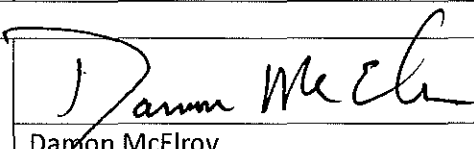
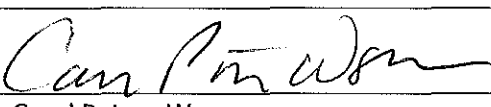


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	April 11, 2018		
Media:	Municipal Wastewater		
Regulatory Program(s)	NPDES		
Utility Name:	Haslet, City of		
Facility inspected:	Wastewater Collection System		
Facility Physical Location:	City Hall and Utility Shop via 101 Main Street		
(city, state, zip code)	Haslet, TX 76052		
Mailing address:	City of Haslet, 101 Main Street		
(city, state, zip code)	Haslet, TX 76052		
County/Parish:	Denton and Tarrant		
Facility Contact:	David Rogers	Public Works Director	
	817-307-0263		
FRS Number:	110010934533		
Identification/Permit Number:	TXU000160		
NAICS:	22132		
SIC:	4952		
Personnel participating in inspection:			
David Rogers	City of Haslet	Public Works Director	817-307-0263
James Tucker	City of Haslet	Water/Wastewater Operator	817-829-4415
Damon McElroy	Region 6 EPA (6EN-WM)	Environmental Engineer & 6EN-WM Enforcement Officer	214-665-7159
EPA Lead Inspector Signature/Date	 Damon McElroy		5/7/2018 Date
Supervisor Signature/Date	 Carol Peters-Wagnon		5/8/18 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Damon McElroy arrived at Haslet City Hall at 8:45 am on April 11, 2018, for an announced Compliance Evaluation Inspection. I met with the City's wastewater utility officials illustrated by the inspection sign-in sheet in Appendix 1. I presented my 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 Sanitary Sewer Overflow (SSO) mitigation activities; as well as SSO reporting according to Federal and 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 examined the City of Haslet's (or City) sanitary sewer collection system, following EPA's National SSO Initiative, in CWA accordance. For further SSO initiative information you may reference the web link: <https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos>. The inspection scope is to generally evaluate the municipalities that receive Trinity River Authority (TRA) wastewater treatment contractual services in order to assist in stopping unauthorized / unpermitted discharges (or SSOs) and encourage sustainability. 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 DCWWS 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

The City's WW utility serves over 1,500 residents via about 240 residential service connections, 193 septic systems, and 98 commercial connections; covering 8.2 square miles. The City's collection system consists of about 17.3 miles of WW gravity mains, zero lift stations, and "primarily" concrete manholes. The sewer mains are comprised of 99% PVC (that is between 5 to 20 years old) and about 1% vitrified clay (VC) pipe.

The Public Works Department employees two fulltime City officials (one utility director and one operator indicated in the sign-in sheet in Appendix 1, that split O&M activities between drinking water (purchased from Fort Worth) and Wastewater O&M activities. The City's sanitary sewage is transmitted to the TRA Denton Creek Regional Wastewater System (DCRWWS – Permit No.: TX0104957) for contractual wastewater treatment.

Section II - OBSERVATIONS

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

- Reportedly, an I/I and CCTV analysis was performed approximately 20 years ago that led to the City's Sewer Master Plan and resultant PVC replacement of existing VC with increased line sizing and capacity.
- Collection system capacity was increased or upsized based on the estimated 'ultimate' growth flowrates.
- The City has adequate capacity during wet weather.
- CMOM activities were explained to consist of the following:
 1. Clean - via trailer mounted jet - about 33% of the WW mains each year.
 2. Conduct inspection and preventative maintenance (i.e. jet cleaning) of collection system areas known to have operational problems (such as sagged or flat sewer lines).
 3. Replace and upsize the existing VC gravity system.
- The City reported one sewer overflow in the past five years as documented in Appendix 2.
- The City uses the TCEQ Regulatory Guidance "RG-395" for unauthorized discharges and sanitary sewer overflows, revised September 2016. The RG-295 web-address is located here:
https://www.tceq.texas.gov/assets/public/comm_exec/pubs/rg/rg-395.pdf
- The City's sewer overflow SOP (standard operational procedure) is described as follows:
 1. Determine sewer overflow source and call for additional contractual personnel and support as needed.
 2. Stop or reduce the source of the sewer outflow.
 3. Contain the spill; use sand bags, booms, pillows or earthen dams.
 4. Return the spill to the sewer collection system; use a spoil vacuum trailer or trash pump to mop up as much of the spill as possible and dispose of in manhole SH-10 (located at 790 School House Road).
 5. Treat and disinfect the affected area; use concentrated enzymes and calcium hypochlorite (HTH or chlorine) mix with water if necessary.
 6. Assess any threat to human health and the environment and take laboratory samples as needed.
 7. Submit Water Quality Non Compliance Notification form to TCEQ according to RG-395.
 8. Make any needed repairs.
 9. Evaluate possible ways to prevent future outflows.
- If a SSO reaches a waterway, public works does not notify the Texas Parks and Wildlife or the City code enforcement department or any MS4 team.
- Customer inquiries are handled at the call center located at City Hall, 101 Main Street.
- Public Works operates 40 hours per week during "normal" working hours (i.e. Monday through Friday, from about 8:00 a.m. to 5:00 p.m.).

- Utility related phone inquiries and emergencies that occur after the 40-hour work week are routed to the City's utility director and the utility operator's cell phone automatically - from the call center's phone.
- The City does not participate in the TCEQ Sanitary Sewer Overflow Initiative (SSOI).
- O&M is funded annually as part of the water and sewer budget.
- Water rates are adjusted as needed to cover WW utility costs.
- I/I reportedly occur primarily from "older" manholes.
- City operator(s) are TCEQ certified and receive adequate training.
- The City was observed to not implement a fat, oils and grease (FOG) program.
- The City was observed to not have a root-control program.
- The City does not have a formal program to stop private or subscriber sewer overflows.
- There is no City ordinance granting authority to take appropriate action to stop private or subscriber sewer overflows or implement a FOG program (i.e. right of entry, enforcement, and inspection authority).
- The City does not document, analyze and map repeat problem areas or hot spots.
- The City purchased a GIS system that is to be populated with WW utility assets in the future.
- The City intends to conduct a collection system condition assessment in the future, including for PVC pipelines over ten years old and manholes.
- The City has plans to install additional lines to unserved or underserved areas including to replace septic systems with a gravity sanitary sewer system.
- The City has not implemented a formal capacity, management, operation and maintenance (CMOM) program.
- The City does not utilize a work order management system.
- Wastewater customer inquiries or work orders could not be obtained or compared to reported SSOs to identify non-reported SSOs.
- The City does not implement an asset management plan.
- The City indicated it has adequate capital improvement resources for wastewater utility O&M.
- The City reported that it has adequate resources for an intended future condition assessment.
- There are no categorical industries in the City.

Section III – AREAS OF CONCERN

The City of Haslet utility department will best serve Haslet's customers by addressing the following:

1. The City utility needs a FOG Program.
2. The City needs a program to mitigate private or subscriber sewer overflows.
3. The City needs ordinances (i.e. right of entry, enforcement, and inspection authority) to implement a FOG program and a private sewer overflow mitigation program.
4. The City needs to implement a Work Order Management System to track and identify problem areas.

5. The City needs to track and analyze WW relevant customer inquiries to prevent SSOs.
6. The City further needs to document, analyze, and map repeat problem areas or hot spots.
7. Updated O & M related SOPs need to be made available for utility staff.

Section IV – RECOMMENDATIONS AND SUGGESTIONS

RECOMMENDATIONS

1. The City needs a formal capacity, management, operation and maintenance (CMOM) program.
2. If a SSO reaches a waterway, the City needs to notify and work with the:
 - a. The Code enforcement group,
 - b. The Texas Parks and Wildlife department, and
 - c. Any Municipal Separate Storm Sewer System (MS4) permit program team as appropriate.
3. The City needs a root-control program.
4. The City should implement a formal asset management process. An active asset management plan will support the City to manage and operate utility assets at a lowered cost as well as judiciously identify critical infrastructure rehabilitation or replacement projects.

SUGGESTIONS

- The City would benefit by participating in the TCEQ Sanitary Sewer Overflow Initiative (SSOi) (more SSOi information is available via the web-address:
<https://www.tceq.texas.gov/compliance/investigation/ssoinitiative>)

Section V – FOLLOW UP

No information was received by EPA after exiting the Facility on April 11, 2018.

Section VI – LIST OF APPENDICES

Appendix 1 – Opening Conference Sign-In Sheet.

Appendix 2 – Reported SSOs (one in the last five calendar years).

Appendix 1

Sign in Sheet



United States Environmental Protection Agency
Region 6 – Water Enforcement Branch
1445 Ross Avenue, Suite 1200



DATE: April 11, 2018
TIME: 8:45 am
SUBJECT: City of Haslet Collection System and Wastewater Utility
Compliance Evaluation Inspection

MEETING ATTENDEES

NAME	ORGANIZATION	PHONE	EMAIL
David Rogers	City of Haslet	817-307-0263 alt 817-439-5931 alt.	d.rogers@haslet.org
James Tucker	City of Haslet	817-827-4415	jtucker@haslet.org
Damon Muehlrooy	EPA R6	214-665-7159	muehlrooy.damon@epa.gov

Appendix 2
SSO Noncompliance Report (One)
(For the Past Five Calendar Years)



Accidental Discharge or Spill Monthly Summary Form

See back of form for guidance for completion

General Information:

Permittee: ☐

Regulated Entity Name: Town of Westlake

Regulated Entity No: 101272979

Permit No: N/A

Subscriber: ☒

EPA ID No: N/A

TCEQ Region: Region 4 - DFW

County: Tarrant

Start Date Start Time	End Date End Time	Volume (gallons)	Location	Cause	Steps taken to reduce, eliminate, and prevent recurrence	Description/Content	Standard Method for Volume Calculation
7/31/2017 7:30 a.m.	7/31/2017 9:30 a.m.	400	Arta Drive & Girona Drive intersection	Developer/Contractor construction activities caused over flow	Construction inspector to inspect plug insertion prior to contractor work.	Inflatable plug installed by the development contractor dislodged and blocked flow. Discharge was contained on site.	Domestic metered usage from hourly web based meter reading system and field estimation.

Information Reported by (Name/Title) Jarrod Greenwood
Public Works Director

Date Reported 8/1/2017

Signature: Jarrod Greenwood

TCEQ-20756 (06-27-16)

Note: A copy of this form should be sent to your TCEQ Regional Office no later than the 20th day of the following month and the original to the TCEQ Compliance Monitoring Team (MC224), Enforcement Division, P.O. Box 13087, Austin, TX 78711-3087

*If the accidental spill or discharge occurs at a Subscriber system (collection system only), use the RN associated to the collection system. If you are uncertain of your RN, you may call the TCEQ Regional Office for assistance.