

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/14/2024	
Media Program:	Water	
Regulatory Program(s)	SDWA	
Company Name:	City of Grapevine	
Facility Name:	City of Grapevine	
Facility Physical Location:	200 S. Main Street	
(city, state, zip code)	Grapevine, TX, 76051	
Mailing address:	200 S. Main Street	
(city, state, zip code)	Grapevine, TX, 76051	
County/Parish:	Tarrant	
Facility Phone Number	(817)-410-4141	
Facility Contact:	Kent Conkle	Water Plant Manager
	kconkle@grapevinetexas.gov	
FRS Number:	-	
Identification/Permit Number:	PWS ID#: TX2200013	
Media Identifier Number:	-	
NAICS:	-	
SIC:	-	
Personnel participating in inspection:		
Fatima Shaikh	EPA Region 6	Lead Inspector
Chelo Hall	EPA Region 6	Credentialed Inspector
Daniel Kim	EPA Region 6	Credentialed Inspector
Michael Ashley	City of Grapevine	Compliance
David Clark	City of Grapevine	Utility Manager
Kent Conkle	City of Grapevine	Water Treatment Plant Manager
Darryl Austin	City of Grapevine	IT Security Administrator
EPA Lead Inspector Signature/Date	FATIMA SHAIKH Digitally signed by FATIMA SHAIKH Date: 2024.09.30 16:51:09 -05'00'	09/30/2024
	{Inspector name}	Date
Supervisor Signature/Date	RUBEN ALAYON-GONZALEZ Digitally signed by RUBEN ALAYON-GONZALEZ Date: 2024.10.02 13:40:20 -05'00'	09/30/2024
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Fatima Shaikh, Chelo Hall, and Daniel Kim arrived at the City of Grapevine City Hall at 9:00 am on August 14, 2024 for an announced inspection. The inspection was prompted by national priority targeting systems for the Region's Safe Drinking Water Act (SDWA) 1433 inspections with a cybersecurity focus. We met Kent Conkle, Water Treatment Plant Manager, David Clark, Utility Manager, Michael Ashley, Compliance, and Darryl Austin, IT Security Administrator. Chelo Hall and Daniel Kim presented their credentials to Mr. Conkle and informed him that this was an EPA inspection to evaluate the system under the SDWA Section 1433(a) and (b), which requires community water systems that serve more than 3,300 people to develop and certify completion of a Risk and Resilience Assessment (RRA), Emergency Response Plan (ERP). The scope of the inspection was to perform an onsite document review of the system's RRA and ERP in addition to a focus on cybersecurity.

FACILITY DESCRIPTION

The City of Grapevine is a community water system located in Grapevine, Tarrant County, Texas. The City has 25,637 service connections and serves a population of 50,653 customers. The water system is a surface water system with the source water coming from Lake Grapevine. The system consists of conventional treatment with a capacity of 8 million gallons per day (MGD). The system consists of three treatment trains, seven filters, a transfer well, and clear wells. The system also has a surface water purchase (SWP) from Trinity River Authority (TRA). There are 7 operators at the plant. The plant operates 24/7 with manned operation (7AM-7PM) and unmanned operation (7PM-7AM) with on-call staff with remote capabilities. There are two shifts with 2 operators per shift.

Section II – OBSERVATIONS

- I observed the RRA, and ERP certified by Jimmy Didehbani (previous utilities manager). The RRA and ERP were certified within 6 months of each other as required by the statute.

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

- I observed an assessment of the risk to the system from malevolent acts and natural hazards.
- I observed an assessment of the resilience of the pipes and constructed conveyances, physical barriers, source water, water collection and intake, pretreatment, treatment, storage, distribution facilities, electronic, computer and other automated systems which are used by the system.
 - The RRA identified and characterized the critical assets that would be at risk from the natural hazards and malevolent acts.
- I observed an assessment of the monitoring practices of the system for malevolent acts and natural hazards.

- I observed an assessment of the impact to the financial infrastructure of the system in the event of malevolent acts and natural hazards.
- I observed an assessment of the impact to the use, storage, and handling of various chemicals by the system in the event of malevolent acts and natural hazards.
- I observed an assessment of the impact to the operation and maintenance of the system in the event of malevolent acts and natural hazards.

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

- I observed 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.
- I observed actions which can prevent or mitigate the impact of a malevolent act or natural hazard on the safety and supply of drinking water.
- I observed plan and procedures developed, personnel required, and equipment available to respond to a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water.
- I observed plans for coordination with existing local emergency services.
 - The system conducts exercises with the fire department and the water treatment plant.
- I observed strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system.
 - The system has one source of power from the electric provider. Back-up generators have been purchased and will be installed.

The cybersecurity portion of the inspection was discussed with the IT Security Administrator and the City of Grapevine personnel where the list of cybersecurity questions for community water systems was provided to the water system prior to the inspection.

Section III – AREAS OF CONCERN

1. The RRA and ERP had an outdated contact list as some personnel have left employment. The system is encouraged to update the contact information to reflect current personnel and make updates regularly as information changes.

EPA Region 6 inspectors Fatima Shaikh, Daniel Kim, and Chelo Hall conducted a closing conference with Kent Conkle, David Clark, Michael Ashley, and Darryl Austin at City of Grapevine at 10:40 am on August 14, 2024. During the closing conference, the Area of Concern was reviewed. It was noted during the inspection that the population of the system increased to greater than 50,000 since the preparation of the RRA and ERP. This indicates that the certification schedule will change for the system where the next 5 -year submission cycle deadline will be December 31, 2025, for the RRA and June 30, 2026, for the ERP. EPA resources and factsheets were provided to system for the RRA, ERP, and Cybersecurity are listed in Appendix 2.

Section IV – FOLLOW UP

EPA received additional background information about the public water system on August 30, 2024, after exiting the Facility on August 14, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Inspection sign-in sheet

Appendix 2 – List of EPA resources

Appendix 1

Inspection sign-in sheet

Sign-in Sheet 8/14/2024

Name	TITLE	ORG.	Phone	Email
Daniel Kim	Inspector	EPA Region 6	214-665-6601	Kim.Daniel@epa.gov
Fatima Shaikh	Inspector	EPA Region 6	214-665-7188	fatimash@epa.gov
Michael Wesley	Compliance Grapevine	Grapevine	817-410-3362	marshley@grapevinetexas.gov
David Clark	utility Manager	COG	817-410-3350	dclark@grapevinetexas.gov
Kent Conkle	WTP MANAGER	COG	817-410-4474	KCONKLE@GRAPEVINETEXAS.GOV
Darryl Austin		COG	(817)410-3314	daustin@grapevinetexas.gov
Chelo Hall	Inspector	EPA	214-665-2716	hall.chelo@epa.gov

Appendix 2

List of EPA resources

The following factsheets were shared with the system during the inspection:

- EPA AWIA Community Water System ERP Template and Instructions
- EPA AWIA Risk and Resilience Assessment Guidance
- EPA RRA and ERP Factsheet
- EPA Incident Action Checklist Cybersecurity
- EPA Cyber Incident Reporting Process
- Top Cyber Actions for Securing Water Systems
- Free Cyber Vulnerability Scanning for Water Utilities