

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	8/10/2023	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	Town of Highland Park	
Facility Name:	Wastewater Utility Department	
Facility Physical Location:	Highland Park, Utility Service Center, 5005 Holland Ave.	
(city, state, zip code)	Dallas, TX 75209	
Mailing address:	4700 Drexel Drive	
(city, state, zip code)	Highland Park, Texas 75205	
County:	Dallas	
Facility Phone Number	214-521-4161	
Facility Contact:	Stephen Davis	Public Works Superintendent
	sdavis@hptx.org	
FRS Number:	110010935140	
Permit Number:	TXU000120	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Stephen Davis	Town of Highland Park	Public Works Superintendent
Alan Vaughn	EPA Region 6	Enforcement Officer
Damon McElroy	EPA Region 6	Enforcement Officer
EPA Lead Inspector Signature/Date	 Digitally signed by McElroy, Damon Date: 2023.08.25 15:38:27 -05'00'	
	Damon McElroy	Date
Supervisor Signature/Date	 Digitally signed by ROBERTO BERNIER Date: 2023.08.28 10:05:27 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Alan Vaughn and Damon McElroy arrived at the Town of Highland Park Public Works office at about 9:00 am on August 10, 2023, for an announced inspection. We (EPA inspectors) met with the city official indicted above and illustrated in the Appendix 1 sign-in-sheet. We presented our federal credential identifications. I (Damon McElroy) 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 operations and maintenance is sufficient to prevent SSOs.

FACILITY DESCRIPTION

The Town of Highland Park (HP) serves approximately 8,900 people through 3,012 residential, 88 commercial, two industrial, and 37 multifamily service connections. The Town's collection system is comprised of gravity sanitary sewer pipes ranging in size from 6-inch to 30-inch. The Town discharges its sanitary sewage to the Dallas Water Utilities (DWU) Central WWTP. Two basins on the west side of Town, one basin in the northeast part of Town, and the central wastewater basin discharge to Dallas through a HP newly Insituform-CIPP remediated 30-inch SS collector that feeds to a DWU metered point of entry at the lowest point of the collection system at the DWU 30-inch RCP transmission line, as shown in the Appendix 2, Photo 2. The Town's system also serves as a pass-through for the upstream City of University Park and the Southern Methodist University (SMU). University Park and SMU SS (sanitary sewer) flows are conveyed through the Town's central basin system and discharged to the metered discharge point to DWU. The gravity mains are comprised of the following:

Highland Park SS Pipe Material Estimate Table:

Pipe Material	Approx. Composition (%)
VC	20
PVC	26
RCP / CIPP	11
HDPE	35
Other	8

SSO analysis: Table B shows that over the past five years, 16 SSOs totaling 146,285 gallons occurred. 14 of these SSOs (88%) at over 245,000 gallons were reported as due to storm events indicating hydraulic capacity and I/I (inflow and infiltration) issues. Failure to prevent SSOs is shown as a public health and environmental issue for the Town. A recurring SSO point was observed as occurring near the collection system hydraulic discharge point and along the Town's 30-inch RCP collector main as it approaches the DWU 30-inch transmission line discharge point. The new HP 30" CIPP SS main mentioned above has alleviated a primary issue of hydraulic capacity and I/I issues in this area. A recurring wet weather SSO challenge for the Town remains from the DWU 30-inch collector reported to cause backflow, due to insufficient hydraulic capacity, into the HP collection system causing back-up related SSOs during storm events.

Table B: Town of Highland Park SSOs Reported from August 2018 to Current

ID	Date Started	Location	Type of Overflow	Volume of Overflow (Gallons)	SSO Impact	Description
1	8/22/2022	MH # 1MH403 at Lomo Alto Dr.	I/I, Storm Event	6,300	DWU Storm Sewer	MH overflow
2	8/22/2022	MH # 1MH359 at Lomo Alto Dr.	I/I, Storm Event	42,000	Turtle Creek	MH overflow
3	2/11/2022	MH # 1MH33 at Douglas Ave.	Grease	520	Turtle Creek	MH overflow
4	2/12/2020	MH # 3MH86 at Douglas Ave.	I/I, Storm Event	9,600	Turtle Creek	MH overflow
5	1/20/2020	MH # 1MH3 at Westside Dr.	Construction	630	Street and curb only (ground)	MH overflow
6	2/12/2020	MH # 3MH30 at Lomo Alto Ave.	I/I, Storm Event	6,240	DWU Storm Sewer	MH overflow
7	1/16/2020	MH # 3MH27 at Lomo Alto Ave.	I/I, Storm Event	4,620	DWU Storm Sewer	MH overflow
8	1/16/2020	MH # 3MH86 at Lakeside Drive.	I/I, Storm Event	24,640	Turtle Creek	MH overflow
9	5/18/2019	MH # 3MH86 at Lakeside Drive.	I/I, Storm Event	13,500	Turtle Creek	MH overflow
10-12	10/16/2018	MH #s ● 3MH30 ● 3MH29 ● 3MH86	I/I, Storm Event	19,650	Storm Sewer or Turtle Creek	Three MH overflows
13-16	10/15/2018	MH #s ● 3MH130 ● 3MH27 ● 3MH283 ● 3MH86	I/I, Storm Event	43,200	Storm Sewer or Turtle Creek	Four MH overflows
Total = 16 SSOs at 146,285 gallons						

Section II - OBSERVATIONS

The Town has reached buildout and has moved away from needing new wastewater infrastructure towards rehabilitating existing infrastructure. HP's goal is to continue to rehabilitate or replace the collection system to prevent failures as well as to reduce capacity constraints on downstream pipes. Repair, maintenance, monitoring, and maintaining proper SS flow within the collection system are the city's responsibility. Wastewater maintenance falls under the City's Public Works (PW) department. Below are Capacity, Management, Operation, and Maintenance (CMOM) program related observations:

- Annual funds are dedicated to replacing existing 6-inch sewer lines with minimum 8-inch sewer lines to improve capacity.
- Annual smoke testing is done on about 10% of its system (or about 25,000 LF of SS mains) annually to identify and address I/I issues.
- Annual CCTV assessment on about 25,000 LF of SS main is conducted based on either smoke test results or for general maintenance.
- The Town 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.
- The Town was noted to implement adequate safety protocol and training resources for its crews.
- The Town offers (year-round) curbside collection and two drop-off events annually and include FOG as a part of the Household Hazardous Waste program.
- WW utility staffing is adequate based on EPA's CMOM guidance manual (reference https://www.epa.gov/sites/default/files/2015-10/documents/cmom_guide_for_collection_systems.pdf)
- The Town has standard operating procedures for responding to SSOs.
- The Town owns and operates line cleaning equipment including a jet truck for small diameter lines (other than 30-inch Turtle Creek Interceptor) which is used to jet-clean the Town's SS system at the goal of 1.5 to twice per year.
- HP visually inspects manholes for condition assessment, repairing any grouting issue and ensuring placement of rain guards to aid in the abatement of infiltration.

- The Town applies root killer regularly in areas of the system with known root intrusion issues.
- The Town uses an enzyme formula to mitigate grease buildup and odors in commercial parts of the Town's SS system.
- HP responds to SS related citizen inquiries through the Customer Relationship Management (CRM) system accessible through the Town's website and over the phone via customer service that generates a work order as needed for response.
- Adequate staff training and certification is established. HP sewer personnel are supported to maintain a Class II sewer collections license.
- The CRM system is currently used to track SSOs though a spreadsheet. The Town has a GIS system in place to map sanitary sewer assets. The town is currently discussing obtaining new asset management software to streamline the W and WW utility program process.
- Adequate utility funds are budgeted annually to account for operations, maintenance, emergency repairs and replacement.
- The homeowner is responsible to maintain lateral lines from the tap in the street ROW to the home.

Section III – AREAS OF CONCERN

The following concern was observed and discussed to stop SSOs:

1. Recurring wet weather SSOs are caused by the DWU 30-inch collector backflow due to insufficient hydraulic capacity.

Section IV – SUGGESTIONS

1. EPA recommends that HP implement a formal asset management program. An active asset management plan will support the Town to manage and operate utility assets at a lowered cost as well as judiciously identify critical infrastructure rehabilitation or replacement projects.
2. EPA suggests that HP may alternatively conduct CCTV analysis after jet cleaning for targeted pipe areas such as VC pipe and areas of the gravity system older than 15 years.
3. EPA suggests HP use the EPA informational resources found on the web-site::
<https://www.epa.gov/npdes/sanitary-sewer-overflow-ssso-additional-resources>

Section V – FOLLOW UP

There was no follow-up after the inspection.

Section V – LIST OF APPENDICES

Appendix 1 – Sign-in Sheet

Appendix 2- Photo Log (three photos)

Appendix 1

Sigh-In Sheet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102



DATE: August 10, 2023
TIME: 9:10 AM
SUBJECT: Town of Highland Park, Texas

MEETING ATTENDEES

NAME	COMPANY	PHONE NO.	EMAIL
Stephen Davis	Highland Park	214 281 4317	SDavis@Hlprky.org
ALAN VAUGHN	U.S. EPA	214 614 5748	Vaughn.Alan@EPA.gov
Darmon McElroy	DEP	7159	McElroy.Darmon@EPA.gov

Appendix 2

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photos No. 1

Location: Highland Park Public Works Building		
Town: Highland Park	County: Dallas	State: Texas



Photo File Names:

20230810_102056.JPG (Left)

20230810_102101.JPG (Right)

Photographer: DLM

Time: 10:20

Description: Utility Building



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photos No. 2

Location: Highland Park Public Works Building		
Town: Highland Park	County: Dallas	State: Texas



Photo File Name: 20230810_091012.JPG

Photographer: DLM

Time: 9:10

Description: Utility Building

Highland Park to DWU
Point of Entry

DWU 30-inch
Transmission Line



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photos No. 3

Location: Highland Park Public Works Building		
Town: Highland Park	County: Dallas	State: Texas



Photo File Name: 20230810_104252.JPG

Photographer: DLM

Time: 10:42

Description: Highland Park 30-inch SS Connection Point and metering MH to DWU 30-inch Collector.