

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/10/2022	
Media Program:	Water	
Regulatory Program(s)	SDWA PWS	
Company Name:	Town of Flower Mound	
Facility Name:	Town of Flower Mound	
Facility Physical Location:	201 Spinks Rd.	
(city, state, zip code)	Flower Mound, TX 75028	
Mailing address:	201 Spinks Rd.	
(city, state, zip code)	Flower Mound, TX 75028	
County/Parish:	Denton County	
Facility Phone Number	972-874-6400	
Facility Contact:	Clay Riggs	Director of Public Works
	clayton.riggs@flower-mound.com	
FRS Number:	none	
Identification/Permit Number:	none	
Media Identifier Number:	TX0610023	
NAICS:	none	
SIC:	none	
Personnel participating in inspection:		
Clay Riggs	Town of Flower Mound	Director of Public Works
Ronnie Bates	Town of Flower Mound	Assistant Director of Public Works
Jeremy Jennings	Town of Flower Mound	Utility Line Maintenance Supervisor
Tony Criss	Town of Flower Mound	Utility Line Maintenance Supervisor
Stephen Stacks	Town of Flower Mound	Chief Mechanic
Sami Doupnik	EPA Region 6/ECAD-WB-WD	Physical Scientist
Jessica Moore	EPA Region 6/ECAD-WB-WD	Physical Scientist
EPA Lead Inspector Signature/Date	Sami Doupnik  Digitally signed by Sami Doupnik Date: 2022.04.25 15:14:09 -05'00'	4/25/2022
	Sami Doupnik	Date
Supervisor Signature/Date	CURRY JONES  Digitally signed by CURRY JONES Date: 2022.04.25 11:48:13 -05'00'	
	Curry Jones	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Sami Doupnik and Jessica Moore arrived at the Town of Flower Mound Public Water System Public Works Building at 8:30 AM on March 10, 2022 for an announced inspection of the water system. We met with Clay Riggs, Director of Public Works, Ronnie Bates, Assistant Director of Public Works, Jeremy Jennings, Utility Line Maintenance Supervisor, Tony Criss, Utility Line Maintenance Supervisor, and Stephen Stacks, Chief Mechanic, at the Opening Conference. I presented my credentials to Clay Riggs and informed him that this was an EPA inspection to determine the water system facility's compliance under the Safe Drinking Water Act and was being conducted as a part of a drinking water inspector training for federal and state drinking water inspectors. Appendix 3 contains the names and contact information of all EPA and state participants of the training.

FACILITY DESCRIPTION

The Town of Flower Mound is a purchase water system that serves a total of 24,976 connections and an approximate population of 76,030 individuals, based on Texas Drinking Water Watch data. The water system facilities consist of three pump stations that serve one pressure plane. The purchased water is supplied to the Town of Flower Mound through two master meters.

The Town of Flower Mound secures water through a purchase contract with Dallas Water Utility (TX0570004), which secures up to 11.0 million gallons per day (MGD) of purchased treated surface water. The purchased water supplies the Pintail Pump Station. The purchased water flows through a master meter before entering three ground storage tanks. Four service pumps pump water from the tanks to the distribution system.

The Town of Flower Mound also secures water through a purchase contract with the Upper Trinity Regional Water District (TX0610213), which secures up to 30.0 MGD of purchased treated surface water. The purchased water supplies the Stonehill Pump Station and the Western Pump Station. At the Stonehill Pump Station, the purchased water flows through a master meter prior to entering one ground storage tank. Five service pumps pump water from the tank to the distribution system. At the Western Pump Station, the purchased water flows through a master meter prior to entering one ground storage tank. Three service pumps pump water from the tank to the distribution system.

The Town of Flower Mound also has three elevated storage tanks that provide addition storage and pressure maintenance to the distribution system. One elevated storage tank has a chloramine booster.

The Town of Flower Mound also sells water to Red Rock Water Supply Corporation (WSC) (TX0610113) through a wholesale contract where the Town of Flower Mound provides a maximum purchase rate of 98 gallons per minute to Red Rock WSC.

A full diagram of the Town of Flower Mound water system provided by Clay Riggs, Director of Public Works, can be found in Appendix 2.

Section II - OBSERVATIONS

During the inspection, we inspected the water system's SCADA system, three pump stations, and two of the three elevated storage tanks.

SCADA System – housed and operated at 1105 Duncan Lane, Flower Mound Texas, 75028, approximately 0.2 miles south from the Public Works Building toward the Flower Mound Wastewater Treatment facilities.

- The SCADA system is manned 24/7. Two computers have access to SCADA and a third computer is a read-only monitor. Operators communicate via radios on a dedicated radio frequency. The SCADA system has a seconds-counter as a cybersecurity measure (Appendix 1, Photo 1). We were informed that only one person mans the SCADA system during the night shift, however the system is working to budget for two in the future. When an alarm goes off, the person manning the SCADA system then notifies necessary personnel. Every SCADA operator has the same log-in information to access into the system (AOC 1).

Pintail Pump Station – 708 Pintail Place, Flower Mound, Texas 75067

- The pump station and three ground storage tanks are located within a residential neighborhood. We were informed that no noise complaints have been made from neighboring residents. Two of the four pumps were online at the time of the inspection. A third pump may go online during peak season demand. Three pumps are variable speed controlled and one is a soft start. We were informed that one of the pumps that was offline at the time of the inspection was undergoing maintenance and waiting on replacement parts. The other three pumps were observed to be in good condition, free of rust and leaks (Appendix 1, Photo 2). The wall surrounding the water entry pipe had visible cracking and previous repair (Appendix 1, Photos 3-4; AOC 2). We were informed that the pipe vibrates and damaged the wall, and the system is working to install a pressure regulator to stop the movement of the pipe.
- 1.0 MG ground storage tank: Tank was observed to be in good condition at the time of the inspection.
- 2.0 MG ground storage tank: The fence located between the tank and the adjacent creek was broken (Appendix 1, Photo 5; AOC 3). We observed soil and sediment accumulated above the tank's concrete pad (Photo 6, AOC 4). Tank was otherwise in good condition.
- 3.0 MG ground storage tank: We observed broken and missing shims along the sidewalk at the base of the tank (Appendix 1, Photo 7; AOC 5) and erosion beneath the sidewalk (Appendix 1, Photo 8; AOC 5). The tank itself was observed to be in good condition.

Stonehill Pump Station – 6200 Stone Hill Farms Parkway, Flower Mound, Texas 75028

- One of the five pumps was online during the time of the inspection. We were informed that the pumps rotate operation every month. A second pump may go online during peak season demand. Pumps were free of rust and no leaks were observed. The lubricating oil for the pumps was in an unlabeled 5-gallon bucket in a storage closet (Appendix 1, Photo 9; AOC 6). The original packaging and label was missing at the time of the inspection.
- The storage tank was observed to be in good condition at the time of the inspection.

Western Pump Station – 6600 Stonecrest Road, Argyle, Texas 76226

- One of the three pumps were online during the time of the inspection. We were informed that one of the offline pumps is waiting on replacement seals. The pumps were equipped with drip trays at the base to collect any condensation or drips from the sampling taps. We observed rust in the drip trays but not on the pumps. We observed evidence of leaking on a wall in the pipe gallery located in the basement beneath the pumps. No active leak was observed at the time of the inspection. We were informed that the system is currently planning to reconfigure the existing pipes to avoid future leaks.

Freeman Road Tower – 4400 Freeman Road, Flower Mound, Texas 75022

- Tower was observed to be in good condition at the time of the inspection.

Bruton Orand Tower and Chloramine Booster – 3810 Bruton Orand Boulevard, Flower Mound, Texas 75022

- The liquid ammonium sulfate (LAS) barrels for the chloramine booster had adequate secondary containment. LAS barrels were missing original labels (Appendix 1, Photo 10; AOC 7).
- We observed deteriorating seals on the tank entry (Appendix 1, Photo 11; AOC 8), and a leak coming from the actuator arm (Appendix 1, Photo 12; AOC 9). Water from the leak was pooling in a joint on either side of the actuator (Appendix 1, Photo 13; AOC 9).

Section III – AREAS OF CONCERN

1. Every operator that has access to the water system's SCADA system shares the same login (username and password). We recommend unique login usernames and passwords for each operator with access to SCADA for enhanced cybersecurity.
2. The wall surrounding the water entry pipe had visible cracking and previous repair. We recommend installing the pressure regulator and repairing any remaining wall damage.
3. The fence is broken at the Pintail Pump Station. We recommend repairing the broken fence to keep the pump station and two ground storage tanks secure.
4. Sediment build-up at the base of the 2.0 MG ground storage tank at the Pintail Pump Station. Erosion control is recommended.

5. Erosion beneath the sidewalk and missing/degrading shims at the 3.0 MG ground storage tank at the Pintail Pump Station. We recommend repairing the erosion beneath the concrete, implementing erosion control, and replacing missing/degrading shims.
6. Lubricating oil in an unlabeled container at the Stonehill Pump Station. We recommend keeping lubricating oil in its original container with label or applying the original label to the current container.
7. LAS barrels missing/deteriorating labels at the Bruton Orand Tower Chloramine Booster. We recommend new labels for all three LAS barrels.
8. Deteriorating seals on the tank entry at Bruton Orand Tower. We recommend replacing deteriorating seals.
9. Active leak and water pooling from the actuator arm on the tank entry at the Bruton Orand Tower. We recommend fixing the observed leak and inspecting the areas where water had pooled for rust and repair any damage.

EPA Region 6 inspector Sami Doupnik conducted a closing conference at the Town of Flower Mound Public Works Building at approximately 2:30pm on March 10, 2022 for the inspection. During the closing conference, Sami Doupnik reviewed the nine (9) Areas of Concern noted during the inspection and our recommendations.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility March 10, 2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 13 photos taken 3/10/22

Appendix 2 – Water System Diagram

Appendix 3 – Opening conference sign-in sheets

Appendix 1

Photograph Log

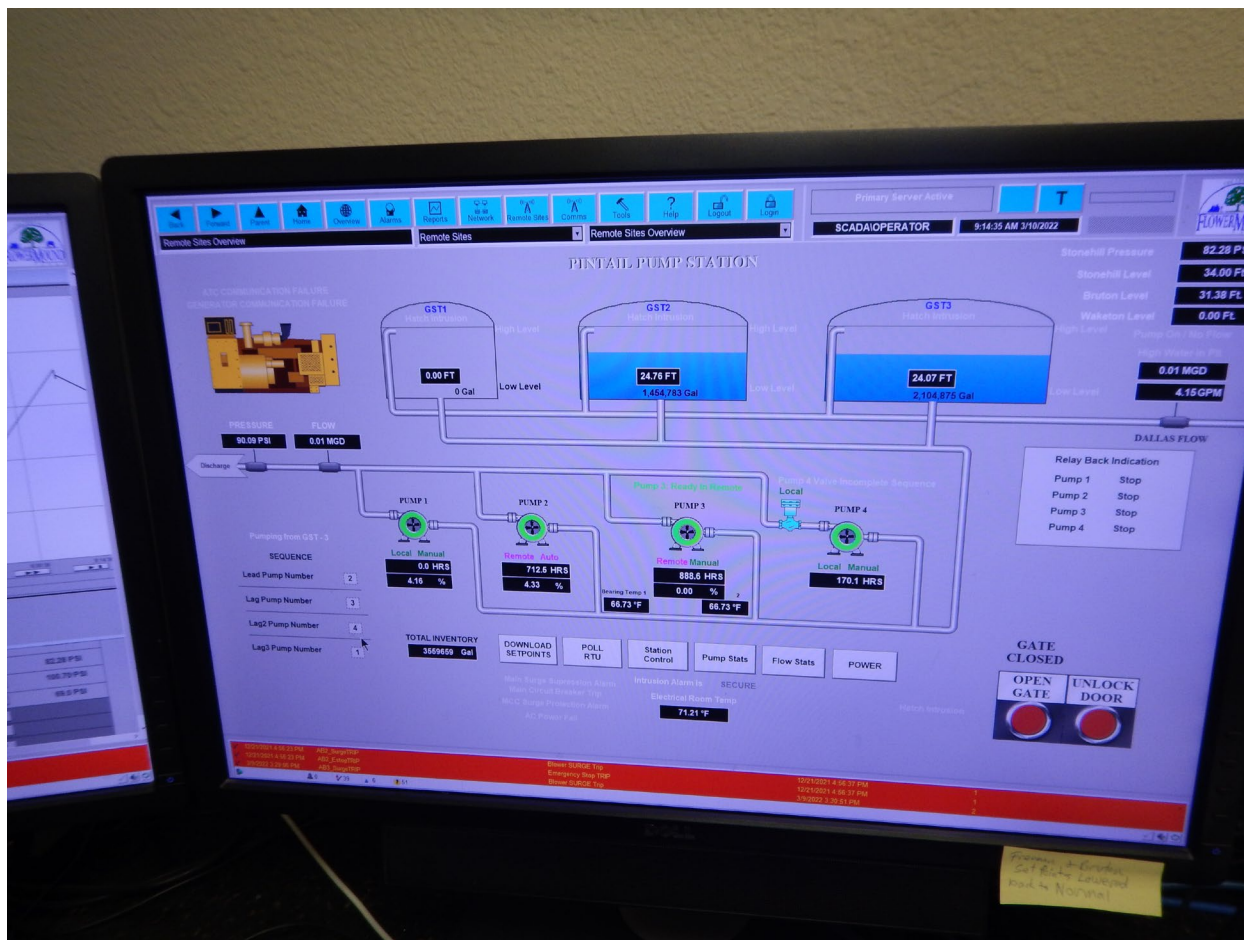


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0501.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:11 AM

Photographer: Jessica Moore

Description: Pintail Pump Station pump in good condition



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0502.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:16 AM

Photographer: Jessica Moore

Description: Repaired wall surrounding the entry pipe into the Pintail Pump Station taken from outside of the pump building



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0503.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:16 AM

Photographer: Jessica Moore

Description: Damaged wall surrounding the entry pipe into the Pintail Pump Station taken from inside the pump building



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0505.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:24 AM

Photographer: Jessica Moore

Description: Broken fence behind Pintail Pump Station 1.0 and 2.0 MG ground storage tanks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0507.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:27 AM

Photographer: Jessica Moore

Description: Sediment deposition on top of Pintail Pump Station 2.0 MG ground storage tank concrete base



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0510.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:33 AM

Photographer: Jessica Moore

Description: Broken sidewalk shim surrounding Pintail Pump Station 3.0 MG ground storage tank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0511.JPG

Date of Photo: 3/10/2022

Time of Photo: 11:34 AM

Photographer: Jessica Moore

Description: Erosion beneath the sidewalk surrounding Pintail Pump Station 3.0 MG ground storage tank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0516.JPG

Date of Photo: 3/10/2022

Time of Photo: 12:13 PM

Photographer: Jessica Moore

Description: Unlabeled pump lubricating oil containers at Stonehill Pump Station



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0518.JPG

Date of Photo: 3/10/2022

Time of Photo: 2:49 PM

Photographer: Jessica Moore

Description: Unlabeled LAS barrels at Bruton Orand Tower Chloramine Booster



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0519.JPG

Date of Photo: 3/10/2022

Time of Photo: 2:31 PM

Photographer: Jessica Moore

Description: Deteriorating seal on the tank entry at Bruton Orand Tower



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0520

Date of Photo: 3/10/2022

Time of Photo: 2:52 PM

Photographer: Jessica Moore

Description: Active leak from tank entry actuator arm at Bruton Orand Tower



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Town of Flower Mound PWS		
City: Flower Mound	County/Parish: Denton County	State: Texas



Photo File Name: DSCN0522

Date of Photo: 3/10/2022

Time of Photo: 2:54 PM

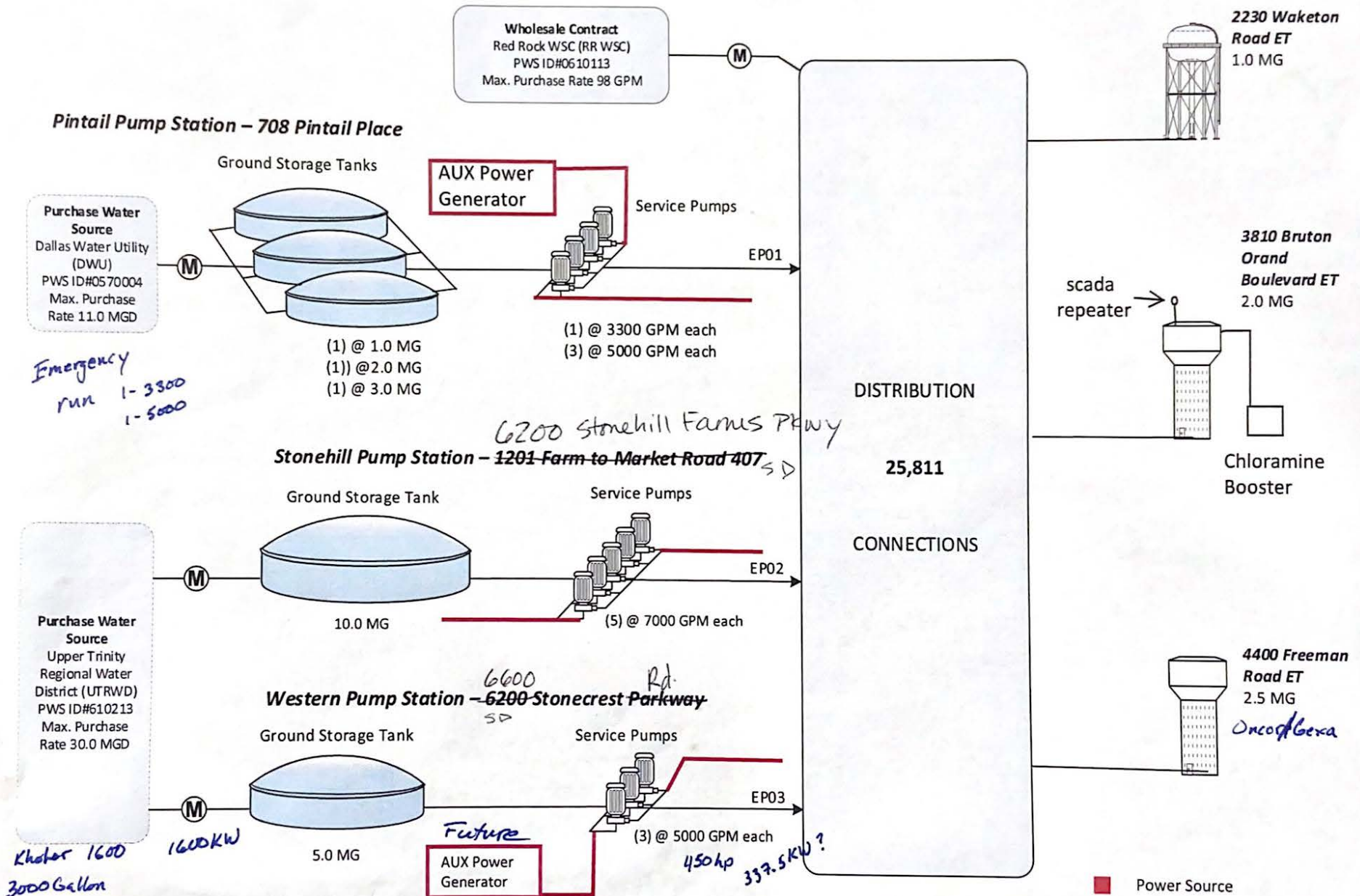
Photographer: Jessica Moore

Description: Water pooling from tank entry actuator arm leak at Bruton Orand Tower

Appendix 2

Town of Flower Mound
PWS ID# 0610023

TOWN OF FLOWER MOUND WATER SYSTEM DIAGRAM ATTACHMENT A



Appendix 3

Town of Flower Mound

EPA INSPECTION

Date: March 10, 2022

NAME	ORGANIZATION	TITLE	PHONE NUMBER/EMAIL
Rocky Overgaard	ODEQ	Engineer Intern	405-702-8144 rockyovergaard@deg.ok.gov
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Seb Noori	ODEQ	Engineer Intern	405-404-6620 seb.noori@deg.ok.gov
Raquel Taveras	US EPA-HQ	Environmental Engineer	202-564-9651 taveras.raquel@epa.gov
Tanya Trujillo	NM Env Dept	Compliance Manager	505-372-8273 tanya.trujillo@state.nm.us
Christina Davis	LDH	Engineer Intern II	225-287-1722 christina.davis@lsu.gov
David Parker	EPA-NEIC	Physical Scientist	303-462-9012 parker.david@epa.gov
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Naima Khan	NMED	Compliance Officer	505-4707120 naima.khan@state.nm.us
Joseph Hopkins	TCEQ	Investigator	806-252-3426 joseph.hopkins@tceq.texas.gov
Sami Dougnik	EPA R6	Physical Scientist	214-665-7495 dougnik.sami@epa.gov
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Corey Harris Jr.	LDH/OPH R9 Engineering	Engineer Intern II	985-543-4457/985-877-9318 Corey.Harris@la.gov
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Jessica Moore	EPA-R6	Physical Scientist	214-665-6495 moore.jessica@epa.gov
Frank Baca	NMED	Compliance Officer	505/469-1323 FrankBaca@state.nm.us
Stephen Stacks	Flower Mound	Chief Mechanic	972/874/6407/stephen.stacks@flower-mound.com
Tony Criss	Flower Mound	ULM Supervisor	972-874-6427/tony.criss@flower-mound.com
Jeremy Scanning	Flower Mound	ULM Supervisor	972-874-6440/Jeremy.Scanning@flower-mound.com
Ronnie Bates	Flower Mound	Asst Public Works Dir	972-874-6414.Ronnie.Bates@flower-mound.com
Clay Rigg	Flower Mound	Dir Public Works	972-874-6411 clayton.rigg@flower-mound.com