

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	10/30/2018		
Media:	Water		
Regulatory Program(s)	NPDES		
Utility Name:	Burleson, City of		
Facility Inspected:	Burleson Wastewater Collection System		
Facility Physical Location:	Burleson Public Works, 725 SE John Jones Drive		
(city, state, zip code)	Burleson, TX		
Mailing address:	Burleson Public Works, 725 SE John Jones Drive		
(city, state, zip code)	Burleson, TX 76028		
County/Parish:	Johnson		
Facility Contact:	Kevin North	Assistant Public Works Director	
	knorth@burlesontx.com		
FRS Number:	110039879076		
Identification/Permit Number:	TXU0047295		
Media Number:			
NAICS:			
SIC:	4952		
Personnel participating in inspection:			
Rachel Matthews	Region 6 EPA (6EN-WM)	Life/Physical Scientist	214-665-8589
Tony Loston	Region 6 EPA (6EN-WM)	Environmental Engineer	214-665-3109
Kevin North	City of Burleson	Assistant Public Works Director	(817)426-9830
EPA Lead Inspector Signature/Date			
	Rachel Matthews		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Rachel Matthews and Tony Loston arrived at the City of Burleson Public Works office around 9:00 am on October 30, 2018 for an announced inspection. We met with Mr. Kevin North, Assistant Public Works Director. We presented our credentials to Mr. North informing him this was an EPA evaluation to determine compliance with the Clean Water Act regarding sanitary sewer overflows from the sanitary sewer collection system. The scope is a full compliance evaluation.

FACILITY DESCRIPTION

The City of Burleson Public Works serves approximately 47,889 residents, 1,453 commercial businesses, and 162 industrial facilities. All sewage connections are routed through the sanitary sewer collection system to the Village Creek Wastewater Reclamation Facility (VCWRF) that is owned and operated by the City of Fort Worth. The City of Burleson's sanitary sewer collection system consists of approximately 211 miles of pipeline, 3,364 manholes, and 3 pump/lift stations. The pipe is over half PVC, but a large portion (43%) is unknown.

All lift stations have quick-connects for portable pumping units, although emergency power is available. The alarm systems include visual (lights) and audible onsite, as well as SCADA connections with alarms sent to cell phones for high level and power outages. The city also owns various equipment for emergency operations as well as regular Operations & Maintenance, such as vac-truck with jetter, separate small trailer jetter, CCTV camera system, portable pumping units for rerouting sewerage.

The City has 21 full time employees dedicated to utility operations, with five primarily dedicated to wastewater operations. These positions consist of 2 Utility Crew Leaders, 1 Sewer Equipment Operator and 2 Utility Workers.

Section II – OBSERVATIONS

Prior to the meeting, the City sent electronic documents of maps, staffing information, some Standard Operating Procedures (SOP), SSO reports, example work orders, the budget and Capital Improvement Project information, CCTV planning, ordinance information, etc. A hard copy was also prepared for EPA in advance and presented to us at the meeting.

According to Mr. North, staffing needs, as well as budgetary needs, satisfactory. His department only needs to replace a couple of empty positions, otherwise the City has enough certified staff and crews dedicated to the system. He also commented that, when necessary, staff from other areas of the department can be temporarily reassigned. In addition, the City has a CIP fund and emergency fund that ensures the system is well maintained and operated. He commented he usually does not need to spend 100% of his funds that are dedicated to the collection system.

According to city official SSO reports there were eighteen (18) SSOs in the last 5 years. One wet-weather SSO occurred during a significant storm event in 2015. Blockages were related to grease, debris, and/or roots, while there were a few related to lift station failures.

According to information submitted in advance, the City conducts daily inspections of the lift stations. Remote manholes (213) are inspected annually and creek crossings are inspected annually after heavy rain events of 1 inch or more.

During the meeting, it was mentioned that most SSOs are caused by blockages. However, when crews report back what the problem was, the work orders do not fully explain the blockages and the cause.

The city has a water and wastewater master plan as well as an in-house asset management program, using GIS, to keep track of all pipes, manholes, lift stations, work orders, complaints, etc. Work orders are generated and emailed (sent to field tablets that crews carry) as well as tracked through the in-house management system.

the City uses CCTV to investigate pipe problems and “hot spots” and uses the rating system for pipe assessment to decide rehabilitation/replacement needs. The city’s goal for collection system cleaning and CCTV inspection is currently to have the entire system (12” lines and below) complete every 4 years. The goal includes identifying the 43% pipes of unknown material. The city also employs an acoustic assessment of pipes, which mimics water movement by using sound. This technology is SL-RAT®

The City does not have an ordinance for grease traps but does have an investigatory system in place to find any problems with food establishments, including enforcement through citation if necessary.

Section III – AREAS OF CONCERN

There were no major areas of concern at the time of the closing meeting. But, there were a few suggestions to help the City for future issues and trend analysis:

1. Begin including more details in all work orders on what kind of blockages are found, as well as how they were corrected to allow trend analyses to be run to more easily, find specific problems, as well as to distinguish them on the GIS mapping system. For example: what kind of debris (rags, diapers, wipes...etc.).
2. Begin looking at the neighborhoods (not connected to food establishments) that have blockages to determine the root problems. Depending on the issue, various forms of public education (including multi-lingual) should be employed if necessary.
3. Begin training someone to understand the internal functions/operations of the in-house asset management program to ensure there is a back-up when necessary.

However, after the meeting, and further review of documents prepared for EPA, it was noted that SOPs and/or checklists do not exist for routine inspections or maintenance of lift stations or condition assessments for manholes. This is an area of concern due necessary consistency regarding these activities as well as training of new staff and the consistency of the training. It is therefore strongly recommended that SOPs and checklists be developed for both.