EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/03/2025	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	**Schertz, City of**	
Facility Name:	**Wastewater Utility Department**	
Facility Physical Location:	Public Works Building	
(city, state, zip code)	Schertz, TX 78154	
Mailing address:	1400 Schertz Parkway	
(city, state, zip code)	Schertz, Texas 78154	
County:	Guadalupe, Comal and Bexar (Primarily Guadalupe County)	
Facility Phone Number	210-619-1800	
Facility Contact:	Larry Bush	Public Works Director
	lbusch@schertz.com	
FRS Number:	110071950612	
Identification/Permit Number:	TXU009130	
NAICS:	221320	
SIC:	4952	

Personnel participating in inspection:

Name	Affiliation	Title	Email
Larry Busch	City of Schertz	Public Works Director	lbusch@schertz.com
Katie Overstreet	San Antonio River Authority	Utilities Manager	koverstreet@sariverauthority.org
Desiree Johnson	City of Schertz	Admin. Manager	djohnson@schertz.com
Zachary Eaton	City of Schertz	W/WW Superintendent	zeaton@schertz.com
Nick Ferris	City of Schertz	Public Works Official	nferris@schertz.com
Jerad Moheit	City of Schertz	Public Works Official	jmoheit@schertz.com
Damon McElroy	EPA Region 6	EPA Inspector	mcelroy.damon@epa.gov

EPA Lead Inspector Signature/Date	McElroy, Damon Digitally signed by McElroy, Damon Date: 2025.06.30 15:10:23 -05'00'	
	{Inspector name}	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2025.06.30 16:49:46 -05'00'	
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Damon McElroy arrived at the City of Schertz Public Works Building at approximately 9:00 am on June 3, 2025, for an announced inspection. I (Damon McElroy) met with the city officials and San Antonio River Authority (SARA) representative specified above and listed in the Appendix 2 Sign-in Sheet. I presented my federal credential identification at 1:52 PM in an email to the city and SARA participants. I informed the group this was an EPA inspection to determine compliance with the Clean Water Act regarding sanitary sewer overflows (SSO) from the wastewater collection system. The scope of the inspection is a compliance evaluation to determine if the city's sanitary sewer collection system capacity, management, operations, and maintenance (CMOM) is sufficient to prevent SSOs.

FACILITY DESCRIPTION

The City of Schertz serves approximately 42,000 citizens over a 32.3 sq. mile area through 15,054 residential service connections, 926 commercial connections, and 3 industrial connections. Any septic systems are the county's responsibility and are not tracked by the city. The 192 miles of gravity collection system is estimated to be comprised of pipe as sown in the below Table 1:

Table 1:

Pipe Material	Quantity (Feet)	Quantity (%)
PVC	846,084	83.6%
VC	123,679	12.2%
HDPE	29,103	2.9%
DI	10,595	1.0%
A/C	3,051	0.3%

The Schertz Utility Operations Division is responsible for the construction, maintenance, and capital improvement of the city's wastewater infrastructure. This division cleans and maintains the city's wastewater mains and 17 active lift stations (LS). It also responds to clogged sanitary sewer lines, emergency overflows and LS repairs. The collection system directs most of its sanitary sewer flow under contract for treatment to the Cibolo Creek Municipal Authority Regional WWTP (CCMA) (Permit #: TX0077232), with a minor portion of sewerage (about 175 service connections) being transmitted to San Antonio River Authority's Salatrillo WWTP (SARA) (Permit: TX0053074).

Section II – OBSERVATIONS

- The city was noted to implement adequate safety protocol and training resources for its crews. The city provides training including WW operator certification program requiring a Texas Commission of Environmental Quality (TCEQ) wastewater (WW) collection certification of at least Class I, as well as In-house technical and daily safety training.

- The city implements a working site map of the wastewater system assets including alignments and MH (manhole) locations on a GIS (Geographic Information Systems) coordinate system.

- The primary cause of SSOs is described as FOG (fats, oils, and grease) blockage followed by construction accidents. Roots are not a known cause of sewer main blockages or SSOs but do contribute to customer lateral issues. The city was observed to not track SSOs or recurring SSOs.

- MH Smart Covers are used to monitor and capture I&I (inflow and infiltration) data.

- Wet weather infiltration during rain events remains a concern, especially at PVC joints, which may shift over time.

- Additional planning resources in use:

    - Utility Master plan
    - Wastewater Hydraulic capacity analysis
    - Impact fee studies
    - Ongoing work to add expansion into new areas ensuring adequate capacity

- The Town owns and operates line cleaning equipment including a jet truck for small diameter lines which is used to jet-clean the City's SS system at the goal of 25% per year.

- There are no odor issues in the city and no sewer related odor complaints identified to be reported from city residents.

- The city reported that it is in the process this calendar year of installing a proprietary electronic work order management system that should enable future wastewater O&M management, invoice management, SSO recovery and response, and general utility reporting and tracking.

- The city currently implements a handwritten work order management system inadequate for SSO tracking, asset management, or other similar efficient O&M features.

- Schertz has adequate ordinance and a program outlining sewer discharge requirements including FOG (fats, oils, and grease) grease trap requirements for non- residential developments, restaurant or equivalent inspections, service lateral responsibility, and maintenance protocol as implemented by the Schertz Code Enforcement Team.

- The city reports sufficient hydraulic capacity for current conditions and future growth to prevent SSOs. Projected capacity at CCMA and SARA WWTPs is also accounted for as adequate to prevent any hydraulic issues, both current and future that may lead to SSOs.

- Of the 19 public utility employes, there are 11 wastewater "level I" operators and four wastewater "level II" operators. The 19 employees split their working duties between drinking water and wastewater O&M as well as other city tasks such as grass mowing, etc.

- Wastewater collection system O&M activities are required to be supervised and inspected daily by an on-site licensed wastewater operator. The minimum Schertz supervisory operator licence requirement is wastewater Class III (since the daily average wastewater flow is over 1 MGD); reference 30 TAC, Chapter 30, Subchapter J [Section 30.350 (n)].

- The city responds to emergency calls via a call center or direct dispatch during business hours. Citizens may also lodge an inquiry through the 311-call system. The Schertz 311 Call Center operates 24/7 and is staffed by Customer Service Representatives who are trained to receive calls from residents to report issues and request city services. City wastewater officials are in turn available 24 hours a day to respond to emergency utility events including SSOs.

Lift station maintenance: the City of Schertz owns and operates 17 working LSs and four out-of-service LSs indicated in Table A below. 13 of the working LSs are monitored by SCADA (supervisory control and data acquisition system) for power, communications, pump failures, and wet-well level and are inspected and maintained at least three days per week. The four LS without SCADA are inspected by city staff daily for operations and repaired as needed. A general LS maintenance logbook is kept at the Public Works main building documenting LS O&M activities. I physically inspected six LSs (two without SCADA and four with SCADA). The inside of the six inspected LSs, or the wet well area, was observed to have excessive floating grease and debris (see Photo 6 in Appendix 1 as an example). In case of a power outage, lift stations without on-site backup power have electrical connection means and access to a portable generator or a mobile by-pass pump as applicable.

Table 2: Schertz Lift Station Summary Table:

ID No.	LS Name	Address	SCADA	Onsite Generator
1	Bussey Flea Market	18726 IH 35N	N	N
2	Park Lift Station	65 Poplar Ave.	N	N
3	Schertz Pkwy	1159 Schertz Pkwy	N	N
4	Smoke Pit	858 FM 78 by Ditch Next	N	N
5	Belmont Park #2	218 Cabot Ct.	Y	N
6	Corbett	12000 Ray D. Corbett	Y	N
7	Covers Cove	6001 Covers Cove	Y	N
8	Cypress Point	6021 Cypress Pt.	Y	Y
9	Friesenhahn	441 Friesenhan Lane	Y	Y

ID No.	LS Name	Address	SCADA	Onsite Generator
10	Riata	19550 IH 35 N.	Y	N
11	Scenic Hills	5780 Maxfil	Y	N
12	Town Creek GBRA	22330 IH 35 North	Y	Y
13	Tri-County	7303 FM 3009	Y	Y
14	Homestead Lift Station	1450 Schwab Rd.	Y	Y
15	Parklands Lift Station	5118 Parklands Way	Y	Y
16	Woman Hollering Lift Station	I-10	Y	Y
17	Saddle Brook Lift Station	Lower Seguin Rd.	Y	Y
18	Elbel	1170 Elbell Rd.	Not in service.	
19	Northcliffe	3510 Whisper Branch		
20	Sedona	8217 E. FM 1518		
21	Woman Hollering WWTP	8705 Greaves Lane		

SSO analysis: Table 3 shows that over the past three years, four SSOs were reported totaling 32,465 gallons.

Table 3: City of Schertz SSOs Reported past three years from April 20, 2022, to Current

ID	Date Started	Location	Type of Overflow	Volume of Overflow (Gallons)	SSO Impact	Description
1	6/11/24	FM at 24550 N I-35 Frontage Rd.	Force Main Crack	800	Puddle on Ground	FM leak drained 160 ft. to low lying area
2	1/30/24	LS to MH 8217 E. FM 1518	LS to MH	24,065	Through pasture to creek	Sedona LS stopped caused MH SSO
3	6/21/23	17051 IH-35 North	MH Blockage	4,000	MH to drainage culverts	MH SSO due to Grease & debris blockage
4	4/20/22	17605 N. I-35 Frontage Rd.	Grease Blockage	3,600	Drainage culvert	Grease blockage SSO to culvert only
Total = 4 SSOs at 32,465 gallons						

Based on a SSO workorder analysis there is insufficient data in the current hand-written work-order system for a SSO examination or to compare customer complaints.

Section III – AREAS OF CONCERN

a. The city needs to implement an adequate work order management system for sufficient O&M.

b. The city needs to verify that LS wet wells are kept clean and free from excessive grease and debris.

c. The city needs to confirm that is has secured the minimum TCEQ operator licence requirement.

d. The city needs to confirm it has sufficient sanitary sewer system Standard Operational Procedures for critical processes.

Section IV – Recommendations

a. Preparation of a formal CMOM (capacity, management, operations, and maintenance) program to reduce future SSO occurrence. Further CMOM information may be obtained in the EPA "Guide for Evaluating CMOM programs at Sanitary Sewer Collection Systems" located at this web-address: https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos.

b. Preparation of a written SOP to adequately reduce wet weather infiltration through continued pipe and MH assessment and remediation.

c. Preparation of and implementation of a formal asset management program for enhanced O&M.

Section V – FOLLOW UP

The following information was received by EPA on June 12, 2025:

1. A list of all lift stations, including SCADA or alarm systems identification.
2. SSO reports for the past three years.
3. Citizen complaints for the past three years.

Section VI – LIST OF APPENDICES

Appendix 1 – Photo Log – 6 photos taken 6/3/2025

Appendix 2 – Opening conference sign-in sheet