United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/04/2025	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act	
Company Name:	**City of Cibolo, TX**	
Facility Name:	**City of Cibolo, TX**	
Facility Physical Location:	108 Cibolo Dr.	
(city, state, zip code)	Cibolo, TX 78108	
Mailing address:	Same	
(city, state, zip code)		
County/Parish:	Bexar & Guadalupe Counties	
Facility Phone Number	210-619-0069	
Facility Contact:	Chris Hubbard	Utilities Supervisor
	chubbard@cibolotx.gov	
FRS Number:	110071951747	
Identification/Permit Number:	TXU009131	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	

Personnel participating in inspection:		
Jeremy Trimm	City of Cibolo	Utilities Foreman
Nicholas Guel	City of Cibolo	Utilities Crew Leader
Chris Hubbard	City of Cibolo	Utilities Supervisor
Julio Gomez	City of Cibolo	Public Works Director
Shannan Hall	City of Cibolo	Executive Assistant
Rachel Matthews	Environmental Protection Agency	Life Scientist

EPA Lead Inspector Signature/Date	RACHEL MATTHEWS Digitally signed by RACHEL MATTHEWS Date: 2025.06.25 09:56:44 -05'00'	
	Rachel Matthews	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2025.06.25 14:13:03 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Rachel Matthews arrived at the City of Cibolo Public Works office, at 8:56 am on June 4, 2025, for an announced inspection. I met with Mr. Chris Hubbard, Utilities Superintendent, Mr. Julio Gomez, Public Works Director, and other city utilities staff. I presented my credentials to Mr. Hubbard 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 Cibolo serves an approximately 34,000 residents, with 250 commercial connections and 11,306 residential connections. The city's sanitary sewer collection system consists of approximately 115.6 miles of pipe with five (5) lift stations. The lift stations are connected to Supervisory Control and Data Acquisition (SCADA) and have back-up generators as well as audible/visual alarm system. In addition, the city has two (2) vactor trucks available. The oldest sewer pipe (50+ years) is 4% vitreous clay, located in "old town" and the rest of the pipe is polyvinyl chloride (PVC) (new since 2020). All sewer lines are connected and routed through the collection system to a wastewater treatment plant (WWTP) owned and operated by Cibolo Creek Municipal Authority (CCMA).

There are no septic systems outside of the piped service areas of the city. There is one (1) industrial area that is being added, but negotiations were ongoing at the time of the inspection. The surrounding San Antonio metropolitan area is greatly expanding. According to Public Works, Cibilo is rapidly expanding and has another five (5) square miles to full build-out.

Section II – OBSERVATIONS/INTERVIEWS

Department of Public Works personnel include 15 fulltime staff. According to the city, this is currently adequate, but they will need an additional crew (4 staff) with the expected expansion within the next five (5) years. The city expects the population to increase to 50,000 + residents in about 10 years.

During the inspection, a review of the Sanitary Sewer of Overflow (SSO) reports (paper copies) showed the city reported only seven (7) SSOs since 2001. Most issues are at the lift stations and stem from inflow/infiltration (I/I) during heavy rain events if the pumps cannot keep up. The city has been using two (2) crews for annual cleaning, and follow-up closed circuit television (CCTV) inspection, all pipes and manholes throughout the system. Staff commented that dye and smoke testing is occasionally completed as well. Any root intrusion to the system in a right of way will add a concrete encasement for protection so as not to remove the tree. There is no formal I/I study however, and therefore unknown how much I/I there is.

The city has a pretreatment ordinance for Fats, Oils, and Grease (FOG). Code Enforcement manages the grease traps for food establishments. And, while the apartment complexes (new in the last 5 years) schools, and other institutions with kitchens, grease and other blockages have not been a problem. The city also incorporates educational programs (including part of a parade) and fliers for the community. There is one "hot spot" jetted on a weekly basis.

When asked about any manholes located in flood plains (and/or bolted down to prevent overflows), or creek crossings of pipes, the city said the line running through Schlater Park, through Schertz and Cibolo – is in a low area and all manholes are bolted down.

City personnel inspect the lift stations every day. While there is a spreadsheet for pump run times tracked, there is no written checklist or Standard Operating Procedure (SOP) for daily inspections. All lift stations have a generator connected to SCADA. The generator is auto-tested once a week and runs for 30 minutes, which shows on SCADA. Of the five (5) lift stations, 2 smaller ones will be removed and replaced with one new lift station. Enzymes are used at lift stations to address FOG and (primarily) odor monthly.

The onsite inspection of two (2) lift stations (Venado and Kaylee) included a high-water alarm check. The Kaylee lift station, located directly behind a home, did not trip the audio/visual alarm when the high-water alarm was tested. It did send a text warning through SCADA. The access road at the Kaylee lift station has active construction to rebuild the retaining wall between the homeowner's yard and the access road.

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

- SCADA
- Routine Inspections/Maintenance
- 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

The city has ongoing training that includes On-The-Job and orientation for new staff whereby they change crews after a month to work with multiple people. The TCEQ required training for licensing and online training are also included, along with a monthly safety training.

The city staff explained they use the "OpenGov" software platform for work orders. According to the website, the platform "delivers a unified experience across asset management, permitting, procurement, budgeting..." The city is currently getting "Cartegragh Asset Management", which works in conjunction with OpenGov. The city already has their sanitary sewer collection system mapped in GIS, with some work orders connected. The city is in the midst of developing a more comprehensive management system. Currently preventative maintenance is tracked in the GIS mapping system, but not through the work order system. The only work orders currently generated are from complaints that are taken through the billing department. These are conveyed to a customer services representative who investigates to verify legitimacy and then transfers the problem to public works for resolution. During the inspection, I requested to review complaints, and the associated work orders with details, which indicated they were not seamless. It took multiple tries to get a "complete picture" of one complaint. The city expects this to be uniform once the comprehensive system is fully up and running.

According to the city, a rate study is in process - for the current Master Plan - to look at the projected expansion and updates. The annual budget is used to fund Operation & Maintenance, emergency

repairs, as well as some rehabilitation. There is a 5-year Capital Improvement Plan for 2019-2024, which includes a 2024 comprehensive plan for the future, according to city staff.

Regarding cyber security protocols and protections, I discussed some recent issues as well as training programs that are available. The city has an information technology (IT) department and said they have some protocols set for protections. Staff commented that phishing email tests are sent out occasionally. 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.

CLOSING CONFERENCE

EPA Region 6 inspector Rachel Matthews conducted a closing conference. During the closing conference I reviewed Areas of Concern and recommendations

Section IV – FOLLOW UP

There was no information requested or received by EPA after I exited the Facility on June 4, 2025.

RECOMMENDATIONS:

The following recommendations were discussed during the closing conference:

1. Develop and maintain up-to-date written 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. Review regulations regarding private laterals and their associated maintenance requirements. Develop and institute a code if necessary.
4. Develop an ERP where necessary and ensure staff training.

Section V – LIST OF APPENDICES

There are no appendices in this report