

**Region 6 Enforcement & Compliance Assurance Division
INSPECTION REPORT**

Inspection Date(s):	March 20, 2024		
Media:	Sanitary Sewer Overflow Initiative Inspection		
Regulatory Program(s)	NPDES		
Utility Name:	City of Hewitt		
Facility inspected:	City of Hewitt		
Facility Physical Location:	3200 Patriot Court		
(city, state, zip code)	Hewitt, TX 76643		
Mailing address:	3200 Patriot Court		
(city, state, zip code)	Hewitt, TX 76643		
County/Parish:			
Facility Contact:	Kevin Reinke	254-666-3151	
	kreinke@cityofhewitt.com		
FRS Number:	110010935015		
Identification/Permit Number:	TXU000104		
Media Identifier Number			
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
Kevin Reinke	City of Hewitt	Utilities Director	254-666-3151
Ryan Bell	City of Hewitt	Utilities Operations Manager	254-666-3151
EPA Lead Inspector Signature/Date	RACHEL MATTHEWS Digitally signed by RACHEL MATTHEWS Date: 2024.04.01 12:34:10 -05'00'		
	Rachel Matthews		Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2024.04.01 13:11:48 -05'00'		
	Roberto Bernier		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors, Rachel Matthews and Tony Loston, arrived at The City of Hewitt at 0900 on March 20, 2024, for an announced Sanitary Sewer Overflow Initiative Inspection. We met with Mr. Kevin Reinke, the Utilities Director and Mr. Ryan Bell, the Utilities Operations Manager. 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 Hewitt serves a population of approximately 16,452 with 5,589 connections. This includes 255 commercial connections and no industrial facilities. Hewitt's sanitary sewer system was built in the 80's and consists of about 89 miles of primarily PVC pipe, with less than 1% clay or ductile iron. There are five lift stations. All are connected to Supervisory Control and Data Acquisition (SCADA) system. There are 4 septic systems that will be connected to sewer when available.

All areas that have sewer lines are connected and routed through the collection system to one of two wastewater treatment facilities (Bullhide Creek or Central) owned and operated by the City of Waco.

Section II – OBSERVATIONS/INTERVIEWS

Prior to the meeting, the city sent an electronic questionnaire with some information requested ahead of time.

The city's utilities department is staffed with 8 full-time employees. The staff manage the sanitary sewer collection system, the drinking water distribution, grounds, and utility billing. Staffing is currently appropriate according to the director.

The city reported an overflow the day before the inspection. The overflow was approximately 25,000 gallons from a lift station. Prior to that, only 4 SSOs were reported in 2019. It was explained that some discussion was ongoing with Texas Commission on Environmental Commission (TCEQ) regarding what must be reported. City staff were confused, in part, due to the TCEQ reporting form that includes reporting for other non-compliance. There was also confusion regarding what types of SSOs need to be reported.

The city does not have a comprehensive work order system connected to GIS mapping and/or incorporating an asset management plan. The city does use a combination of 2 electronic systems for calls/complaints and record keeping. During normal work hours, the billing system (STW Software) is used to log the calls, while records are maintained through the Intellix software system. In regard to mapping, the city does have both paper and GIS mapping in general. The online GIS maps show the manholes with some information regarding each.

The city contracted an Inflow and Infiltration (I&I) study in 2020. In 2023, CCTV inspections were also completed for areas considered severe per NASSCO ratings. The city conducts (in-house) smoke testing as needed. The assets are still relatively "young" (99% PVC pipe) and not showing a lot of issues at this time. Staff explained that while there are no issues with the clay pipe it is earmarked to get replaced. The soils in the area are fairly shallow, with stable rock underneath. The clay pipe has been stable since it was placed. According to staff, the main issue with I&I has been from missing clean out caps on private laterals during rain events, at times finding that homeowners used the clean outs to drain standing water. While private laterals have not been a major problem, when there is a back-up, the city will respond to the first call by cleaning (jetting) and camera inspection out of courtesy to find the problem. However, if

there are any continued overflows, and the owner does not correct the problem, the city can enforce the ordinance (under Chapter 78 Utilities, Article III Wastewater) to correct the problem.

The city budgets approximately \$50,000 annually for manhole seal coating and has other line items for cleaning of main lines inspections. Repairs and rehabilitation project plans are developed and ran by the finance department before bringing to council for approval. While asked, no formal Capital Improvement Plan was offered during the inspection, but instead was explained that if the finance department can show the work is feasible the council has always approved. According to staff, the water/wastewater rates meet the needs of operation & maintenance requirements and council does raise rates if necessary as they prefer not to issue bonds for such projects.

While there are about 40 restaurants, 3 nursing homes, and a few other institutions with kitchens, grease has not been a problem. The city follows the Waco FOG program, which is extensive throughout all subscriber cities. According to the city website, there are several drop off locations to recycle left over cooking oil and grease. There are 2-4 dentists that have pretreatment requirements under the City of Waco program for the wastewater facilities.

The city has 5 lift stations, 3 have generators. Two of the lift stations were inspected by EPA: one serves the area at Walmart off the highway, and one serves 16 homes that pumps 200 yards to get to gravity flow. Neither have showed historical problems according to staff. All have flashing red lights but no audible alarms and all are connected to SCADA that call out alarms to cell phones. During the inspection, the city tested the high-level alarm at lift station # 2-8. While SCADA called out an alarm, the light did not work. Daily checks are conducted for general performance and pump run times. The floats are cleaned once a month while generators are checked quarterly. A local generator shop provides maintenance to the generators. There is one spare pump on hand if needed,

Section III – AREAS OF CONCERN and/or RECOMMENDATIONS

There were no major areas of concern at the time of the closing meeting. The following are some recommendations:

1. Retain up-to-date physical copies of Standard Operating Procedures (SOPs) for all employees,
2. Incorporate an inspection checklist for all areas of lift station inspections,
3. Ensure all visual alarms are working at the lift stations,
4. Add visual alarm test to checks for lift stations,
5. Ensure emergency contact information signage is visible to public at all lift stations.

Section IV – ATTACHMENTS

No attachments in this report.