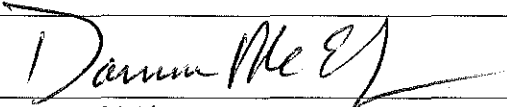
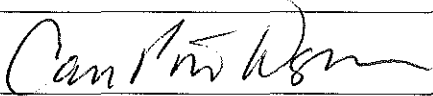


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	April 12, 2018		
Media:	Municipal Wastewater		
Regulatory Program(s)	NPDES		
Utility Name:	Westlake, Town of		
Facility inspected:	Wastewater Collection System		
Facility Physical Location:	Town of Westlake, 1500 Solana Boulevard, Building 7, Suite 7200		
(Town, state, zip code)	Westlake, TX 76262		
Mailing address:	1301 Solana Blvd.		
(Town, state, zip code)	Westlake, TX, 76262		
County/Parish:	Denton and Tarrant		
Facility Contact:	Jarrold Greenwood	Public Works Director	
	(817) 490-5717 (office)		
FRS Number:	110069996042		
Identification/Permit Number:	TXU011194		
NAICS:	22132		
SIC:	4952		
Personnel participating in inspection:			
Jarrold Greenwood	Town of Westlake	Public Works Director	817-788-7159
Kory Kittrell	Town of Westlake	Water/Wastewater Operator	817-788-1030
Damon McElroy	Region 6 EPA (6EN-WM)	Environmental Engineer & 6EN-WM Enforcement Officer	214-665-7159
EPA Lead Inspector Signature/Date			5/9/2018
	Damon McElroy		Date
Supervisor Signature/Date			5/9/18
	Carol Peters-Wagnon		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Damon McElroy arrived at Westlake Town Hall at 8:55 am on April 12, 2018, for an announced Compliance Evaluation Inspection. I met with the Town's wastewater utility officials illustrated by the inspection sign-in sheet in Appendix 2. I presented my credentials to the group. The purpose of the inspection was broadly explained as a collection system compliance evaluation of areas such as capacity, management, operations, and maintenance (CMOM) and associated Sanitary Sewer Overflow (SSO) mitigation activities; as well as SSO reporting according to Federal and Texas law. For further CMOM program guidance you may reference the web link:

https://www3.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf.

Jeff Tate from TCEQ (DFW Region) was invited to participate via phone call at (817)-588-5800 on March 22, 2018. The inspection examined the Town of Westlake's (or Town) sanitary sewer collection system following EPA's National SSO Initiative, in CWA accordance. For further SSO initiative information you may reference the web link: <https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos>. The inspection scope is to generally to evaluate the municipalities that receive Trinity River Authority (TRA) wastewater treatment contractual services in order to assist in stopping unauthorized / unpermitted discharges (or SSOs) and encourage sustainability. The Town's collection system is regulated under the:

- Texas Water Code (TWC)
- Texas Administrative Code (TAC)
- Texas Health and Safety Code
- Clean Water Act (CWA)
- Code of Federal Regulations (CFR)
- Associated DCWWS NPDES General Permit Conditions

Before leaving the facility, an exit briefing was conducted that explained observations, suggestions and areas of concern. This inspection report is based on information supplied by the Town representatives, observations made by the U.S. EPA inspector, records and reports maintained by Westlake, the State of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Westlake's WW utility serves about 1,200 residents via about 270 residential service connections, 90 septic systems, and 76 commercial connections. The Town's collection system consists of about 20 miles of WW gravity and force mains, three lift stations, and concrete manholes. The sanitary sewer system was installed beginning in 1999. The WW mains are 100% PVC and up to about 19 years old. Westlake is a town in Denton and Tarrant Counties and is described as an upscale suburb of Fort Worth

The Public Works Department employs two fulltime Town officials (one utility director and one operator) that split O&M activities between drinking water and Wastewater O&M activities. The Town's sanitary sewage is transmitted to the TRA Denton Creek Regional Wastewater System (DCRWWS –

Permit No.: TX0104957) for contractual wastewater treatment. The Town's zoning code mandates at least a half-acre lot per home and one acre lots for every eight apartments.

Section II - OBSERVATIONS

Based on the inspection discussions, data analysis, and observations:

- The Town has adequate capacity during dry weather.
- The Town retained RJN, Inc. to conduct a I/I Study and Report, dated July 2016. The Westlake collection system analysis study included:
 1. Smoke Testing
 2. Dye Testing
 3. CCTV condition assessment of pipelines.
 4. Hydraulic analysis.
- The collection system experiences infiltration and inflow (I/I) during wet weather.
- I/I reportedly occur primarily from private service laterals and manholes.
- The Town's sanitary sewer overflow (SSO) or unauthorized discharge notification procedure adheres to the TCEQ's Office of Compliance and Enforcement RG-395 (regulatory guidance 395), revised September 2016. The RG-295 web-address is located here:
https://www.tceq.texas.gov/assets/public/comm_exec/pubs/rg/rg-395.pdf
- Westlake reported the below to SSO Non-Compliance Reports in the past five years:

Start Date	Volume (Gallons)	Location/Description	Cause
10/21/2012	300	Manhole approximately 100 ft. west of Post Oak Rd. & Sabine Rd. Intersection. Discharged to concrete drainage channel.	Equipment failure
10/17/2014	450	2600 Ottinger Rd. manhole overflowed to ground.	Blockage

- Emergency LS power is provided by a Sunbelt Rental contract.
- The SCADA system has backup battery power that should last at least three days.
- The town has adequate spare parts including LS pumps.
- The three LSs (i.e. named Deloitte, Fidelity and Vaquero) are connected to SCADA that monitor low level, high level, run times, relevant high level alarm, etc. and are available via the web on offsite devices such as cell phones or personal computers (reference Photo 3 in Appendix 1).
- The Fidelity LS was observed to have a problem with grease and debris.
- The LS emergency notification and response is handled by the SCADA alarms that notify City officials.
- Lift stations are inspected each workday that include a visual inspection of site conditions.

- Customer inquiries are handled at the call center located at Westlake Town Hall, 1500 Solana Boulevard, Building 7, Suite 7200.
- LSs are reportedly cleaned contractually every six months.
- Public works operates 40 hours per week during “normal” working hours (i.e. Monday through Friday, at about 8:00 am to 5:00 pm).
- Phone inquiries and emergencies that occur after the 40-hour work week are routed to the Town’s utility director and the utility operator.
- The Town does not participate in the TCEQ Sanitary Sewer Overflow Initiative (SSOi).
- O&M is funded by the adopted water and sewer budget.
- Town operator(s) are TCEQ certified and receive adequate training.
- The Town was observed to not implement a fat, oils and grease (FOG) program.
- The Town was observed to not have a root-control program.
- The Town does not have a formal program stop private or subscriber sewer overflows.
- There has no ordinance for authority to take appropriate action to stop private or subscriber sewer overflows or implement a FOG program (i.e. right of entry, enforcement, and inspection authority).
- The Town jet cleans known hot spots annually.
- The Town does not document, analyze or map repeat problem areas.
- The Town purchased a GIS system that is to be populated with WW utility assets in the future.
- The Town plans to install additional WW lines to unserved or underserved areas including to replace the existing septic systems with a gravity sanitary sewer system.
- The Town has not implemented a formal capacity, management, operation and maintenance (CMOM) program.
- The Town does not utilize a work order management system.
- Wastewater customer inquiries or work orders could not be obtained or compared to any non-reported SSOs.
- The Town does not implement an asset management plan.
- The Town indicated it has adequate capital improvement resources for wastewater utility O&M.
- The Town reported that it has adequate resources for condition assessment.
- The Town reported that it has adequate resources for emergency repairs.
- There are no categorical industries in the Town.

Section III – AREAS OF CONCERN

The Town of Westlake utility department will best serve Westlake’s customers by addressing the following:

1. Updated SOPs need to be created and made available for utility staff including for each O&M and emergency activity.
2. The Town needs a FOG Program.
3. The Town needs a program to mitigate private (or subscriber) sewer overflows.

4. The Town needs ordinance (i.e. right of entry, enforcement, and inspection authority) to implement a FOG program and a private sewer overflow mitigation program.
5. The Town needs to implement a Work Order Management System.
6. The Town needs to track and analyze WW relevant customer inquiries to prevent SSOs.
7. The Town further needs to document, analyze, and map repeat problem areas or hot spots, and confirm to clean more often than annually.
8. The Fidelity LS grease and debris needs to be removed.
9. The Town needs a formal collection system condition assessment program.
10. The Town needs a utility GIS map that is populated with assets.
11. Phone inquiries for WW emergencies including SSOs need to be confirmed to be routed to the Town's utility director and the utility operator "after hours" and on weekends; including a resulting SOP.

Section IV – RECOMMENDATIONS AND SUGGESTIONS

RECOMMENDATIONS

1. The Town needs a formal capacity, management, operation and maintenance (CMOM) program.
2. If a SSO reaches a waterway, the Town needs to notify and work with the:
 - a. The Code enforcement group,
 - b. The Texas Parks and Wildlife department, and
 - c. Any Municipal Separate Storm Sewer System (MS4) permit program team as appropriate.
3. The Town needs a root-control program.
4. The Town should implement a formal asset management process. An active asset management plan will support the Town to manage and operate utility assets at a lowered cost as well as judiciously identify critical infrastructure rehabilitation or replacement projects.

SUGGESTIONS

- The Town would benefit by participating in the TCEQ Sanitary Sewer Overflow Initiative (SSOi) (more SSOi information is available via the web-address:
<https://www.tceq.texas.gov/compliance/investigation/ssoinitiative>)

Section V – FOLLOW UP

No information was received by EPA after exiting the Facility on April 12, 2018.

Section VI – LIST OF APPENDICES

Appendix 1 – Photographic Log –eight photos taken

Appendix 2 – Opening Conference Sign-In Sheet.

Appendix 3 –Westlake Maps (GIS & Zoning)

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:26 a.m.

Photographer: DLM

Description: Deloitte LS outside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:29 a.m.

Photographer: DLM

Description: Deloitte LS inside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:30 a.m.

Photographer: DLM

Description: Example of remote (cell phone) SCADA access to LS data.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:32 a.m.

Photographer: DLM

Description: Deloitte LS outside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:46 a.m.

Photographer: DLM

Description: Fidelity LS inside view - grease issue observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 11:43 a.m.

Photographer: DLM

Description: Fidelity LS outside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 12:00 p.m.

Photographer: DLM

Description: Vaquero LS outside view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Town of Westlake Collection System		
Town: Westlake	County: Denton and Tarrant	State: Texas



Date of Photo: 04/12/2018

Time of Photo: 12:02 p.m.

Photographer: DLM

Description: Vaquero LS inside view.

Appendix 2
Sign in Sheet



United States Environmental Protection Agency
Region 6 – Water Enforcement Branch
1445 Ross Avenue, Suite 1200



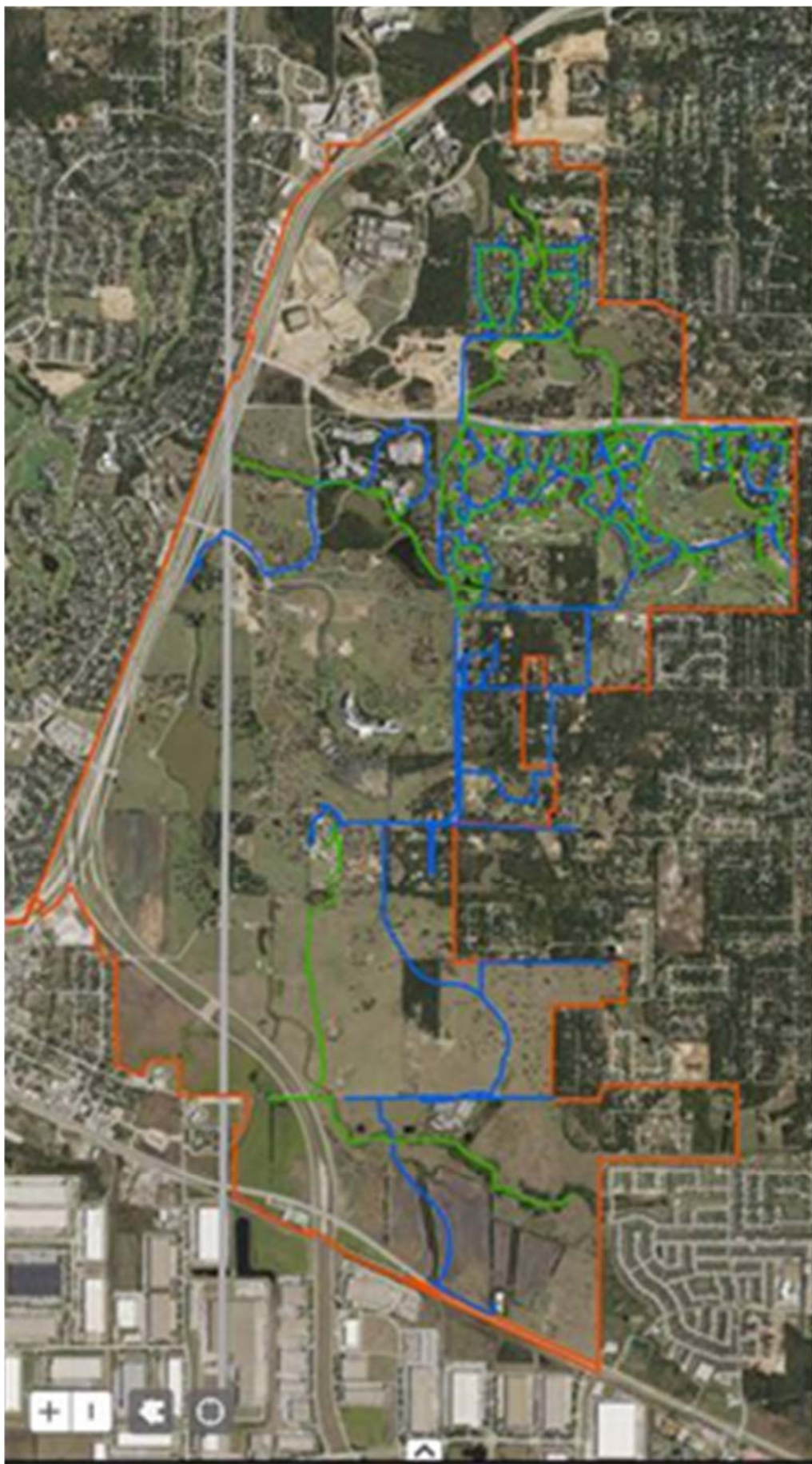
DATE: April 12, 2018
TIME: 8:55 am
SUBJECT: Town of Westlake Collection System and Wastewater Utility
Compliance Evaluation Inspection

MEETING ATTENDEES

NAME	ORGANIZATION	PHONE	EMAIL
DANIEL MUELLER	EPA R6	214 665 7159	DMUELLER.DANIEL@EPA.GOV
KORY KITTRELL	TOWN OF WESTLAKE	817-788-1030	KKITTRELL@WESTLAKE-TX.ORG
JGREENWOOD	TOWN OF WESTLAKE	817-680-1422	JGREENWOOD@WESTLAKE-TX.ORG

Appendix 3

Westlake Maps (GIS & Zoning)



WESTLAKE

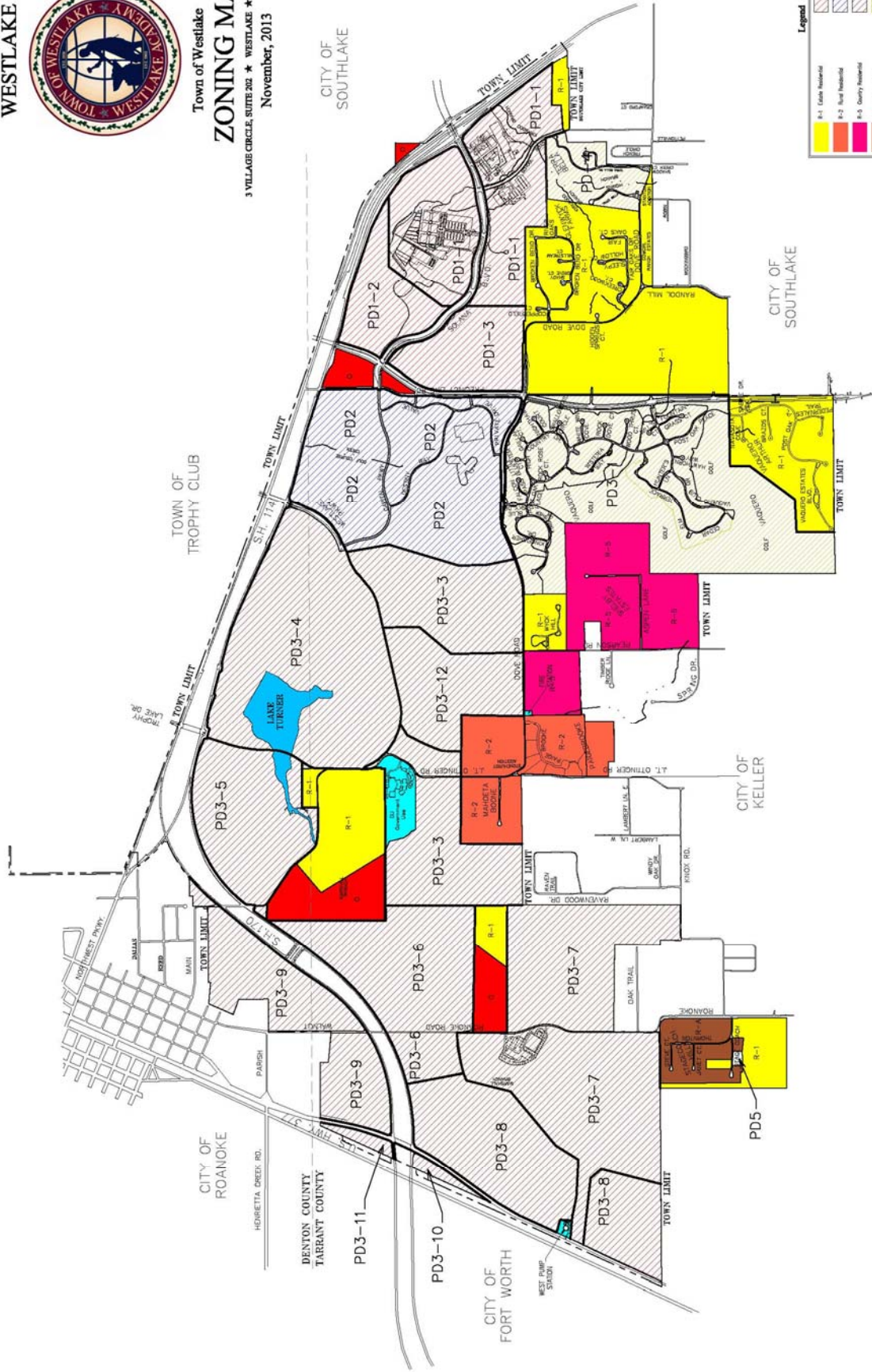


Town of Westlake

ZONING MAP

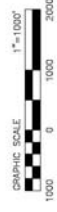
3 VILLAGE CIRCLE, SUITE 202 ★ WESTLAKE ★ TEXAS ★ 76042
November, 2013

CITY OF
SOUTHLAKE



Legend

PD-1 Planned Development	R-1 Single Residential
PD-2 Planned Development	R-2 Single Residential
PD-3 Planned Development	R-3 Single Residential
PD-4 Planned Development	R-4 Single Residential
PD-5 Planned Development	R-5 Single Residential
PD-6 Planned Development	R-6 Single Residential
PD-7 Planned Development	R-7 Single Residential
PD-8 Planned Development	R-8 Single Residential
PD-9 Planned Development	R-9 Single Residential
PD-10 Planned Development	R-10 Single Residential
PD-11 Planned Development	R-11 Single Residential
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PD-97 Planned Development	R-97 Single Residential
PD-98 Planned Development	R-98 Single Residential
PD-99 Planned Development	R-99 Single Residential
PD-100 Planned Development	R-100 Single Residential



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