EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/28/2023	
Media Program:	Water	
Regulatory Program(s)	AWIA/SDWA	
Facility Name:	**Salem Water Users Association**	
Facility Physical Location:	620 Airlane Dr.	
(city, state, zip code)	Benton, AR 72015	
Mailing address:	620 Airlane Dr.	
(city, state, zip code)	Benton, AR 72015	
County/Parish:	Saline	
Facility Phone Number	501-776-2212	
Facility Contact:	Clarisse Harris	General Manager
	waterusers@att.net	
FRS Number:	N/A	
Identification/Permit Number:	AR0000492	
Media Identifier Number:	N/A	
NAICS:	N/A	
SIC:	N/A	

Personnel participating in inspection:		
Clarisse Harris	Salem Water Users Association	General Manager
Jerry W. Mitchell	Salem Water Users Association	Supervisor
Andrew Burchfield	Salem Water Users Association	Lead Person
Mike McFadden	ERG	EPA Contract Inspector
Shada Roberts	Arkansas Department of Health	District Engineer

EPA Lead Inspector: Mike McFadden Signature/Date	Mike McFadden (ERG)	08/17/2023 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On June 28, 2023, U.S Environmental Protection Agency (EPA) Region 6 contract inspector from Environmental Research Group (ERG) (hereinafter, the EPA Inspector) conducted an announced American Water Infrastructure Act (AWIA) Risk and Resiliency Assessment (RRA) and Emergency Response Plan (ERP) program/document inspection of the Salem Water Users Association public water system (PWS) ID No. AR0000492 (System). The inspection process began at approximately 8:00 a.m. on June 28, 2023, and finished at approximately 12:20 p.m. Shada Roberts, a District Engineer from the Arkansas Department of Health (ADH), was also present for the inspection.

Mike McFadden of ERG presented his SDWA inspector credential to the System representative upon arrival. He informed the System representatives that this was an inspection to observe compliance with the Safe Drinking Water Act (SDWA) Section 1433(a) and (b), which requires community water systems that serve more than 3,300 people to complete a RRA and develop an ERP. To facilitate the inspection process, a checklist outlining the requirements of SDWA Section 1433(a) and (b) was used during the document review (refer to Appendix 1, Safe Drinking Water Act (SDWA) Sections 1433(a) and (b) Checklist). The EPA Inspector met with Clarisse Harris, the General Manager; Jerry Mitchell, the Supervisor; and Andrew Burchfield, the Lead Person, for the opening conference.

As a component of the RRA and ERP document review, the following field assets were also observed:

Finished Water Storage Tanks:

- Longhills Tank
- Mulberry/Salem Tank

Booster Chlorination Station:

- Sparks Booster Chlorination Station

Master Meters (Purchasing Interconnection):

- Sparks Master Meter (Central Arkansas Water (CAW))

Supervisory Control And Data Acquisition (SCADA) System:

- SCADA control station (at System office)

SYSTEM DESCRIPTION

The System is a purchase water system that buys from two public water supplies, Central Arkansas Water (CAW) and Benton Waterworks (Benton) for distribution. The System serves a population of approximately 16,737 people according to the EPA Safe Drinking Water Information System (SDWIS) database. There are three master meters from Benton and four master meters from CAW for a total of seven. The distribution system for the System is separated into two pressure zones through multiple isolation valves which can be manually operated to interconnect the distribution system for emergency response purposes. There are four water storage tank standpipes in the System. There are four booster

chlorination stations. One certified operator operates and maintains the System with standard Monday through Friday business hours. A second operator assists with the operation and maintenance and both operators have emergency response 24-hour on-call responsibilities. The System employs an additional certified operator that is a backup for the Salem system.

ASSET WALKTHROUGH

As a component of the RRA and ERP document review, several assets were observed to cross-reference the information listed in the documents with what was being implemented in the field.

Water Storage Tanks

The Longhills Tank was inspected first (refer to Appendix 2, Photograph 1). The access to the tank was a driveway that was a few hundred feet beyond a locked gate. The tank is a 500,000-gallon standpipe that was surrounded by two locked perimeter fences. The outer fence is 6 feet high and equipped with barbed wire. The inner fence is 10 feet high and equipped with razor wire (refer to Appendix 2, Photograph 1). An older "No Trespassing" warning sign was not legible (refer to Appendix 2, Photograph 1). A sign reading "In Case of Emergency" contained emergency contact phone numbers. The bottom rungs were removed from the tank's access ladder to approximately 14 feet, and the ladder was equipped with a locked security shield (refer to Appendix 2, Photograph 2). An overflow pipe extended from the approximate overflow level of the tank. It was downturned and appeared to be screened, however, the screen size and condition could not be evaluated from ground level (refer to Appendix 2, Photographs 3 and 4).

The System representative stated that there were no alarms or video surveillance tied to the tank. In addition to an external target level indicator, a tank level sensor was tied to SCADA for remote observation. The concrete foundation was flush with ground level which allows surface water and debris to reach the metal tank base (refer to Appendix 2, Photograph 5). The seal between the metal tank base and the concrete foundation that was visible was weathered, cracked, and had numerous 1/8-inch width gaps throughout (refer to Appendix 2, Photograph 6). Sediment covered the seal up to the tank sidewall in several sections (refer to Appendix 2, Photograph 7). Tank water appeared to be seeping from a 4-foot section of the tank base located on the near side of the tank to the left of the entrance gate and from a 2-foot section located on the side of the tank to the right of the entrance gate. The seepage was not in enough volume to collect a sample to test for chlorine that would more confidently identify the tank water as the source. System representatives stated that the tank was professionally inspected within the past year, but it was unclear if the inspection provided a quality view, and therefore a thorough assessment of the tank floor.

The EPA Inspector did not walk through the Congo Tank site. System representatives stated that they are aware that the tank has a hole in the bottom which is actively leaking. The leak was identified by System personnel as well as in a recent professional tank inspection. The System representatives stated that a board-approved project was due to be scheduled to address the source of the leak.

The Mulberry / Salem Tank was inspected second (refer to Appendix 2, Photograph 8). The tank is a 500,000-gallon standpipe that was surrounded by two locked perimeter fences. The outer fence is 6 feet high and equipped with barbed wire. The inner fence is 10 feet high and equipped with razor wire (refer to Appendix 2, Photograph 8). A sign reading "In Case of Emergency" contained emergency contact phone numbers (refer to Appendix 2, Photograph 9) but did not have "No Trespassing" warning signage. The bottom rungs were removed from the tank's access ladder to approximately 14 feet and was equipped with a locked security shield (refer to Appendix 2, Photograph 8). An overflow pipe extended from the approximate overflow level of the tank. It was downturned and appeared to be screened: however, the screen size and condition could not be evaluated from ground level (refer to Appendix 2, Photograph 10). The System representative said that there were no alarms or video surveillance tied to the tank. A tank level sensor was tied to SCADA for remote tank level observation. The seal between the metal tank base and the concrete foundation that was visible was weathered, cracked, and had numerous gaps as wide as 1/4 inch throughout (refer to Appendix 2, Photograph 11). Tank water appeared to be seeping from three areas of the tank base located on the right half of the tank from the entrance gate. The seepage was not in enough volume to collect a sample to test for chlorine that would more confidently identify the tank water as the source. System representatives stated that the tank was professionally inspected within the year prior to the inspection, but it was unclear if the inspection provided a quality view, and therefore a thorough assessment of the tank floor.

Master Meters

The Sparks Master Meter was observed (refer to Appendix 2, Photograph 12). System representatives stated that the master meter infrastructure is owned and operated by CAW. The meter was below-grade in a meter vault, and downstream of the meter was a control valve in a separate vault. The vaults were locked and located within the same perimeter security fencing as the Sparks Chlorination Booster Station. There was approximately one foot of standing water in each vault which was beneath the meter and the control valve. The vaults are equipped with automated submersible pumps which appeared to be functional when triggered by a water level just above one foot (refer to Appendix 2, Photograph 12).

Booster Chlorination Station

The Sparks Booster Chlorination Station was observed (refer to Appendix 2, Photograph 13). System representatives stated that this station and the other three stations have very similar designs and are operated and maintained in a similar fashion. The function of the stations is to slightly boost the amount of the purchased water chorine residual to allow the residual to meet the System's distribution chlorine residual goals at all points of the distribution system. System representatives stated that a failure to boost chlorine levels at the stations would need to be addressed but would not be a high-level emergency due to the chlorine residual levels of the purchased water.

The chlorine building consisted of a chlorine storage and feed side and a chlorine pump and application point side. The chlorination system was operated with one active 150-pound chlorine gas cylinder from

a dual chlorine scale. A second chlorine gas cylinder was not on standby or plumbed with an automatic tank switchover unit, but spare chlorine was available onsite. The Regal Brand chlorinator did not appear to be plumbed with a vent. A chlorine gas detector was mounted, but not operational. System representatives stated that a recent issue had disabled the unit and they had scheduled it for service the following day. The entrance door to the chlorine storage and feed side of the chlorine building was not tied to automatic operation of the interior exhaust fan. An entrant to the building could utilize an exterior switch to manually operate the exhaust fan prior to entry. A self-contained breathing apparatus (SCBA) was mounted on the exterior of the building. A chlorine cylinder repair kit was not onsite. System representatives stated that they own a chlorine cylinder repair kit but were not aware of its location at the time of the inspection. A chlorine gas feed measurement device was in use, and it appeared to be resting at zero flow. System representatives stated that this station feeds a very low amount of chemical and that it was feeding during the inspection. The station log also indicated low but regular chemical use. The chlorine analyzer that measures chlorine residual had been intentionally abandoned in place. System representatives stated that they had abandoned all of the station analyzers in place due to quality issues, despite regular maintenance efforts. Operators have a procedure to check all stations on a weekly basis.

SYSTEM SECURITY AND MONITORING

The System has a SCADA system and can monitor tank levels and alerts such as high and low water levels and power loss. System representatives stated the SCADA does not monitor master meter activity; the purchasing system operators monitor them on their behalf, with notifications as needed. [redacted] Access to the software is limited to specific personnel. The General Manager stated that the software was checked every morning to monitor for specific activity in the distribution system. In addition to the software, operators drive by the assets approximately daily to check for unusual activity.

RRA AND ERP GENERATION

The System completed the RRA using the EPA Vulnerability Self-Assessment Tool (VSAT) and provided the *RA* [RRA] *Summary Report for Salem Water Users PWA* for review. The System also presented a *Vulnerability Assessment* that appeared to supplement the VSAT summary report.

The System presented a custom ERP that it had developed for review. The ERP contained brief general procedures for staff to respond to some emergency scenarios.

RISK AND EMERGENCY RESPONSE EXAMPLES

As a component of the RRA and ERP document review, and to provide an example of emergency response and risk assessment, the EPA Inspector asked System representatives to describe their response to some specific challenges that it may have a risk of encountering:

Water Supply Shortage, which could occur as the ultimate result of many types of emergencies at the selling water system such as power loss, contamination, or equipment failure. Although the System indicated that it does not have an alternate water source, it effectively does have an alternate source due to its configuration of receiving purchased water from two distinct water suppliers. Because the distribution system is normally isolated into two distinct pressure zones, each of the two supplies can only supply the opposing pressure zone under the proper operational conditions. The System did not have a procedure in its ERP to describe the necessary valve manipulations and other operational steps that would be required to use either water supply during times of a water supply shortage.

Redundancy of Operational Staff, which involves the transfer of knowledge from current System representatives to new staff and future members to promote consistent reliable operations in times of emergency and employee turnover. The System ERP contained several brief generalized procedural steps to address some emergencies. However, the System did not have operations and maintenance (O&M) manuals or standard operating procedures (SOPs) written for how to operate/maintain the various assets in the distribution system. System representatives stated that the Salem Water Users Association employed a second fully certified operator and that up to four staff members were seeking ADH operator certification. The Supervisor was in the process of training one of those individuals (to be the lead operator) on aspects of the Salem System but the training was not taking place formally through documented procedures.

Section II - OBSERVATIONS

The following observations pertain to the SDWA Section 1433(a), Risk and Resilience Assessments.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(i), states that "Risk and resilience assessments shall include an assessment of the risk to the system from malevolent acts and natural hazards."

Observation 1. The RRA listed "storms or lightning" as natural hazards that are a risk to pipes and constructed conveyances, water collection, and intake. All other asset categories were marked to indicate they did not require assessment for reasons listed in the RRA such as "all secure" and "backup systems."

Observation 2. The System representatives verbally discussed the risk of reduced water supply or loss of water supply from their source water, specifically purchased water from Benton Waterworks, but did not list it as a risk in the RRA.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(ii), states that "Risk and resilience assessments shall include the resilience of the pipes and constructed conveyances, physical barriers, source water, water collection and intake, pretreatment, treatment, storage and distribution facilities, electronic, computer, or other automated systems (including the security of such systems) which are utilized by the system."

Observation 3. The RRA did not include a description in narrative form, or other format, that described an assessment of asset resilience beyond phrases such as "all secure and backup systems." During the EPA Inspection, system representatives noted several tools and procedures that provide a level of resiliency such as a tamper-resistant key locking

system and multiple software and financial accounting strategies that were not mentioned in the RRA.

Observation 4. Notably, the System has installed a high level of physical barriers to protect its finished water storage tanks that were not included in the RRA. They included a two-fence system, ten-foot high fencing, razor wire, tank ladder access removed to about 14 feet from ground level, and locked access ladder guards.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(iii), states that "Risk and resilience assessments shall include an assessment of the monitoring practices of the system."

Observation 5. The RRA did not include a description in narrative form, or other format, that described threat monitoring practices. During the EPA Inspection the system representatives described several monitoring practices that it has in place such as a SCADA system capable of producing alarms that notify on-call staff after-hours, automated email notifications from the power company, and alerts from the selling water systems for interconnect and supply issues.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(iv), states that "Risk and resilience assessments shall include an assessment of the financial infrastructure of the system."

Observation 6. The RRA did not describe the financial impact to system infrastructure as a result of a threat.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(v), states that "Risk and resilience assessments shall include an assessment of the use, storage, or handling of various chemicals by the system."

Observation 7. The System indicated "no chemicals" on the RRA and did not assess a threat impact on the asset category that addresses the use, storage, or handling of chemicals. During the EPA Inspection, system representatives explained that it does use chemicals in the form of chlorine gas to boost the chlorine residual in the distribution system at several pump stations (refer to Appendix 2, Photograph 14). The EPA Inspector visited one of the three chlorine booster stations where chlorine gas in 150-pound cylinders is used to increase the chlorine residual in the distribution system (refer to Appendix 2, Photograph 13).

The Safe Drinking Water Act, Section 1433(a)(1)(A)(vi), states that "Risk and resilience assessments shall include an assessment of the operation and maintenance of the system."

Observation 8. The RRA did not describe the impact to the operation and maintenance of the System as a result of a threat. System representatives stated that they did not have a formal operation and maintenance manual, or standard operating procedure documented. The system representatives described operating procedures that would need to take place to properly operate the System during some emergencies. The distribution system roughly consists of one pressure zone for each set of interconnects from the two purchased water suppliers. The resulting two pressure zones are separated by intentionally closed distribution valves that are identified in the operator's records. System representatives stated that the corrective action for some emergencies is to

open the closed valves in a proper sequence and manner that is not documented in a written procedure.

The following observations pertain to the SDWA Section 1433(b), Emergency Response Plan.

The Safe Drinking Water Act, Section 1433(b)(4), states that "The emergency response plan shall include strategies that can be used to aid in the detection of malevolent acts or natural hazards that threaten the security or resilience of the system."

Observation 9. During the EPA Inspection, the System representatives described several monitoring practices that were not described in the ERP. For example, the system representatives stated that it has a SCADA system capable of producing alarms that notify on-call staff after-hours to detect chlorine and water supply issues, automated email notifications from the power company for power reliability issues, and alerts from the selling water systems for interconnect and water supply issues.

The Safe Drinking Water Act, Section 1433(b)(3), states that "The emergency response plan shall include actions, procedures, and equipment which can obviate or significantly lessen the impact of a malevolent act or natural hazard on the public health and the safety and supply of drinking water provided to communities and individuals, including the development of alternative source water options, relocation of water intakes, and construction of flood protection barriers."

Observation 10. Some action steps were developed in the ERP to mitigate the impacts of threats to the System. During the EPA Inspection, several actions were mentioned that the operator and staff could take to mitigate impacts but were not outlined in ERP procedures, such as distribution valve manipulations to interconnect the two pressure zones of the distribution system and the use of the System's automated customer dialing system.

The Safe Drinking Water Act, Section 1433(c), Coordination, states that "Community water systems shall, to the extent possible, coordinate with existing local emergency planning committees established pursuant to the Emergency Planning and Community Right-To-Know Act of 1986 (42 U.S.C. 11001 et seq.) when preparing or revising an assessment or emergency response plan under this section."

Observation 11. The action steps in the ERP indicate when to contact local emergency responders as a response step to some emergencies such as thunderstorms. The System has a relationship with the emergency response community. One example is a board member that is also a fire chief with a local fire department. The ERP did not have a developed section on preplanning with the emergency response community, such as review or sharing of the ERP or participation in emergency scenario table-top exercises.

The Safe Drinking Water Act, Section 1433(b)(1), states that "The emergency response plan shall include strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system."

Observation 12. The ERP did not address items that could improve the physical and cybersecurity resiliency of the System. System representatives produced a long-term capital

improvement plan that System representatives stated includes resiliency improvements, but the document was not summarized or referenced in the ERP.

Observation 13. Cybersecurity was not mentioned in the ERP. System representatives were confident that administrative cybersecurity was strong and described backup financial accounts and the professional security background of their contracted information technology consultant.

Observation 14. [redacted]

The following observations pertain to the field assets that were observed during the walkthrough component of the review.

Observation 15. The base of the Longhills Tank had soil coverage above the concrete foundation and against the metal base of the tank and metal sidewall for about one half of the circumference (refer to Appendix 2, Photograph 7). The entire concrete foundation was flush to the ground on the remainder of the circumference, limiting drainage away from the base (refer to Appendix 2, Photograph 5).

Observation 16. The junction of the concrete base and metal bottom of the Longhills Tank is a blend of grout and caulking. The grout and caulking were loose or missing around the circumference (refer to Appendix 2, Photograph 6).

Observation 17. The junction of the concrete base and metal bottom of the Mulberry / Salem Tank is a blend of grout and caulking. The grout and caulking were loose or missing around the circumference. In some areas, a 1/4-inch gap exists which allows stormwater under the floor of the tank (refer to Appendix 2, Photograph 11).

Observation 18. The EPA Inspector observed apparent seepage from the Longhills Tank at one 2-foot section (rear right) and one 4-foot section (front left) as referenced from the entrance gate (refer to Appendix 2, Photographs 5 and 6).

Observation 19. The EPA Inspector observed apparent seepage from the Mulberry / Salem Tank at two locations, a 4-foot section (front) and a 6-inch section (front right), as referenced from the gate (refer to Appendix 2, Photographs 15 and 16).

Observation 20. The System representatives stated that the Congo Tank has a known hole in the bottom of the tank that is actively leaking from advanced seepage at the base. The System has an approved project to repair the tank.

Observation 21. The Longhills Tank overflow was downturned at the top of the tank and appeared to be at least rough screened, but evaluation for fine mesh could not be made. The overflow did not come to a ground-level standard (refer to Appendix 2, Photographs 13 and 14).

Observation 22. The Mulberry / Salem Tank overflow was downturned at the top of the tank and appeared to be at least rough screened, but evaluation for fine mesh could not be made. The overflow did not come to a ground-level standard (refer to Appendix 2, Photograph 10).

Observation 23. The EPA Inspector observed that the chlorine gas detector at the Sparks Chlorine Booster Station was not functioning. System representatives stated that it had failed recently and that a contractor was scheduled to service the detector on 6/29/2023 (refer to Appendix 2, Photograph 17).

Observation 24. The chlorine regulator at the Sparks Chlorine Booster Station was not equipped with a vent (refer to Appendix 2, Photograph 14).

Section IV – CLOSING CONFERENCE

On June 28, 2023, the EPA Inspector met with the System representatives for a closing conference at approximately 12:10 p.m. Mike McFadden reviewed observations with the System representatives and explained that all observations were preliminary and did not constitute any formal compliance determination.

Section V – FOLLOW UP

No additional information was received by the EPA Inspector after exiting the facility on June 28, 2023.

Section VI – LIST OF APPENDICES

Appendix 1 – Safe Drinking Water Act (SDWA) Sections 1433(a) and (b) Checklist
Appendix 2 – Photograph Log

Appendix 2

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 1. Longhills Tank View of the double-fence system with the innermost fence equipped with razor wire and access ladder modified to above ground level. The “No Trespassing” signage was unreadable.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 2. Longhills Tank View of the Longhills Tank access ladder that was cut above ground level and shielded with a ladder guard.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 3. Longhills Tank Alternate view of the Longhills Tank access ladder that was cut above ground level and shielded with a ladder guard. Also, visible in this image is the overflow that was downturned but did not extend to ground level. The overflow did not allow for evaluation for adequate screening.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 4. Longhills Tank Alternate view of the Longhills Tank overflow. The overflow was downturned but did not extend to ground level. The overflow did not allow for evaluation for adequate screening.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 5. Longhills Tank View of the concrete base of the Longhills Tank. The base was flush to ground level which allows water and sediment to come in contact with the metal tank base. The area was wet, indicating tank seepage from the base.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 6. Longhills Tank View of the grout and caulking seal at the base of the Longhills Tank that was weathered, peeling away, and cracked.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 7. Longhills Tank View of the concrete base of the Longhills Tank that was covered with soil above the base seal and to the sidewall of the tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 8. Mulberry/Salem Tank View of the double-fence system with the innermost fence equipped with razor wire and access ladder modified to above ground level.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 9. Mulberry/Salem Tank View of an emergency contact sign that was prominently attached to the outer fence at the Mulberry/Salem Tank. A “No Trespassing” sign was not present.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 10. Mulberry/Salem Tank View of the overflow of the Mulberry/Salem Tank that was downturned but did not extend to ground level. The overflow did not allow for evaluation for adequate screening.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 11. Mulberry/Salem Tank View of a gap greater than ¼ inch between the metal tank base and the concrete foundation of the Mulberry/Salem Tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 12. Sparks CAW Master Meter View of light sediment on the pit floor and 1 foot of standing water which was near the submersible pump trigger point to operate.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 13. Sparks Chlorine Booster Station View of the exterior of the chlorine storage and chlorine feed entrance door. A distinct second room had a rear entrance door (not in the photograph view).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 14. Sparks Chlorine Booster Station View of one (1) 150 lb. chlorine gas cylinder that was in operation on a chlorine scale. The Regal chlorinator did not have a vent plumbed into the unit.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 15. Mulberry/Salem Tank View of apparent seepage from base of the tank, ponding onto the concrete base at the Mulberry/Salem Tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 16. Mulberry/Salem Tank Alternate view of apparent seepage from the base of the tank onto the concrete base at the Mulberry/Salem Tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Salem Water Users Association Water Public Water System		
City: Salem	County/Parish: Saline County	State: Arkansas

Photograph 17. Sparks Chlorine Booster Station View of the chlorine gas detector that was not functional at the Sparks Chlorine Booster Station.