

Region 6 Enforcement & Compliance Assurance Division INSPECTION REPORT

Inspection Date(s):	March 21, 2024		
Media:	Sanitary Sewer Overflow Initiative Inspection		
Regulatory Program(s)	NPDES		
Utility Name:	City of Lorena		
Facility inspected:	City of Lorena		
Facility Physical Location:	Citywide		
(city, state, zip code)	Lorena, TX 76643		
Mailing address:	107-A South Frontage Road		
(city, state, zip code)	Lorena, TX 76643		
County/Parish:	McClennan		
Facility Contact:	Kyler Jones	Public Works Director	
	254-857-4641 kjones@lorenatx.gov		
FRS Number:			
Identification/Permit Number:	TXU009109		
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
Kyler Jones	City of Lorena	Public Works Director	254-857-4641
EPA Lead Inspector Signature/Date			
	Rachel Matthews		Date
Supervisor Signature/Date			
	Roberto Bernier		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors, Rachel Matthews and Tony Loston, arrived at The City of Lorena at 0900 on March 21, 2024, for an announced Sanitary Sewer Overflow Initiative Inspection. We met with Mr. Kyler Jones, the Public Works Director. We presented credentials and informed him 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 Lorena serves a population of approximately 1,791 with 560 connections. This includes 53 commercial connections. Lorena's sanitary sewer system consists of about 22 miles of primarily PVC pipe, with about 10% vitrified clay, mostly in the oldest parts of downtown. The mainline in downtown was replaced in 2018. There are five lift stations. Three are connected to Supervisory Control and Data Acquisition (SCADA) system, which alerts the "on call" phone during an emergency.

The sewer collection system is routed to one (of two) wastewater treatment plants (Bullhide Creek) owned and operated by the City of Waco.

Section II – OBSERVATIONS/INTERVIEWS

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

The city's public works department is staffed with two full-time employees. Staffing levels should be about four FTEs. According to the director, job announcements have been open for over two months but at the time of this inspection, there have been no applicants. There is no call center. Most complaints come through an online portal and calls/emergencies are directed to the "on call" phone.

The city has reported only three overflows since the mainline in downtown was replaced in 2018. Two were at the "South Old Temple lift station and the 3rd was a home clean-out. Prior to that, only 4 SSOs were reported in 2019. Since the mainline was replaced, wet weather issues appear not to be a problem.

The city does not have a comprehensive work order system connected to GIS mapping. The city does use Incode for preparing work orders but has to print each for processing.

The city performs in-house jetting, smoke testing, and camera inspections as necessary. According to the director, the main issue with any inflow/infiltration (I&I) was with the old downtown mainline and the occasional private lateral. While private laterals have not been a major problem, when there is a back-up, the city will respond with a camera inspection out of courtesy to find the problem. However, if there are continued overflows and the owner does not correct the problem, the city can enforce by issuing a ticket for a court hearing. The city has the authority to disconnect water supply if necessary.

The city's annual utility fund meets the general needs of the department. However, a rate study is being completed to ensure the rates are at an appropriate level going forward. Currently, the wastewater rates are a base flat fee of \$50.05 monthly and a volumetric rate of \$5.87 per 1000 gallons additional for both residential and commercial. There is no formal approach to capital improvement planning.

The city follows the Waco Fats, Oils, & Grease (FOG) program, which is extensive throughout all subscriber cities. Still, the city mentioned that FOG is not an issue in Lorena.

The city has 5 lift stations and 2 have generators. The generators are checked weekly, and each lift station is vac-trucked annually. There are daily walkthroughs at each lift station to check pump run times. Other than weekly checks and some basic in-house upkeep, generator maintenance is completed by a local trucking company that maintains diesel engines. EPA inspected the Old South Temple lift station. This lift station is located between a road and a creek, with no space for a generator or bypass. This location is also not on SCADA but does have an onsite emergency audible and visual alarm system. It has had problems related to power outages and with the electricity service provider not receiving the correct information to address power issues. Oncor is actively upgrading a substation about a mile down the road, which is supposed to ensure better reliable electricity to the area and more reliable data sent to Oncor when there is a problem. During the inspection, EPA did note some erosion from the lift station down the stream bank that was apparent.

Although a route book is used to keep track of daily inspections, there are no written standard operating procedures (SOPs) for lift station inspections, nor written SOPs for overflow responses and, clean-ups.

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 SOPs for all current and future employees,
2. Ensure all visual/audible alarms are working at the lift stations, and include as a weekly or monthly test,
3. Incorporate an inspection checklist for all areas of lift station inspections and testing,
4. Ensure emergency contact information signage is visible to public at all lift stations,
5. Begin regular monitoring of erosion at the “Old South Temple” lift station, including measurements and pictures of eroded area. Research and prepare for steps to be taken to ensure an unfortunate event is prevented.

Section IV – ATTACHMENTS

No attachments in this report.