. Complete Right-of-Way, and Utility Clearance, Environmental Document approval work required per FHWA. Complete analysis of pre-construction sewer flow monitoring/sampling and data collection analysis for IWWIP improvements. Advertise the project for bids.

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, 2025 – December 31, 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 was unable to obtain an easement to connect their sewer lateral to the sanitary sewer main across a private drive from the adjacent property owner. The property owner has hired a contractor to construct a new sewer lateral to connect to the Edgewater Drive sanitary main. Work is expected to be completed within the next reporting period.

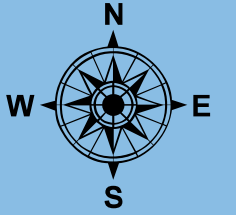
III. NON-COMPLIANCE

The City of Lakewood has met all requirements for the January 1, 2025 – June 30, 2025, 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	1/1/2025
To	6/30/2025

Sewershed	WIB Occurrences	Causes (choose all that apply)	Other Cause Description
One	5	Other Blockages	wipes
One	8	Roots	
One	1	Grease	
One	7	Debris in Line	
One	2	Line Deterioration	
One	4	Extreme Weather	
Two	5	Other Blockages	wipes
Two	7	Roots	
Two	0	Grease	
Two	5	Debris in Line	
Two	1	Line Deterioration	
Two	3	Extreme Weather	
Three	3	Other Blockages	wipes
Three	6	Roots	
Three	1	Grease	
Three	5	Debris in Line	
Three	1	Line Deterioration	
Three	0	Extreme Weather	
Four	2	Other Blockages	wipes
Four	10	Roots	
Four	1	Grease	
Four	5	Debris in Line	
Four	0	Line Deterioration	
Four	2	Extreme Weather	



SEPTEMBER 2020

