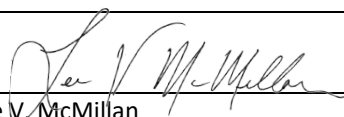
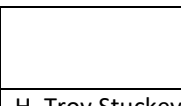


Region 6 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	08/21/2019		
Media:	FIFRA		
Regulatory Program(s)	Section 12		
Company Name:	City of Corpus Christi		
Facility Name:	O. N. Steven Water Treatment Plant		
Facility Physical Location:	13101 Leopard Street		
(city, state, zip code)	Corpus Christi, TX 78410		
Mailing address:			
(city, state, zip code)			
County/Parish:	Nueces County		
Facility Contact:	Kevin Norton, P.E.	Director of Water Utilities	
	KevinN@cctexas.com		
FRS Number:	N/A		
Identification/Permit Number:	N/A		
Media Number:			
NAICS:			
SIC:			
Personnel participating in inspection:			
Kevin Norton, P.E.	City of Corpus Christi Utilities Department	Director of Water Utilities	(361) 826-1874
Gabriel Ramirez	City of Corpus Christi Utilities Department	Assistant Director of Water Quality & Treatment	(361) 826-1202
William Creech	City of Corpus Christi Utilities Department	Utilities System Manager	(361) 826-1954
Rafael Martinez	City of Corpus Christi Utilities Department	Water Plant Manager	(361) 826-1218
Crystal Ybanez	City of Corpus Christi Utilities Department	Water Quality Manager	(361) 826-1289
Rebecca Pezzi	City of Corpus Christi Utilities Department	Environmental Programs Specialist-Safety	(361) 826-1871
Lee McMillan	EPA Region 6 – Pesticide Enforcement	Inspector/Environmental Engineer	(214) 665-6404
Perry Cervantes	Texas Department of Agriculture	Coordinator for Pesticide Certification and Compliance	(512) 463-7692
Ernest Hernandez	Texas Department of Agriculture	Inspector/Regional Training Specialist	(956) 787-8866
EPA Lead Inspector Signature/Date	 Lee V. McMillan		10/21/19 Date
Supervisor Signature/Date	 H. Troy Stuckey		10/22/19 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Lee McMillan arrived at the City of Corpus Christi O. N. Stevens Water Treatment Plant at 8:53 AM on August 21, 2019 for an announced joint inspection with Texas Department of Agriculture inspectors (TDA), Perry Cervantes and Ernest Hernandez. I presented my credentials to Kevin Norton along with a Notice of Inspection and informed him that this was an EPA inspection to investigate a potential unregistered pesticide. The scope of the inspection was the evaluation of the facility's use of sodium permanganate to treat pests in the water treatment process. At 9:05 AM introductions were made. We met with Kevin Norton, Director of Water Utilities, Gabriel Ramirez, Assistant Director of Water Quality & Treatment, William Creech, Utilities System Manager, Rafael Martinez, Water Plant Manager, Crystal Ybanez, Water Quality Manager, and Rebecca Pezzi, Environmental Programs Specialist-Safety.

FACILITY DESCRIPTION

The City of Corpus Christi Water Department serves nearly 500,000 citizens of Corpus Christi and the Coastal Bend. The Department supplies water for municipal and industrial use in a seven-county service area covering 140 square miles. Water is drawn from the Lake Corpus Christi and Choke Canyon Reservoir System, both within the Nueces River Basin, and from Lake Texana via the Mary Rhodes Pipeline. Approximately 50% of the water delivered to homes in Corpus Christi comes from Lake Texana. Lake Corpus Christi, which stores 242,241 acre-feet of water and Choke Canyon Reservoir stores 695,271 acre-feet of water. The City of Corpus Christi also purchases 41,840 acre-feet of water per year from the Lavaca-Navidad River Authority.

Approximately 28 billion gallons of water are treated each year. Water infrastructure has a rated capacity of 167 million gallons per day, which is well above the peak summer demand of as much as 110 million gallons per day. The department operates five pumping stations, four elevated storage tanks and maintains 1,600 miles of pipeline. The Water Department repairs and replaces water infrastructure and maintains a water testing laboratory. The City diverts raw water from the Nueces River and Lake Texana into the plant to be treated and turned into drinking water.

Water is drawn from the Nueces River where it passes through screens to remove the large floating objects such as leaves, branches, fish, etc. The water is pumped from the Nueces River to the treatment plant to the junction box where the water is blended with Lake Texana water. From there, the water is piped to a receiving unit where coagulants are added to the water to "destabilize" colloidal suspensions. The coagulation process works to remove any colloidal suspended particles present in the raw water. Disinfectant chemicals are also injected into the water to kill bacteria and viruses. The water is then piped into settling basins where the coagulation process continues until it is completed. After that, water enters the filtration system for the final removal of particles. Additional disinfectant chemicals are added to the water before the water is stored in clear wells. Large master pumps help to distribute water into the city where water is stored in storage tanks.

Section II – OBSERVATIONS

During the inspection we discussed the facility's processes and systems. All the plant's processes are self-contained within the facility. I was made aware that this facility currently uses sodium permanganate to treat its surface water. The facility had used potassium permanganate 10 years prior. At approximately 10:05 AM I began touring the following areas accompanied by the facility staff along with TDA inspectors: Raw Water Intake Area, Sodium Permanganate Station, Pre-sedimentation Basin, Recycle Pond, Coagulation Area, Flocculation Area including Settlement Areas, Filtration Area, and the Pumping station. I learned that chlorine dioxide is used to control taste and odor after raw water settlement. The sodium permanganate is introduced into the system at a rate of 5 mg/L per 8 million gallons. On average 70 – 80 mg/L are used in treatment. Anthracite Coal/Clay is the only filter media used in the filter area. The water treatment facility has the ability to store approximately 14 million gallons and on average provides about 80 million gallon per day to its citizen.

Section III – AREAS OF CONCERN

I observed the installation of a sodium permanganate injection system used by O. N. Stevens Water Treatment Plant to control taste and odor caused by algae. The labeling did not have any indication of EPA pesticide registration. The sodium permanganate product was potentially sold and distributed in violation of FIFRA because at the time of the inspection the pesticide was unregistered. At 11:30 AM a closing was conducted with the facility staff. During the inspection documents were requested regarding the plant's use of sodium permanganate to be sent at a later date. The inspection was concluded at approximately 11:40 AM and I exited the facility.

Section IV – FOLLOW UP

The following information was received by EPA after exiting the Facility on August 21, 2019:

- Submitted Bid Proposals to the City of Corpus Christi
- Bid Invitation Letter from the City of Corpus Christi
- Bid Submission Instructions
- Sample Bid Forms from the City of Corpus Christi.
- City of Corpus Christi Disclosure of Interest
- Technical Data Sheets for Sodium Permanganate
- SDS for Sodium Permanganate and
- Sodium Permanganate Purchase Invoices to the City of Corpus Christi

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 25 photos taken

Appendix 2 – Notice of Inspection

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\DSCN0039.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:13 AM

Photographer: Ernest Hernandez

Description: Raw Water Junction Box Station



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0041.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:17 AM

Photographer: Ernest Hernandez

Description: Raw Water Junction Box Station



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0044.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:19 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Pumping Station



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0048.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:22 AM

Photographer: Ernest Hernandez

Description: Raw Water Intake Pumps



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0049.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:24 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Pumping Station



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0050.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:25 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Storage



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0051.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:25 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Tote



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0052.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:25 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0054.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:26 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Labeling



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0056.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:27 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Injection Point



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0057.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:27 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Injection Point



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0058.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:27 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Injection Point at Pre-sedimentation Basin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0059.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:27 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Flow Meter



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0060.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:34 AM

Photographer: Ernest Hernandez

Description: Pre-sedimentation Basin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0061.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:34 AM

Photographer: Ernest Hernandez

Description: Pre-sedimentation Basin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0062.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:35 AM

Photographer: Ernest Hernandez

Description: Recycle Water Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0064.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:36 AM

Photographer: Ernest Hernandez

Description: Pre-sedimentation Basin Sodium Permanganate Inlet



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0065.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:48 AM

Photographer: Ernest Hernandez

Description: Recycle Water Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0066.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:48 AM

Photographer: Ernest Hernandez

Description: Recycle Water Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0069.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:53 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Station at Recycle Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0070.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:54 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Label at Recycle Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christi (Citizen)\Inspection\Photos\ DSCN0071.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:54 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Station at Recycle Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0072.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:54 AM

Photographer: Ernest Hernandez

Description: Sodium Permanganate Station Control at Recycle Pond



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0073.JPG

Date of Photo: August 21, 2019

Time of Photo: 10:59 AM

Photographer: Ernest Hernandez

Description: Coagulation Area



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: O. N. Stevens Water Treatment Plant		
City: Corpus Christi	County/Parish: Nueces	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\ FY2019\2019-061 City of Corpus Christy (Citizen)\Inspection\Photos\ DSCN0074.JPG

Date of Photo: August 21, 2019

Time of Photo: 11:40 AM

Photographer: Ernest Hernandez

Description: Facility Arial Photo

APPENDIX 2

NOTICE OF INSPECTION



U. S. ENVIRONMENTAL PROTECTION AGENCY

NOTICE OF INSPECTION

ADDRESS (EPA Regional Office)

1201 Elm St., Ste 500
Dallas TX 75270

DATE

8/21/2019

HOUR

9:00

A.M.
P.M.

NAME OF INDIVIDUAL

Kevin Norton, P.E.

TITLE

Director of Water Utilities

FIRM NAME

City of Corpus Christi
ON Stevens Water Treatment Plant

FIRM ADDRESS (Number, Street, City, State and Zip Code)

13101 Leopard St.
Corpus Christi, TX 78410

SIGNATURE OF EPA EMPLOYEE

TITLE

Environmental Engineer

REASON FOR INSPECTION

- ☐ FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED, LABELED, AND RELEASED FOR SHIPMENT, AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES, IN PLACES WHERE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec. 9 (a) and 12 (a) (2) (B)).
- ☒ FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169. (Sec. 8 and 12 (a) (2) (B)).

VIOLATION SUSPECTED:

For Cause Inspection - FIFRA Section 12(a)(1)(A) - Unregistered Pesticide

Reviewing process associated with permanganate used
in Water Treatment

Received 8/21/19

Kevin M. Norton

Section 8, 9 (a) and 12 (a) (2) (B) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et seq.) are quoted on the reverse of this form.