

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

|                                        |                                                                                                                |                          |                       |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------|-----------------------|
| Inspection Date(s):                    | January 25, 2023                                                                                               |                          |                       |
| Media:                                 | Municipal Wastewater                                                                                           |                          |                       |
| Regulatory Program(s)                  | NPDES                                                                                                          |                          |                       |
| Utility Name:                          | <b>City of Wilmer</b>                                                                                          |                          |                       |
| Facility inspected:                    | <b>Wilmer Wastewater Collection System</b>                                                                     |                          |                       |
| Facility Physical Location:            | Community wide                                                                                                 |                          |                       |
| (city, state, zip code)                | NA                                                                                                             |                          |                       |
| Mailing address:                       | 128 N. Dallas Ave                                                                                              |                          |                       |
| (city, state, zip code)                | Wilmer, TX 75172                                                                                               |                          |                       |
| County/Parish:                         | Dallas County                                                                                                  |                          |                       |
| Facility Contact:                      | Wayne McCurley                                                                                                 | Director of Public Works |                       |
|                                        | (972) 441-6373 Ext. 232                                                                                        |                          |                       |
| FRS Number:                            | 110010935177                                                                                                   |                          |                       |
| Identification/Permit Number:          | TXU000124                                                                                                      |                          |                       |
| NAICS:                                 | 22132                                                                                                          |                          |                       |
| SIC:                                   | 4952                                                                                                           |                          |                       |
| Personnel participating in inspection: |                                                                                                                |                          |                       |
| Wayne McCurley                         | City of Wilmer                                                                                                 | Director of Public Works | 972-441-6373 Ext. 232 |
| Lupe Muniz                             | City of Wilmer                                                                                                 | Public Works Foreman     | 972-441-6373          |
| Juan Plascencia                        | City of Wilmer                                                                                                 |                          | 972-441-6373          |
| Tony Loston                            | EPA R6 (ECDWM)                                                                                                 | Inspector                | 214-665-3109          |
| Rachel Matthews                        | EPA R6 (ECDWM)                                                                                                 | Inspector                | 214-665-8589          |
| EPA Lead Inspector<br>Signature/Date   | <b>RACHEL MATTHEWS</b> Digitally signed by RACHEL MATTHEWS<br><small>Date: 2023.02.07 12:07:48 -06'00'</small> |                          |                       |
|                                        | Rachel Matthews                                                                                                |                          | Date                  |
| Supervisor<br>Signature/Date           | <b>ROBERTO BERNIER</b> Digitally signed by ROBERTO BERNIER<br><small>Date: 2023.02.10 09:17:07 -06'00'</small> |                          |                       |
|                                        | Roberto Bernier                                                                                                |                          | Date                  |

## **Section I – INTRODUCTION**

### **PURPOSE OF THE INSPECTION**

EPA Region 6 inspectors, Rachel Matthews and Tony Loston, arrived at the City of Wilmer, Public Works Office at 9:00 am on January 25, 2023, for an announced Compliance Evaluation Inspection. We met with Mr. Wayne McCurley, Director of Public Works, as well as Mr. Lupe Muniz and Mr. Juan Plascencia. 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 Wilmer serves a population of approximately 4,820 with 1,074 residential connections and 118 commercial connections. There are no industrial connections or septic systems. Wilmer's sanitary sewer collection system consists of 31.7 miles of pipeline and 5 lift stations. Much of the pipe is vitrified clay (approximately 60%) and PVC (approximately 35%) with the age primarily from 1972. The sanitary sewer collection system is routed to the City of Dallas Southside Wastewater Treatment Plant that is owned and operated by the City of Dallas.

All five lift stations are equipped with visual and audible alarm systems. Three of the lift stations have generators and the city has a portable generator available for use in an emergency.

Wilmer Public Works is not fully staffed with 9 full time employees (FTE). The city is currently short-staffed by 1 FTE in the water/wastewater section and 1 FTE in another section. The wastewater crews are also the drinking water crews and may incorporate other duties where needed as well.

## **Section II - OBSERVATIONS**

Prior to the inspection, the city sent some electronic information. During the inspection, we interviewed staff and reviewed documents regarding the Operation and Maintenance of the sanitary sewer collection system. According to employees interviewed, Texas Commission of Environmental Quality (TCEQ) approved an increase of wastewater flow based on population size of 6,690.

The collection system has been mapped in GIS and an asset management was develop in 2021 in paper format. Work orders are primarily printed out by the front desk administration, who gives those to the public works staff. Public works staff also use their own work order forms in paper format when necessary. Work order forms are kept in a 3-ring binder. The GIS map is updated as needed by an outside contractor. There is a hotspot list, and maps are printed out when those locations are cleaned. These work orders and maps are also kept in the same binder.

The city is in the middle of a capacity study at the time of the inspection. In addition, smoke testing was planned in 2022, but has been put on hold due to staff shortages.

The lift stations are inspected daily, but the generators are not exercised on a regular basis. While Supervisory control and data acquisition (SCADA) has been "in process" for a couple of years, engineering plans have not been completed at this time.

While staff said there were 5 SSOs over the last 5 years, EPA was also waiting for a list from the Texas Commission of Environmental Quality (TCEQ) during that time. Mr. McCurley was interested in receiving the information EPA was expecting, as he and his staff were new since 2021 and did not believe they had all the reports in their files. Their understanding of the primary reason for SSOs is due to blockages. A list of reported SSOs was sent on January 26, 2023, which showed 16 SSO reports submitted to TCEQ, see Attachment A.

Standard Operating Procedures (SOPs) and checklists for inspections exist. However, some have not been used, including the lift station inspection checklist. Some SOPs/checklists were not as detailed to ensure a proper, comprehensive inspection or to ensure new staff did not miss anything.

There is a FOG (Fats, Oils, and Grease) flyer that is used for educational purposes, as well as reminders for grease trap cleaning to the restaurants. However, no formal grease trap inspection program is in place and some facilities (such as churches, apartment complex, etc) may not be getting the information or understand their impact. Hot Spots are cleaned once a week.

Staff explained that a formal water/wastewater rate analysis has not been completed and that rates have remained the same for 8 years. A budget and Capital Improvement Plan (CIP) have been developed. However, there is no long-term inspection and rehabilitation program for the considerable amount of aging clay pipe throughout the city. Rehabilitation of the oldest part of the city; the downtown area, is included in the budget.

### **Section III – AREAS OF CONCERN & RECOMMENDATIONS**

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

1. All lift stations have an emergency standby generator or there is capability to connect a portable emergency generator, when necessary,
2. A comprehensive Fats, Oils, and Grease (FOG) program that includes inspections and enforcement,
3. A more efficient work order system that includes electronic tracking with an ability to run reports, trends, and ensure asset management is more effective,
4. Include all inspections (including manhole inspections) in the more efficient work order system and asset management, and
5. A private lateral ordinance and enforcement program

### **Section IV – FOLLOW-UP**

EPA received the requested SSO reports for the previous 5 years from TCEQ on January 26, 2023, the following day of the inspection.

### **Section V -- ATTACHMENTS**

Attachment A – List of SSOs reported to TCEQ from 2018 through 2022

**City of Wilmer, TX**

**Attachment A: Sanitary Sewer Overflow reports to TCEQ - 2018-2022**

| <u>Report Received</u> | <u>Amount in Gallons</u> | <u>Cause</u>               | <u>Description</u>                                                                                                                                                                                                                  |
|------------------------|--------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12/05/2018             | 1500                     | VANDALISM                  | An SSO of 1,500 gallons occurred from a lift station because of a vandalism. The city indicated that someone intentionally turned off power to the lift station.                                                                    |
| 03/06/2019             | 50                       | GREASE BLOCKAGE            | Grease blockage caused an SSO from a manhole onto surrounding ground.                                                                                                                                                               |
| 03/29/2019             | 80                       | GREASE BLOCKAGE            | Wash towels and grease debris caused an SSO from a cleanout onto surrounding ground.                                                                                                                                                |
| 10/29/2020             | 2000000                  | LINE BREAK                 | Erosion of river bank caused force main to break discharging wastewater to the Trinity River. Location is east of Post Oak Rd and Western Edge of Trinity River. PMN submitted. See Investigation Report No. 1679945 for more info. |
| 11/17/2020             | 50                       | LINE BLOCKAGE (NON-GREASE) | The SSO occurred at a manhole because of a line blockage.                                                                                                                                                                           |
| 11/19/2020             | 600                      | LINE BLOCKAGE (NON-GREASE) | The SSO occurred at a manhole because of a line blockage.                                                                                                                                                                           |
| 12/08/2020             | 100                      | EQUIPMENT FAILURE          | The SSO occurred because of a leak in an air release valve.                                                                                                                                                                         |
| 02/26/2021             | 75                       | LINE BLOCKAGE (NON-GREASE) | The SSO occurred at a manhole because of a line blockage from excess solids.                                                                                                                                                        |
| 03/01/2021             | 875                      | LINE BLOCKAGE (NON-GREASE) | The SSO occurred at a manhole because of a line blockage from excess solids.                                                                                                                                                        |
| 05/25/2021             | 100                      | INFILTRATION AND INFLOW    | The SSO occurred at a cleanout because of inflow and infiltration.                                                                                                                                                                  |
| 08/10/2021             | 50                       | GREASE BLOCKAGE            | The SSO occurred at a manhole because of a line blockage from grease.                                                                                                                                                               |
| 12/22/2021             | 400                      | EQUIPMENT FAILURE          | The SSO occurred because of a leak at an air release valve.                                                                                                                                                                         |
| 05/19/2022             | 5                        | GREASE BLOCKAGE            | Manhole overflowed from grease.                                                                                                                                                                                                     |
| 5/31/2022              | 270                      | EQUIPMENT FAILURE          |                                                                                                                                                                                                                                     |
| 8/11/2022              | 18                       | GREASE BLOCKAGE            |                                                                                                                                                                                                                                     |
| 8/23/2022              | 70                       | INFILTRATION AND INFLOW    |                                                                                                                                                                                                                                     |