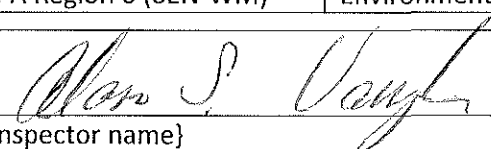
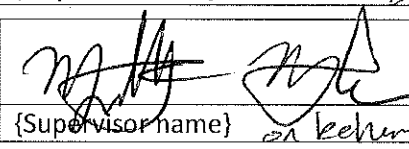


Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	August 3, 2017		
Media:	Municipal Wastewater		
Regulatory Program(s)	NPDES		
Company Name:	Coppell, City of		
Facility Name:	Coppell Wastewater Collection System		
Facility Physical Location:	City of Coppell Public Works Utilities Operations Division 816 S. Coppell Road		
(city, state, zip code)	Coppell, Texas 75019		
Mailing address:	P.O. Box 9478		
(city, state, zip code)	Coppell, Texas 75019		
County/Parish:	Dallas County		
Facility Contact:	Billy Williams	Wastewater Operations Supervisor	
	bwilliams@coppelltx.gov		
FRS Number:	110010934427		
Identification/Permit Number:	TXU000149 (served by TRA Central Regional Wastewater System (TX0022802))		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Billy Williams	City of Coppell Public Works	Wastewater Operations Supervisor	972-304-3681
Zack Young	City of Coppell Public Works	Environmental Health	214-846-2822
Danilo Dimafelix	City of Coppell Public Works	Sewer Crew Leader	214-406-5642
Damon McElroy	EPA Region 6 (6EN-WM)	Environmental Engineer	214-665-7159
Alan Vaughn	EPA Region 6 (6EN-WM)	Environmental Engineer	214-665-7487
EPA Lead Inspector Signature/Date			5/30/18
	{Inspector name}		Date
Supervisor Signature/Date			5/21/18
	{Supervisor name} Ceral Roberts-Wyann		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The inspection purpose is to examine the City of Coppell's (or City) sanitary sewer collection system as an element of the EPA's National Sanitary Sewer Overflow (SSO) Initiative to prevent raw sewage from entering our 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 inspection scope 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 City Public Works Utility Office at 9:10 am on August 3, 2017, for an announced Compliance Evaluation Inspection. We met with the City's Wastewater Utility Officials illustrated by the inspection sign-in sheet in 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 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

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 City representatives, observations made by the U.S. EPA inspectors, records and reports maintained by the City, the State of Texas, and the U.S. EPA.

FACILITY DESCRIPTION

Coppell was described as a relatively affluent City and a suburb of Dallas located in northwest Dallas County, Texas. The City Wastewater Utilities Department is located at 816 S. Coppell Road, Coppell, TX 75019. The City's Wastewater (WW) Utilities serves about 41,000 residents with approximately 8,577 residential connections and 514 commercial connections covering approximately 15 square miles. The WW utility operates 24 hours a day and seven days a week. The City's collection system consists of approximately 198 miles of gravity lines, force mains, and two system lift stations. The collection system gravity lines consist of roughly 84% PVC, 14% Vitrified Clay (VC), 1% Ductile Iron (DI) and 1% other. The

two lift stations are connected remotely to the City's supervisory control and data acquisition (SCADA) system.

When an overflow from the City's collection system or from a private lateral caused by the City occurs, the Texas Commission on Environmental Quality (TCEQ) is notified within 24 hours as required by Texas law. Sanitary sewage is routed through the City's collection system to the TRA trunk line. The City's wastewater is then transmitted to the TRA Central Regional Wastewater Treatment System (TX0022802) for contractual wastewater treatment.

Section II - OBSERVATIONS

A) The City described the wastewater utilities Capacity Management Operations and Management Program (CMOM) activities that includes the following:

- Protocols for Identifying SSO's
- GIS/Work order system
- Routine maintenance program
- Routine Cleaning program
- Manhole/system inspection program
- System rehabilitation program
- Lift station maintenance program
- Fats, oils and grease (FOG) control program

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

- It was determined by TCEQ and the Facility that the City's collection system age and failure frequency does not support development and participation in the TCEQ Sanitary Sewer Overflow Initiative at this time.
- The City has a goal of cleaning the wastewater collection system once every five years.
- Current budgeted annual funding for all routine maintenance and standard repairs to the wastewater systems.
- The City visits the Lift Stations daily, however, they do not document the visits.
- Entering the Sandy Lake Lift Station, staff used portable gas detectors entering the stairwell, however, there was not any Confined Space signage.
- The City reported four SSOs during FY15 and FY16.
- The City is lacking good data on its collection system and should evaluate strengthening its Asset Management System.
- The City reported that it has roughly five fulltime wastewater utility staff and roughly eight drinking water utility staff. The City should evaluate if its staffing level is adequate.

C) The standard operational procedures (SOP) developed and used include:

- SCADA
- Routine Inspections & Maintenance
- SSO Clean-up
- Lift Station maintenance
- Sewer cleaning equipment operations and maintenance

Relevant regulatory information:

- a. 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.
- b. 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 – RECOMMENDATIONS and SUGGESTIONS

EPA generally recommends that the City:

1. Evaluate if current staffing levels are adequate.
2. Evaluate updating its work order management system.
3. Implement an updated asset management program.
4. Implement documenting Lift Station visits.
5. Determine where Confined Space signage is necessary at Lift Stations.
6. Review and update SOPs.
7. EPA generally recommends that the City implement a CMOM program.

Section IV – FOLLOW UP

None Necessary

Section V – LIST OF APPENDICES

Appendix 1 – City of Coppell SSO Checklist

Appendix 2 – Opening conference sign-in sheet

Appendix 1

City of Coppell SSO Checklist

EPA
SSO Inspection Checklist

Name of Municipality City of Coppell

Collection System Description

1. Describe the collection system. The City of Coppell's sanitary sewer system provides service to 41,159 residents. There are two lift stations and 168.17 miles of sanitary sewer mains. The collection system flows to a TRA metering station located in Carrollton TX.
2. What is the population of the service area:
 - Number of residents 41,159 as of July 1, 2015
 - Commercial connections 514
 - Any septic systems? Yes. If yes, how many? 2
3. How many miles of sanitary sewer mains are in the collection system? City owned 168.17/ Privately owned 30.5
4. What is the age of collection system? 23,231 feet is pre 1974, 4,726 feet is unknown age and the rest is 1974 to current.
 - %VC $\approx$ 129,081 ft.=14%
 - %DI $\approx$ 16,980 ft.=1%
 - %PVC $\approx$ 747,012 ft.=84%
 - %Other $\approx$ 10,353 ft.=1%
5. Does the collection system experience problems during dry weather? No
Describe or provide documentation: The City of Coppell's wastewater system operates at normal capacity during dry weather. The City of Coppell has estimated 4.8MGD being sent to TRA for out monthly average flow in the upcoming year.
6. Does the collection system experience problems during wet weather?
Describe or provide documentation: The City of Coppell experiences a surge of flow entering our Deforest Lift Station. The flow increases almost immediately when the rain event starts and ends a short time after the rain subsides
7. What is your sanitary sewer overflow (SSO) notification procedure? The City of Coppell follows the Texas Commission on Environmental Quality procedures for reporting sanitary sewer overflows.

What is reported? All sanitary sewer overflows are reported to TCEQ. These reports are made within 24hrs of the SSO and the written report is saved and sent to the main TCEQ office by mail.
8. Are all SSOs reported, regardless of size? Yes. If no, why not? _____

EPA
SSO Inspection Checklist

Lift/Pump Stations

1. How many lift stations are in the system? 2
 - How many have backup power sources? Currently 1
 - Describe: Our Deforest Lift Station currently has a backup generator, we are working on installing a backup generator at our Sandy Lake Lift Station.
2. Describe how pump/lift stations are inspected and monitored? We do daily inspections of the structure, pumps, control panels and SCADA system monitoring.
3. Is a SCADA system used? Yes If so, what parameters are monitored? We monitor all run times, inflow and outflow, wet well levels, hours on pumps, and run time for each cycle on pumps
4. What provisions have been made for emergencies? We have emergency plans in place that include pumping around the lift station into a secondary force main. We also have containment berms in case of overflow.
 - Emergency Power? Deforest Lift Station has backup generator. Sandy Lake has mobile generator hookups.
 - Critical Processes? _____
 - SCADA? We have several alarms including level alarms, pump failure alarms, and power outage alarms
 - Other? _____
5. Describe any automated emergency notification/response process. SCADA sends alerts and notifications to both water and wastewater supervisors, crew leaders, and on-call personnel. These alerts are in the form of emails, phone calls, and messages that need to be acknowledged by city personnel.

Satellite Systems

1. Does the collection system receive flow from satellite systems? Yes
If yes, continue with questions 2-4
2. Is flow from satellite systems monitored? Yes
If yes, how? The City of Dallas monitors flow from a small lift station that flows into our wastewater system. The City of Coppell takes monthly reading from the flow monitor located just outside the lift station security fence.
3. Describe any known problems with the satellite collection system (hydraulic flow, wastewater concentration, ordinances, etc.)? There are no known issues with this satellite collection system.
4. Who is responsible for satellite systems, enforcement, and response? The City of Dallas is responsible for the operation and maintenance of the satellite system.
 - Enforcement? The City of Dallas (Dallas Water Utilities)
 - Response? The City of Dallas (Dallas Water Utilities)

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.: _____

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? The City of Coppell plans on participating in the TCEQ SSOi in the near future.
3. What Standard Operational Procedures (SOP) are developed and used?
 - X SCADA?
 - X Routine Inspections/Maintenance?
 - Root Control?
 - X Lift/Pump Stations?
 - Valve maintenance?
 - Fleet Management?
 - Clean-up?
 - Other? _____
4. Has an infiltration & inflow (I/I) analyses or sanitary system evaluation survey been performed? Yes
 - If yes, describe (and provide a copy of any associated reports) RIN is currently involved in phase II of an I&I study that will cover approximately 22,000ft. of our sanitary sewer system. Phase I was a general study of our collection system as a whole.
 - Smoke Testing?
 - Dye Testing?
 - X CCTV?
 - X Peaking Factors?
 - If not, why not? _____
5. Describe the sewer cleaning and inspection goals. The City of Coppell has set a goal to try and clean the sanitary sewer system in a five year time frame. This will also include the inspection of any areas that may be damaged and manholes that may need repair or replacement. Setting these goals will help us understand what areas of town need to be focused on and issues corrected.
 - X Hot Spots? We have approximately 10 hot spots that are checked on a monthly basis.
 - X Annual Goals? With a 5 year goal this would mean cleaning roughly 33.5 miles of sewer line annually
6. Describe any training for receiving, documenting, and responding to sewer calls.
 - Discharge Estimates? _____
 - Safety/Confined Space? Fire Dept. confined space training, and additional training from instructors.
 - Lockout/Tagout? We have lockout/tagout equipment available at all Lift Stations.
 - Reporting? Overflows are reported to the Supervisor at wich time proper paperwork is documented.
 - Treatment/Clean-up? Necessary actions are taken depending on severity of SSO.
 - Other? _____

EPA
SSO Inspection Checklist

7. Describe any Asset Management process in place for the collection system. The City of Coppell is currently creating an asset management process for its collection system. The I&I study that is currently underway will help us put a plan in place.
8. Describe the funding status. _____
- Emergency Repairs: Funding for emergency repairs are done on a case by case basis. Funding is provided by the city managers office and city council once it is determined to be an emergency.
 - Operation & Maintenance: We have funds in our yearly budget and a five year plan that insures the money for operations, tools, and equipment will be used efficiently and correctly.
 - Rehabilitation: We are currently developing a plan for manhole rehabilitation, sanitary sewer main, and lift station maintenance. The lift station currently has a plan in place for maintenance and pumps.
 - Rates: _____
 - Other? _____
9. Describe any formal approach to target areas for Capital Improvement Projects. We are currently putting areas with older lines in our five and ten year plan. The City of Coppell is having information gathered from the I&I study currently being done. This information will help us systematically replace and repair areas in our system that need to be corrected. Having a plan will also help us budget for these repairs.
10. Please provide any other relevant information.
- _____
- _____
- _____

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.

9/15/2016
Date

Billy Williams
Signature
Billy Williams
Print name and Title

Appendix 2
Meeting/Inspection Attendees List

EPA CITY COLLECTION SYSTEM EVALUATION

CITY OF COPPELL

8/3/17

ALAN VAUGHN

EPA Rep. 6

214 665-7407

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Zach Young

Environmental Health

214-846-2622

Z.young@Coppelltx.gov

DANILO DIMAFELIX SEWER CREW LEADER (214) 406-5642

ddimafelix@coppell

tx.gov.

Damon MCELroy

EPA Rep

214 665 7159

mcelroy.damon@EPA.gov

1. 11/11/2021 10:00 AM - 11:00 AM

2. 11/11/2021 11:00 AM - 12:00 PM

3. 11/11/2021 12:00 PM - 1:00 PM

4. 11/11/2021 1:00 PM - 2:00 PM

5. 11/11/2021 2:00 PM - 3:00 PM

6. 11/11/2021 3:00 PM - 4:00 PM

7. 11/11/2021 4:00 PM - 5:00 PM

8. 11/11/2021 5:00 PM - 6:00 PM

9. 11/11/2021 6:00 PM - 7:00 PM