

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	July 26, 2022	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	City of Richland Hills	
Facility Name:	Wastewater Utility Department	
Facility Physical Location:	Public Works Office, 6700 Rena Drive	
(City, state, zip code)	Richland Hills, TX 76118	
Mailing address:	Richland Hills City Hall, 3200 Diana Drive	
(City, state, zip code)	Richland Hills, TX 76118	
County:	Tarrant	
Facility Phone Number	817-616-3830	
Facility Contact:	Scott Mitchel	Public Works Director
	smitchell@richlandhills.com	
FRS Number:	NA	
Permit ID Number:	TXU000080	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Justin Meine	City of Richland Hills	City Official (Licensed WW Operator)
Scott Mitchell	City of Richland Hills	Public Works Director
David Burkett	Halff Associates, Inc.	Civil Engineer
Alicia Johnson	City of Richland Hills	Administrative Assistant
P Dillary	Halff Associates, Inc.	Civil Engineer
Damon McElroy	EPA Region 6	EPA Enf. Officer and Inspector
EPA Lead Inspector Signature/Date	DAMON MCELROY Digitally signed by DAMON MCELROY DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=DAMON MCELROY, 0.9.2342.19200300.100.1.1=68001003655653 Date: 2022.08.04 08:12:36 -05'00'	
	Damon McElroy	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2022.08.04 10:21:40 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Damon McElroy arrived at the City of Richland Hills (RH or City) Public Works office at 9:30 am on July 26, 2022, for an announced inspection. I met with the five City representatives indicated above and illustrated in the Appendix 1 Sign-In-Sheet. I presented my EPA Inspector Credentials informing the group this was an EPA inspection to determine compliance with the Clean Water Act regarding sanitary sewer overflows from the sanitary sewer collection system. The scope of the inspection is a compliance evaluation to determine if capacity, management, operations, and maintenance (CMOM) is sufficient to prevent sanitary sewer overflows (SSO).

FACILITY DESCRIPTION

The City of Richland Hills serves approximately 8,130 residents (2000 census), with 2,700 residential and 340 commercial service connections. All areas that have sewer lines are connected and routed through the sanitary sewer collection system to the Village Creek wastewater treatment plant that is owned and operated by City of Fort Worth. Richland Hills' sanitary sewer collection system utilizes one lift station constructed about seven years ago connected remotely to a SCADA system.

When an overflow occurs, TCEQ (Texas Commission on Environmental Quality) is notified by RH as required by the SOP (standard operational procedure) for managing and reporting SSOs. The sanitary sewer system infrastructure (i.e., gravity pipe and manholes) is up to 60 to 70 years old. There are about 60 miles (316,800 LF) of sewer pipes ranging in size from 4 to 36 inches in diameter as well as 590 manholes. The wastewater gravity mains consist of about 70% vitrified clay with the remainder consisting of PVC and to a lesser amount cast iron, concrete, and polyethylene pipe. From past SSOs reported to TCEQ from 2016 to 2020, RH has averaged 7 SSOs per year.

Preventative maintenance to avoid stoppages and sewer backups and condition-responsive repair work represent a large part of the wastewater utility workload. Contractor support is available for emergency remedial or repair work. There are three wastewater utility city staff and three drinking water staff. Public Works employees maintain current TCEQ licenses. Repair, maintenance, monitoring, and maintaining proper flow within the collection system are the City's responsibility. Wastewater maintenance falls under the City's Public Works (PW) department. Wastewater services are provided 24 hours per day. After-hour wastewater emergencies can be addressed via dispatch.

Richland Hills participates in the TCEQ SSO Initiative (or SSOI). The SSO Initiative is a voluntary program to address SSOs due to aging collection systems and encourages corrective action before an SSO occurs. The RH goal is to preempt SSOs and any associated harm to human health or the environment - as described in TCEQ general information document (GI-389) located here at the following TCEQ web-address: <https://www.tceq.texas.gov/compliance/investigation/ssoinitiative>. RH is required to file an annual SSOI Progress Report to TCEQ as shown in Appendix 3 for the 2020-2021 reporting period.

Section II – OBSERVATIONS

The City has a Capacity Management Operations and Management Program (CMOM) to include the following:

- Targeted pipe and manhole cleaning and condition assessment.
- Targeted pipe remediation (rehab or replace) (7.9% annually).
- Targeted manhole remediation (12.4% annually).
- Routine inspection program for gravity pipes and manholes.
- Targeted I/I reduction study.
- Routine gravity pipe and manhole remedial measures according to CIP and I/I reduction.
- Public education about FOG and no-flush items.
- Private Service Line Defect and Remediation program.
- FOG and no-flush items public education.
- SSO response plan.
- Long-term routine sewer cleaning program.
- Employee training.
- Increased data management plan.
- Weekly Lift Station inspections.
- City ordinances for wastewater utility operation (needed for FOG inspections and Private Service Line Remediation program).

Funding

RH reported that the SSO Plan will require increases in The City's operating expenses. RH routinely seeks the Community Development Block Grant funds. RH is not currently seeking other funding resources as CWSRF loans or new bonds which are now on hold due to current reported debt service issues.

Staffing

There are three city Sewer Maintenance Staff. RH reported that it is 60% staffed, or it needs two additional wastewater maintenance officials, which are now open positions with the city. Most projects and initiatives will be carried out with existing staff. EPA estimates that the City's total sewer maintenance staff personnel requirements based on population is estimated at roughly 12 (or 260 hours per week). This includes 6 maintenance staff at 80 hours per week (reference the EPA "Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs", January 2005, Page 2-9; available on the web-address:

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

Section III – AREAS OF CONCERN

1. The City lacks sufficient wastewater staff to provide a CMOM program capable of preventing SSOs or to stop sewer backups.
2. The City lacks sufficient funds for wastewater collection services to prevent SSOs or sewer backups.
3. When examining the Calendar Year 2019 workorder display of customer calls related to wastewater inquires there was one SSO on 10/17/2019 that appeared to not be reported to TCEQ.
4. RH needs an asset management system that needs to be analyzed for targeted remedial measures for SSOs and customer backups.

Section IV -RECOMMENDATIONS

1. RH should establish sufficient methods to obtain and hold on to sufficient wastewater officials.
2. RH should provide sufficient wastewater program funding. This may entail any increase in wastewater utility rates for full-cost pricing. The City should also continue to evaluate alternative funding sources including available CWSRF grant funds (or loan funds as feasible), as well as other state, federal, and grant financial assistance programs.

Section V -SUGGESTIONS

1. RH should continue to participate in the TCEQ SSOI for the next cycle.
2. RH should conduct a routine collection system cleaning, assessment, and pipe and manhole remedial measures program at 20% or more of system per year.
3. Sanitary sewer pipe and manhole assessment activities should be conducted via a NASSCO MACP and PACP ratings system.
4. RH should create comprehensive wastewater utility Standard Operational Procedures.
5. Reference the EPA “Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs”, January 2005, available on the web-address:
https://www3.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf

SECTION VI –REGULATORY INFORMATION:

The City'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

Below is a list of regulatory information pertinent to the Richland Hills Wastewater utility program:

- A. Failure to prevent unauthorized/unpermitted discharges or Sanitary Sewer Overflows as stipulated in TAC § 305.125(9); TWC § 26.121(a); Section 301 of the CWA; and 40 CFR § 122.1(b).
- B. Failure to report SSOs; as stipulated in Title 30 of the TAC § 305.125(9), TWC § 26.121, & 40 CFR § 122.41(l)(6).
- C. Failure to implement proper O&M of the collection system as stipulated in Title 30 of the TAC § 305.125(5) & 40 CFR § 122.41(e).

Section VII – FOLLOW UP

No additional information was received by EPA after exiting the Facility on July 26, 2022.

Section VIII – LIST OF APPENDICES

- Appendix 1 – Opening conference Sign-In Sheet
- Appendix 2 – Reported SSOs from 9/2016 to 9/2020
- Appendix 3 – City of Richland Hills 2020-2021 Annual Report for the TCEQ SSOI program

Appendix 1

Opening conference Sign-In Sheet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102



DATE: July 26, 2022

TIME:

9:30 AM

SUBJECT: City of Richland Hills, Texas

MEETING ATTENDEES

NAME	COMPANY	PHONE NO.	EMAIL
Damon McElroy	EPA	214 529 9115	mcElroy.DAMON@EPA.gov
Justin Meine	Richland Hills	469-816-7468	jmeine@richlandhills.com
Scott Mitcheoc	Richland Hills	817-616-3770	SMITCHEOC@RICHLANDHILLS.COM
David Burkett	Half Associates	817-689-6720	dburkett@half.com
Alicia Johnson	Richland Hills	(817) 266-4264	ajohnson@richlandhills.com
Phawn Dilan	Half Assoc.	(817) 764-7504	pdilan@half.com

Appendix 2

Reported SSOs from 9/2016 to 9/2020

City of Richland Hills Reported SSOs from 9/2016 to 9/2020:

ID	Start Date	Location and Description
1	9/16/2016	Grease blockage discharge into storm drain
2	1/10/2017	Clean out overflow at 7334 White Hall St into storm drain inlet: sewer main collapsed
3	1/22/2017	Overflow at 7508 Evergreen to street
4	3/27/2017	A 10-inch sewer line collapsed near the 7900 Block of Baker Blvd and caused a discharge to an unnamed creek. A public media notification was issued on 3/27/17 and an onsite investigation was conducted 3/28/17.
5	5/21/2017	Discharge at Scruggs Park Dr near Mimosa Park Dr to storm drain.
6	12/5/2017	Overflow at 3100 Scruggs Dr to street.
7	12/13/2017	Manhole overflow at 2800 Fir Pk to storm drain.
8	3/1/2018	Discharge at 6521 Allena Ln to storm drain
9	3/1/2018	Discharge at Scruggs Park Dr & Pine Pk to storm drain.
10	6/18/2018	Overflow at 3601 Ruth Rd to yard and street
11	9/3/2018	Discharge at 6808 Park Pl to storm drain due to rain surcharge.
12	9/22/2018	Manhole overflow at 6800 Blk Pine Park to street due to rain event
13	9/22/2018	Manhole overflow at 7100 Blk of Latham to street due to rain event.
14	10/15/2018	Manhole overflow at 6936 Richlynn Ter to storm drain due to significant rain event.
15	10/15/2018	Manhole overflow at 7078 Brooks Ave to storm drain due to significant rain event.
16	10/16/2018	Manhole overflow at 7100 Latham Dr to storm drain due to significant rain event.
17	1/15/2019	Manhole overflow at 7600 Blk Dover to street.
18	1/4/2019	Manhole overflow at 6800 Blk Park Place Dr to storm drain.
19	12/18/2018	Manhole overflow at 7300 Blk Richland Rd to street.
20	3/6/2019	Overflow at 3200 Blk Scruggs Park Dr to storm drain inlet.
21	4/14/2019	Collapsed section of sewer main near 3300 blk Henry Dr caused discharge to storm drain.
22	10/2/2019	Overflow at 2800 block of Fir Park to street.
23	12/2/2019	Overflow at 7300 block Richland Rd to street.
24	3/16/2020	Overflow at 7071 Brooks Ave to storm drain due to significant rain event.
25	9/15/2020	Overflow at 2800 Block of Fir Park to street.

Appendix 3

Richland Hills 2020-2021 Annual Report for the TCEQ SSOI program



CITY OF RICHLAND HILLS, TEXAS

DEPARTMENT OF NEIGHBORHOOD SERVICES

• Community Development • Code Enforcement • Animal Services • Public Works •

• PH: (817) 616-3770 • Fax: (817) 616-3802 • 3200 DIANA DR. RICHLAND HILLS, TX 76118 •

June 22, 2021

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Re: Sanitary Sewer Overflow (SSO) Agreement Annual Progress Report for Richland Hills

Attached is the 2020-2021 Annual Report for the City of Richland Hills SSOI program.

If you have any questions regarding this report, please do not hesitate to call me at (817) 616-3771 or by e-mail at smitchell@richlandhills.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Mitchell".

Mr. Scott Mitchell
Director of Neighborhood Services
City of Richland Hills

CC: Water Section Manager

Copy sent to:

Water
~~Water~~ Section Manager
Dallas/Fort Worth Regional Office
Texas Commission of Environmental Quality
2309 Gravel Drive
Fort Worth, TX 76118-6951

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
SANITARY SEWER OVERFLOW (SSO) AGREEMENT
ANNUAL PROGRESS REPORT**

INSTRUCTIONS

- This form is optional; however, it identifies the required and optional information to be included in the annual progress report for participants in the SSO Initiative. **Participants are highly encouraged to use the form.**
- You may attach to this form any additional information that demonstrates the progress made during the reporting period (such as graphs, photos, work order receipts, etc.)
- The **annual reporting period is located in your Agreement**. Typically, an initial progress report is due 90 days after the effective date of the Agreement, with progress reports due annually thereafter.
- This form may also serve as a template for developing your SSO plan.
- For each section that is completed, please reference the corresponding provision number from the Agreement.
- Participants are required to report the items marked with an asterisk (*) including all items in Section 1 through Section 4.

SECTION 1. PARTICIPANT INFORMATION

1.1 Participant Name*	CITY OF RICHLAND HILLS
1.2 Case Number (located on the Agreement)*	55678
1.3 Regulated Entity Number*	RN101423408
1.4 State Water Quality Permit Number (if applicable)*	
1.5 Representative Name & Title*	MR. SCOTT MITCHELL, DIRECTOR NEIGHBORHOOD SERVICES
1.6 Representative Phone #* (area code and # - no dashes)	(817) 616-3771
1.7 Annual Reporting Period (Month and Year - see instructions)*	JUNE 2020 - JUNE 2021

SECTION 2. EVALUATING THE EFFECTIVENESS OF THE PLAN

2.1 Provide the total number of SSOs (As a separate attachment, include a list of SSOs that details the date, volume, and cause for each SSO event) that occurred during the reporting period.*	0				
2.2 Provide a brief summary of how the corrective actions that were completed during this reporting period have already contributed to a reduction of SSOs in the system.*	N/A				

2.3 What actions are currently being taken or planned to ensure a reduction of SSOs will occur in the future?*	Monthly hot spot list cleaned 1st Monday of the month for problem areas.
2.4 Provide any additional information that demonstrates the success of your program (e.g. Compare the number of wet weather overflows with dry weather overflows to show inflow/infiltration (I/I) reduction).*	See sewer line replacements for I/I reduction.

SECTION 3. INTERIM MEASURES TO MITGATE SSOs

3.1 Describe your SSO response plan.*	Our SSO response plan describes the chain of command for responding to and reporting SSO's, assigned responsibilities; actions to take; emergency contact information for third party vendors, notification procedures and TCEQ reporting procedures, it also addresses necessary responses at the lift station and in the collection system. Training requirements and procedures are also addressed.
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3.2 What actions were taken during this reporting period to mitigate SSOs?*	Clean and camera sewer mains monthly.
3.3 What improvements were made to your SSO response plan?*	None during this reporting period.
SECTION 4. SOURCES OF FUNDING	
4.1 Provide a summary of the costs expended for completed projects during this reporting period.*	Utility Fund - Total amount for this year and the next - \$598,000, Without personnel costs - \$288,000.

4.2 Describe the anticipated and confirmed sources of funding for the next two years.*	Utility Fund - \$598,000 each year for the next two years.
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SECTION 5. OPERATIONS AND MAINTENANCE (O&M) PROGRAM

5.1 Briefly describe your O&M Program for the reporting period.*	RHPW crews During this reporting period; city crews replaced 1 manhole and 482 linear feet of main line; cleaned 31,600 linear feet of sewer mains and CCTV inspected 29,750 linear feet of sewer pipe.
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5.2 O&M Activities	Quantify the following components of your O&M activities for the reporting period. If you did not conduct an activity, please indicate with N/A.
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5.2.1 Inspection frequency of the system (sewer pipes, lift stations, manholes, etc.)*	Monthly inspections are done. Weekly inspections are done at the Lift Station.
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5.2.2 Cleaning frequency of the system (sewer pipes, lift stations, manholes, etc.)*	Monthly cleaning is done. Lift station is cleaned weekly.
5.2.3 Total number of linear feet of sewer pipe in the system*	316,800 LF
5.2.4 Total number of linear feet of sewer pipe inspected*	29,750
5.2.5 Total number of manholes in the system*	589
5.2.6 Total number of manholes inspected*	117
5.2.7 Total number of lift stations in the system*	1
5.2.8 Total number of lift stations inspected*	1
5.2.9 Total number of linear feet of sewer pipe cleaned*	31,600
5.2.10 Describe the types of SSO-related employee training that was completed (e.g., Capacity, Management, Operations, & Maintenance; Fats, Oils, & Grease; etc.)*	O & M -staff infield training

5.2.11 Other	N/A
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SECTION 6. SYTEM EVALUATION & REHABILITATION	
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6.1 System Evaluation	Quantify or describe the following measures used to evaluate your system's capacity; inflow/ infiltration (I/I) rate; etc. that were completed during the reporting period. If you did not conduct an activity, please indicate with N/A.
6.1.1 Flow Monitoring (e.g., wastewater treatment facility; lift stations; rainfall records, etc.)	Lift Station is flow monitored 24/7 via the SCADA. Flow meters with Hurst and Ft. Worth are monitored weekly, with monthly totals forwarded.
6.1.2 Dye Testing (e.g., to identify leaks, illegal connections, etc.)	None during this reporting period.

6.1.3 Smoke Testing (e.g., to identify illegal connections, exposed cleanouts, etc.)	None during this reporting period. Smoke testing was postponed due to pandemic related vendor availability.
6.1.4 Evaluation to identify the location and condition of sewer pipes.	Sewer line locations are identified in the city GIS program. City crew inspected, via TV Camera, 29,750 LF of sewer line.
6.1.5 Evaluation to identify the location and condition of manholes.	Manhole locations are identified in the city GIS program.

6.1.6 Evaluation to identify the location and condition of lift stations.	The one Lift Station in the City of Richland Hills is located at 6905 Midway Road. Crews inspect and perform weekly maintenance.
6.1.7 Closed Circuit Television	29,750 LF
6.1.8 System Mapping Updates	None during this reporting period.

6.1.9 Other	N/A
6.2 Rehabilitation Projects	Quantify or describe the following rehabilitation projects that were completed during the reporting period. Please provide specific details, such as the number of linear feet, sizes of sewer pipes, number of manholes, etc. If you did not conduct an activity, please indicate with N/A.
6.2.1 Number of Sewer Pipes Repaired/Rehabilitated*	482 LF
6.2.2 Number of Sewer Pipes Replaced*	0
6.2.3 Number of Sewer Pipes Removed	0
6.2.4 Number of Sewer Pipes Added	0
6.2.5 General Sewer Pipe Improvements	Reflected in repairs and replacements.
6.2.6 Number of Manholes Repaired/Rehabilitated*	0
6.2.7 Number of Manholes Replaced*	1
6.2.8 Number of Manholes Removed	0
6.2.9 Number of Manholes Added	0

6.2.10 General Manhole Improvements (e.g., installing locks, replacing covers, etc.)	Replaced 1 manhole cover.
6.2.11 Number of Lift Stations Repaired/Rehabilitated*	0
6.2.12 Number of Lift Stations Replaced*	0
6.2.13 Number of Lift Stations Removed	0
6.2.14 Number of Lift Stations Added	0
6.2.15 General Lift Station Improvements (e.g., electrical upgrades, installation of monitoring systems, etc.)	None during this reporting period.
6.2.16 Other	N/A

7.1 General SSO Education & Outreach	Quantify or describe the following measures completed under your SSO Education Program (if applicable) during the reporting period. Please provide specific details, such as number/frequency of brochures distributed, etc.
7.1.1 Educational Brochures (e.g., bill inserts, door knockers, etc.)	Public outreach programs normally done during Public Events via in-person booths and educational handouts was halted this year due to pandemic.
7.1.2 Media Advertisements (e.g., television, radio, newspaper, etc.)	None this reporting period.
7.1.3 Website Updates	The City website is monitored and updated on a regular basis. The current web includes info & links for FOG; use of Wipes' and sewer back up prevention.
7.1.4 Educational/Training Opportunities (e.g., community events, school programs, etc.)	Public outreach programs normally done during Public Events via in-person booths and educational handouts was halted this year due to pandemic.
7.1.5 City Ordinances	Richland Municipal Ordinance Chapter 86-Utilities-Article II-Sewage Systems Section 86-88, 86-89 Discharge Prohibitions and Limitations.
7.1.6 Other	N/A

7.2 Fats, Roots, Oil, & Grease (FROG) Program	Quantify or describe the following measures completed under your FROG Program (if applicable) during the reporting period. Please provide specific details, such as number/frequency of brochures distributed, etc.
7.2.1 Number of Grease Trap/Interceptor Inspections*	None
7.2.2 Grease Ordinance Updates	None this reporting period.
7.2.3 Grease Ordinance Enforcement	3 actions through Code enforcement.
7.2.4 Grease Control Methods	N/A

7.2.5 Food Service Establishment Training	N/A
7.2.6 Root Control Methods	None
SECTION 8. ADHERENCE TO MILESTONES	
8.1 Discuss/describe all of the milestones that were completed in accordance with the requirements of the Agreement during the reporting period.*	Inspected & cleaned a total of 31,600 LF of sewer pipe including the 7,359 LF prioritized by table 3.1 Attachment A in the SSO Plan. Inspected 117 manholes including the manholes prioritized by table 3.2, Attachment A in the SSO Plan.

8.2 Discuss/describe all of the milestones that were NOT completed in accordance with the requirements of the Agreement during this reporting period. Include any changes you plan to make to ensure that milestones are completed for the next two years.*	Smoke testing - this milestone has not been addressed in this reporting period. RHPW has concentrated on inspecting & cleaning sewer lines and manholes during this reporting period.
8.3 Provide a list of scheduled projects that are planned for the next two years.*	Inspect and clean no less than 21,800 LF of sewer pipe per year Inspect and clean no less than 72 manholes per year Implement a new hire training program to acclimate new hires to the RH Emergency SSO Response Plan. Implement standard, on-going, training for all RHPW employees to insure each possess efficient knowledge and abilities on response and reporting procedures to SSO's based on the approved SSO Emergency Response Plan. Sanitary sewer pipe and manhole rehab, based on assessment results of pipe & manhole inspection and cleaning. Schedule targeted I / I reduction study on 13,000 LF

SECTION 9. MISCELLANEOUS

Provide any additional information you feel necessary to demonstrate compliance under the terms of the SSO Initiative.	Staffing levels are at 40% of allocated strength due to labor shortage (industry wide problem).
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SECTION 10. SIGNATURE

Signature:	Date:
Name (printed or typed):	Title: