EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	02/26/2025	
Media Program:	Drinking Water	
Regulatory Program(s)	Safe Drinking Water Act (SDWA)	
Company Name:	**New Mexico State University (NMSU)**	
Facility Name:	**NMSU Water System**	
Facility Physical Location:	1510 Stewart Street	
(city, state, zip code)	Las Cruces, NM 88003	
Mailing address:	PO Box 3001, Dept 3545	
(city, state, zip code)	Las Cruces, NM 88003	
County/Parish:	Doña Ana County	
Facility Phone Number	575-646-5956	
Facility Contact:	Patrick Chavez	Executive Director of Energy
	pchavez@nmsu.edu	
FRS Number:	110042056404	
System Classification:	Community Water System	
PWS ID:	NM3528707	

Personnel participating in inspection:		
Chelo Hall	EPA Region 6	EPA Inspector
Chris Padilla	ERG	Senior Engineer, Lead Inspector
Maura Harbaugh	ERG	Engineer, Inspector
Andres Bencome	NMSU	Asst. Manager
Brandon Garcia	PureOps (Contract Operations Firm)	Technical Lead
Patrick Chavez	NMSU	Executive Director of Energy
Lorraine Silva	NMSU	Facilities Utility Manager
Mario Gonzales	PureOps (Contract Operations Firm)	Tech Operator
Jennifer Allen	NMSU	Manager – Information Section
Marc Medina	NMSU	Network Systems Security Admin
Jared Balderas	NMSU	SCADA Specialist

EPA Lead Inspector Signature/Date	C L Bordlemay Padilla	
	Chris Padilla	03/21/25
Supervisor Signature/Date	RUBEN ALAYON-GONZALEZ Digitally signed by RUBEN ALAYON-GONZALEZ Date: 2025.04.25 08:49:36 -05'00'	
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On February 26, 2025, the United States Environmental Protection Agency (EPA) and EPA contract inspectors from Eastern Research Group, Inc. (ERG) (hereinafter, the EPA inspection team) conducted an announced Compliance Evaluation Inspection under Section 1445 of the Safe Drinking Water Act (SDWA), 42 U.S.C. §300j-4, of the New Mexico State University (NMSU) Water System (hereinafter, the System or NMSU) (NM3528707). The inspection process began at approximately 8:00 AM on February 26, 2025, and finished at approximately 4:42 PM on February 26, 2025.

Chris Padilla presented credentials to Patrick Chavez during the opening conference. The EPA inspection team informed him that this was an EPA inspection to determine compliance with the SDWA and other applicable federal and state regulations. The EPA inspection team also informed the System representative that they would be conducting a cybersecurity evaluation alongside the SDWA Section 1433 review of the System's Risk and Resilience Assessment (RRA) and Emergency Response Plan (ERP). To facilitate the inspection process, the EPA inspection team used a checklist outlining the requirements of SDWA Section 1433 during the document review. Refer to Appendix 2, Inspection Sign-in Sheet.

SYSTEM DESCRIPTION

The System is owned by NMSU, serves a population of approximately 24,000 people, and has 532 service connections. The EPA inspection team reviewed the above information with System representatives during the inspection process via conversations. It is a community water system as defined by 40 C.F.R., Part 141 Subpart A.

The System is a groundwater system with polyphosphate iron and manganese sequestration and sodium hypochlorite disinfection. The infrastructure consists of four active wells, three storage tanks that float on the distribution system, and one booster pumping station. There are two pressure zones in the distribution system. There is an emergency interconnection with the City of Las Cruces that can flow in both directions as needed.

The System owner is a state-funded university that creates budgets based upon the expenses of the System and sets water rates accordingly. The university establishes building renewal and replacement funds for projects identified in one- and three-year cycles. System representatives stated that there are pending projects for a new well, well house renovations, and water line replacements, which are part of a $32 million utility improvement project.

A contract operations firm, PureOps, employs certified operators who staff the System 24 hours per day, seven days per week. According to System representatives, due to the fluctuating student population,

water demand during winter break in January averages 0.65 million gallons per day (MGD) while during the summer months water demand averages 2.8 MGD, primarily due to increased irrigation.

Section II – INSPECTION ACTIVITY SUMMARY

The EPA Inspection Team conducted an array of interviews and field activities to discuss and observe the System operation and maintenance activities and to assess the condition of drinking water system assets. The physical inspection occurred over one day. The System provided some documents before the inspection for review. The information in this report is based on document review, conversations with System representatives, and observations made during this inspection.

DOCUMENT REVIEW

After the opening conference of the inspection, the EPA Inspection Team inquired about the technical, managerial, and financial capacity of the System, including a review of operator certifications, an overview of the water system, asset management, and source water protection. System representatives stated that they did not have a documented Source Water Protection Plan. Programmatic topics followed, including a review of monitoring and reporting requirements, such as monthly operating reports, Revised Total Coliform Rule (RTCR) Sample Siting Plan, Disinfection Byproducts (DBP), Lead and Copper Rule (LCR) – Revisions (LCRR), and Improvements (LCRI), per- and polyfluoroalkyl substance requirements, inorganics, volatile and semi-volatile organic chemicals, and radiological monitoring. The System representatives described their records' retention policy and the annual development of the Consumer Confidence Report.

The EPA Inspection Team subsequently reviewed distribution system items with the System representatives, such as their Cross-Connection Control Program, tank inspections, hydrant flushing and valve exercising programs, water main break and customer complaint logs, mapping, metering, and water loss audits. System representatives stated that they conduct hydrant flushing and valve exercising activities but have not developed a formal Hydrant Flushing Plan or Valve Exercising Plan.

The EPA inspection team also reviewed the System's Section 1433 RRA and ERP and the System's cybersecurity practices.

VIOLATIONS – LAST FIVE YEARS

Table 1 below provides a summary of the System's violations as identified in New Mexico Drinking Water Watch for the last five years. All violations are reported as "returned to compliance."

Table 1. SDWA Violations for Compliance Periods between January 2020 and January 2025 (data pulled on 03/18/2025)

Determination Date	Violation Type	Violation Name	Analyte Code	Analyte Name
01-21-2025	75	PUBLIC NOTICE RULE LINKED TO VIOLATION	7500	PUBLIC NOTICE
05-15-2023	03	MONITORING, ROUTINE MAJOR	1094	ASBESTOS
04-13-2022	52	FOLLOW-UP OR ROUTINE TAP M/R (LCR)	5000	LEAD & COPPER RULE
02-17-2022	27	MONITORING, ROUTINE (DBP), MINOR	0999	CHLORINE

FIELD ASSETS

Field assets were inspected following the document review. Observations related to field assets are included in Section III – OBSERVATIONS.

Well #10

Well #10 was 700 feet deep with a 16-inch diameter casing and a yield of 1541 gpm. There was one vertical turbine pump located in a well house that has been scheduled for a refurbishment project in NMSU's current capital plan. The System fed sodium hypochlorite for disinfection and polyphosphate for iron and manganese sequestration at this entry point to the distribution system, utilizing positive displacement diaphragm pumps.

The EPA Inspection Team observed that ventilation of the Well #10 well house, which stored sodium hypochlorite, did not activate. The EPA Inspection Team noted that the polyphosphate storage tank did not have secondary containment and the chemical feed pumps did not have anti-siphon devices to prevent overfeeding chemicals (Refer to Appendix 1, Photographs 1, 2, and 3). There was no guard on the pump motor shaft, creating a potential safety hazard (Refer to Appendix 1, Photograph 4).

Well #17

Well #17 was 900 feet deep with a 16-inch diameter casing and a yield of 1796 gpm. There was one vertical turbine pump located in a well house. The EPA Inspection Team observed no guard around the pump motor shaft, creating a potential safety hazard (Refer to Appendix 1, Photograph 6). The System

fed sodium hypochlorite for disinfection and polyphosphate for iron and manganese sequestration at this entry point to the distribution system, utilizing positive displacement diaphragm pumps.

The EPA Inspection Team noted that the chemical storage tanks lacked secondary containment and the chemical feed pumps did not have anti-siphon devices to prevent overfeeding of chemicals (Refer to Appendix 1, Photographs 7 and 8).

The EPA Inspection Team also noted that animal feed lots were within 1000 feet of the well (Refer to Appendix 1, Photograph 9).

Well #14

Well #14 was 668 feet deep with a 16-inch diameter casing and a yield of 1883 gpm. There was one vertical turbine pump located in a well house. The EPA Inspection Team observed no guard on the pump motor shaft, creating a potential safety hazard (Refer to Appendix 1, Photograph 14). The System fed sodium hypochlorite for disinfection and polyphosphate for iron and manganese sequestration at this entry point to the distribution system, utilizing positive displacement diaphragm pumps.

The EPA Inspection Team noted the chemical storage tanks lacked secondary containment, the sodium hypochlorite tank had a displaced lid, and the chemical feed pumps did not have anti-siphon devices to prevent overfeeding of chemicals (Refer to Appendix 1, Photographs 11, 12, and 13).

The EPA Inspection Team observed a screen larger than #24-mesh on the air relief port (Refer to Appendix 1, Photograph 16).

There was a gap beneath the security fencing large enough for unauthorized access (Refer to Appendix 1, Photograph 10).

Well #16

Well #16 was 720 feet deep with a 16-inch diameter casing and a yield of 1246 gpm. There was one vertical turbine pump located in a recently refurbished well house. The perimeter security fence around the well house and a chemical storage building on site was approximately 6 feet tall with no barbed wire (Refer to Appendix 1, Photograph 17). The System fed sodium hypochlorite for disinfection and polyphosphate for iron and manganese sequestration at this entry point to the distribution system, utilizing positive displacement diaphragm pumps.

The chemical feed pumps did not have anti-siphon devices to prevent overfeeding of chemicals and line shaft guards were missing from the well pump motor (Refer to Appendix 1, Photograph 18). The sodium hypochlorite and polyphosphate chemical storage tanks were double lined at this site (Refer to Appendix 1, Photograph 22 and 23).

The EPA Inspection Team observed a PVC chemical feed line plumbed on the floor in a common walkway without protection or labeling (Refer to Appendix 1, Photograph 21).

4-Million Gallon (MG) Tank

Although locked and secured, the EPA Inspection Team noted that the access ladder attached to the tank was positioned only 7 feet above the ground, easily accessible to unauthorized entry (Refer to Appendix 1, Photograph 25). The EPA Inspection Team also observed that the tank overflow was screened with a coarse mesh (Refer to Appendix 1, Photograph 24). The seal between the foundation and tank was brittle and missing where observable; however, the EPA Inspection Team could not inspect the entire foundation's circumference as it was covered with sand and soil. Drains meant to remove water from the foundation ring were clogged (Refer to Appendix 1, Photograph 26).

Transfer Pump Station

The transfer pump station pumps water from the 4-MG and 5-MG tanks to the 250,000-gallon tank with two pumps. The pumps are controlled by the level of the 250,000-gallon tank, with back up pump control from the station discharge pressure.

5-MG Tank

Although locked and secured, the EPA Inspection Team noted that the access ladder attached to the tank was positioned only 9 feet above the ground, accessible to unauthorized entry (Refer to Appendix 1, Photograph 27). The EPA Inspection Team also observed that the tank overflow was screened with a coarse mesh larger than #24-mesh (Refer to Appendix 1, Photograph 29). The seal between the tank and foundation was brittle or missing in sections (Refer to Appendix 1, Photograph 28 and 30).

250,000-Gallon Tank

The EPA Inspection Team observed that the tank overflow was screened with a coarse mesh larger than #24-mesh (Refer to Appendix 1, Photograph 32). The seal between the tank and the foundation was brittle or missing in sections (Refer to Appendix 1, Photograph 31).

Section III – OBSERVATIONS

SDWA Section 1433(a), 42 U.S.C. 300i-2, Community Water System Risk and Resilience requires a CWS serving more than 3,300 persons to conduct an RRA of its system, including an assessment of:

a. the risk to the system from malevolent acts and natural hazards;
b. 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;
c. the monitoring practices of the system;
d. the financial infrastructure of the system;
e. the use, storage, or handling of various chemicals by the system; and
f. the operation and maintenance of the system.

Observation 1. On February 12, 2025, EPA completed an inspection of the System under SDWA Section 1445, 42 U.S.C. §300j-4. EPA inspectors requested to review the System's RRA and observed the following:

a. Document was available at the time of the inspection.
b. The RRA was dated to show that it was completed before the date of the certification of completion.
c. The RRA did not assess all required elements of Section 1433(a).
d. The RRA did not include a complete assessment of the required elements.

40 Code of Federal Regulations (CFR) §141.63(e)(3), Maximum contaminant levels (MCLs) for microbiological contaminants, states: "Proper maintenance of the distribution system including appropriate pipe replacement and repair procedures, main flushing programs, proper operation and maintenance of storage tanks and reservoirs, cross connection control, and continual maintenance of positive water pressure in all parts of the distribution system."

Observation 2. The EPA Inspection Team observed that the System conducts hydrant flushing activities but has not developed a formal Hydrant Flushing Plan or Standard Operating Procedure (SOP).

Observation 3. The EPA Inspection Team observed that the System conducts valve exercising activities but does not have a formal Valve Exercising Plan or SOP.

EPA How to Conduct a Sanitary Survey of Drinking Water Systems (2019) §10.4.8, states, "Concrete foundations should be inspected to ensure that there is minimal spalling (ground level tanks) and no cracks (elevated tanks). Anchor bolts should not be rusted so much that their material strength has been compromised. Column shoes should be clean and painted, and grout under the shoes and riser plates should be in good condition. There should not be any pooled water, erosion, weeds, or shrubs around a tank's foundation."

Observation 4. The EPA Inspection Team noted that dirt and sand had collected around the foundation of the 4-MG Storage Tank and was against the tank wall in places. The drains for the foundation rings were clogged with debris (Refer to Appendix 1, Photograph 26).

Observation 5. The EPA Inspection Team observed that the seal between the foundation and at the 4-MG Storage Tank, 5-MG Storage Tank, and 250,000 Gallon Storage Tank was brittle or missing altogether, allowing moisture, vegetation, insects, or animals to penetrate and cause damage (Refer to Appendix 1, Photographs 26, 28, 30, and 31).

EPA's How to Conduct a Sanitary Survey Guide (August 2019) §5.10, states, "Inspecting pumping facilities also includes observing any unsafe conditions that could pose a safety risk to the operator or other staff involved in the operation of the PWS."

AWWA Standard G100-11 Water Treatment Plant Operation and Management (2011) §4.3.1, Maintenance Management, states, "The plant shall have a maintenance management system with practices adequate to sustain plant performance. The system shall document maintenance frequency goals, and there shall be a system to take corrective action if the goals are not being achieved. The maintenance goals shall include inspection frequency for the process units associated with plant operations."

Observation 6. The well pump/motor rotating shaft had no protective guards installed at Wells #10, #17, #14, and #16 (Refer to Appendix 1, Photographs 4, 6, 14, and 18).

New Mexico Environment Department (NMED) Recommended Standards for Water Facilities §5.1.8.e, states, "Double containment should be provided for storing chemicals."

Observation 7. The EPA Inspection Team observed that the polyphosphate storage tank had no secondary containment at Well #10 (Refer to Appendix 1, Photograph 1), and the sodium hypochlorite storage tanks had no secondary containment at Wells #10, #14, and #17 (Refer to Appendix 1, Photographs 2, 7, and 11).

Recommended Standards for Waterworks (Ten State Standards) (2022 Edition) §5.5.5, Liquid chemical feeders, states, "Liquid chemical feeders shall be installed and plumbed so that chemical solutions cannot be siphoned or overfed into the water being treated by having:

(a) A vacuum relief valve;
(b) A suitable air gap, or anti-siphon device; or
(c) Other effective means or combinations of means to prevent siphoning or overfeeding the chemical acceptable to the reviewing authority."

Observation 8. The EPA Inspection Team observed that there were no anti-siphon valves on the chemical feed pumps at Wells #10, #17, #14, and #16, potentially allowing chemicals to be overfed (Refer to Appendix 1, Photograph 3).

New Mexico Administrative Code (**NMAC) §20.7.10.400.C, Protection of a public water system well,** states**:** "A ground water supply well serving a public water system shall have a sanitary seal installed at the wellhead to protect against entry of storm water and other non-potable fluids or foreign materials and against access by insects, rodents, birds or other vermin. All vents installed in the well casing shall be protected against entrance of foreign material and flooding. If the well is completed in a subsurface vault, the casing shall extend above the potential flooding height. All cracks, joints or other openings at the wellhead and all penetrations to the casing at or near the ground surface shall be tightly sealed with an impermeable material."

NMED Recommended Standards for Water Facilities §3.2.7.5, Casing Vent, states, "Provisions should be made for venting the well casing to the atmosphere. The vent should terminate in a downturned position, at or above the top of the casing or pitless unit in a minimum 1½ inch diameter opening covered with a 24 mesh, corrosion resistant screen."

Observation 9. The EPA Inspection Team observed that a mesh larger than #24-mesh was used on the vents on Wells #16, #14, and Well #10 (Refer to Appendix 1, Photographs 15, 19, and 20).

New Mexico Administrative Code §20.7.10.400.B, GENERAL OPERATING REQUIREMENTS, states**,** "Security and protection of a public water system. Any part or component of a public water system including but not limited to spring junction boxes, well houses, storage reservoirs, collection devices, pump facilities, and treatment facilities shall be constructed, operated and maintained to prevent:

(1) unauthorized entry to the water supply;
(2) flooding of the water supply; and
(3) contamination of, the water supply."

Observation 10. The EPA Inspection Team noted that there were gaps under the security fencing around Well #17 that could allow unauthorized access (Refer to Appendix 1, Photograph 10).

Observation 11. The EPA Inspection Team observed that the security fencing around Well #16 was low, approximately 6-7 feet, with no barbed wire (Refer to Appendix 1, Photograph 17).

NMED Recommended Standards for Water Facilities §3.2.3.3, Wellhead protection, states, "A wellhead protection plan for continued protection of the wellhead from potential sources of contamination shall be provided as determined by NMED."

Observation 12. The EPA Inspection Team observed that the System did not have a documented Wellhead Protection Plan.

New Mexico Administrative Code §20.6.6.16.E.1(e), Production area setback requirements, states, "The [dairy facility] production area, excluding feed storage silos, feed storage barns and liquid feed tanks, shall be located greater than 1000 feet from any water well or spring that supplies water for a public water system as defined by 20.7.10 NMAC, unless a wellhead protection program established by the public water system requires a greater distance."

Observation 13. The EPA Inspection Team noted animal feed lots within 1000 feet of the wellhead at Well #17 (Refer to Appendix 1, Photograph 9).

NMED Recommended Standards for Water Supply Facilities §5.1.11, Chemical Suction and Feed Lines, states,

"a. Chemical suction lines between the storage tanks and the chemical feeders and feed lines to the point of application should be designed and constructed with the following provisions:

1. Have the minimum length practical;
2. Be of materials that are durable, corrosion-resistant, and suitable for the specific chemical being conveyed;
3. Be easily accessible throughout the entire length;
4. Be protected against freezing;
5. Be readily cleanable;
6. Be double-contained, when the chemical poses a health and safety concern;
7. Have thermal expansion of the piping considered in its layout, with the consideration of including expansion loops;
8. Have a minimum number of high points where air or other gases can be trapped and interrupt chemical flow; and
9. Be color-coded and labeled (Refer to Part 2.15).

Observation 14. The EPA Inspection Team observed unlabeled chemical feed lines (Refer to Appendix 1, Photograph 21).

Observation 15. The EPA Inspection Team observed an unprotected PVC chemical feed line plumbed across the floor at Well #16, creating both a trip hazard and a vulnerability to breakage (Refer to Appendix 1, Photograph 21).

Recommended Standards for Waterworks (Ten State Standards) (2022 Edition) §7.1.12.a, Safety, states**,** "Ladders, ladder guards, balcony railings, and safely located entrance hatches shall be provided. Access to roof hatches and vents shall be provided. When a fixed ladder is used, the bottom shall be located at least 12 feet above ground to prevent the entrance of unauthorized personnel."

Observation 16. The EPA Inspection Team noted that the height to the first ladder rung at the 4-MG Storage Tank was 7 feet (Refer to Appendix 1, Photograph 25).

Observation 17. The EPA Inspection Team noted that the height to the first ladder rung at the 5-MG Storage Tank was 9 feet (Refer to Appendix 1, Photograph 27).

Recommended Standards for Water Works, (Ten States Standards) (2022 Edition) §7.1.7.c, Overflow, states, "The overflow shall open downward and be screened with twenty-four mesh non-corrodible screen. The screen shall be installed within the overflow pipe at a location least susceptible to damage by vandalism. A mesh-fitted mechanical flap valve is acceptable provided the flapper is supplied with non-corroding and non-seizing hinges. The flap valve shall be spring loaded or counterweighted, so it closes and forms a tight seal after the overflow event."

Observation 18. The EPA Inspection Team observed that the end of the overflow piping at the 4-MG Storage Tank, the 5-MG Storage Tank, and the 250,000 Gallon Storage Tank did not have #24-mesh non-corrodible screens to prevent unwanted intrusion by insects, birds, and animals (Refer to Appendix 1, Photographs 24, 29, and 32).

Section IV – CLOSING CONFERENCE

The EPA Inspection Team held a closing conference at 4:20 PM on February 26, 2025, at NMSU's Satellite Chilled Water Plant. The EPA inspection team discussed preliminary observations identified during the field component of the inspection. The EPA inspection team reiterated to the System representative that these preliminary observations were not compliance determinations. Preliminary observations shared during the closing conference are subject to further investigation by EPA upon the review of additional records and documentation. Therefore, this inspection report may include observations that were not identified at the time of the closing conference.

Observations are described in **Error! Reference source not found.** The EPA inspection team shared observations related to cybersecurity practices with the System verbally. The inspection concluded at approximately 4:42 PM.

Section V – FOLLOW UP

No additional information was received by the EPA Inspection Team after exiting the Facility on February 26, 2025.

Section VI – LIST OF APPENDICES

Appendix 1 – Photograph Log
Appendix 2 – Sign-in Sheet

APPENDIX 1 – PHOTO LOG

Unless otherwise indicated herein, all photographs were taken by Maura Harbaugh of ERG during the inspection. The displayed date and time are the local time (MST unless otherwise noted). Photographs were not manipulated beyond minor cropping for sizing and adding labels or callouts to draw attention to the subject of the photograph.

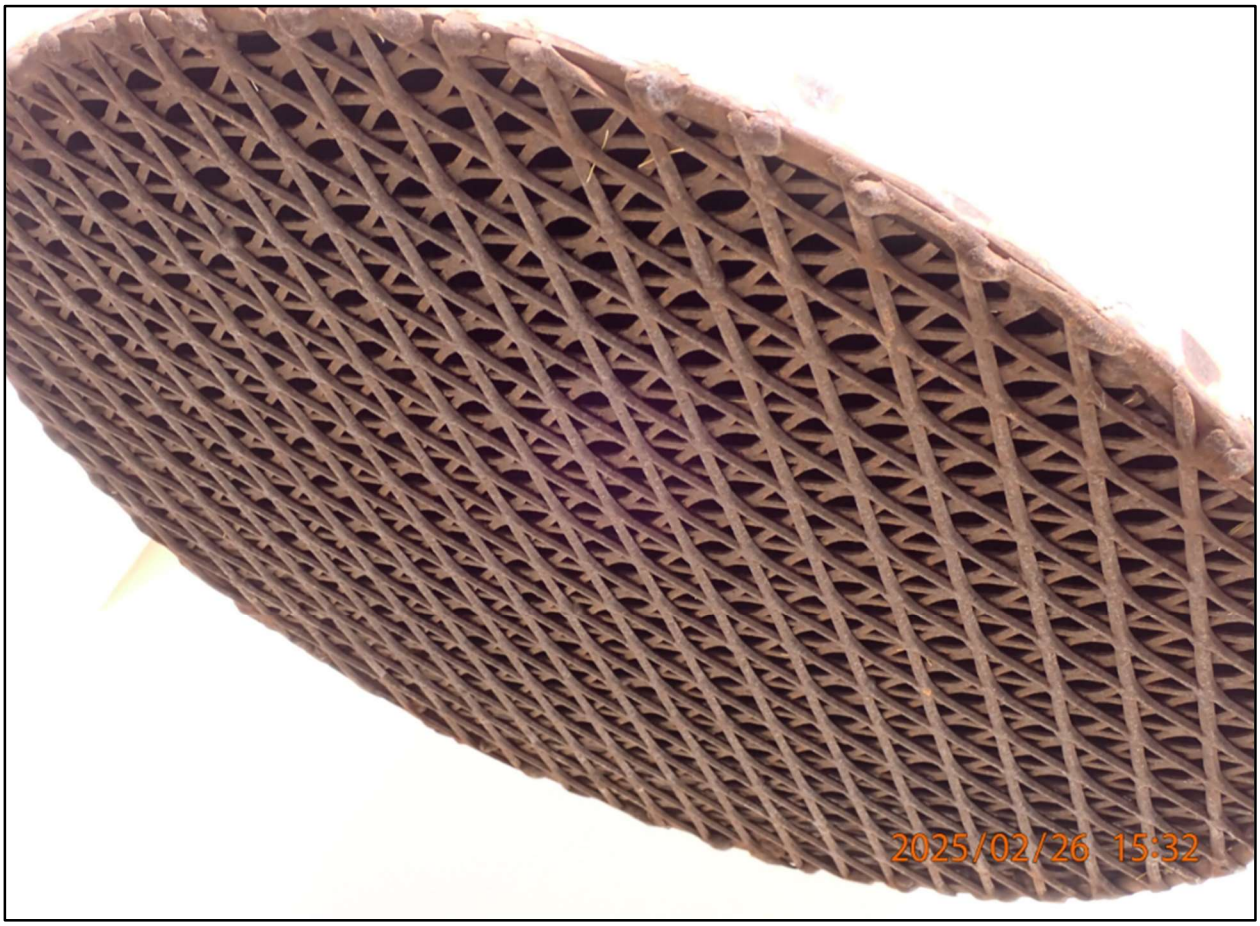
Not all photographs taken during the inspection are included in the Photograph Log.

Photograph 1. 02/26/2025 13:39 P2260411.JPG
Description: Sodium hypochlorite storage at Well #10 without secondary containment.

Photograph 2. 02/26/2025 13:40 P2260413.JPG
Description: Chemical feed equipment at Well #10 (representative of all chemical feed equipment throughout the System) without anti-siphon valves.

Photograph 3. 02/26/2025 13:47 P2260418.JPG
Description: Well #10 rotating pump shaft without protective guard.

Photograph 4. 02/26/2025 13:38 P2260410.JPG
Description: Polyphosphate chemical storage at Well #10 without secondary containment.



Photograph 5. 02/26/2025 15:32 P2260555.JPG
Description: 5-MG Storage Tank overflow with coarse screen.

Photograph 6. 02/26/2025 14:00 P2260433.JPG
Description: Well #17 air relief port with fine mesh.

Photograph 7. 02/26/2025 14:00 P2260435.JPG
Description: Well #17 rotating pump shaft without protective guard.

Photograph 8. 02/26/2025 14:01 P2260440.JPG
Description: Polyphosphate storage at Well #17 without secondary containment.

Photograph 9. 02/26/2025 14:02 P2260442.JPG
Description: Sodium hypochlorite storage at Well #17 without secondary containment.

Photograph 10. 02/26/2025 14:24 P2260469.JPG
Description: Well #14 rotating pump shaft without protective guard.

Photograph 11. 02/26/2025 14:20 P2260453.JPG
Description: Gap underneath the fencing around Well #14 large enough for unauthorized access.

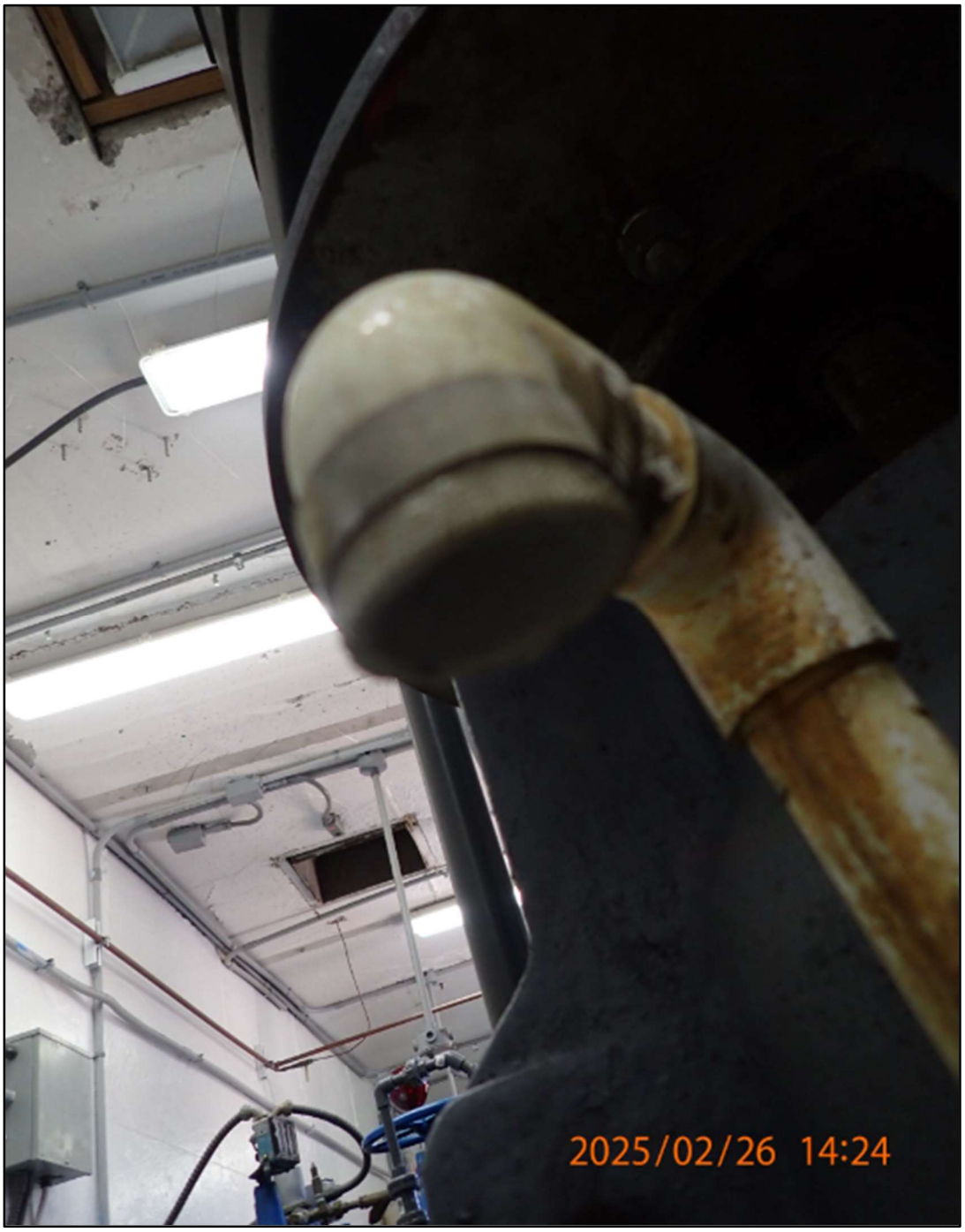
Photograph 12. 02/26/2025 14:22 P2260459.JPG
Description: Sodium hypochlorite storage at Well #14 without secondary containment.

Photograph 13. 02/26/2025 14:22 P2260463.JPG
Description: Sodium hypochlorite storage at Well #14 with displaced lid.

Photograph 14. 02/26/2025 14:12 P2260450.JPG
Description: Animal feed lots located within 1000 feet of Well #17. Fence surrounds well house.

Photograph 15. 02/26/2025 15:32 P2260558.JPG
Description: 5-MG Storage Tank overflow with missing foundation seal.

Photograph 16. 02/26/2025 14:24 P2260467.JPG
Description: Polyphosphate storage tank at Well #14 without secondary containment.

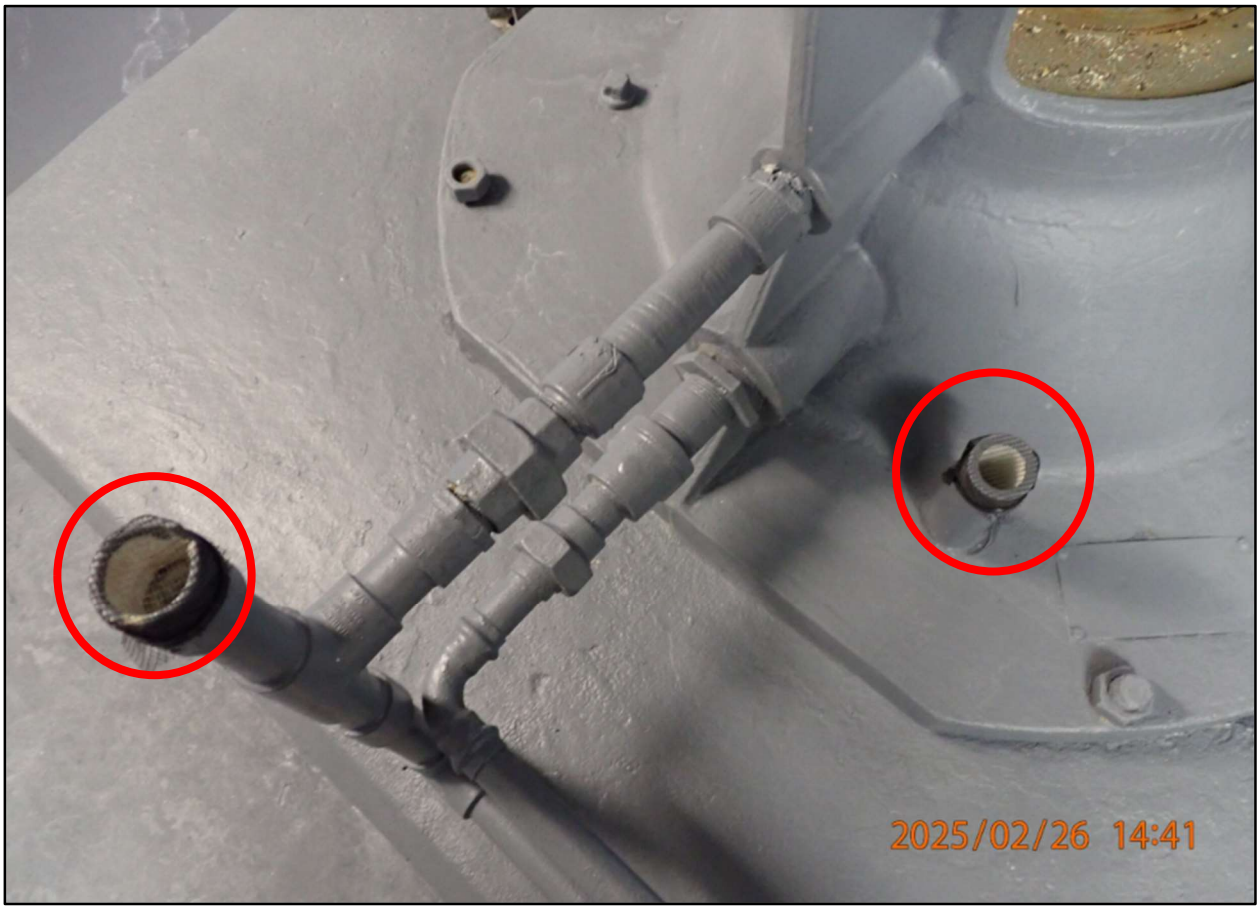


Photograph 17. 02/26/2025 14:24 P2260470.JPG
Description: Well #14 vent with fine mesh.

Photograph 18. 02/26/2025 14:27 P2260473.JPG
Description: Well #14 vent line with a screen larger than #24-mesh.

Photograph 19. 02/26/2025 15:51 P2260566.JPG
Description: 250,000-Gallon Storage Tank with gaps in foundation seal.

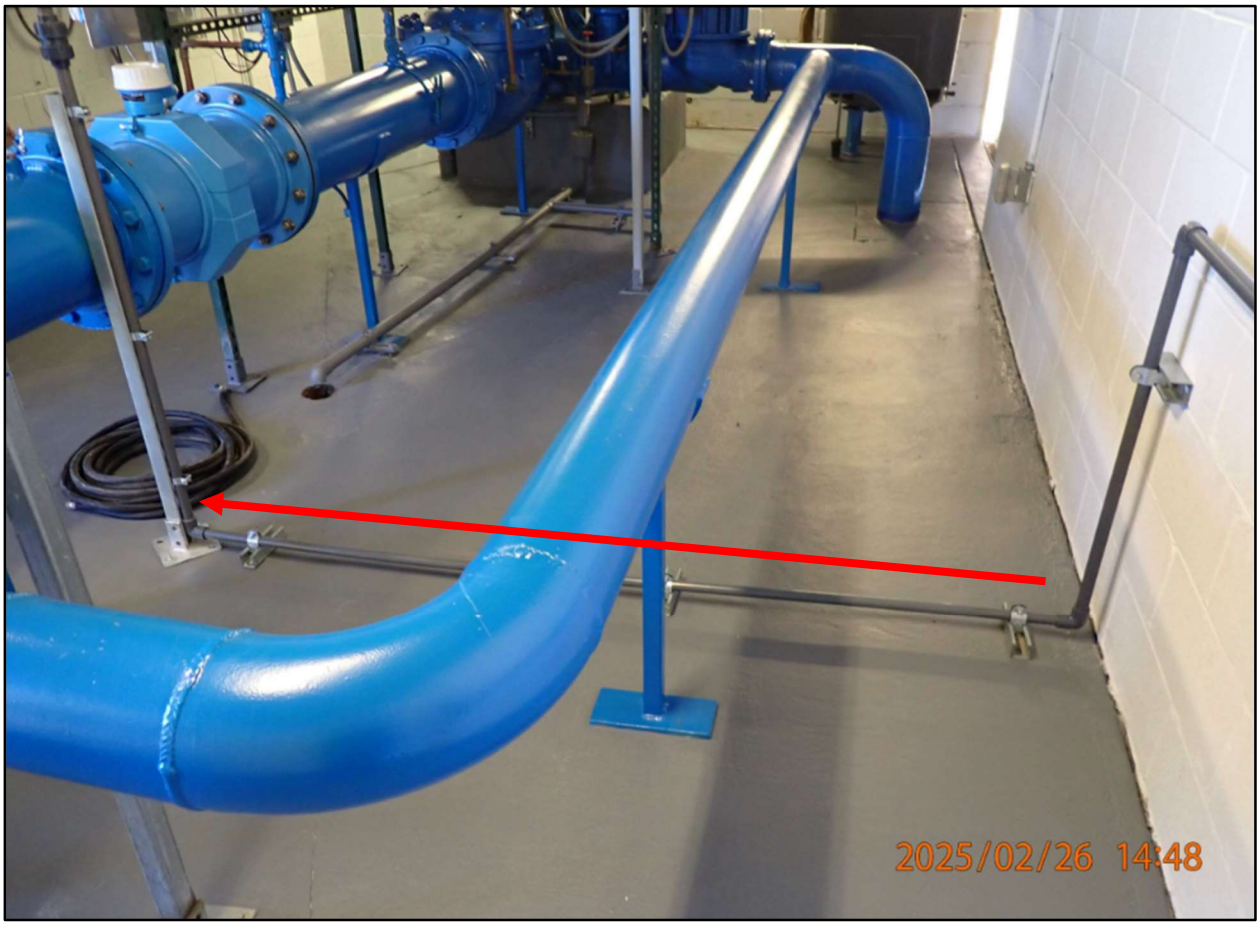
Photograph 20. 02/26/2025 15:51 P2260567.JPG
Description: 250,000 Gallon Storage Tank overflow with coarse screen.



Photograph 21. 02/26/2025 14:41 P2260488.JPG
Description: Well #16 drain vent with a screen larger than #24-mesh.

Photograph 22. 02/26/2025 14:38 P2260478.JPG
Description: Short fence without barbed wire surrounding Well #16.

Photograph 23. 02/26/2025 14:41 P2260487.JPG
Description: Well #16 rotating pump shaft without protective guard.



Photograph 24. 02/26/2025 14:48 P2260492.JPG
Description: Unlabeled chemical feed line plumbed across the floor of Well #16.

Photograph 25. 02/26/2025 14:41 P2260489.JPG
Description: Well #16 vent with a screen larger than #24-mesh.

Photograph 26. 02/26/2025 14:51 P2260502.JPG
Description: Double-walled sodium hypochlorite storage at Well #16.

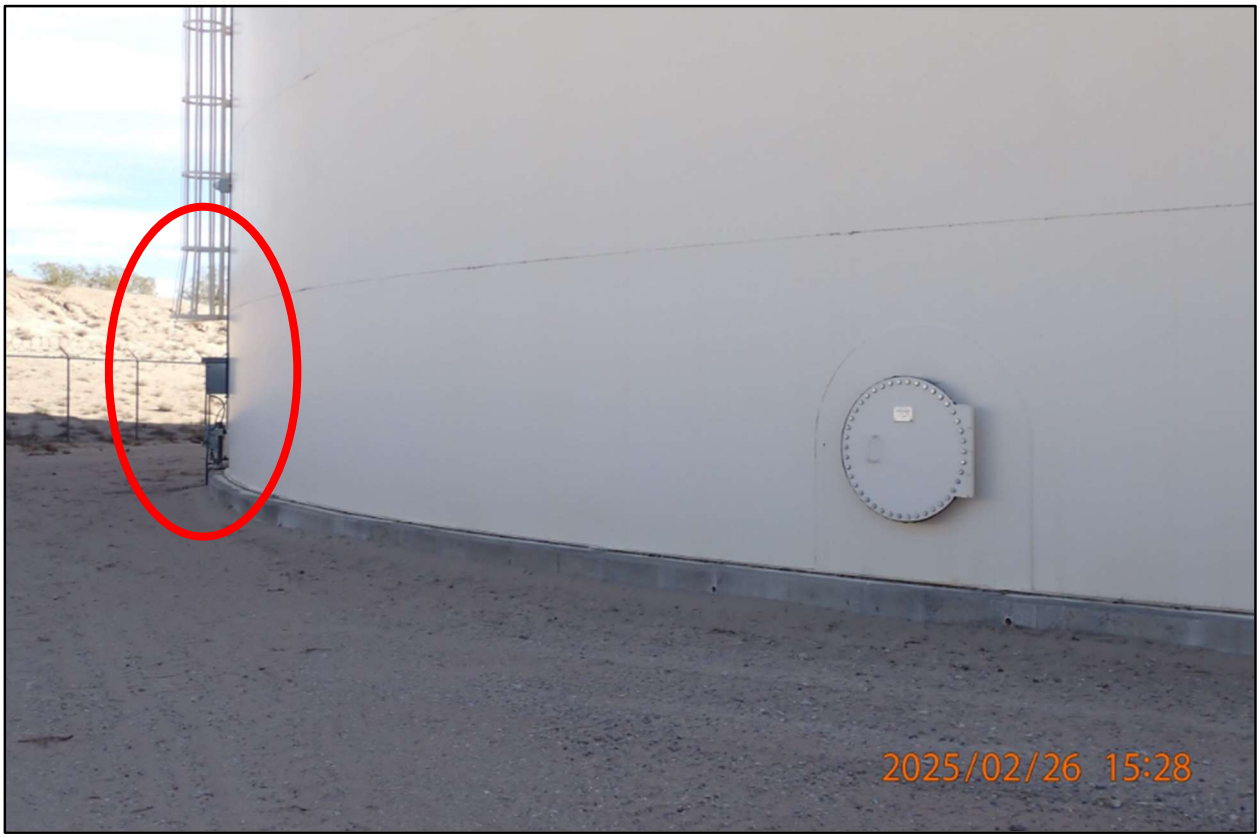
Photograph 27. 02/26/2025 14:51 P2260503.JPG
Description: Double-walled polyphosphate storage at Well #16.

Photograph 28. 02/26/2025 15:16 P2260532.JPG
Description: First ladder rung at the 4-MG Storage Tank 7 feet off the ground.

Photograph 29. 02/26/2025 15:15 P2260527.JPG
Description: Overflow of the 4-MG Storage Tank with coarse screen (shown in mirror).

Photograph 30. 02/26/2025 15:20 P2260535.JPG
Description: Dirt and sand collected around the foundation of the 4-MG Storage Tank, clogging foundation ring drains.

Photograph 31. 02/26/2025 15:30 P2260551.JPG
Description: 5-MG Storage Tank foundation with brittle and missing seal.



Photograph 32. 02/26/2025 15:28 P2260547.JPG
Description: First ladder rung at the 5-MG Storage Tank 9 feet off the ground.

APPENDIX 2 – SIGN-IN SHEET

INSPECTION SIGN-IN SHEET

Facility:	PWS ID No.:	Date:

Name	Title	Agency/Company	Phone	Email
Chelo Hall	EPA Inspector	US EPA	214-665-2716	hall.chelo@epa.gov
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