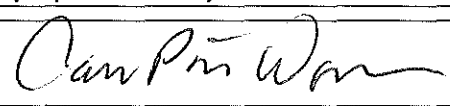


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	04/26/2017		
Media:	Water		
Regulatory Program(s)	NPDES - Clean Water Act		
Company Name:	Addison, Town of – Trinity River Authority (TRA) Member City		
Facility Name:	Addison Wastewater Collection System		
Facility Physical Location:	16801 Westgrove Drive		
(city, state, zip code)	Addison, Texas 75001		
Mailing address:	P.O. Box 9010		
(city, state, zip code)	Addison, Texas 75001		
County/Parish:	Dallas County		
Facility Contact:	Lisa A. Pyles	Dir. Infrastructure and Development Svcs.	
	lpyles@addisontx.gov		
FRS Number:	110010935113		
Identification/Permit Number:	TXU000116 [and served by TRA CRWWS (TX0022802)]		
Media Number:	N/A		
NAICS:	22132		
SIC:	4952		
Personnel participating in inspection:			
Lisa A. Pyles	Town of Addison	Dir. Infrastructure and Development Services	972-450-2878
Jason Shroyer	Town of Addison	Asst. Dir. Infrastructure and Development Services	972-450-2849
Jason Sutton	Town of Addison	Utilities Mgr. Line Maint.	972-450-2826
Phil Kagarice	Town of Addison	Utilities Mgr. Water Quality	972-450-2860
Marissa Paz	Town of Addison	Management Assistant	972-450-2818
Neil Gayden	Town of Addison	Environmental Svcs. Official	972-450-2821
Mike Tillman	EPA Region 6 (6EN-WM)	Environmental Scientist	214-665-7531
Damon McElroy	EPA Region 6 (6EN-WM)	Environmental Engineer	214-665-7159
Stephanie Meyers	EPA Region 6 (6EN-WM)	Life Scientist	214-665-6496
EPA Lead Inspector Signature/Date			8/11/17
	{Inspector name}		Date
Supervisor Signature/Date			8/11/17
	{Supervisor name}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The purpose of the inspection is to examine the Town of Addison's (or Town) sanitary sewer collection system as an element of the EPA's National Sanitary Sewer Overflow (SSO) Initiative to prevent raw sewage from entering streets, rivers, reservoirs, front yards, etc. For further SSO initiative information you may reference the web link: <https://www.epa.gov/enforcement/water-enforcement>. The scope of the inspection is to generally evaluate the municipalities that receive Trinity River Authority (TRA) wastewater treatment services in order to assist in stopping or mitigating unauthorized/unpermitted discharges or SSOs.

EPA Region 6 inspectors arrived at the Town of Addison's Service Center Office at 8:50 am on April 26, 2017 for an announced Compliance Evaluation Inspection (CEI). We met with the Town's wastewater utility and stormwater coordination officials listed on the cover sheet above and illustrated by the inspection sign-in sheet (Appendix 2.) We presented our 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 SSO mitigation activities; as well as comprehensive SSO reporting according to 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.

The inspection was conducted in accordance with the Clean Water Act (CWA). 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 CRWWS 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's representatives, observations made by the U.S. EPA inspectors, records and reports maintained by the Town of Addison, the State of Texas, and the U.S. EPA. TCEQ was notified of the inspection, but did not to participate.

FACILITY DESCRIPTION

The Town of Addison's Wastewater Utilities Department and Customer Call Center are located at 16801 Westgrove Drive, Addison, Texas 75001. The Town's wastewater (WW) utility serves over 15,500 residents and approximately 1,126 commercial connections covering approximately 4.5 square miles. The Town's collection system consists of approximately 72 miles of gravity lines, 1 lift station, and approximately 1500 manholes. About 70% of the collection system is polyvinyl chloride (PVC), 20% is vitrified clay (VC), with the remainder being a combination of ductile iron (DI) and various other materials. Addison has one lift station, the Kellway lift station, which has a visual alarm on-site and is remotely connected to a Supervisory Control and Data Acquisition (SCADA) system at the Service

Center (Appendix 1; photo #1.) The Kellway lift station is equipped with a dedicated 200 kW backup generator for emergency power (Appendix 1; photo #3), which is tested monthly and has preventative maintenance performed quarterly. The Service Center also has a generator with battery back-up to meet any emergency power needs. A duplicate SCADA system is located at the Celestial Water Supply Pump Station, located at 5510 Celestial Road. Town staff can also access SCADA from home via laptop computer if required. Further, there is a cascade telemetry system which serves as backup to the Town's SCADA system.

The WW utility operates 24 hours a day, seven days a week. The system is split into 10 different wastewater basins (Appendix 3), over half of Addison's wastewater is routed through its collection system to three TRA trunk lines. Two of the lines, which are metered by TRA, flow through the City of Farmers Branch while the remaining trunk line (Brookhaven), flows directly to TRA. The Town's wastewater is then transmitted to TRA's Central Regional Wastewater Plant (ID: TX0022802) which provides contractual wastewater treatment services. The remainder discharges to the City of Dallas wastewater collection and treatment system.

Section II - OBSERVATIONS

- A) Based on the inspection discussions, data analysis, and observations at the time of the inspection:
- Management indicated that Addison is now reporting all overflows whether or not they originate from the private side or public side whether or not they enter a storm drain. In the past, only public side overflows were reported. All SSOs are reported on forms required by and in accordance with TCEQ requirements.
 - Addison has submitted reports for three (3) SSOs in the past three (3) years.
 - In preparation for the inspection, Addison identified two (2) additional SSO reports that had been completed, but not submitted to the TCEQ. The dates were July 23, 2016 and January 11, 2017. A record keeping error was identified as the reason for the oversight. The reports were promptly submitted to the TCEQ via "Disclosure of Violation" letter dated April 26, 2017 (Appendix 4.)
 - Addison indicated it's SSOs have primarily been caused by general contractors boring into sanitary sewer collection lines.
 - Legacy Contracting, dba "Control Specialists" is on standby for the Town of Addison to perform mitigation, disinfection, and any repairs that may be required in response to any SSOs. Control Specialists also maintains all spare parts required to handle electrical or pump emergencies.
 - The Town of Addison does not participate in the TCEQ's Sanitary Sewer Overflow Initiative (SSOi.) Management indicated they were not aware of and not familiar with the program, but interested in learning more about the program.
 - It was noted that the Town received several 'historic' rain events (i.e. roughly greater than a 50-year flood event) in the months of June and July in 2015, but they did not have a significant impact on the collection system.
 - During the inspection, it was noted that Addison is currently performing an overall Sanitary Sewer System Evaluation.
 - Addison's collection system has been completely mapped and integrated into the Geographic

Information System (GIS).

- An inflow and infiltration (I&I) analysis is ongoing and includes smoke testing, dye testing, and information obtained from routine inspections performed by maintenance crews.
- Updated information from GIS and the I&I studies will be incorporated into the collection system Master Plan, once the current Sanitary Sewer Evaluation is completed.
- Addison maintains a goal of performing preventive maintenance on 3000 linear feet of sanitary sewer main each month or an overall goal of 36,000 linear feet annually.
- Approximately 15,000 linear feet of Hot Spots have been identified and are cleaned on a quarterly basis whether needed or not. However, the Hot Spots have not been mapped in GIS.
- Utility maintenance staff make daily rounds and perform general maintenance to the collection system and is responsible for the initial response to any system emergencies. There are no written standard operating procedures (SOPs) for routine operations and maintenance (O&M) activities.
- Control Specialists, a contractor, is on 24/7 standby to handle any major repair work associated with emergencies. Emergency repairs are funded through an accelerated procurement process.
- Normal utility operations and capital projects are fully funded by the utility rates. Emergency repairs are paid for out of the operating budget.
- The Town's fiscal year runs from October to September. Each year the department submits an operations budget that is approved by the Town's Council.
- Most major rehabilitation projects fall under the capital improvements budget.
- At the time of the inspection, Addison was working on a 5-year capital improvement plan (CIP). Management is awaiting the findings and recommendations from the current Sanitary Sewer Evaluation, so they can be incorporated into the finalized Master Plan. Expectations are to finalize the CIP by end of the year. Typically, capital expenditure projects are designed by licensed professional engineers and focus on the repair and or replacement of known issues.
- Training for response, mitigation, and clean-up of SSOs and lockout-tagout procedures are performed in-house (Appendix 5.) Confined space training is handled by an outside contractor.
- Addison's "Call Center" handles sewer complaints and overflow calls (Appendix 1; photo #2.) Calls are received by a department assistant, who notifies the Utilities Manager by both telephone and email. The manager assigns a WW crew to respond. There are no written SOPs for the Call Center.
- At the time of the inspection, Addison did not have an automated work order system in place to document sewer calls. Email was the primary means of written documentation.
- During the inspection, it was also determined that the Town of Addison has no formal asset management program in place. However, FY17 funding has been established to facilitate the development of a comprehensive asset management program.

B) Capacity Management, Operations, and Maintenance Program (CMOM)

Addison does not have a formal CMOM program, but has a number of "Policies and Procedures" in place which incorporate many CMOM components. Addison's Policies and Procedures Manual includes the following:

- Organizational structure with staffing;
 - Program funding through annual budgets and capital improvement plans;
 - Collection system maintenance equipment including a Closed Circuit TV (CCTV) truck and recent acquisition of a jet-vac truck;
 - Sewer Use Ordinance with a Fats, oils and grease (FOG) control and grease trap program;
 - Safety and maintenance training programs;
 - Protocols for Identifying SSO's;
 - Routine collection system maintenance program;
 - Hot-spot cleaning program;
 - Manhole/system inspection program;
 - System rehabilitation program and;
 - Lift station maintenance program.
- C) Relevant regulatory information:
- Failure to prevent unauthorized / unpermitted discharges or Sanitary Sewer Overflows is stipulated in TAC § 305.125(9); TWC § 26.121(a); Section 301 of the CWA; and 40 CFR § 122.1(b) corresponding to the "NPDES Permit" General Conditions.
 - Failure to implement proper O&M of the collection system is stipulated in Title 30 of the TAC § 305.125(5) & 40 CFR § 122.41(e) corresponding to the "NPDES Permit" General Conditions.

Section III – AREAS OF CONCERN

At the time of the inspection, Addison indicated it was determined that (2) SSOs had not been reported to the TCEQ as required. The SSOs were reported in a Disclosure of Violation letter dated April 26, 2017 (Appendix 4.)

Section IV – RECOMMENDATIONS

EPA generally recommends that the Town of Addison:

1. Consider participation in the TCEQ's SSOi program.
2. Regularly review staffing, equipment, and funding levels to ensure wastewater utilities has adequate resources to properly implement an SSO prevention and mitigation program.
3. Continue with GIS mapping efforts incorporating all identified assets and hot spots into the system and map all assets and hot spots on a physical map.
4. Develop written SOPs for the Call Center and all preventive O&M operations.
5. Finalize efforts to adopt and implement an automated work order system for the purpose of tracking all sewer service calls and response to those calls.
6. Develop and adopt an automated asset management program.
7. Repair / replace damaged security fencing and clear / remove vegetation away from security fencing at the Kellway lift station.
8. Increase inspection / cleaning frequency of the wet well at the Kellway lift station. At the time of this inspection, the wet well was in need of cleaning (Appendix 1; photo #4.)

9. Increase inspection / degreasing frequency at the Tokyo1 manhole. At the time of inspection there was evidence of grease buildup (Appendix 1; photo #7.)
10. As part of the Town's FOG / Grease Trap programs, expand efforts to inspect liquid wastehauler grease trap pumping efforts, Trip Tickets and occasional follow up with approved grease trap waste disposal sites.

Section V – FOLLOW UP

The following information was received by EPA after exiting the Facility on 4/26/17:

1. Marissa Paz, Management Assistant, Town of Addison transmitted the following via email:
 - April 28, 2017 – Drop Box link to documents to be included with the Town's Policies and Procedures Manual;
 - May 2, 2017 – Copies of SSO reports for the last 3 years;
 - May 9, 2017 – An update on Addison's development of an automated work order system and SSO reporting training;
 - May 31, June 6, June 19 and June 20, 2017 – Updates on work being done to the security fencing at the Kellway Lift Station.

Section VI – LIST OF APPENDICES

Appendix 1 - Photo Log / 12 photos taken 4/26/17

Appendix 2 - Opening conference sign-in sheet

Appendix 3 - Town of Addison collection system basin and sanitary sewer system maps

Appendix 4 - April 26, 2017 "Disclosure of Violation" Letter

Appendix 5 - Sanitary Sewer Overflow Response SOP

Appendix 6 - Town of Addison SSO Inspection Checklist

Appendix 1

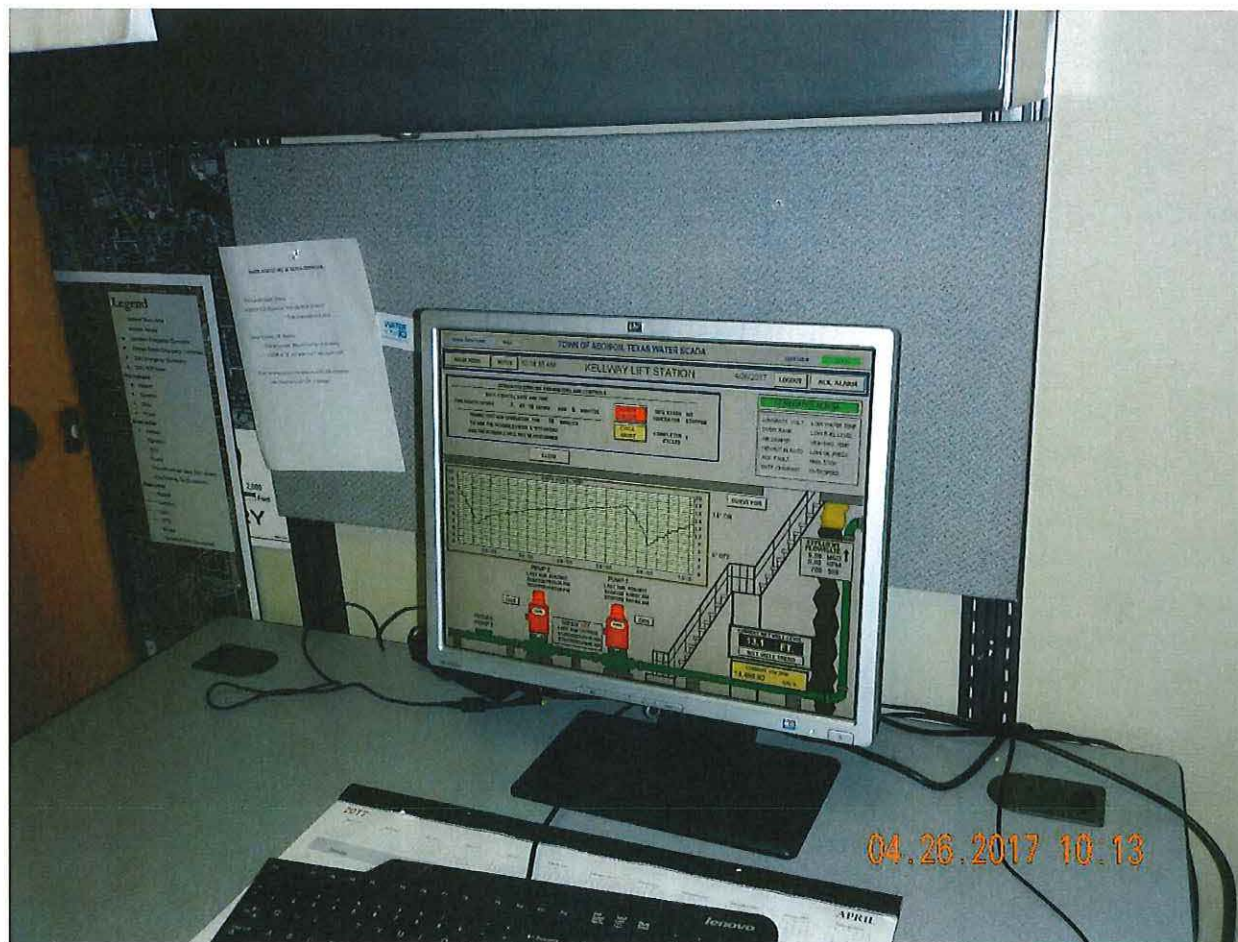
Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: SCADA System, Service Center, 16801 Westgrove Dr., Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:13 AM	
Comments: SCADA system showing the Kellway lift station. Addison has a duplicate SCADA system located at the Celestial Pump Station, 5510 Celestial Rd.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Reception / Dispatch, Service Center, 16801 Westgrove Dr., Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:18 AM	
Comments:		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: Kellway Lift Station, 4245 Kellway Circle, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:49 AM	
Comments: Backup Diesel Generator with double walled above ground fuel tank, located in the foreground. Note: Vegetation was noted growing up and over security fencing on the northeast quadrant. Vegetation is to be cleared from fencing.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Kellway Lift Station, 4245 Kellway Circle, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:42 AM	
Comments: Wet well with large amount of debris and some grease floating on top.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Kellway Lift Station, 4245 Kellway Circle, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:54 AM	
Comments: Electrical panel with red light / visual alarm located on top.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Kellway Lift Station, 4245 Kellway Circle, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 10:46 AM	
Comments: Dry well.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 7

Location: Tokyo #1 Manhole, Midway @ Belt Line Rd., Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 11:11 AM	
Comments: Manhole behind restaurant row which is routinely maintained by Town of Addison. Evidence of grease in line and floor of manhole.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Atrium Manhole, Midway @ Hornet, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 11:23 AM	
Comments: Manhole appears to be relatively clean and in good working order.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 9

Location: Landmark Manhole, Landmark St. south of Belt Line Rd., Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 11:39 AM	
Comments: Recently rehabbed manhole with epoxy coating. On Landmark, just south of Belt Line, in the middle of the street, adjacent to Stadium Café. Manhole appears to be well sealed, clean, and in good working order.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Excel Parkway, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 1:07 PM	
Comments: Jet Vac Truck cleaning line prior to CCTVing.		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 11

Location: Excel Parkway, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 1:22 PM	
Comments: CCTVing of sewer main.		

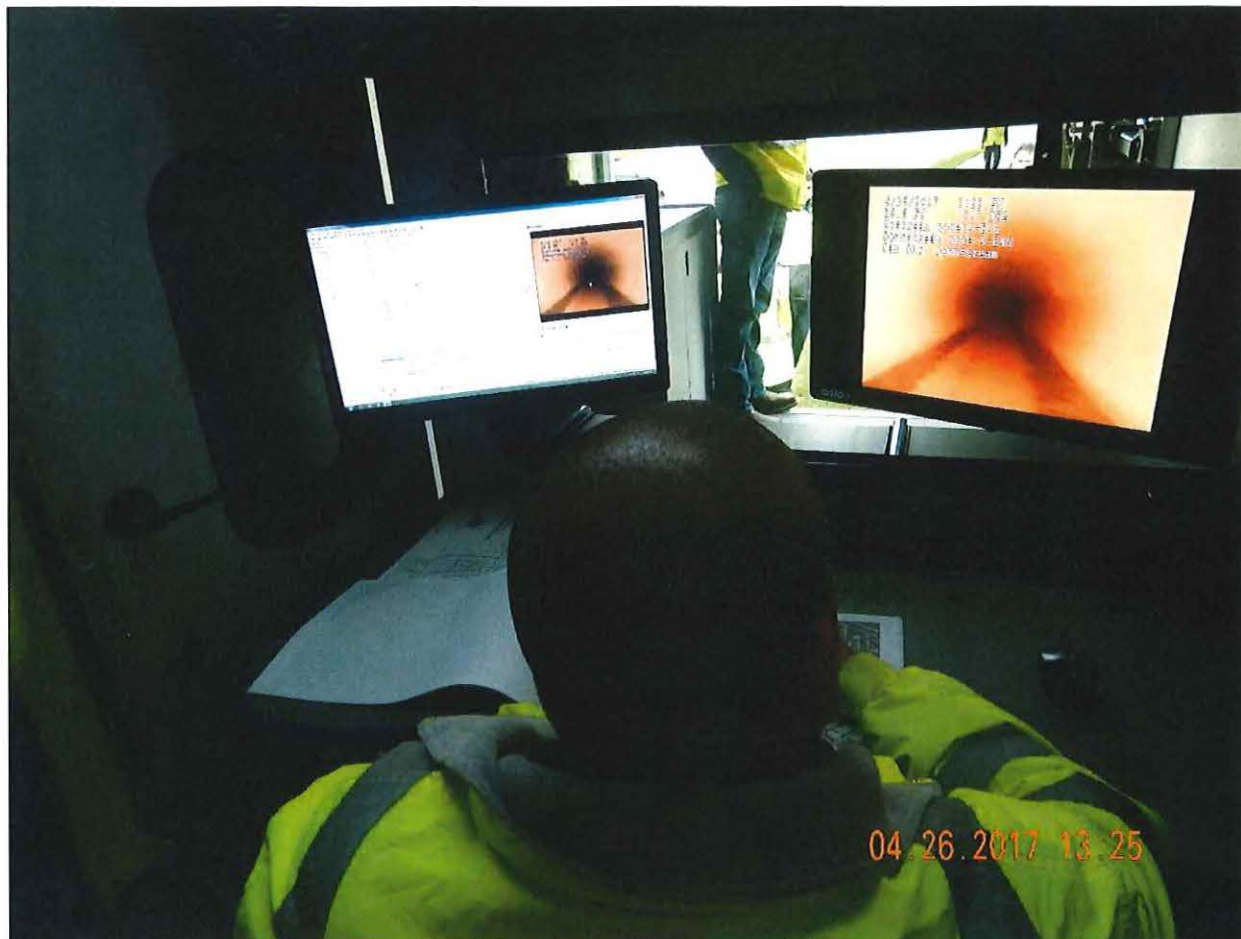




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

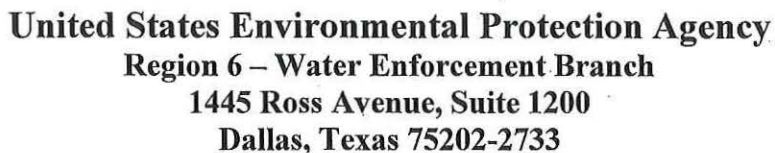
Photo No. 12

Location: Excel Parkway, Addison TX		
City: Town of Addison	County/Parish: Dallas	State: Texas
Date: 4/26/2017	Time: 1:25 PM	
Comments: CCTV operator evaluating condition inside of sewer main.		



Appendix 2

Opening Conference Sign-in Sheet



DATE: April 26, 2017

TIME: 9:00 AM

SUBJECT OF MEETING: Town of Addison, SSO Compliance Assurance Project

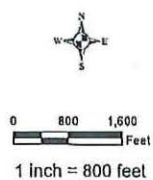
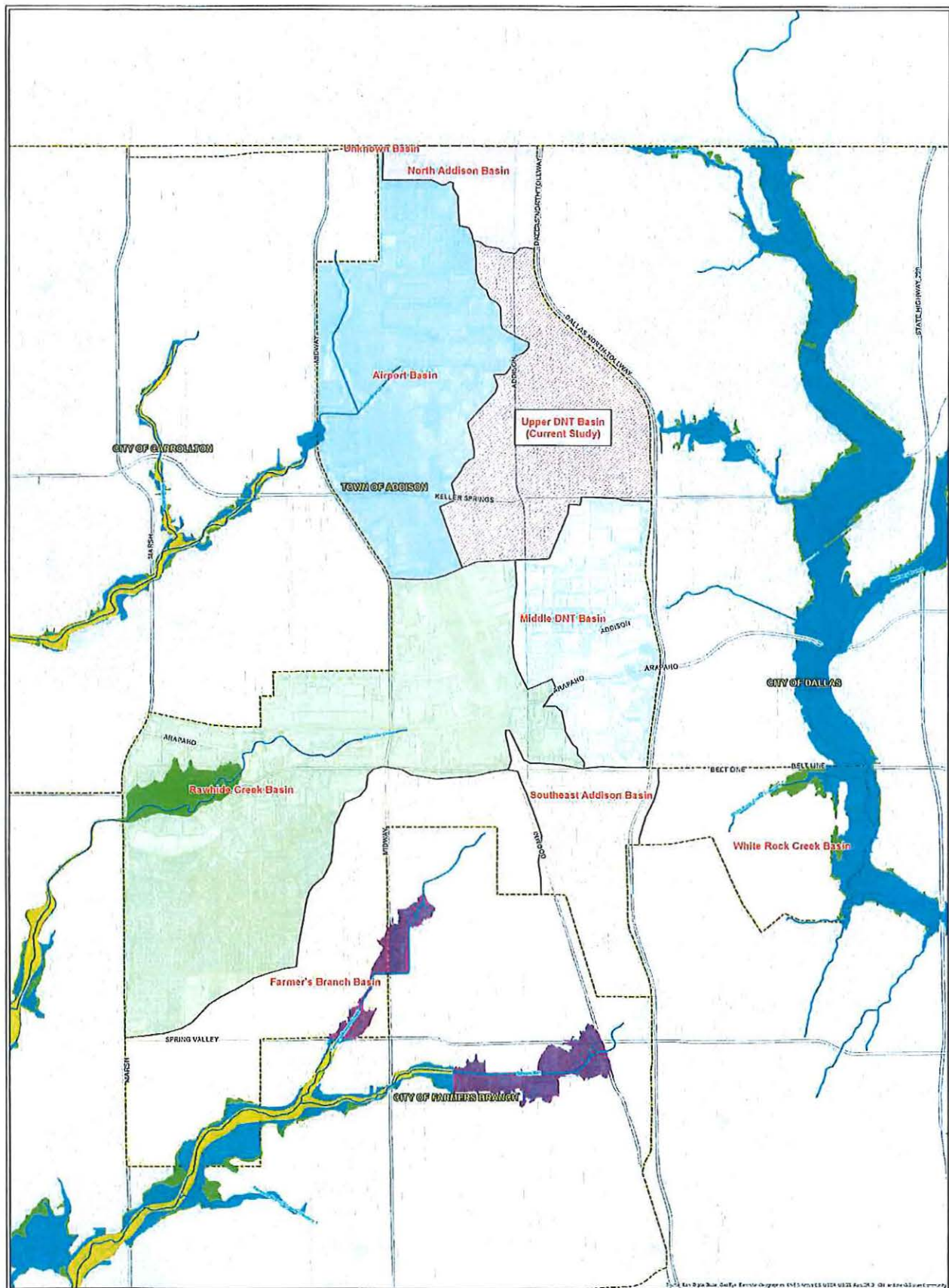
NPDES No.: TXU000116 (CRWWS: TX0022802)

MEETING ATTENDEES

[illegible]

Appendix 3

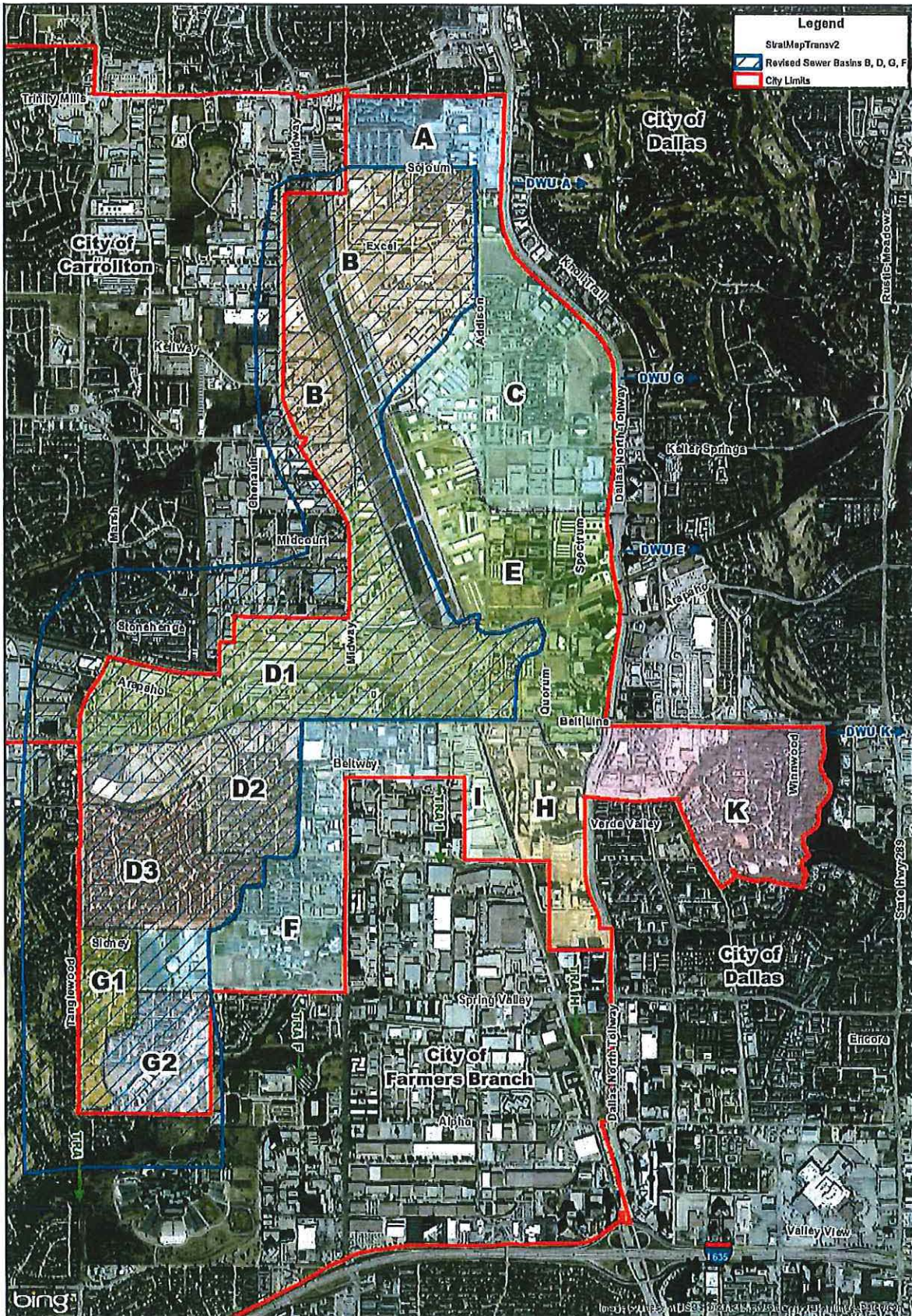
Town of Addison Collection System Basin and Sanitary Sewer System Maps



Legend

- Airport Basin
- Farmer's Branch Basin
- Middle DNT Basin
- North Addison Basin
- Rawhide Creek Basin
- Southeast Addison Basin
- Unknown Basin
- Upper DNT Basin
- White Rock Creek Basin
- Floodway
- Zone AE (100-Yr)
- Zone A (Approx. 100-Yr)
- Shaded Zone X (500-Yr)
- Community Areas
- Stream Centerlines

Town-Wide Overall Basin Map



Legend
 StralMapTransv2
 Revised Sewer Basins B, D, G, F
 City Limits

LNV
 engineers | architects | contractors
 1822 JIM LEE BLVD.
 1300 W. Walnut St., Ste 355
 Irving, TX 76038
 Phone: 972-500-9154
 Fax: 972-500-9154

Addison!



Sanitary Sewer Map
 Various Engineering Projects
 Town of Addison

DATE: February 04, 2010
 SCALE: 1"=2,000'
 FILE: Addison_workmap
 DRAFTER: AS

Exhibit
1

Path: C:\Users\lshah\Documents\Project Files\Qualla\Addison\ES\2010\02-04-2010\workmap.aprx

Appendix 4

April 26, 2017 “Disclosure of Violation” Letter



April 26, 2017

Tony Walker
Texas Commission on Environmental Quality
Region 4 Dallas/Fort Worth
2309 Gravel Dr.
Fort Worth, TX 76118-6951

Mr. Tony Walker,

During recent training sessions, the Town of Addison became aware that we were not properly reporting all Sanitary Sewer Overflows (SSOs). Town staff thought that a SSO was the city's responsibility only if it originated from Town wastewater mains and entered into a watershed. Therefore, SSOs that originate from private service lines or lines in which the flow does not reach an active stream system, did not have to be reported to TCEQ. However through research, internal discussions, and training, we have become aware that we had been misinterpreting the regulations.

The Town of Addison does not treat its own wastewater. Our wastewater is treated by the City of Dallas and Trinity River Authority (Permit WW20018). We have discovered there have been two SSOs that have not been reported correctly according to the reporting requirements as set forth in Title 30, Texas Administrative Code Section 327.32. This letter is submitted as a "disclosure of violation" (DOV) to notify the Texas Commission on Environmental Quality (TCEQ) that two SSOs were not reported in the monthly written notification to TCEQ. Details of both SSOs are described below and the Water Quality Noncompliance Notifications are also attached for your review.

1st SSO corrective actions

4011 & 4013 Lindbergh: 4011 Lindbergh property owner called stating they had a backup in their building. Upon investigation Addison found they shared a common private lateral with the building immediately to the east at 4013 Lindbergh. Staff confirmed the ROW limits and took responsibility of the common lateral from 5' outside of roadway. When excavation activities began Staff realized that the existing common lateral was failing and needed to be replaced. Staff then contacted Tri-Dal, who is the emergency contractor the Town uses for utility services, and they removed and replaced the common lateral within 24 hours. No further investigation or action was deemed necessary.



2nd SSO corrective actions

14665 Midway: Street crews noticed water flowing on the curb line at 14665 Midway and notified management. Staff immediately responded and shut off the water supply at the listed address, set up erosion control methods by dispensing litter on the wet areas of the sidewalk and road, and began repairs. The crew was able to clean out the impacted storm drain removing sewage, leaves, and other floatables with the use of a Vacuum truck. When the crew reviewed the surrounding manholes to locate the blockage they discovered the immediate manhole sewer pipe to the east of the building was cracked so they repaired it. The site was restored to its original clean state and no other action was deemed necessary.

In order to warrant proper reporting with these incidences in the future, a central point of contact for a clear chain of command has been established within the department to submit all SSOs within TCEQ regulated time frames.

In addition, the Town is currently working with Teague Nall & Perkins (TNP) to develop a training program that will detail standard operating and reporting procedures for department staff. TNP is the Town's consultant who develops the Small Municipal Separate Storm Sewer System (sMS4) Report. That training will take place in May 2017. As of current, all personnel have been directed to immediately notify their direct supervisor and those supervisors have been directed to notify the Management Assistant and Director of Infrastructure of any SSOs.

As an organization, we strive to educate our employees to avoid mistakes and provide an overall safe work environment. Each of these SSOs were dealt with immediately but not reported appropriately. As stated above, we have implemented new operating procedures and processes to ensure that these errors do not occur in the future. We appreciate your understanding and support.

Please let me know if we can provide any additional information or if you have any questions regarding any information provided herein.

Regards,

Jason Shroyer, P.E.
Assistant Director of Infrastructure

Water Quality Noncompliance Notification

See back of Form for Guidance for Completion

☒ Unauthorized Discharge

☐ Reportable Effluent Violation

☐ Other

General Information

Entity Name: Town of Addison

Telephone No: (972) 450-2849

☒ Permittee

☐ Subscriber

TCEQ Region: 4

County: Dallas

*Permit Number: WQ0010060001

Noncompliance Summary

Description of Noncompliance (include location, discharge route, and estimated volume of unauthorized discharge):
Between 4011 & 4013 Lindbergh Dr., Addison TX 32.957729, -96.842570. 1000 gallons into ditch line that was bored across the road for the installation of the 6 inch lateral to the main.

Cause of Noncompliance: 6 inch Cast Iron Sewer lateral failure due to age.

Duration: Start Date and Time: 7-23-16 @ 6pm

End Date and Time: 7-24-16 @ 4pm

Or Date Expected to be Corrected:

Potential Danger to Human Health and Safety or the Environment: yes

Actions Taken

Monitoring Data: Data should be attached or submitted to TCEQ when available.

☐ Yes ☒ No Field Measurements
☐ Yes ☒ No Laboratory Samples
☐ Yes ☒ No Fish Kill If yes, estimated number killed:

Actions Taken to Mitigate Adverse Effects: Replaced 6 inch cast iron lateral with SDR 35 PVC across entire roadway from ROW to Main. All material excavated for the repair was hauled off by Tri Dal.

Actions Taken to Correct the Problem and Prevent Recurrence: The entire lateral was replaced.

Verification Information

Information Reported By (Name/Title): Jason Sutton, Utilities Manager Line Maintenance

Date Reported: 3-9-17

Signature: 

Note: If this form is being used for a 5-day written report, a copy of the form should be sent to the TCEQ Region Office, and the original to: TCEQ, Compliance Monitoring Team (MC224), Enforcement Division, P.O. Box 13087, Austin, TX 78711-3087.

* If the noncompliance is an unauthorized discharge from a wastewater collection system, use the permit number of the treatment plant to which the collection system is tied. If you are uncertain of this permit number, you may call the TCEQ Regional Office for assistance.

Water Quality Noncompliance Notification

See back of Form for Guidance for Completion

☒ Unauthorized Discharge

☐ Reportable Effluent Violation

☐ Other

General Information

Entity Name: Town of Addison

Telephone No: (972) 450-2849

☒ Permittee

☐ Subscriber

TCEQ Region: 4

County: Dallas

*Permit Number: WQ0010060001

Noncompliance Summary

Description of Noncompliance (include location, discharge route, and estimated volume of unauthorized discharge):

14665 Midway Rd., Addison TX 32.947538, -96.839402. Into storm drain 200 gallons.

Cause of Noncompliance: Cast Iron Sewer lateral failure that passes through a storm drain pipe trunk line.

Duration: Start Date and Time: 1-11-17 @ 1pm

End Date and Time: 1-11-17 @ 3pm

Or Date Expected to be Corrected:

Potential Danger to Human Health and Safety or the Environment: yes

Actions Taken

Monitoring Data: Data should be attached or submitted to TCEQ when available.

☐ Yes ☒ No Field Measurements

☐ Yes ☒ No Laboratory Samples

☐ Yes ☒ No Fish Kill If yes, estimated number killed:

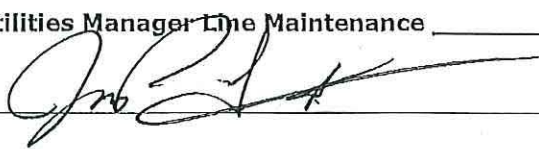
Actions Taken to Mitigate Adverse Effects: Replaced section of lateral cast iron with SDR 35 PVC with repair clamps that day and encapsulated entire crossing of lateral with concrete the following day. During removal and replacement and there after we flushed a hydrant upstream from the incident at a flow of 400 gpm for approximately 6 hours beginning at 12 noon before we cut the pipe until new pipe was in place. We continued flushing past time of repair while we cleaned up job site.

Actions Taken to Correct the Problem and Prevent Recurrence: We encapsulated lateral until we can get an engineering firm to design a permanent repair due to conflicts in grades between the storm line and the wastewater lateral.

Verification Information

Information Reported By (Name/Title): Jason Sutton, Utilities Manager Line Maintenance

Date Reported: 3-8-17

Signature: 

Note: If this form is being used for a 5-day written report, a copy of the form should be sent to the TCEQ Region Office, and the original to: TCEQ, Compliance Monitoring Team (MC224), Enforcement Division, P.O. Box 13087, Austin, TX 78711-3087.

Appendix 5

Sanitary Sewer Overflow Response SOP

TOWN OF ADDISON



SANITARY SEWER OVERFLOW RESPONSE S.O.P

TABLE OF CONTENTS

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SECTION 2: SPILL RESPONSE

SECTION 3: EMERGENCY TRAFFIC CONTROL

SECTION 4: BYPASS

SECTION 5: CONTAINMENT

SECTION 6: REPORTING AND NOTIFICATION

SECTION 7: SIGN POSTING

SECTION 8: RESTORATION

SECTION 9: DOCUMENTATION

SECTION 1: PURPOSE

The purpose of the Sanitary Sewer Overflow Response Plan is to minimize the impact of sanitary sewer overflows (SSO's) to the public and the environment. All sanitary sewer overflows will be responded to in a timely manner to expedite the necessary steps to relieve the overflow. Relieving the sewage blockage and spill containment will be our highest priority, taking in to consideration public health concerns. This response plan will be the guideline for the standard operating procedures in the event of a sanitary sewer overflow. The response plan will be reviewed periodically to ensure that all corrective measures are being taken.

SECTION 2: SPILL RESPONSE

When the Utility Operator is notified of a potential Sanitary Sewer Overflow during working hours, they will notify the Utilities Manager or the Assistant Director of Infrastructure Services. After hours, the On-Call Operator will notify the Utilities Manager or the Assistant Director of Infrastructure Services of a potential sanitary sewer overflow, the (UM) will notify all other staff members from the Utility Division to assist in the spill response.

- i. The crew will respond to the site of the complaint with the proper Spill Response material and the Combo Truck (Gap-Vac). If the problem is identified as an actual spill, it may be necessary to send for additional equipment.
- ii. The Utility Manager will assess the problem and assign the response crew job duties in order to eliminate the overflow. The Utility Manager will also inform the Assistant Director of Infrastructure Services of the SSO.
- iii. If the problem has escalated to an emergency situation, we will use resources from the entire Infrastructure department such as the Water Quality, Streets, Stormwater, and Traffic Divisions. If the issue has escalated beyond the Town's capability to remedy, an outside contractor will be called in under the emergency procurement process.

Section 3: Emergency Traffic Control

In the event that the spill is located in a high traffic area, the Utility Manager will utilize assistance from the Streets Division. The Utility Manager may also notify Police dispatch for assistance:

Todd Weinheimer – Streets and Stormwater Manager – (972)-489-7370

Juan Gutierrez – Streets Superintendant – (214)-687-2629

Police Dispatch Non-Emergency (972)-450-7156

Section 4: Bypass

If the blockage is not relieved within the first few attempts (20 minutes), it is crucial that the bypass procedures are followed immediately.

- i. Locate the nearest downstream manhole that can accept the additional flow.
- ii. Set up an appropriately sized pump. Please contact the Utilities Manager for assistance with pump selection. The pump discharge hose should be secured or placed far enough into the manhole that it will not come out during pumping. The pump and pump hose should be protected from traffic by barricades.

Section 5: Containment

Containment is Departments top priority. The Utilities Crew will make every valued effort to keep the SSO in a small area as possible. It is preferred that the crew keeps the SSO in the street and out of storm drains. To make sure the SSO is contained, the Collections Crew will use the following methods:

- i. Use soil or other means to keep the overflow from reaching a storm drain.
- ii. Should the overflow take place in an area not normally accessible to the public, such as; (fields, tributaries, etc.), the Utilities Crew will use any reasonable means to contain the flow in that area for recovery.
- iii. Should the flow be too much to be contained on the street and is identified as a danger to the public, the Collections Crew will allow the flow to enter the storm drain or catch basin. The crew will make every reasonable attempt to dam up the spill in the storm drain or catch basin and recover it from that point.

Section 6: Reporting and Notification

All SSO's regardless of size and location must be reported. The Utilities Manager or crew will notify the Infrastructure and Development Services Management Analyst as soon as is practical upon responding to an SSO. The Utilities crews are responsible for response, repair, remediation, flow monitoring, times/dates, etc. This information will be communicated to the Management Analyst. The Management Analyst will provide notification per the following:

- i. As soon as is practicable but not greater than 24-hours after becoming aware of an SSO event, notification to the TCEQ local region office in Fort Worth will be made by phone.
- ii. Within 5 working days, written notification to both the local region office and to the TCEQ's Enforcement Division in Austin will be made. This notification will be made on the Water Quality Noncompliance Notification form (TCEQ-00501).
- iii. In the event that the Management Analyst is unable to provide this documentation, the Utilities Manager or the Assistant Director of Infrastructure Services will assume the responsibility.

Section 7: Posting (if necessary)

Public health and safety is the top priority of the Collections Department and District. We will post the proper signs to warn the public of potential contamination hazards.

- i. Posting of contamination signs will be done in all cases whether there is standing water or the ground is saturated.
- ii. Signs will be placed in locations with high visibility as so that they can be seen from all routes that the public might take to enter an area.
- iii. Signs will remain posted for a period of not less than five days, unless directed by the TCEQ.

Section: 8 Restoration

We will make every effort to restore the environment to the condition that existed before the SSO occurred by using the following procedures:

- i. If the SSO occurred in the street, staff will apply a chlorine solution to the affected area and use the nearest fire hydrant to wash down the area, dechlorination if needed and recover wash down water, as much as possible. If the SSO occurred in an unpaved/dirt area staff would apply hydrated lime as needed for odor control and apply class 2 base at a minimum of two inches (2") of coverage.
- ii. Collect and dispose of any standing or pooled sewage that is accessible to the public.
- iii. Recover any sewage within storm drains, channels, curb, gutters, and culverts.
- iv. Clear surrounding area of paper, solids, and any other signs of a SSO.
- v. We will replace vegetation, sidewalks, asphalt, fencing or any other items that were damaged as a result of the SSO or the crews working to restore service.

Section: 9 Documentation

Documentation shall contain the following information:

- i. Beginning and ending time.
- ii. Exact location of the SSO.
- iii. Any and all conditions that may have contributed to the cause of the SSO.
- iv. Potential danger to human health and safety or the environment
- v. Did the SSO reach surface waters or a storm drain?
- vi. Total gallons spilled and the amount recovered.
- vii. Damage that was caused and any repairs that were made.
- viii. Photographs of the affected area.
- ix. Any additional information deemed necessary by the Utilities Manager

Appendix 6

Town of Addison SSO Inspection Checklist

EPA
SSO Inspection Checklist

Name of Municipality Town of Addison

Collection System Description

1. Describe the collection system. *The Town of Addison is approximately 4.5 square miles in area. The wastewater system is split into 10 different wastewater basins with more than half of the wastewater going to the TRA treatment system and the other to the Dallas Water Utilities treatment system.*
2. What is the population of the service area:
 - Number of residents *15,518*
 - Commercial connections *1126 based on water connections*
 - Any septic systems? *No* If yes, how many? _____
3. How many miles of sanitary sewer mains are in the collection system? *72*
4. What is the age of collection system? *30-50 years*

%VC ≈ 20%
%DI ≈ 5%
%PVC ≈ 70%
%Other ≈ 5%

5. Does the collection system experience problems during dry weather? *no*
Describe or provide documentation: _____

6. Does the collection system experience problems during wet weather? *no*
Describe or provide documentation: *There are some localized increase to flows to our lift station during a rain event.*
7. What is your sanitary sewer overflow (SSO) notification procedure? *We currently utilize the TCEQ's notification process for SSO's. They require notice to the local region office within 24 hours of the SSO. We also provide a written report on form TCEQ – 00501 to the Austin office within 5 days of the incident.*

What is reported? General information such as name, phone number, TCEQ region, permit number. We provide a description of the issue, when it started, when it ended, potential route of the discharge, date and time of correction or expected correction, and the potential danger to human health or safety. We describe the corrective actions taken and estimate the amount of sanitary sewer discharge.

8. Are all SSOs reported, regardless of size? *Yes.* If no, why not? _____

Lift/Pump Stations

1. How many lift stations are in the system? *1*
 - How many have backup power sources? *All*

EPA SSO Inspection Checklist

- Describe: *Spectrum GA325 200 kW. Generator preventive maintenance occurs quarterly under a contract with Worldwide Power.*
- 2. Describe how pump/lift stations are inspected and monitored? *The lift station is inspected every day during the Utility division's operational rounds. The pumps and motors are maintained on a semi-annual basis through an outside contract with Legacy Contracting. The pumps are monitored through the Town's SCADA system. The Town has also embarked on an assessment and masterplan development for the lift station with Garver. That project began in May of 2016 and we expect it to be complete in the first quarter of 2017.*
- 3. Is a SCADA system used? *Yes* If so, what parameters are monitored? *flow, pump run time, pump hours, levels in the wet well, generator information, gpm during pump runs, alarms* Also have telemetry system backup for operation
- 4. What provisions have been made for emergencies? *The Town owns additional pumps, portable generators, sewer equipment such as Combo-Unit (Vac-truck with rodding capabilities), portable lights, trailers, etc.*
 - Emergency Power? *Yes, generators at the main service facility, the main water pump station, and the lift station.*
 - Critical Processes? _____
 - SCADA? *Yes, main SCADA computer is at a generated facility and is on a battery backup.*
 - Other? _____
- 5. Describe any automated emergency notification/response process. *The SCADA system will call out based on the current alarm parameters. A representative from the Utility division will receive the call and must respond. If the SCADA system does not receive a response from the first number it calls, the system will roll to the next number. The alarm will continue until acknowledged. The Utility employee must log onto the SCADA system and assess the situation and respond appropriately. The Town also maintains a service agreement for 24/7 emergency assistance with SCADA related issues with Prime Controls.*

Satellite Systems

- 1. Does the collection system receive flow from satellite systems? *No*
If yes, continue with questions 2-4
- 2. Is flow from satellite systems monitored? _____
If yes, how? _____

- 3. Describe any known problems with the satellite collection system (hydraulic flow, wastewater concentration, ordinances, etc.)? _____

- 4. Who is responsible for satellite systems, enforcement, and response? _____
 - Enforcement? _____
 - Response? _____

EPA SSO Inspection Checklist

Performance Indicators

1. Summarize the Capacity, Management, Operations, and Maintenance (CMOM) components utilized by the facility and satellite systems, if applicable: *The most recent capacity study performed in the Town of Addison was completed in 1996. The Town is currently in the process of updating this information with new data and input from the Sanitary Sewer Evaluation and Master Plan that is currently in progress. The utilities division of the Infrastructure and Development Services Department is responsible for the daily management and oversight of the sanitary sewer system. The department consists of a director, an assistant director who is a licensed professional engineer, two utility managers, and 9 utility operator positions. These positions are responsible for the maintenance and operations of both the water and sanitary sewer systems. The department is supported by the engineering inspection group that is responsible for plan review and inspections of private development where they interface with the public infrastructure. The department also houses the development services and environmental divisions who are responsible for private development plan review, private development installation inspections, and restaurant inspections. The Town of Addison does not treat wastewater and consists of approximately 66 miles of sanitary sewer mains with one lift station. The system is separated into 10 sanitary sewer basins. Those are further defined by the treatment agencies that receive the flows. The Town currently sends wastewater to the Trinity River Authority and Dallas Water Utilities. The system is currently mapped in GIS and will be updated upon completion of the Sanitary Sewer Evaluation and Master Plan. Maintenance staff use a wide variety of equipment to perform maintenance of the sanitary sewer system including, truck mounted CCTV unit, jet-rodder, combo unit (Vac-truck with rodding capabilities), backhoe, dump trucks, pick-up trucks, trailers, gas detectors, and other safety related equipment. The Town does not perform construction related activities for sanitary sewer installation or maintenance. CIP projects are designed by licensed professional engineers, bid in accordance with the Town's purchasing guidelines, and then awarded to qualified contractors. The Town maintains oversight and inspection of all capital improvement projects. Town staff is responsible for responding to sewer emergencies, although the repair work associated with these types of events will most likely be contracted out as well through an accelerated procurement process. Town staff performs general maintenance to the sanitary sewer system including: CCTV, cleaning, manhole inspections, and lift station inspections and cleaning. All utilities staff, from the mid-level up are required to obtain and maintain both water and wastewater licenses. The Town performs training either through monthly safety meetings or through a contract with a qualified vendor such as TEEX (Texas A&M Engineering Extension Service). While every employee is responsible for their own personal safety, each division manager is ultimately responsible for the safety of the division. The Town provides all safety equipment from steel-toed boots to safety glasses. The SSO reporting process is handled at the managerial level and the Town follows the requirements of the TCEQ.*
2. Does the utility participate in the TCEQ Sanitary Sewer Overflow Initiative (SSOi)? *no*
 - If yes, please provide the latest SSOi Annual Report.
 - If no, why not? *Was not aware of the program*
3. What Standard Operational Procedures (SOP) are developed and used?

• ☒ SCADA?	• ☒ Valve maintenance?
• ☒ Routine Inspections/Maintenance?	• ☒ Fleet Management?
• ☐ Root Control?	• ☒ Clean-up?
• ☒ Lift/Pump Stations?	• ☐ Other? _____
4. Has an infiltration & inflow (I/I) analyses or sanitary system evaluation survey been performed? *In progress*
 - If yes, describe (and provide a copy of any associated reports) *in progress*
 - ☐ Smoke Testing? *Limited smoke testing was performed in conjunction with the Sanitary Sewer Evaluation and Master Plan. The results of the testing will be available upon completion of the plan.*
 - ☐ Dye Testing? *Dye testing is performed during the locating of sanitary sewer services.*
 - ☐ CCTV? *During our routine inspections, our crews are trained to look for sources of I&I.*

EPA SSO Inspection Checklist

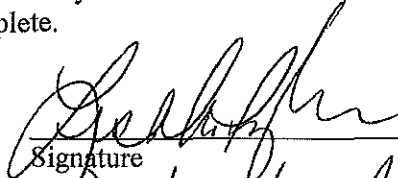
- Peaking Factors?
 - If not, why not?
 -
 -
 -
5. Describe the sewer cleaning and inspection goals. *The Town's monthly sewer cleaning goal is 3000 L.F. per month.*
- Hot Spots? *The Town has approximately 15,000 L.F. of hot spots that are cleaned on a quarterly basis.*
 - Annual Goals? *The annual goal for the Town is to clean 36,000 L.F. of sanitary sewer main.*
6. Describe any training for receiving, documenting, and responding to sewer calls.
- Discharge Estimates? *The Town provides in house trainings for estimating the amount of discharge. We account for size of pipe, length of time that pipe is discharging, type of break, flow rate.*
 - Safety/Confined Space? *The Town contracts the confined space training to a qualified firm. The last comprehensive confined space training occurred in 2014.*
 - Lockout/Tagout? *The Town provides in house trainings for lockout/tagout procedures.*
 - Reporting?
 - Treatment/Clean-up? *The Town provides in house trainings for the clean-up of spills. We discuss the importance of removing solids, chlorinating/disinfecting the area, dechlorinating if necessary and washing down the area.*
 - Other?
7. Describe any Asset Management process in place for the collection system. *No formal asset management process currently exists for the sanitary sewer system however, the Town does have funds in the FY17 budget to perform a comprehensive asset management program.*
8. Describe the funding status. *Utility operations and capital projects are fully funded by the utility rates*
- Emergency Repairs: *Emergency repairs are paid for out of the operating budget. The emergency is later ratified by the Council and a budget amendment can be done if necessary.*
 - Operation & Maintenance: *The Town budgets on a fiscal year cycle, from October to September. Each year the department submits an operations budget that the Council later votes on and approves.*
 - Rehabilitation: *Most major rehabilitation projects fall under the capital improvements budget.*
 - Rates: *The Town uses a tiered rate structure with a minimum bill based on meter classification and total gallons used. The Town also has a stormwater fee.*
 - Other?
9. Describe any formal approach to target areas for Capital Improvement Projects. *Our approach for capital projects will be based on the findings and recommendations of the finalized master plan. Currently we prioritize and repair/replace known issues.*
10. Please provide any other relevant information.
-
-
-

EPA
SSO Inspection Checklist

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information provided and in any enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate, and complete.

9-27-16
Date


Signature
Director Lisa A Pyles
Print name and Title

