

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/03/2025	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act	
Company Name:	City of Live Oak, TX	
Facility Name:	City of Live Oak, TX	
Facility Physical Location:	8001 Shin Oak Dr.	
(city, state, zip code)	Live Oak, TX 78233	
Mailing address:	Same	
(city, state, zip code)		
County/Parish:	Bexar County	
Facility Phone Number	210-653-9143	
Facility Contact:	James Neeley	W/WW Supervisor
	jneeley@liveoaktx.net	
FRS Number:	110010934793	
Identification/Permit Number:	TXU000193	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Edmond McNew	City of Live Oak	Assistant Director of Public Works
James Neeley	City of Live Oak	W & WW Supervisor
Avery Lunsford	City of Live Oak	Public Works Coordinator
Bobby Guerra	San Antonio River Authority	Construction Superintendent
Joseph Winkler	San Antonio River Authority	Collection Foreman
Rachel Matthews	Environmental Protection Agency	Life Scientist
EPA Lead Inspector		
Signature/Date	Rachel Matthews	Date
Supervisor		
Signature/Date	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Rachel Matthews arrived at the City of Live Oak Public Works office, at 8:55 am on June 3, 2025, for an announced inspection. I met with Mr. Edmond McNew, Assistant Director of Public Works, other city staff, as well as representatives from the San Antonio River Authority (SARA). I presented my credentials to Mr. McNew and the others informing them this was an EPA inspection to determine compliance with the Clean Water Act regarding sanitary sewer collection system. The scope of the inspection is a compliance evaluation.

FACILITY DESCRIPTION

The City of Live Oak serves an approximately 15,800 residents, with 184 commercial business connections and 4,413 residential connections. The city's sanitary sewer collection system consists of approximately 6.5 miles of pipe with one (1) lift station. The lift station is connected to Supervisory Control and Data Acquisition (SCADA), has a back-up generator as well as audible/visual alarm system. In addition to a back-up generator at the lift station, the city has a bypass/pump available. The sewer pipe is approximately 55% vitreous clay and 45% polyvinyl chloride (PVC). All sewer lines are connected and routed through the collection system to one of two (2) wastewater treatment plants (WWTP): 89% of flow is routed to a WWTP owned and operated by San Antonio River Authority (SARA) and the remainder to a WWTP owned and operated by Cibolo Creek Municipal Authority (CCMA).

There are approximately 10 septic systems outside of the piped areas of the city. The surrounding San Antonio metropolitan area is greatly expanding. However, according to Public Works, Live Oak is built out and cannot expand further. The only potential sewer expansion are areas with septic systems.

Section II – OBSERVATIONS/INTERVIEWS

Department of Public Works personnel include 6 fulltime staff that manage both wastewater collection and drinking water distribution. According to the city, this is an adequate staff currently. However, some work is contracted out that possibly could be done in-house with more staff. At the time of the inspection, only one person received after hours emergency calls, with no back-ups. The city agreed to add another staff member for back-up notification when this was discussed.

City personnel inspect the lift station every day, However, there is no check list or written record of inspections. In addition, there is no written Standard Operating Procedure (SOP). The onsite generator at the lift station is connected to SCADA and is set to automatically kick on once a week, which is tracked through SCADA. There is no manual inspection of the generator. While the city keeps back up parts for various maintenance issues, contractors are relied on to address lift station failures or more difficult maintenance needs.

The city explained that while there are procedures for many purposes, none are written. The city staff commented that it would be valuable to have all procedures and checklists written out prior to hiring new staff and/or upcoming retirements.

The following are some of the procedures the city affirmed to have based on a pre-inspection questionnaire:

- SCADA
- Routine Inspections/Maintenance
- Root Control Program
- FOG Program
- Privately owned SSO mitigation
- Lift/Pump Stations
- Infiltration/Inflow Abatement
- Condition Assessment
- Pipeline Cleaning Program
- Valve maintenance
- SSO Clean-up
- Hot Spot Maintenance or mitigation

According to staff, the city does not have a comprehensive work order system, connected to GIS mapping and/or incorporating an asset management plan. However, approximately a month ago, Live Oak began using My Government Online (or MGO) software for its work orders. Prior to this, there was no central way of handling complaints or work orders and no tracking system. A review of the MGO website shows that MGO is a type of Community of Governments (COG) organization developed to help a group of municipalities build a suite of software tools that are integrated and evolve with the jurisdiction's needs at a minimal monthly fee. The piping is currently mapped using Auto-CAD, and manholes have recently been identified with Global Position System (GPS). But there is no comprehensive Asset Management Plan currently underway, and no interconnected system.

A review of the Sanitary Sewer of Overflow (SSO) reports showed the city reported two (2) SSOs in the last three (3) years, but the (paper) reports go back to 2001. Most SSOs have been from blockages. There is an unknown number of restaurants ("a lot" was mentioned) and some neighborhoods have had blockage problems. The city followed up with educational fliers.

According to the pre-inspection questionnaire, the city uses degreaser in problem areas and car washes and restaurants require grease traps per building regulations. The city has elderly care facilities, apartment complexes, schools, and other institutions with kitchens, but staff commented that grease has not been a problem from these locations. I requested information regarding any Fats, Oils, & Grease (FOG) program and/or ordinance. Mr. McNew was unsure of specific program (cleaning and inspection) for grease traps for food establishments, or an ordinance, but had mentioned there may be something through building inspections or health department. I requested follow up and received information regarding the International Plumbing Code, 2021 Edition, CHAPTER 10, traps, interceptors and separators. However, no other information was provided.

According to the city, the rates for water & wastewater were increased in April 2024 for both commercial and residential. While the city services the wastewater system, billing for both wastewater and drinking water is managed through the San Antonio Water System (SAWS), which provides drinking water. The annual budget is used to fund both Operation & Maintenance (O&M) and rehabilitation. However, there is an "emergency operating budget" as well. It was explained that, while a Capital Improvement Plan (CIP) had been established in the past, there is no current CIP for long-term performance and reliability, nor a review of staffing needs for the future.

City staff said that one chronic problem (hot spot) had been from a lift station owned by a private (commercial) entity. While there is no service agreement between the city and the property owner, the city explained that the issue has been addressed after working with the owner. Staff are not aware of other problem areas without complaint calls, and those were not being tracked prior to the new work order system.

Dry weather issues are due to root intrusion at the bell joints and cracking in the clay pipe from shifting bed material. Regarding wet weather problems, the city explained that seasonal flooding causes a “shock load” of water to the WWTPs. While an Inflow/Infiltration (I&I) study has not been completed at this time, in 2024 a contract engineer inspected the entire system using closed circuit television (CCTV). The pre-inspection questionnaire shows the assessment is being used to identify needed repairs (for CIP inclusion). However, during the onsite inspection staff said the results are not entirely available yet.

There is no ordinance specific to private lateral connections. The public works staff will respond to calls and assist in the beginning, but if the problem is not in the city right of way, they inform the owner of their responsibility.

When asked about any manholes located in flood plains (and/or bolted down to prevent overflows), or creek crossings of pipes, the city said they do not have any. However, the representatives from the San Antonio River Authority (SARA) explained they do have some manholes that are bolted down in the low areas of the city.

In addition to the information provided by the City of Live Oak, the representatives from SARA explained that approximately 72 flow meters were installed around the cities of Converse and Live Oak to measure more accurate flows into their system from the cities. The flow meters were recently installed in October 2024, so there is little data available at this time. SARA also helps its connected communities by assisting with their own jetting and camera inspections when needed.

Regarding cyber security protocols and protections, I discussed some recent issues as well as training programs that are available. The city said they can “unplug and go manual” if necessary. However, they do not have a written emergency response plan (ERP) for wastewater, nor does staff attend specific training.

Section III – AREAS OF CONCERN

There were no major areas of concern on the date of inspection. However, it was mentioned that sewer overflows are most likely occurring more often than staff realizes due to the age and percentage of clay pipe, and there appears to be I/I problems.

CLOSING CONFERENCE

EPA Region 6 inspector Rachel Matthews conducted a closing conference. During the closing conference I reviewed Areas of Concern and recommendations, as well as discussed follow-up items to address.

Section IV – FOLLOW UP

The following information was requested and received by EPA, after I exited the Facility on June 3, 2025:

- A pdf map of the collection system.
- Information specific to a FOG program and ordinance.

RECOMMENDATIONS:

The following recommendations were discussed during the closing conference:

1. Develop and maintain up-to-date written copies of Standard Operating Procedures (SOPs), including an inspection checklist and alarm test for the lift station, ensuring current and new employees understand necessary job functions.
2. Continue developing the new work order system to ensure accurate and efficient tracking system for all complaints, planned and unplanned work, and potential trend analysis.
3. Develop and incorporate an asset management plan, in conjunction with the work order system, to ensure the best level of service in a cost-effective long-term sustainable process.
4. Develop a 5-year Capital Improvement Plan to assist in long-term planning and maintenance of all assets of the sanitary sewer collection system.
5. Review regulations regarding private laterals and their associated maintenance requirements. Develop and institute a code if necessary.
6. Develop an emergency response plan where necessary and ensure staff training/responsibilities.
7. Develop and incorporate a FOG program to ensure restaurants, other food establishments, as well as commercial/industrial entities, collect and properly dispose of fats, grease, and oil on a regular basis.

Section V – LIST OF APPENDICES

There are no appendices in this report