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Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 22, 2024


@mac.com

Re: Investigation Request at:
NTMWD Lower White Rock Creek Lift Station, 1001 Campbell Rd., Plano, Collin County
Regulated Entity No.: RN102342144, TCEQ Permit No.: WQ0010363-001, EPA ID No.:
TX0047911, Investigation Report No.: 1973784, Incident No.: 419092

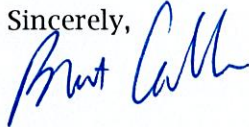
Dear Mr. Moreno:

The Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (DFW) Region Office has completed a final investigation in response to your concern regarding the unauthorized wastewater discharge into White Rock Creek at the above-referenced facility. Enclosed is a copy of the investigation report.

To access a copy of our complaint policies and procedures or to track your complaint using Complaint Tracking Number 419092, you may refer to our website: <https://www.tceq.texas.gov/compliance/complaints>.

We appreciate your concern in bringing this matter to our attention. If we can be of further assistance, please contact Mr. Bismark Otorino at 817-588-5813 or by email at bismark.otorino@tceq.texas.gov.

Sincerely,



J. Gary Sinclair, Jr., M.P.H., Wastewater Work Leader
Dallas/Fort Worth Region Office
Texas Commission on Environmental Quality

JGS/bo

Enclosures: Investigation Report No. 1973784
(w/o attachments)

MWD_10363-001_CP_20240514_COMPLIANCE
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: North Texas Municipal Water District
Customer Number: CN601365448

Regulated Entity Name: NORTH TEXAS MUNICIPAL WATER DISTRICT
ROWLETT CREEK

Regulated Entity Number: RN102342144

Investigation # 1973784

Incident Numbers

419092

Investigator: BISMARCK OTORINO

Site Classification DOMESTIC MAJOR

Conducted: 03/15/2024 -- 03/15/2024

SIC Code: 3589

SIC Code: 4952

NAIC Code: 221320

NAIC Code: 333318

Program(s): WASTEWATER

Investigation Type: Compliance Investigation

Location: WASTEWATER TREATMENT PLANT

Additional ID(s) WQ0010363001

R10363001

TX0047911

TXR05U122

Address: 1600 LOS RIOS BLVD,
 PLANO, TX , 75074

Local Unit: REGION 04 - DFW METROPLEX

Activity Type(s) WWRECONMAJ - WW Major Recon
 WWCMPPL - WW Complaint

Principal(s):

| Role | Name |
|------------|--------------------------------------|
| RESPONDENT | NORTH TEXAS MUNICIPAL WATER DISTRICT |

Contact(s):

| Role | Title | Name | Phone |
|-------------------------------|--------------------------------------|--------------------|--|
| NOE CONTACT | EXECUTIVE DIRECTOR | JENNAFER COVINGTON | Work (972) 442-5405 Cell (972) 400-1587 |
| REGULATED ENTITY CONTACT | EXECUTIVE DIRECTOR | JENNAFER COVINGTON | Work (972) 442-5405 Cell (972) 400-1587 |
| REGULATED ENTITY MAIL CONTACT | EXECUTIVE DIRECTOR | JENNAFER COVINGTON | Work (972) 442-5405 Cell (972) 400-1587 |
| REGULATED ENTITY CONTACT | WASTEWATER CONVEYANCE SYSTEM MANAGER | SCOTT HOELZLE | Work (469) 626-4335 Cell (972) 569-7660 Fax (972) 295-6436 |

Other Staff Member(s):

| Role | Name |
|--------------|----------------|
| QA Reviewer | GARY SINCLAIR |
| Investigator | JAQUELINE MORA |
| Supervisor | BRENT CANDLER |

Associated Check List

| <u>Checklist Name</u> | <u>Unit Name</u> |
|--|-------------------------|
| WQ COMPLAINT INVESTIGATION | Lower White Rock Creek |
| WATER EQUIPMENT | Equipment/Sampling |
| WQ COMPLIANCE CHECK/RECONNAISSANCE INVESTIGATION | Lower White Rock Creek |

Investigation Comments:

INTRODUCTION

The City of Plano notified the Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (DFW) Region Office on March 14 and 15, 2024, of a major sanitary sewer overflow (SSO) from three manholes. A field investigation was conducted on March 15, 2024, by Ms. Jaqueline More, Environmental Investigator, to determine compliance with applicable wastewater collection regulations. This investigation is considered a reconnaissance and a complaint investigation. The investigation report was written by Mr. Bismark Otorino, Environmental Investigation. A copy of the TCEQ Exit Interview Form (EIF) was sent to Ms. Morgan Dadgostar, North Texas Municipal Water District (NTMWD) Regional Wastewater System Manager, on May 9, 2024. Based on the findings of this investigation, a Notice of Enforcement (NOE) was issued to facilitate compliance.

GENERAL FACILITY AND PROCESS INFORMATION

The Lower White Rock Creek Lift Station which caused the SSO is located at 1001 Campbell Rd., Plano, Collin County, Texas and is operated and maintained by NTMWD. The lift station sends influent to the NTMWD's Rowlett Creek Wastewater Treatment Plant (WWTP), TPDES Permit No. WQ0010363-001, which is permitted to discharge an annual average flow of 24 million gallons per day (MGD) of treated domestic wastewater to Lake Ray Hubbard in Segment No. 0820 of the Trinity River Basin.

Additionally, the City of Plano's sewer mainline were impacted by the malfunction at the Lower White Rock Creek Lift Station thus causing SSOs at three Plano manholes. The City of Plano (RN103099156) is a subscriber to NTMWD including the Rowlett Creek WWTP.

BACKGROUND

The last comprehensive compliance investigation (CCI) at the WWTP was conducted on December 9, 2021. A violation for failure to prevent the unauthorized discharge of wastewater at the WWTP was cited and it has since been resolved; see Investigation Report No. 1794705 for more information.

The SSOs from the three manholes have been filed as Incident Nos. 419063, 419062, and 419061 and the written noncompliance notifications are attached to this investigation report.

The complaint was filed as Incident No. 419092 and is associated to this investigation report.

The NTMWD Rowlett Creek WWTP is a participant in the TCEQ SSO Initiative (SSOI) program. The SSOI program is a proactive approach to pollution prevention which focuses on addressing SSOs before they impact human health, safety and/or the environment, or the SSOs become formal enforcement issues. A participating system is generally exempt from formal enforcement by the TCEQ for most SSO violations, if the SSOs are addressed by the SSOI plan and there are no serious impacts to the environment. The district signed an 8-year agreement that started in 2008 and will expire on December 31, 2026. The last annual progress report was submitted on March 4, 2024. The report indicated that 10% of the gravity pipes and manholes are inspected every year and lift stations are inspected daily. Cleaning of the collection system is done whenever an issue is noted during an inspection. The report also indicated additional pumping

NORTH TEXAS MUNICIPAL WATER DISTRICT ROWLETT CREEK - PLANO

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capacity and generator were added to the Lower White Rock Creek Lift Station in 2020. The next report is due in February 2025.

ADDITIONAL INFORMATION

The TCEQ DFW Region Office was initially notified by the City of Plano on March 14 & 15, 2024, through the Texas Spill Hotline, Report Nos. 20240921, 20240917, and 20240913, of ongoing SSOs from three manholes in the city. The city stated the SSOs started on March 14, 2024, at the manholes and were impacting White Rock Creek. The manholes were located at 5510 W. Plano Parkway (Pkwy), 1001 Campbell Rd., and 5505 W. Plano Pkwy, Plano, Texas. The cause of the SSOs was due to malfunctioning equipment at the NTMWD's Lower White Rock Creek Lift Station. The initial volumes were not known as the SSOs were ongoing during the reporting. There was no initial report of any dead aquatic organisms.

On March 15, 2024, Ms. Mora conducted a field investigation to determine compliance with applicable regulations. The investigator arrived at the location of one of the spills (1001 Campbell Rd.) and observed a manhole actively overflowing into White Rock Creek. The manhole was located next to the creek and the entire SSO was entering the creek. Minimal solids were observed entering the creek and no dead aquatic organisms were seen in the creek at this location. Sufficient flow was observed in the creek upstream and downstream of the SSO entry point. Other areas of the creek downstream of the SSO and the other two manholes could not be observed because of inaccessibility and a storm event that was happening during the investigation. It should be noted that dechlorinated potable water from fire hydrants was being applied to the creek via stormwater drain inlets to help maintain adequate dissolved oxygen level in the creek. Ms. Mora did not conduct creek flow sampling as the Cities of Dallas and Plano were monitoring the creek.

The investigator continued to the NTMWD's Lower White Rock Lift Station that had equipment malfunctioned and caused the SSOs. Ms. Mora met with Mr. Justin Diviney, NTMWD CMOM Project Manager, and Mr. Marty Luke, NTMWD Wastewater Conveyor Supervisor II and discussed the reason for the investigation. Ms. Mora was informed by the staff that a motor in the dry well of the lift station failed on March 14, 2024, and caused wastewater to accumulate in the well. This also caused wastewater to back-up into the City of Plano's sewer mainline thus causing SSOs at three upstream manholes. Ms. Mora observed NTMWD staff actively pumping wastewater from the dry well in order to repair the motor. Bypass pumps were also observed onsite getting ready to be setup during the investigation and staff planned to get them running later that day.

In March 2024, the TCEQ DFW Region Office received a complaint from four complainants alleging concern with the SSOs into the creek. The complaint concerns were investigated by Ms. Mora during her onsite investigation and the allegations were substantiated.

The City Plano performed field analysis of the flow in the creek during their onsite investigation and recorded a dissolved oxygen (DO) level of 10.0 mg/L and ammonia nitrogen (NH₃N) level of 0.20 parts per million (PPM) on March 14, 2024, at a location upstream of the overflowing manhole at 1001 Campbell Rd. DO and NH₃N levels were 9.69 mg/L and 1.17 ppm, respectively, immediately downstream of this location. The City of Plano also sampled flow in the creek on March 18, 2024, further downstream of 1001 Campbell Rd. and recorded a DO level of 9.70 and NH₃N level of 0.20 ppm and upstream at Willow Bend & W Park Blvd. with a DO level of 9.44 mg/L and NH₃N level of 0.21 ppm. The City of Plano stated that all the SSOs stopped by March 18, 2024, and impacted areas were cleaned, and debris removed by March 19, 2024.

The City of Dallas Water Utilities (DWU) monitored the creek from Frankfort Rd. up to White Rock Lake as this section of the creek is within the city limits and the lake is operated and maintained by the city. The city sampled flow in the creek at 5504 Frankfort Rd. from March 14 - 17, 2024, and obtained E. coli values of >2419 Most Probable Number (MPN); at Spring Valley Rd. from March 15 - 17, 2024, and obtained E. coli values of >2419; at Walnut Hill Ln. on March 16, 2024, and obtained an E. coli value of >2419; and at E. Mockingbird Ln. on March 16 - 17, 2024, and obtained E. coli values of >2419. The City of Dallas also sampled flow in the lake from March 16 - 21, 2024, at Bathhouse and obtained an E. coli geometric mean value of 336 MPN; and at Pumphouse on March 16 - 21, 2024, and obtained an E. coli geometric mean value of 202 MPN. It should be noted that Frankfort Rd. and E. Mockingbird Ln. are approximately 1.14 and 12.4 miles, respectively, downstream of 1001 Campbell Rd. The E. coli sample taken at E. Mockingbird Ln. was at

the mouth of the lake. Because of the evaluated E. coli level in the creek and White Rock Lake, the City of Dallas Park and Recreation in consultation with DWU closed the lake from March 19 to March 23, 2024, to restrict public access during the SSOs. The lake was reopened on March 24, 2024, after E. coli sample results indicated the lake had returned to normal conditions. The City of Plano Environmental Health posted signs at the overflowing manhole areas to restrict access as well. The signs were removed once the SSOs stopped and impacted areas cleaned, and debris removed. The Cities of Dallas and Plano as well as NTMWD all worked together during this incident to make sure impact to public health and the environment is minimized.

White Rock Creek in Segment No. 0827A of the Trinity River Basin is listed as Impaired for bacteria since the E. coli geometric mean value for the TCEQ 2022 Integrated Report was 379.32 MPN which is above the Contact Recreation Screening Level of 126 MPN. White Rock Lake in Segment No. 0827 of the Trinity River Basin is listed as unimpaired for contact recreation since the Contact Recreation Screening Level is below 126 MPN. The event of March 14 - 16, 2024, indicated significant E. coli impact to the creek and lake had occurred. As such, NTMWD is being referred for formal enforcement since the SSOs occurred because of malfunctioning equipment at their Lower White Rock Creek Lift Station and caused serious impact to the environment.

The TCEQ DFW Region Office received copies of the final written noncompliance notification for the SSOs on March 18, 2024. The total discharged volume from the three SSOs was estimated to be 1.5 million gallons. A notice to local government officials and local medias was made on March 14, 2024, but was submitted to the TCEQ late, March 18, 2024. The notice also did not include all required information listed in 30 TAC 319.302. These issues are addressed as a violation.

The City of Plano has reported thirteen (13) SSOs that have impacted White Rock Creek during the record review period of 2019 to 2024. Eight of the SSOs were attributed to inflow & infiltration (I&I) during storm events. The total discharged volume from the I&I related SSOs was 2.3 million gallons. The SSOs were corrected and impacted areas cleaned and disinfected where applicable, and appropriate repairs were made.

As required, a letter and a copy of the investigation report were sent to NTMWD and complainants.

NOE Date: 5/14/2024

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

Track Number: 879704

Compliance Due Date: To Be Determined

Violation Start Date: 3/14/2024

2D TWC Chapter 26.121(a)(1)

2D TWC Chapter 26.121(c)

30 TAC Chapter 305.125(1)

PERMIT WQ0010363001, WQ0010363001

Permit Conditions 2.g.

EPA ID TX0047911, TX0047911

Permit Conditions 2.g.

Alleged Violation:

Investigation: 1973784

Comment Date: 05/13/2024

Failure to prevent the unauthorized discharge of wastewater resulting in a documented serious impact to the environment. On March 14 - 16, 2024, sanitary sewer overflows (SSOs) from three manholes in the City of Plano sanitary sewer collection system occurred as a result of malfunctioning equipment at the NTMWD's Lower White Rock Creek Lift Station. The total discharged volume was estimated to be 1.5 million gallons. This resulted in significant E. coli impact to the creek and lake.

Recommended Corrective Action: The regulated entity ceased the unauthorized discharge on March 16, 2024, and cleaned and disinfected impacted areas as required. Repairs to the lift station have been made.

Additional compliance documentation may be requested by the Enforcement Division.

Track Number: 879705 **Compliance Due Date:** To Be Determined

Violation Start Date: 3/14/2024

30 TAC Chapter 319.302(c)
30 TAC Chapter 319.302(d)

Alleged Violation:

Investigation: 1973784

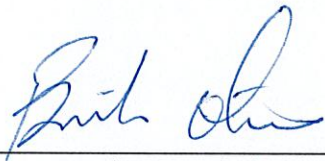
Comment Date: 05/09/2024

Failure to properly complete the public media notification and provide a copy of the notice to the TCEQ as required. Specifically, the regulated entity failed to include all the precautionary statements in 30 TAC 319.303(c) in the notice to local government officials and local media and submit a copy of the notice to the TCEQ within 48 hours after it has been issued.

Recommended Corrective Action: NTMWD has submitted adequate public media notification in the past and is aware of the reporting requirements.

Additional compliance documentation may be required by the Enforcement Division.

Signed

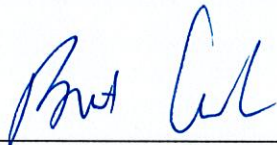


Environmental Investigator

Date

5/13/24

Signed



Supervisor

Date

5/13/24

Attachments: (in order of final report submittal)

Enforcement Action Request (EAR)

Letter to Facility (specify type) : NOE

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

See list below

List of Attached files

White Rock Raw Data Background info.pdf

White Rock Raw Data Background info2.pdf

PW - Water Quality Notification_2024-03-18T09_46_17_6652196 - 5510 W Plano Pk

TCEQ Letters.pdf

20240913.pdf

03-20-2024 City of Plano North Texas Municipal Water District Joint Release on Sani

Plano SSO history.pdf

20240917.pdf

WhiteRockCreekBasinOverflows_2019-2024.pdf

White Rock Creek Background Summary with IR 2024.pdf

PW - Water Quality Notification_2024-03-18T09_37_38_2485828 - 5505 W Plano P

3-14-2024 NTMWD SSO.pdf

PW - Water Quality Notification_2024-03-18T09_26_01_9170658 - 1001 Campbell

20240921.pdf