

THE CITY OF ITALY

# Monitoring Plan

---

Public Works ID 0706028

**Responsible Official Mayor Frank Jackson**

**Director of Public Works Dean Carrell**

- I. The City of Italy operates a public water system that is ground water based from the Trinity and Woodbend aquifers. The city has a current population of 2160 with 739 connections.
  - a. There are three raw water samplings:
    - i. Well #1
    - ii. Well #2
    - iii. Well #3
  1. In plant sampling
  - b. There are no water treatments other than chlorination through the use of ISO cylinders with gas chlorine.
  - c. Entry point sampling

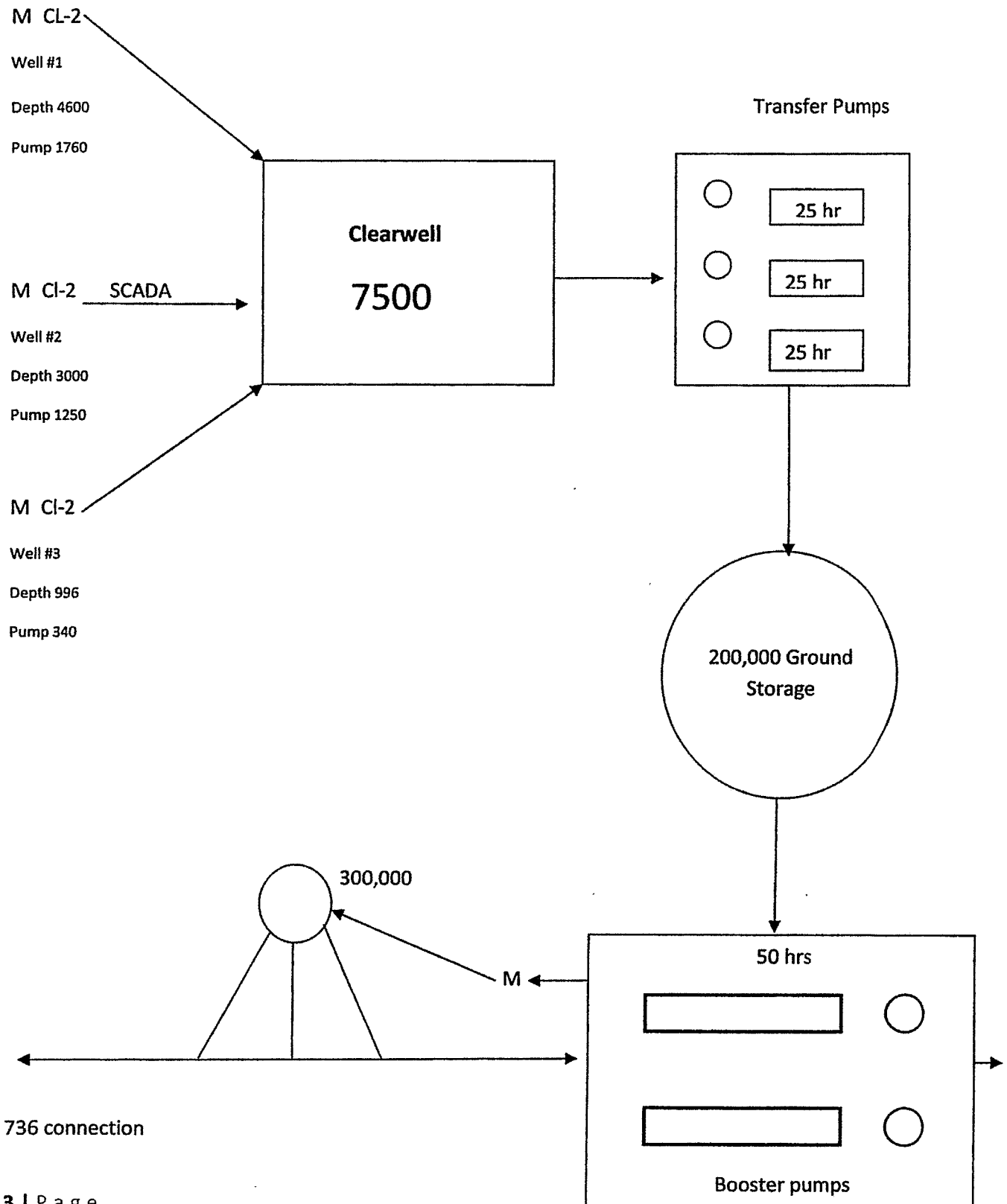
Entry	Sample Site	Source	Plant Name
001	Sample tap at 75,000 ground clean well	Trinity/Woodbind	Wells 1,2,3
002	Sample site at 2,000 gallon ground storage tank	Trinity/Woodbind	Wells 1,2,3
003	Sample site at 3,000 ths elevated	Trinity/Woodbind	Wells 1,2,3

**Table 1**

Coli form and Disinfection Monitoring Sites		
A	516 Waco	
B	409 Venice	
C	621 Cherie	
D	512 Rankin	
E	40 S. Ward	

**Table 2**

Diagram 1



- II. Disinfectant Entering the Distribution System
  - a. The City of Italy operates vacuum chlorination to chlorinate the water from the wells.
  - b. The water system delivers water to the customer as a lower chlorine residual.
  - c. The chlorine is in compliance with TCEQ's rules by serving an entry of 0.2mg/L residual.
- III. Distribution System Sampling
  - a. Appendix 1 shows the distribution of the system.
    - i. Coli form Samples
      - 1. Two coli form samples are taken monthly at each site and rotated as shown in Table 2.
- IV. Method
  - a. Coli form samples are collected by the City of Italy operator and sent to:

Environmental Monitoring Lab  
6145 S. Hwy 171  
Hillsboro, Texas 76645  
254-582-2622
  - b. The City of Italy follows the rules of TCEQ to ensure there are no repeat samples.
    - i. No repeat following fecal or E. coli
    - ii. No more than one repeat if samples are Coli form positive and none of the repeats are fecal or E. coli positive.
- V. Disinfectant Residual – Free or Total Chlorine
  - a. Frequency
    - i. The disinfection residual is measured at the same time every day.
    - ii. Due to the system size (over 250 and less than 5000) the residual is measured every day.
  - b. Disinfection Byproducts
    - i. DBP's, TTHM's, HAH's
      - 1. Since The City of Italy is ground water only, there is no requirement to test for these DBP's.
    - ii. Lower River Colorado samples each well annually to ensure the City's compliance. This is an area water sampling test.
      - 1. The City is not required to monitor lead or copper levels. TCEQ has informed the City regarding this compliance.
    - iii. The City does not monitor for Asbestos as TCEQ has not mandated any requirement.

5. Disinfectant Level Quarterly Operating Report (DL-QOR).
6. Keep Mapping up-to-date at all times.
7. Work Values system.
8. Perform flushing on a monthly basis and report.
9. Keep Monitoring Plan up-to-date as a reference.
10. Keep all grounds clean and entrance resistant.
11. Keep all files and paperwork in order and organized on a daily basis.
12. Keep the Department updated to TCEQ's and EPA rules and regulations.

Environmental Monitoring Lab  
6145 S. HWY 171  
Hillsboro, Texas, 76645  
254-582-2622

- d. B.T.'s will go to:
  - c. The sample site map will remain posted. It is important to alternate each site.
    - v. 400 S. Ward
    - iv. 512 Rankin
    - iii. 621 Cherie
    - ii. 409 Venice
    - i. 516 Waco
  - b. The City will pull B.T.'s each month using the addressees below:
    - a. Work Orders will be generated from City Hall. Personnel assigned to WO are to complete orders and fill out Work Order Request stating what work was done (i.e., water leak – checked for location and scope of leak, completed repairs to pipe) and file is to be turned in to Public Works Director to be filed.

4.
  3. Fill in Monthly Water Production Log. Blanks are in the computer and completed files are kept in cabinet marked Monthly Water Production.

Chlorine Residual #1 \_\_\_\_\_ Address \_\_\_\_\_  
Chlorine Residual #2 \_\_\_\_\_ Address \_\_\_\_\_

d. Daily Residual (sample sites)

	Weight	Before	After	Use
Chlorine	#1			
Scales	#2			

c. 413 Clark St



The City of Italy serves a population of 2160 with 739 connections with three wells, one in Woodbend and two in the trinity aquifer. The water system is disinfected by a vacuum chlorination system with ISO 150 pound cylinder at a residual of 0.2 mgL of free chlorine. There is one 7500 gallon clear well, one 200,000 gallon ground storage clear well and one 300,000 gallon elevated tank. The pump system includes 3-25 hrs jockey pumps and 2-50 hrs booster pumps. All of the system is operated by SCADA.

# 1. Daily Rounds

Daily Rounds-Water Department						
Well readings						
Well #1		Time		On		Off
Well #2		Time		On		Off
Well #3		Time		On		Off

Contract Meters #1 \_\_\_\_\_ #2 \_\_\_\_\_  
 Clear well Level \_\_\_\_\_

## Pump Stations

A 413 Clark Ice House  
 B Pump #1 On \_\_\_\_\_ Off \_\_\_\_\_  
 C Pump #2 On \_\_\_\_\_ Off \_\_\_\_\_  
 D Pump #3 On \_\_\_\_\_ Off \_\_\_\_\_  
 E Pump Station Master Meter \_\_\_\_\_

## Pump Station Boosters

A #1 Pump 50 Hrs  
 B #2 Pump 50 hrs

Master Meter Read \_\_\_\_\_

\*All rounds start at 8:00 am. Prior to starting rounds all personnel are required to check the SCADA system for any problems (alarms, pumpage, wells down, storage tank down, elevated down).

# 2.

a.

	Tank Levels		Residuals	PSI
Barn				
Clear Well				
Ground Storage				
Elevated Tower				

b. Cooling Tower On ☐ Off ☐

# The City of Italy

---

## Plant Operations Manual

**1/25/2013**



- A. The City is under construction adding a half million gallon concrete clearwell, SCADA piping, a cooling tower and a chemical room at this location. See Appendix 4. MSDS Sheets on file with Director of Public Works.
- X. NSF certification for gas chlorine not available.
  - A. NSF Sheets on file with Director of Public Works.
- XI. No copy available of most recent well meter calibrations.
  - A. Current well meter calibrations are on file with the Public Works Director.
- XII. Updated Drought Contingency Plan
  - A. The Drought Contingency Plan must be voted on by the City Council. This plan requires penalties be assessed and the City Council must vote on what those penalties will be. An updated plan is being drafted to put before the City Council for a vote. This process may take several months to complete.

### **Violations Responses**

- I. Failure to maintain Plant Operations Manual
  - A. The Plant Operations Manual has been updated and is on file.
- II. Failure to maintain a Monitoring Plan
  - A. The Monitoring Plan has been updated and is on file.
- III. Failure to maintain the backflow prevention test results.
  - A. The Backflow Prevention Assembly Test and Maintenance Report and copies of the letters sent to addresses requiring backflow assemblies are on file with the Director of Public Works.
- IV. Failure to maintain calibration records for the Hach Colorimeter.
  - A. The City of Italy primarily uses a Hach Color Wheel but will start calibrating our Colorimeter and keeping said calibrations on file.
- V. Failure to properly seal the well head on well #3
  - A. See Appendix 1
- VI. Failures to properly maintain the concrete sealing block on wells #2 and #3.
  - A. The sealing block for both wells will be rehabbed after the insurance company releases the city to do so. Well #3 will be done first then Well #2.
- VII. Failure to maintain functioning upper fan in gas chlorine room.
  - A. The gas chlorine room is under construction and is slated to be moved to a new location. See Appendix 2.
- VIII. Failure to have a working well meter on Wells #1 and #2.
  - A. The City has contracted to have the meters repaired. The invoice for these repairs is on file with the Public Works Director. See Appendix 3 for documentation of damage and needed repairs.
- IX. Failure to properly maintain the grounds.

City of Italy  
101 W. Main  
Italy, Texas 76651

#### Violations List

The City of Italy is responding to the investigation by TCEQ that took place on January 14, 2013. Chrystal D. Watkins was the investigator and performed the exit interview. The number, type and rule citation are listed below.

1. AV 30 TAC 290 Failure to maintain a plant operations manual.
2. AV 30 TAC 290 Failure to maintain a monitoring plan.
3. AV 30 TAC 290 Failure to maintain backflow prevention test results.
4. AI 30 TAC 290 Failure to maintain calibrations records for the Hach colorimeter.
5. AV 30 TAC 290 Failure to properly seal the well head on well #3.
6. AV 30 TAC 290 Failure to maintain the concrete sealing block on well #2&3.
7. AV 30 TAC 290 Failure to maintain functioning upper fan in gas chlorine room.
8. AV 30 TAC 290 Failure to have working well meter on wells #1&2.
9. AV 30 TAC 290 Failure to properly maintain the grounds.
10. RR Please provide a copy of the NSF certification for gas chlorine.
11. RR Please provide the most recent well meter calibration records.
12. AI Please update drought contingency plan.

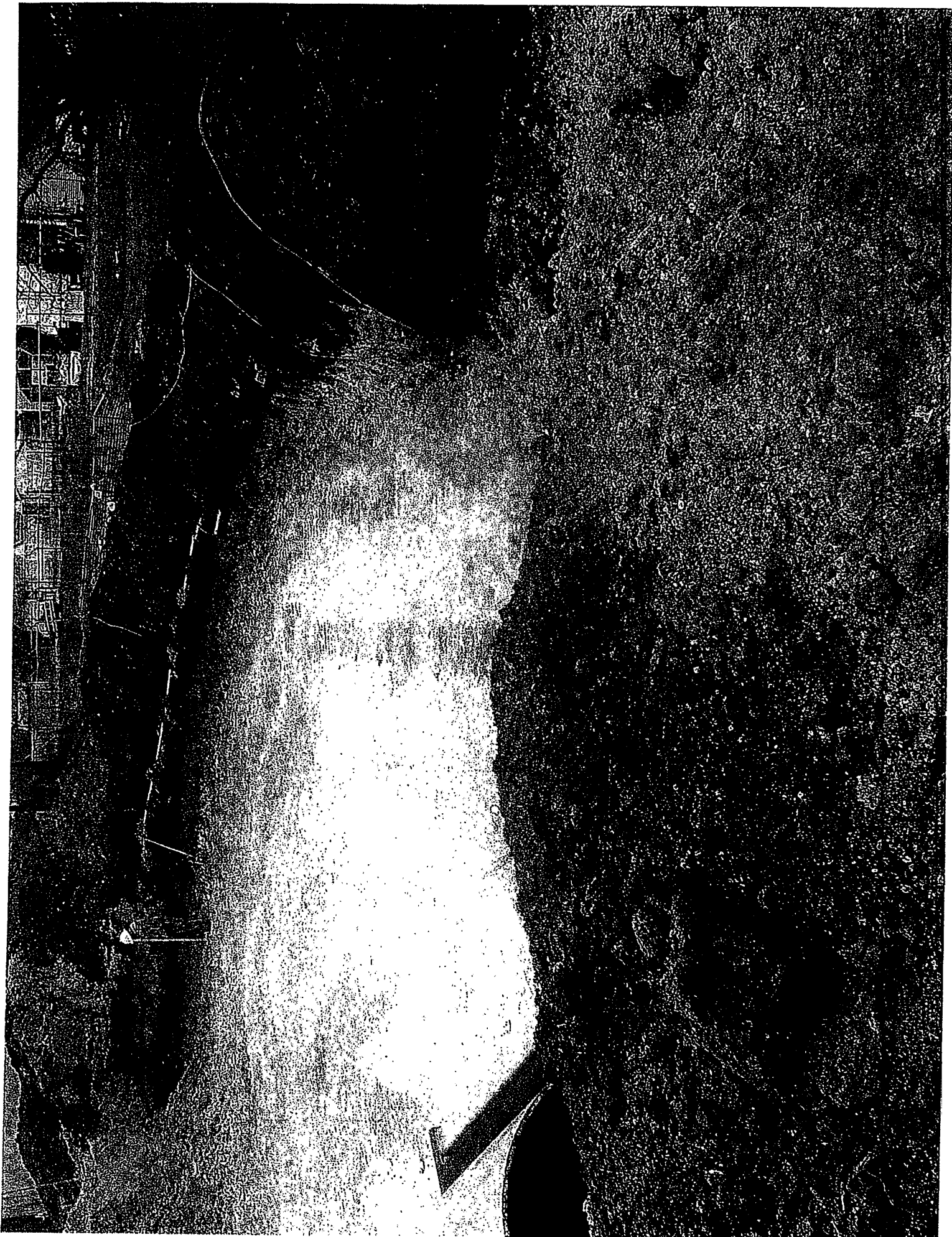
CITY OF ITALY

COPY

# TCEQ Exit Interview Response

---

RECEIVED  
JAN 8 2 2013  
DFW REGION-4





8/2 repair

**K W UTILITIES**  
"THE WATER METER PEOPLE"

**4793 FM 639**  
**FROST, TEXAS 76641**

**PHONE - 254 678 1129-**  
**FAX - 254 678 9071**

**EMAIL: KWMETERS@MYWAY.COM**

**"WE APPRECIATE YOUR BUSINESS"**

**"HUB" MEMBER OWNED BUSINESS**

**METER TESTING - REPAIR - SALES**

*DATE: April 26, 2012*

*TO: City of Italy*

*METER LOCATION: Clark st. Trinity*

*# 2*

*METER BRAND: Water Specialties*

*SIZE: 4"*

*TYPE: Propeller MI-03*

*SERIAL NUMBER: 20061737*

*START READING: 9598200*

*END READING: 9599400*

**CERTIFICATION OF CALIBRATION**

*This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards ( NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.*

*LOW FLOW:*

*QUANTITY:*

*ACCURACY:*

*MEDIUM FLOW:*

*QUANTITY:*

*ACCURACY:*

*HIGH FLOW: 303gpm*

*QUANTITY: 1000gal*

*ACCURACY: 100.8%*

*COMMENTS: This Meter is within AWWA Standards.*

*TESTED BY:*



*Ken Whitsitt*

I

**K W UTILITIES**  
**"THE WATER METER PEOPLE"**

**4793 FM 639**  
**FROST, TEXAS 76641**

**PHONE - 254 678 1129 -**  
**FAX - 254 678 9071**

**EMAIL: KWMETERS@MYWAY.COM**

**"WE APPRECIATE YOUR BUSINESS"**

**"HUB" MEMBER OWNED BUSINESS**

**METER TESTING - REPAIR - SALES**

---

**DATE: April 26, 2012**

**TO: City of Italy**

**METER LOCATION: Clark St.. Woodbine #3**

**METER BRAND: Sensus**

**SIZE: 3"**

**TYPE: Turbine**

**SERIAL NUMBER: 66904529**

**START READING: 18467600**

**END READING: 18466500**

**CERTIFICATION OF CALIBRATION**

*This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards ( NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.*

**LOW FLOW:                      QUANTITY:                      ACCURACY:**

**MEDIUM FLOW:                      QUANTITY:                      ACCURACY:**

**HIGH FLOW: 157gpm                      QUANTITY: 1000gal                      ACCURACY: 98.7%**

**COMMENTS: This Meter is within AWWA Standards.**

**TESTED BY:**

  
**Ken Whitsitt**



I

**K W UTILITIES**  
"THE WATER METER PEOPLE"

**4793 FM 639**

**FROST, TEXAS 76641**

**PHONE - 254 678 1129**

**FAX - 254 678 9071**

**EMAIL: KWMETERS@MYWAY.COM**

**"WE APPRECIATE YOUR BUSINESS"**

**"HUB" MEMBER OWNED BUSINESS**

**METER TESTING - REPAIR - SALES**

---

*DATE: April 26, 2012*

*TO: City of Italy*

*METER LOCATION: Hwy 77 Storage*

*METER BRAND: Water Specialties*

*SIZE: 6"*

*TYPE: Propeller MI-03*

*SERIAL NUMBER: 20053938*

*START READING: 442741000*

*END READING: 442742000*

**CERTIFICATION OF CALIBRATION**

*This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.*

*LOW FLOW:*

*QUANTITY:*

*ACCURACY:*

*MEDIUM FLOW:*

*QUANTITY:*

*ACCURACY:*

*HIGH FLOW: 176gpm*

*QUANTITY: 1000gal*

*ACCURACY: 98.6%*

*COMMENTS: This Meter is within AWWA Standards.*

*TESTED BY:*

*Ken Whitsitt*

**K W UTILITIES**  
"THE WATER METER PEOPLE"

4793 FM 639  
FROST, TEXAS 76641

PHONE - 254 678 1129  
FAX - 254 678 9071

EMAIL - [KWMETERS@MYWAY.COM](mailto:KWMETERS@MYWAY.COM)

"WE APPRECIATE YOUR BUSINESS"

"HUB" MEMBER OWNED BUSINESS

**METER TESTING - REPAIR - SALES**

---

DATE: March 4, 2011

TO: City of Italy

METER LOCATION: City Hall Well #1

METER BRAND: Hersey

SIZE: 4"

TYPE: Turbine

SERIAL: 7053832

START READING: 11963500

END READING: 11965600

**CERTIFICATION OF CALIBRATION**

This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards (NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.

LOW FLOW:

QUANTITY:

ACCURACY:

MEDIUM FLOW:

QUANTITY:

ACCURACY:


HIGH FLOW: 144gpm

QUANTITY: 1000gal

ACCURACY: 99.6%

COMMENTS: This Meter is within AWWA Standards.

TESTED BY:

  
Ken Whitsitt

20P-1  
DeAnn C.

I

**K W UTILITIES**  
"THE WATER METER PEOPLE"

**4793 FM 639**

**FROST, TEXAS 76641**

**PHONE - 254 678 1129**

**FAX - 254 678 9071**

**EMAIL: KWMETERS@MYWAY.COM**

**"WE APPRECIATE YOUR BUSINESS"**

**"HUB" MEMBER OWNED BUSINESS**

**METER TESTING - REPAIR - SALES**

---

**DATE: January 16, 2013**

**TO: City of Avalon**

**METER LOCATION: Wastewater Plant**

**METER BRAND: Sensus**

**SIZE: 1 1/2"**

**TYPE: Turbine**

**SERIAL NUMBER: 46386435**

**START READING: 25435800**

**END READING: 25435900**

**CERTIFICATION OF CALIBRATION**

*This is to certify that the physical standards described below were, on this day, compared to the standards of the State of Texas which are directly traceable to standards of the National Bureau of Standards ( NBS test numbers 39569, 40093, 179355, 225713) American Waterworks Test.*

**LOW FLOW:**

**QUANTITY:**

**ACCURACY:**

**MEDIUM FLOW:**

**QUANTITY:**

**ACCURACY:**

**HIGH FLOW: 14gpm**

**QUANTITY: 100gal**

**ACCURACY: 99.5%**

**COMMENTS: This Meter is within AWWA Standards.**

**TESTED BY:**

  
**Ken Whitsitt**



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
TELEPHONE MEMO TO THE FILE

Please complete with typewriter or black pen.

Call to: Mr. Willett

Call from: \_\_\_\_\_

Date of call: 3-12-14

File no.: \_\_\_\_\_

Phone no.: ( \_\_\_\_\_ ) \_\_\_\_\_

Subject: \_\_\_\_\_

Information for file: \_\_\_\_\_

*I called Mr. Willett & told him that  
the City is okay with the 85% rule.*

Signed \_\_\_\_\_



## Mary Damron

---

**From:** Carol Moulton  
**Sent:** Friday, May 30, 2014 10:03 AM  
**To:** Mary Damron  
**Subject:** City of Italy Wastewater Exit Interview Form  
**Attachments:** WQ0014195-001 Exit Interview Form for 5.20.2014.pdf

Hi Mary,

I've attached the Exit Interview Form for the City of Italy's recent wastewater treatment plant investigation on May 20, 2014.

Let me know if you have any questions.

**Carol Moulton**  
**Environmental Investigator, Water Quality Program**  
**TCEQ Region 4 DFW**  
Direct: 817/588-5894  
Main: 817/588-5800  
Fax: 817/558-5701  
[www.tceq.texas.gov](http://www.tceq.texas.gov)



Please consider whether it is necessary to print this e-mail

If you would like to comment on my customer service, you can use the following link:  
<http://www.tceq.texas.gov/customersurvey>; or you can contact my supervisor directly at: [Karen.Smith@tceq.texas.gov](mailto:Karen.Smith@tceq.texas.gov).





# TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name		City of Italy WWTP		TCEQ Add. ID No. RN No (optional)		WQ0014195-001	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation		Mandatory Minor Investigation	
Regulated Entity Contact	Mr. Dean Carrell		Telephone No.	972-483-6212		Date Contacted	5/14/14
	Public Works Director		FAX #/Email address	Dcarrell_pwd@italyctyhall.org		FAX/Email date	5/21/14

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
10	AV	C violation	Failure to maintain compliance with region collected total chlorine residual sample (Recorded value 0.60 mg/l)
11	O		Missing DMRs: send hardcopy of 12/2009 DMR w/"Resubmittal" at top; find/resend 9/2010 DMR; enter 11/2013 into NetDMR; 10/2011 DMR enter NH3N daily avg & daily max in NetDMR; 1/2013 DMR enter pH max in NetDMR; 10/2013 DMR enter pH max in NetDMR
12	O		Begin including the sludge ID number on waste manifests (five digit TCEQ number beginning w/2)
13	O		Revise/resubmit the SLD-F page for 2011, 2012, 2013 Annual Sludge Reports to indicate Y=1, N=0, not No Discharge
14			
15			

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.			
Carol Moulton		5/21/14	
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

## TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

<b>Regulated Entity/Site Name</b>			City of Italy WWTP		<b>TCEQ Add. ID No.</b> RN No (optional)		WQ0014195-001	
<b>Investigation Type</b>	CCI	<b>Contact Made In-House (Y/N)</b>	Y	<b>Purpose of Investigation</b>	Mandatory Minor Investigation			
<b>Regulated Entity Contact</b>	Mr. Dean Carrell			<b>Telephone No.</b>	972-483-6212		<b>Date Contacted</b>	5/14/14
	Public Works Director			<b>FAX #/Email address</b>	Dcarrell_pwd@italycityhall.org		<b>FAX/Email date</b>	5/21/14

**NOTICE:** The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	AV	Noted & resolved	Flow Violation for 10/2009 0.834 MGD
2	AV	Noted & Resolved	Effluent parameter violations: Aug & Oct 2010 NH3N daily avg & max; Jan 2014 Total Chlorine Residual max
3	AV	Noted & Resolved	No noncompliance notification for 10/2010 NH3N values over 40%
4	AV	B violation	Failure to prevent the discharge of untreated wastewater—8 unauthorized discharges
5	AV	C violation	Failure to calibrate the secondary flow meter on an annual basis or more frequently, as needed
6	AV	C violation	Failure to submit the Annual Sludge Report and Sludge Summary to the Region office since 2011
7	AV	C violation O&M	Failure to have operational barscreen; clean up unauthorized use of lagoon; have fully functional all weather road during rain
8	AV	C violation	Failure to accurately measure the flow according to permit (continuous/totalizing meter)
9	AV	C violation	Failure to collect composite sample according to established requirements. (30 TAC 319.9(a) Table 1)

**Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)**

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Carol Moulton	5/21/14		
Investigator Name (Signed & Printed)	Date	Regulated Entity Representative Name (Signed & Printed)	Date

**If you have questions about any information on this form, please contact your local TCEQ Regional Office.**  
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

**CITY OF ITALY**  
**PUBLIC WORKS DEPARTMENT**  
**DEAN CARRELL PUBLIC WORKS DIRECTOR**

# **TCEQ Exit Interview Response**

---

# TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name			City of Italy WWTP		TCEQ Add. ID No.		WQ0014195-001	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Mandatory Minor Investigation			
Regulated Entity Contact	Mr. Dean Carrell			Telephone No.	972-483-6212		Date Contacted	5/14/14
	Public Works Director			FAX #/Email address	Dearrell_pwd@italycityhall.org		FAX/Email date	5/21/14

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after this date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue	For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.		Description of Issue
No.	Type <sup>1</sup>	Rule Citation (if known)	
1	AV	Noted & resolved	Flow Violation for 10/2009 0.834 MGD
2	AV	Noted & Resolved	Effluent parameter violations: Aug & Oct 2010 NH3N daily avg & max; Jan 2014 Total Chlorine Residual max
3	AV	Noted & Resolved	No noncompliance notification for 10/2010 NH3N values over 40%
4	AV	B violation	Failure to prevent the discharge of untreated wastewater—8 unauthorized discharges
5	AV	C violation	Failure to calibrate the secondary flow meter on an annual basis or more frequently, as needed
6	AV	C violation	Failure to submit the Annual Sludge Report and Sludge Summary to the Region office since 2011
7	AV	C violation O&M	Failure to have operational barscreen; clean up unauthorized use of lagoon; have fully functional all weather road during rain
8	AV	C violation	Failure to accurately measure the flow according to permit (continuous/totalizing meter)
9	AV	C violation	Failure to collect composite sample according to established requirements. (30 TAC 319.9(a) Table 1)

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Carol Moulton	Investigator Name (Signed & Printed)	5/21/14	Date	Regulated Entity Representative Name (Signed & Printed)	Date
---------------	--------------------------------------	---------	------	---------------------------------------------------------	------

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

# TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/ Site Name		City of Italy WWTP		TCEQ Add. ID No. RN No (optional)		WQ0014195-001	
Investigation Type	CCI	Contact Made In-House (Y/N)	Y	Purpose of Investigation	Mandatory Minor Investigation		
Regulated Entity Contact	Mr. Dean Carrell		Telephone No.	972-483-6212	Date Contacted	5/14/14	
	Public Works Director		FAX #/Email address	Dearrell_pwd@italycityhall.org	FAX/Email date	5/21/14	

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and does not represent final TCEQ findings related to violations. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
10	AV	C violation	Failure to maintain compliance with region collected total chlorine residual sample (Recorded value 0.60 mg/l)
11	O		Missing DMRs: send hardcopy of 12/2009 DMR w/ "Resubmittal" at top; find/resent 9/2010 DMR; enter 11/2013 into NetDMR; 10/2011 DMR enter NH3N daily avg & daily max in NetDMR; 1/2013 DMR enter pH max in NetDMR; 10/2013 DMR enter pH max in NetDMR
12	O		Begin including the sludge ID number on waste manifests (five digit TCEQ number beginning w/2)
13	O		Revise/resubmit the SLD-F page for 2011, 2012, 2013 Annual Sludge Reports to indicate Y=1, N=0, not No Discharge
14			
15			

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Carol Moulton	Investigator Name (Signed & Printed)	5/21/14	Date	Regulated Entity Representative Name (Signed & Printed)	Date
---------------	--------------------------------------	---------	------	---------------------------------------------------------	------

If you have questions about any information on this form, please contact your local TCEQ Regional Office. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/229-3282.

#### **Violations List**

The City of Italy is responding to the investigation by TCEQ that took place on May 20, 2014. Carol Moulton was the investigator and performed the exit interview. The number, type and rule citation are listed below.

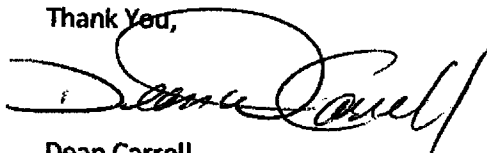
4. Failure to prevent the discharge of untreated wastewater – 8 unauthorized
5. Failure to calibrate the secondary flow meter on an annual basis or more frequently, as needed
6. Failure to submit the Annual Sludge Reports and Sludge Summary to the Region office since 2011
7. Failure to have operational barscreen; clean up unauthorized use of lagoon; have fully functional weather road during rain
8. Failure to accurately measure the flow according to permit (continuous/totalizing meter)
9. Failure to collect composite sample according to established requirements. (30 TAC 319.9(a)Table 1)
10. Failure to maintain compliance with region collect total chlorine residual sample (Recorded value 0.60 mg/l)

### Violations Responses

4. Failure to prevent the discharge of untreated wastewater – 8 unauthorized
    - City of Italy is working with KSA Engineering to put a plan together for rehab of lift station and replacing lift station
  5. Failure to calibrate the secondary flow meter on an annual basis or more frequently, as needed
    - Will have Ken Wetson to calibrate secondary flow meter
  6. Failure to submit the Annual Sludge Reports and Sludge Summary to the Region office since 2011
    - City of Italy has submitted Sludge Reports to Region 4
  7. Failure to have operational barscreen; clean up unauthorized use of lagoon; have fully functional weather road during rain.
    - The City of Italy has hired KSA Engineering to design a compliant working Barscreen.
  8. Failure to accurately measure the flow according to permit (continuous/totalizing meter)
    - The City of Italy is using the effluent totalizer to measure the discharge at the plant.
  9. Failure to collect composite sample according to established requirements. (30 TAC 319.9(a)Table 1)
    - The city of Italy is pulling effluent composite samples on Tuesdays of every week after 10:00am.
- \*Please see attachment EML form\*
10. Failure to maintain compliance with region collect total chlorine residual sample (Recorded value 0.60 mg/l)
    - The City of Italy has adjusted chlorine switch floats to ensure that 1.0 mg will be up to effluent discharge

The above is the response to the corrective actions that will take place for each situation. The City of Italy thanks you for your attention in this matter. If you have any questions please contact me on my cell phone at 972-483-6212 or by email [dcarrell\\_pwd@italycityhall.org](mailto:dcarrell_pwd@italycityhall.org)

Thank You,



Dean Carrell

Public Works Director, City of Italy





## Mary Damron

---

**From:** Mary Damron  
**Sent:** Wednesday, April 23, 2014 9:47 AM  
**To:** dcarrell\_pwd@italycityhall.org  
**Subject:** FW: Scanned image from MX-M453N  
**Attachments:** irgw55@tceq.state.tx.us\_20140423\_083801.pdf

Mr. Carrell,

I noticed that the City of Italy has an active wastewater permit violation. I have attached a copy for your convenience. Please provide an explanation, a corrective action plan and the status.

Thanks,

Mary

-----Original Message-----

From: irgw55@tceq.state.tx.us [mailto:irgw55@tceq.state.tx.us]  
Sent: Wednesday, April 23, 2014 9:38 AM  
To: Mary Damron  
Subject: Scanned image from MX-M453N

Reply to: irgw55@tceq.state.tx.us <irgw55@tceq.state.tx.us> Device Name: Not Set Device Model: MX-M453N  
Location: Not Set

File Format: PDF MMR(G4)  
Resolution: 200dpi x 200dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

Adobe, the Adobe logo, Acrobat, the Adobe PDF logo, and Reader are registered trademarks or trademarks of Adobe Systems Incorporated in the United States and other countries.

<http://www.adobe.com/>



MWD/WQ0014195-001/7-10-2014/CCI Report  
**Texas Commission on Environmental Quality  
Investigation Report**

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

**Customer: City of Italy**  
**Customer Number: CN600460026**

COPY

**Regulated Entity Name: CITY OF ITALY WWTP**

**Regulated Entity Number: RN102336310**

**Investigation #** 1159895

**Incident Numbers**

**Investigator:** CAROL MOULTON

**Site Classification** DOMESTIC MINOR

**Conducted:** 05/20/2014 -- 05/20/2014

**NAIC Code:** 221320

**SIC Code:** 4952

**Program(s):** WASTEWATER

**Investigation Type:** Compliance Investigation

**Location:** LOCATED APPROXIMATELY 0.75 FT  
SOUTH OF SH 34 AND 0.5 MI E OF FM RD 667 ELLIS  
COUNTY

**Additional ID(s):** WQ0014195001  
TX0123056

**Address:** ,  
, ,

**Local Unit:** REGION 04 - DFW METROPLEX

**Activity Type(s):** WWCCIMDMIN - WW CCI Mandatory  
Minor

**Principal(s):**

Role	Name
RESPONDENT	CITY OF ITALY

**Contact(s):**

Role	Title	Name	Phone
Regulated Entity Contact	DIRECTOR OF PUBLIC WORKS	MR DEAN CARRELL	Cell (903) 413-5606 Work (972) 483-6212
Regulated Entity Mail Contact	MAYOR	HON JAMES HOBBS	
Participated in Investigation	EMPLOYEE	MR CLINTON MCCASLAND	
Participated in Investigation	EMPLOYEE	MR JUSTYN HENDERSON	
Participated in Investigation	EMPLOYEE	MR JEFF CLAXTON	
Participated in Investigation	EMPLOYEE	MR JACOB HOPKINS	
Notified	DIRECTOR OF PUBLIC WORKS	MR DEAN CARRELL	Cell (903) 413-5606 Work (972) 483-6212

**Other Staff Member(s):**

Role	Name
QA Reviewer	ERIC AGNEW
Supervisor	KAREN SMITH

**Associated Check List**

<b><u>Checklist Name</u></b>	<b><u>Unit Name</u></b>
WQ DOMESTIC CCI - INTERIM	Italy Domestic
WQ GENERAL CCI CHECKLIST	Italy General
WQ IN-HOUSE LABORATORY COMPLIANCE INVESTIGATION	Italy Lab
WQ INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013	Italy Sampling

**Investigation Comments:****INTRODUCTION**

The City of Italy Wastewater Treatment Plant (WWTP) was investigated on May 8 and 20, 2014 to determine compliance with applicable wastewater treatment regulations. The May 8 investigation is considered an unannounced reconnaissance investigation, while the May 20 investigation is considered a mandatory minor investigation due to time elapsed since the last investigation. The permittee was notified of the mandatory minor investigation on May 14, 2014. A verbal exit interview, explaining the results of the investigation, was conducted on the same day of the investigation with Mr. Dean Carrell, Public Works Director. A copy of the TCEQ Exit Interview Form was received via email by Mr. Carrell. Based on the findings of this investigation, a Notice of Violation letter was issued to facilitate compliance.

**GENERAL FACILITY AND PROCESS INFORMATION**

The Italy WWTP is permitted to discharge 0.65 MGD at Outfall 001. The facility utilizes chlorine gas to disinfect the effluent prior to discharge.

The primary source of wastewater for Outfall 001 is domestic. The facility consists of a manual bar screen, two sequential batch reactors (SBR), an oversized chlorine contact basin, a sludge digester, and a sludge auger press. The collection system consists of 6 lift stations. The facility has had no significant plant modifications and/or collection system upgrades since the last comprehensive investigation.

DCI Sanitation/Republic hauls sludge from this facility to Itasca Landfill (241D) for disposal. The transporter ID number was not located on the waste manifests and is included as an additional issue in this report. The City reported 16.3 dry metric tons of sludge was hauled during reporting period August 2012 to July 2013.

Compliance with the emergency power requirements was verified, and the facility is compliant with these requirements. A 150 KW standby generator with automatic switchover is available for use. The city also recently acquired a mobile generator for the lift stations and water plant.

The primary and secondary flow measuring devices for Outfall 001 include a one foot Parshall flume (width unknown) with Eastech Badger Model 2200 UltraSonic flow meter and totalizer, and a Chessel chart recorder. The flow meters were not checked for accuracy because the staff gauge was not readily accessible and the flow meter had not been calibrated within the last year. This issue is cited as a violation in the report.

The Reduced Pressure Backflow Prevention Device (RPZ) was tested and certified on May 19, 2014 by Mr. Carrell, who holds a valid RPZ tester license, BP00009204.

The effluent samples collected by staff are analyzed by Environmental Monitoring Laboratory, Hillsboro, Texas, for the following parameters: CBOD<sub>5</sub>, TSS, NH<sub>3</sub>N, E-Coli, TDS, Chloride, pH and dissolved oxygen. They also analyze TCLP and sludge tests. The operator performs chlorine residual analysis. The contract laboratory used by the permittee was accredited by TCEQ to perform analytical methods for the permitted parameters.

Effluent samples were collected after the final treatment unit at Outfall 001 discharge point to the receiving stream. Sample analysis results and COC are attached to this report. All parameters, with the exception of total

chlorine residual, were compliant with permitted effluent limits. This issue is noted as a resolved violation in the report. At the time of the investigation, the receiving stream appeared free of negative conditions such as foaming and sludge deposits.

The City of Italy is not required to have an approved pretreatment program. The city has a sewer use ordinance and a grease trap program to manage the discharge of fats, oil, and grease to their collection and treatment systems.

#### BACKGROUND

The last comprehensive compliance investigation was conducted on October 1, 2009. One violation was issued for failing to collect composite samples according to requirements. This violation has since been resolved. Three additional issues were noted.

A lift station focused investigation was conducted on September 14, 2011. One violation was issued for operation and maintenance issues at the lift station, and one additional issue was noted. The violation has since been resolved.

A complaint investigation was conducted on November 2, 2012 which resulted in the issuance of one violation for not reporting SSOs in a timely manner. This violation has been resolved.

#### ADDITIONAL INFORMATION

On May 6, 2014, Mr. Carrell informed the DFW Region Office that the wastewater treatment plant had experienced an upset which resulted in the discharge of partially treated wastewater via the outfall to the receiving stream. Mr. Carrell also advised that a vacuum truck service was contracted to remove the waste from the creek. Since attempts to transport the waste to an authorized disposal facility were unsuccessful, he decided to dump the waste into an abandoned pond that is adjacent to the plant. An unannounced wastewater reconnaissance investigation at the treatment plant was conducted on May 8, 2014 by Environmental Investigators, Carol Moulton and Karen Smith. They arrived onsite at 12:30 pm. Mr. Carrell was not available at the time, but site operators, Justyn "JT" Henderson, Clint McCasland, and Jeff Claxton escorted the investigators through the plant and explained the recent operational failures, repairs, and future actions to return the treatment facility to normal operations.

During the site investigation, the fine screen was no longer in use and replaced with the manual removal of screenings. As a result of this change in operation, a large amount of floating debris was observed in the plant. SBR unit #1 was operating in the normal mode, and SBR unit #2 was idle mode and not operational. Apparently during the upset, waste was diverted to SBR #2 when SBR #1 was taken off line for repairs. The gear box and associated parts that control the decanter for SBR #1 was reportedly stuck in the decant mode and partially treated wastewater (approximately 10,000 gallons) flowed into the chlorine contact chamber (CCC) to the receiving stream.

In order to reduce the impact to the environment, some of the partially untreated waste from the CCC was routed to SBR #2. Eventually this unit became overwhelmed or destabilized and was removed from service. The operators observed that settled solids had floated to the top of SBR#2 on May 5, 2014. SBR#2 was eventually cleaned out, and the waste was routed to the digester, then to the dewatering facility, and transported/disposed at the landfill.

The operators further explained that SBR #1 decanter gear box failed about two weeks ago, or mid-April, 2014 and they had a hard time finding parts to repair the unit. The gear box and bearings were replaced/ rebuilt and the unit was returned to normal operations on May 7, 2014.

Visible remnants of the waste that was dumped in the lagoon was observed during the investigation, and operators were advised that removal of the solids was needed, followed by disinfection with HTH or lime. The investigators were offsite by 1:30 pm.

During the May 20, 2014 investigation, Mr. Carrell indicated that the mechanical bar screen had broken a few years ago and the City was not able to have anyone from the company come out to fix it. Mr. Carrell indicated that KSA Engineering was designing a new mechanical bar screen and that it should be available within the next six months.

Mr. Carrell also indicated that the City has an inflow/infiltration (I/I) problem that results in hydraulically overloading of the SBR system. A letter dated February 10, 2014 was sent from MLA Consulting on behalf of the

City to propose utilizing a decommissioned pond as an equalization basin. A response letter dated March 7, 2014 from TCEQ Wastewater Permitting Section recommended filing a major amendment permit application for incorporating the decommissioned pond.

Mr. Dean Carrell holds a Class C wastewater operator license (WW0026733). Two operators hold Class D licenses, one recently tested for his Class D license, and one is an operator-in-training. The permit requires that the facility be operated by a chief operator or an operator holding a Category C license or higher a minimum of five days a week. If Mr. Carrell is not available to operate the facility five days a week, actions should be taken to ensure an adequately licensed C operator be available at the facility. The collection system is supervised by Mr. Carrell who has the appropriate level of certification.

**NOV Date** 07/10/2014 **Method** WRITTEN

**OUTSTANDING ALLEGED VIOLATION(S)  
ASSOCIATED TO A NOTICE OF VIOLATION**

**Track Number:** 540063

**Compliance Due Date:** 08/11/2014

**Violation Start Date:** 10/26/2012

2D TWC Chapter 26.121(a)  
2D TWC Chapter 26.121(a)(1)  
2D TWC Chapter 26.121(a)(3)  
2D TWC Chapter 26.121(b)  
2D TWC Chapter 26.121(c)  
2D TWC Chapter 26.121(d)  
2D TWC Chapter 26.121(e)  
30 TAC Chapter 305.125(4)  
30 TAC Chapter 305.125(5)  
TWC Chapter 26.121  
TWC Chapter 26.121(a)(2)

**PERMIT , WQ0014195-001**

See PERMIT CONDITIONS, No. 2 Compliance, item g, page 7.

**Alleged Violation:**

**Investigation:** 1159895

**Comment Date:** 07/01/2014

Failure to prevent the unauthorized discharge of wastewater. Specifically, 8 unauthorized discharges have been reported since the last investigation in 2011. Four of these have occurred at the Taylor Street Lift Station where the cause has been equipment failures, two have occurred at the Couch Street Lift Station, and two have occurred at the wastewater treatment plant. There shall be no unauthorized discharge of wastewater.

On May 30, 2014, documentation received in the Region Office indicated the City has contacted KSA Engineering and will be creating a plan to rehabilitate one of the lift stations and replace the other lift station. More information is required.

**Recommended Corrective Action:** Submit to the Region Office a compliance plan and schedule with steps to be taken to prevent the recurrence of unauthorized discharges from the collection system and wastewater treatment plant, particularly the Taylor and Couch Street Lift Stations.

**Track Number:** 540067

**Compliance Due Date:** 08/11/2014

**Violation Start Date:** 5/20/2014

30 TAC Chapter 305.125(1)

**PERMIT , WQ0014195-001**

See EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, No. 1, page 2.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/01/2014

Failure to accurately measure the flow according to the permit requirement. Specifically, the permit requires a totalizing meter that measures flow continuously. During the investigation, the permittee stated flow from the chart recorder was being utilized since the flow meter was not working properly.

Documentation received May 30, 2014 indicated that the effluent totalizing meter is being used to record flow at the plant. However, it was not determined if this meter has been calibrated at this time.

**Recommended Corrective Action:** Submit to the Region Office two weeks of flow data indicating the totalized flow meter is being used to record flow; this data set should be after the secondary meter has been calibrated. This data may be submitted using the log where flow is normally recorded.

---

**Track Number: 540069**

**Compliance Due Date: 08/11/2014**

**Violation Start Date: 5/20/2014**

**30 TAC Chapter 305.125(1)**

**PERMIT , WQ0014195-001**

See MONITORING AND REPORTING REQUIREMENTS, No. 5. Calibration of Instruments, page 5.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/01/2014

Failure to calibrate the secondary flow meter at least annually to ensure accuracy. Specifically, records indicating that the secondary flow meter had been calibrated in the previous 12 months were not available. All automatic flow measuring or recording devices and all totalizing meters for measuring flows shall be accurately calibrated by a trained person at plant start-up and as often thereafter as necessary to ensure accuracy, but not less often than annually.

Documentation received May 30, 2014 indicated a Mr. Ken Wetson will be contacted to calibrate the flow meter.

**Recommended Corrective Action:** Submit to the Region Office a calibration certificate for the secondary flow meter indicating calibration has been done.

---

**Track Number: 540085**

**Compliance Due Date: 08/11/2014**

**Violation Start Date: 9/30/2011**

**30 TAC Chapter 305.125(11)(B)**

**30 TAC Chapter 305.125(11)(C)**

**PERMIT , WQ0014195-001**

See SLUDGE PROVISIONS, SECTION III REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE DISPOSED IN A MUNICIPAL SOLID WASTE LANDFILL, Item G. Reporting Requirements, page 22.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/03/2014

Failure to submit the Annual Sludge Report and Sludge Summary to the Region Office since 2011. Specifically,

the Region Office does not have copies of the 2011, 2012, and 2013 Annual Sludge Reports and Sludge Summary as required by the permit. The permittee shall annually report the required information to the TCEQ Region Office and Water Quality Compliance Monitoring Team by September 30 of each year. Also the SLD-F page from the 2011, 2012, and 2013 Annual Sludge Reports indicate a "No Discharge" when sludge had been produced and hauled offsite during the reporting years, and values should either be Y = 1, or N = 0.

Documentation received May 30, 2014 showed the TCLP results for sludge sampled on August 30, 2011. Annual Sludge Reports and Sludge Summaries were not included.

**Recommended Corrective Action:** Submit a copy of the 2011, 2012, and 2013 Annual Sludge Reports and Sludge Summaries as required in the permit to the Region Office.

---

**Track Number:** 540086

**Compliance Due Date:** 08/11/2014

**Violation Start Date:** 5/8/2014

30 TAC Chapter 305.125(5)

PERMIT , WQ0014195-001

See OPERATIONAL REQUIREMENTS, No. 1, page 9.

**Alleged Violation:**

**Investigation:** 1159895

**Comment Date:** 07/03/2014

Failure to adequately operate and maintain the wastewater treatment plant. Specifically, the facility did not have an operational mechanical bar screen as indicated as a treatment unit in their permit application; did not have approval to use the lagoon to store sludge and trash from the May 8 unauthorized discharge and was not cleaned and disinfected by the May 20 investigation; and did not have a fully functional all-weather road during the May 8 rain event.

Documentation received May 30, 2014 indicated KSA Engineering has been hired by the City to design a compliant working bar screen. The other three issues were not discussed.

**Recommended Corrective Action:** Submit documentation to the Region Office indicating that adequate steps have been taken to address the issues noted during the investigation. If necessary, submit a compliance plan and schedule for the issues noted.

**ALLEGED VIOLATION(S) NOTED AND RESOLVED  
ASSOCIATED TO A NOTICE OF VIOLATION**

---

**Track Number:** 540065

**Resolution Status Date:** 7/3/2014

**Violation Start Date:** 5/20/2014

**Violation End Date:** 5/30/2014

30 TAC Chapter 305.125(1)

PERMIT , WQ0014195-001

See EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, No. 2, page 2.

**Alleged Violation:**

---

**Investigation:** 1159895

**Comment Date:** 07/03/2014

Failure to maintain compliance with the permitted effluent limits for samples taken during the investigation. Specifically, the grab sample collected during the investigation was not compliant with the single grab minimum limit of 1.0 mg/l for total chlorine residual. The result of the analysis was 0.60 mg/l. Compliance with the permitted effluent limits must be maintained.



**Recommended Corrective Action:** Submit to the Region Office documentation describing action taken to prevent the recurrence of total chlorine residual violations.

**Resolution:** Documentation submitted May 30, 2014 indicated that City personnel made adjustments to the chlorine switch floats to ensure a minimum of 1.0 mg/l.

---

Track Number: 540075

Resolution Status Date: 7/1/2014

Violation Start Date: 10/31/2009

Violation End Date: 5/20/2014

30 TAC Chapter 305.125(1)

PERMIT , WQ0014195-001

See EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, No. 1, page 2.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/01/2014

Failure to maintain compliance with permitted flow limits. Specifically, the daily average flow for October 2009 was reported at 0.834 MGD, which is over the permit limit of 0.65 MGD. Compliance with the permitted flow limits must be maintained.

**Resolution:** No permit flow limit violations have been reported since November 2009, therefore this violation is considered resolved.

---

Track Number: 540077

Resolution Status Date: 7/3/2014

Violation Start Date: 8/31/2010

Violation End Date: 5/20/2014

30 TAC Chapter 305.125(1)

PERMIT , WQ0014195-001

See EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, No. 1, page 2.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/03/2014

Failure to maintain compliance with self-reported permit effluent limits. Specifically, the August and October 2010 ammonia nitrogen daily average and daily maximum were exceeded, and the January 2014 total chlorine residual maximum was exceeded. Compliance with the permitted effluent limits must be maintained.

**Resolution:** There have been no ammonia nitrogen violations reported since November 2010, and there have been no total chlorine residual violations reported since February 2014. Therefore, this violation is considered resolved. However, please note that self-reported effluent violations are subject to review by the Enforcement Division, and may be subject to enforcement action, including penalties.

---

Track Number: 540083

Resolution Status Date: 7/3/2014

Violation Start Date: 10/31/2010

Violation End Date: 5/20/2014

30 TAC Chapter 305.125(1)

PERMIT , WQ0014195-001

See MONITORING AND REPORTING REQUIREMENTS, No. 7 Noncompliance Notification, item c., page 6.

**Alleged Violation:**

**Investigation: 1159895**

Comment Date: 07/03/2014

Failure to submit noncompliance notification for effluent violations over 40% of the permitted limit. Specifically, the Region 4 Office did not receive the required noncompliance notification for the October 2010 ammonia nitrogen daily maximum result of 26.3 mg/l that was over 40% of the permitted effluent limit.

**Resolution:** There have been no effluent violations since November 2010 that were 40% over the permitted effluent limit. However, please be advised that future exceedances must be notified and submitted to the Region Office and to the Enforcement Division within 5 days of becoming aware of the noncompliance.

**AREA OF CONCERN**

Track Number: 540080

Resolution Status Date: 7/1/2014

Violation Start Date: 5/20/2014

Violation End Date: 5/30/2014

30 TAC Chapter 305.125(1)

**Alleged Violation:****Investigation: 1159895**

Comment Date: 07/01/2014

Failure to properly collect composite samples according to established requirements. Specifically, a review of the composite sampling records indicates that the first sample is collected before 10:00 A.M.

**Recommended Corrective Action:** Submit to the Region Office composite sample data showing the first samples are collected after 10:00 A.M.

**Resolution:** Documentation received May 30, 2014 showed a chain of custody dated May 28, 2014 with the first composite sample taken at 10:00 A.M.

**Additional Issues**

**Description** Are adequate sludge disposal records maintained?

**Additional Comments**

The sludge transporter ID number was missing from the waste manifests for sludge removal. This number is required on all waste manifests to identify the sludge hauler and to make sure the hauler is registered to haul sludge by the TCEQ. Please request this number be preprinted on the waste manifests, or request the sludge hauler records the ID number on the waste manifest prior to receiving the initial copy.

**Description** Are monthly effluent reports or discharge monitoring reports completed accurately, submitted and are copies maintained?

**Additional Comments**

A review of the self-reported data indicated some discrepancies that were viewed during the investigation. A hardcopy of the December 2009 DMR should be resubmitted; the September 2010 DMR needs to be found and resubmitted; the November 2013 DMR needs to be entered into NetDMR; the December 2011 DMR is missing the ammonia nitrogen daily average and daily maximum values; the January 2013 DMR is missing the pH maximum value; and the October 2013 DMR is missing the pH maximum value. Please sign, date, and resubmit the missing DMRs to the Enforcement Division, indicating "Resubmittal" on the DMR. Also please enter the missing information in NetDMR. These issues will be evaluated during the next investigation.

Signed   
Environmental Investigator

Date 7-3-2014

Signed   
Supervisor

Date 7/7/2014

Attachments: (in order of final report submittal) In Agency Files

☐ Enforcement Action Request (EAR)  
☒ Letter to Facility (specify type): NOV  
Investigation Report  
☒ Sample Analysis Results + COC  
☐ Manifests  
☐ Notice of Registration

☐ Maps, Plans, Sketches  
☒ Photographs  
☒ Correspondence from the facility  
☒ Other (specify):  
3560 FORM  
Exit Interview Form



Questions or Comments &gt;&gt;

[Query Home](#)[Customer Search](#)[RE Search](#)[ID Search](#)[Document Search](#)[Search Results](#)[Permit Detail](#)[TCEQ Home](#)**Central Registry**Detail of: **Wastewater Permit WQ0014195001**For: **CITY OF ITALY WWTP (RN102336310)**

LOCATED APPROXIMATELY 0.75 FT SOUTH OF SH 34 AND 0

Permit Status: **ACTIVE**Held by: **CITY OF ITALY (CN600460026)****OWNER** [View Compliance History](#)

Mailing Address: PO BOX 840 ITALY, TX 76651-0840

**Notice of Violations Current TCEQ Rules**

NOV Date	Status	Citation/Requirement Provision	Allegation	Classification	Self Reporting Indicator
01/31/2014	ACTIVE	2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to meet the limit for one or more permit parameter	MODERATE	YES ✓
11/13/2012	RESOLVED	TWC Chapter 26 26.039 ; 30 TAC Chapter 305, SubChapter F 305.125 (1) ; PERMIT WQ0014195-001	Failure to notify the TCEQ of an unauthorized discharge as soon as possible and not later than 24 hours after the occurrence.	MODERATE	NO
10/07/2011	RESOLVED	30 TAC Chapter 217, SubChapter C 217.60(h)(1) ; 30 TAC Chapter 317 317.3(c) ; 30 TAC Chapter 317 317.3(c)(1) ; 30 TAC Chapter 317 317.3(c)(2) ; 30 TAC Chapter 317 317.3(c)(3) ; 30 TAC Chapter 317 317.3(c)(4) ; 30 TAC Chapter 317 317.3(c)(5) ; 30 TAC Chapter 317 317.3(c)(6) ; 30 TAC Chapter 317 317.3(c)(7) ; PERMIT WQ0014195-001	Failure to maintain lift stations according to design and permit requirements.	MODERATE	NO
10/31/2010	ACTIVE	2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to meet the limit for one or more permit parameter	MODERATE	YES
08/31/2010	ACTIVE	2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to meet the limit for one or more permit parameter	MODERATE	YES
10/31/2009	ACTIVE	2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to meet the limit for one or more permit parameter	MODERATE	YES
10/01/2009	RESOLVED	30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to collect composite samples according to established requirements.	MINOR	NO
09/30/2008	ACTIVE		Failure to meet the limit for	MODERATE	YES



		2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	one or more permit parameter		
09/01/2008	ACTIVE	2D TWC Chapter 26, SubChapter A 26.121(a) ; 30 TAC Chapter 305, SubChapter F 305.125(1)	Failure to meet the limit for one or more permit parameter	MODERATE	YES

[Site Help](#) | [Disclaimer](#) | [Web Policies](#) | [Accessibility](#) | [Our Compact with Texans](#) | [TCEQ Homeland Security](#) | [Contact Us](#) | [Central Registry](#) | [Search Hints](#) | [Report Data Errors](#)

[Statewide Links](#): [Texas.gov](#) | [Texas Homeland Security](#) | [TRAIL Statewide Archive](#) | [Texas Veterans Portal](#)

© 2002-2013 Texas Commission on Environmental Quality





## **Mary Damron**

---

**From:** Crystal Watkins  
**Sent:** Wednesday, July 02, 2014 11:14 AM  
**To:** Mary Damron  
**Subject:** Italy Investigation

Investigation Number #1165503, all violations have been resolved.

Thanks,

Crystal Watkins  
Texas Commission on Environmental Quality  
Environmental Investigator, Region 4-DFW  
Office: (817) 588-5800  
Direct: (817) 588-5804  
Fax : (817) 588-5701

If you would like to comment on my customer service, you can use the following link:

<http://www.tceq.texas.gov/customersurvey.>, or you can contact my supervisor directly at: [charles.l.marshall@tceq.texas.gov](mailto:charles.l.marshall@tceq.texas.gov).

