EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	August 24, 2023		
Media:	Sanitary Sewer Overflow Initiative Inspection		
Regulatory Program(s)	NPDES		
Utility Name:	**Balch Springs**		
Facility inspected:	**City of Balch Springs, City Hall**		
Facility Physical Location:	13503 Alexander Rd		
(city, state, zip code)	Balch Springs, TX, 75181		
Mailing address:	13503 Alexander Rd		
(city, state, zip code)	Balch Springs, TX, 75181		
County/Parish:	Dallas County		
Facility Contact:	Brad Harris	Field Operations Manager	
	bharris@cityofbalchsprings.com		
FRS Number:	110070947872		
Identification/Permit Number:	TXU011265		
NAICS:			
SIC:	4952		
Personnel participating in inspection:			
Rachel Matthews	EPA R6 (ECDWM)	Inspector	214-665-8589
Tony Loston	EPA R6 (ECDWM)	Inspector	214-665-3109
David Montoya Jr	EPA R6 (ECDWM)	Inspector	214-665-6478
Brad Harris	Balch Springs	Field Operations Manager	972-286-4477 x232
William Freeman	Balch Springs	Director of Public Works	972-286-4477 x207
EPA Lead Inspector Signature/Date	RACHEL MATTHEWS Digitally signed by RACHEL MATTHEWS Date: 2023.09.06 10:56:21 -05'00'		
	Rachel Matthews		Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.09.06 11:48:29 -05'00'		
	Roberto Bernier		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors, Rachel Matthews, Tony Loston, and David Montoya Jr., arrived at Balch Springs' City Hall at 0900 on August 24, 2023, for an announced Sanitary Sewer Overflow Initiative Inspection. We met with Mr. Brad Harris, the Field Operations Manager, as well as Mr. William Freeman, the Director of Public Works. We presented credentials and informed them this was an EPA evaluation to determine compliance with the Clean Water Act regarding sanitary sewer overflows from the sanitary sewer collection system.

FACILITY DESCRIPTION

The city of Balch Springs serves a growing population of approximately 27,160. The 2010 Census population was around 23,700. Balch Springs' older sanitary sewer system consists primarily of clay and iron pipes, (an estimate) over 900 manholes that are primarily brick, and 4 lift stations. Most manholes are made of brick.

Section II - OBSERVATIONS

Currently the city's public works department is understaffed by approximately 9 full time employees.

The collection system has been mapped in GIS and communicates with the city's, iWorQ program, a public works, web based, software system used to generate and track work orders. This program replaced the city's paper system around 2018. However, the city does not have a comprehensive Asset Management Program. Instead, assets are managed through the city's finance system. Anything over $5,000, is considered an asset and inventoried annually. There is currently no system in place to ensure parts, pumps, valves, etc. are timely maintained and/or tracked for expected lifetime and need of replacement. City staff do keep some basic essentials on-hand in case of failures and work as proactively as they can considering the lack of manpower.

EPA inspected the Alexander Lift Station. The site was well maintained and secured with adequate fencing and locks. However, there was no signage with emergency contact information. The visual and audio alarm systems were working at the time of the inspection, and it was explained that all lift stations have visual and audible alarms. There is no on-site emergency back-up power at the lift stations. However, the city has a portable generator on standby in addition to the ability to connect an emergency bypass pump if/when necessary. In the event of power failure, staff is alerted by the SCADA system.

The city uses a lift station checklist that is completed during daily walkthroughs at each site. Everything else is checked by their Supervisory Control and Data Acquisition (SCADA) system. SCADA was installed in 2005 and the city has plans for an update. In addition, the current "hot spot" list includes ten (10) sites that are checked daily. The "hot spot" check list is updated as old pipe is replaced in those areas.

The city has committed to replacing all the old clay and iron sewer lines; and since 2010, the city has implemented a pipe bursting program which has resulted in over 60% of old lines being replaced. Any lines between 6-8 inches are replaced with High Density Polyethylene (HDPE) pipe. The replacement of lines above 8 inches are based on needs.

The city no longer has a proactive program to assess manholes or lateral line problems for Inflow and Infiltration (I&I). A separate, and dedicated, department used to assess for I&I. However, due to reorganization, that department no longer exists. Manhole and lateral assessments are now based on necessity only. The city does perform its own cleaning and root control programs for most of the pipelines and hires the services out for the main lines.

When private lateral SSOs do occur, city staff will clean out the lateral for the owner at first. But, if the problem persists and the owner does not correct the problem, a violation of illicit discharge is issued. If the problem is still not corrected, the violations is followed by a court summons. And, if necessary, the city has shut off water supply when an overflowing private lateral is not addressed.

The city reported a total of 4 manhole overflows in separate locations since 2022. The city has targeted these manholes for replacement. During the week of August 13, 2023, Balch Springs had a significant SSO which resulted in a fish kill. The City of Dallas aided in the remediation and conducted sampling and a fish kill survey.

Balch Springs is currently under the City of Dallas' Fats, Oils, & Grease (FOG) program, and uses Chapters 49 & 19 of the City of Dallas' ordinance to address illicit discharges.

The city has a 5-year Capital Improvement Plan (CIP) with an annual budget of $500,000 for pipe bursting/replacement. In addition, the Water & Wastewater Master Plan is currently being updated. The plan will address all future capacity and is on a 10-year track with expectations the city will be built out within this time. The last plan was updated in 2012.

Section III – AREAS OF CONCERN and/or RECOMMENDATIONS

To ensure long-term sustainable Operation & Maintenance of the sanitary sewer collection system, it is recommended the city incorporate the following:

1. Retain up-to-date physical copies of Standard Operating Procedures (SOPs) for all employees,
2. Finish the draft SSO Response Plan,
3. Continue with upgrades to remaining insufficient piping, and
4. Ensure all lift stations have signage with emergency contact information.

Section IV – FOLLOW-UP

EPA requested the following be submitted electronically at the end of the inspection:

1. Lift Station Checklist,
2. Hot Spot Checklist, and
3. TCEQ Agreement under the it's sanitary sewer overflow initiative.

On August 28, 2023, EPA received the requested Lift Station and Hot Spot Checklist.

On August 31, 2023, EPA received the TCEQ Agreement regarding SSOs. This agreement was signed in 2006 and has since expired. It was originally made between TCEQ and the Dallas County Water Control and Improvement District No. 6 (District). The District merged with the City of Balch Springs and the city is currently working with TCEQ on a new SSO Agreement.

Section V – ATTACHMENTS

No attachments in this report.