Inspection Date(s):	05/20/25	
Media Program:	Water	
Regulatory Program(s)	Safe Drinking Water Act (SDWA)	
Company Name:	**Tri-County Special Utility District – Public Water System**	
Facility Name:	**Tri-County Special Utility District**	
Facility Physical Location:	5212 TX-7	
(city, state, zip code)	Marlin, TX 76661	
Mailing address:	P.O. Box 976	
(city, state, zip code)	Marlin, TX 76661	
County/Parish:	Falls County	
Facility Phone Number	(254) 803-3553	
Facility Contact:	Melissa Lloyd	Tri-County SUD Office Manager
	tricountysud@ctwa.com	
FRS Number:	110013278069	
System Classification:	Community Water System (CWS)	
PWS ID:	TX0730004	
Personnel participating in inspection:		
Janet Cherry	Eastern Research Group, Inc. (ERG)/ janet.cherry@erg.com	Lead Inspector
Maura Harbaugh	ERG/ maura.harbaugh@erg.com	Support Inspector
Melissa Lloyd	Tri-County SUD/ tricountysud@ctwa.com	Office Manager
Tim O'Neil	Tri-County SUD/ trstc@msn.com	President Board of Directors
Chris Trainer	Tri-County SUD/ tri.countysud@gmail.com	Operator and Outside Manager
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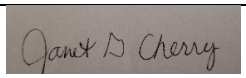
Craig Young	EPA R6/ Young.Craig@epa.gov	EPA Inspector
EPA Lead Inspector Signature/Date		6/27/2025
	Janet Cherry	Date
Supervisor Signature/Date	MARIELA REYNA Digitally signed by MARIELA REYNA Date: 2025.07.18 09:59:27 -05'00'	
	On behalf of Ruben Alayon-Gonzalez	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On May 20, 2025, at 0900, the EPA Inspection Team, consisting of Eastern Research Group, Inc. (ERG) contract inspectors Janet Cherry and Maura Harbaugh, EPA Region 6 inspectors Daniel Kim, Fatima Shaikh, Ruben Alayon-Gonzalez, Chelo Hall, and Craig Young, and Elizabeth Luke from the Texas Commission on Environmental Quality (TCEQ), arrived for an announced inspection at the Tri-County Special Utility District (System). The EPA Inspection Team met with Melissa Lloyd, Tim O'Neil, and Chris Trainer from the System at the opening conference at 5212 TX-7, Marlin, TX 76661. Refer to Appendix 1, Opening and Closing Conference Sign-in Sheet for a list of attendees. Janet Cherry, lead inspector, presented credentials to the System and informed them that this was an EPA inspection to determine the facility's compliance with the SDWA with a focus on the System's compliance status with the arsenic maximum contaminant level (MCL) of 0.010 milligrams per liter (mg/L). 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.

SYSTEM DESCRIPTION

The System is a Special Utility District (SUD), a type of local government entity in Texas established to provide water and other utility services within a designated geographic area. It operates independently of city or county governments and is governed by a board of five elected directors. The System generates revenue through a combination of fixed fees and usage-based charges for its residential and agricultural customers. These funds support daily operations, maintenance, infrastructure improvements, and long-term capital projects.

The utility serves approximately 5,353 people through 1,807 service connections. According to representatives, average water demand ranges from 20 to 25 million gallons (MG) per month, with peak demand reaching 30 MG per month during the summer months. Currently, the system has reached its service capacity and is unable to sell additional meters. To address future demand, the utility has explored the option of constructing an interconnection with a nearby surface water system. This potential project could provide additional capacity to support approximately 600 to 700 new service connections.

Certified operators staff the utility from 0800 to 1700 on weekdays, with on-call coverage during weekends. The water system staff includes two Class C groundwater operators and one maintenance

technician plus two office staff. In addition, a contractor is available on call to handle main breaks, part replacements, and other operations and maintenance tasks.

The System is composed of two independent sections:

- Northern section: Wells 1, 4, 5, and 6. These wells pull water from the 2nd Trinity Aquifer at a depth of over 3,700 feet where raw water temperatures range from 147°F to 153°F. These wells exceed the arsenic MCL.
- Southern section: Wells 3R, 4R, and 7. These wells pull water from the Carrizo-Wilcox Aquifer recharge zone at a depth of 550 feet where raw water temperatures range from approximately 80°F to 110°F. These wells are low in arsenic and do not require treatment for arsenic removal.

These areas are not interconnected and function separately. Spanning approximately 315 miles of pipeline and 13 treatment plants across four counties, the utility is supplied by these seven active water wells. The distribution network consists of nine pressure planes and includes bypass capabilities for all treatment plants, allowing minimum system pressure of 35 psi to be sustained even during treatment plant outages.

Table 1 provides a summary of plants with wells serving Tri-County SUD. Tri-County SUD has other plants with storage tanks and booster pumps to serve the distribution system, but these facilities were not inspected. More details on arsenic treatment efforts are below.

Table 1: Plants with Wells Serving Tri-County SUD

Plant Number	Wells at Plant	Flow per Well, gallons per minute (gpm)	Treatment
1	Well No. 1	278	Polyphosphate, cooling tower and gas chlorine.
6	Well No. 4	320	Polyphosphate, cooling tower, gas chlorine, and arsenic treatment with ferric chloride and filtration. Water from Plant 13 also treated at Plant 6 for arsenic removal.
10	Well No. 3R Well No. 4R Well No. 7	258 250 Unknown	Polyphosphate and gas chlorine.
11	Well No. 5	330	Polyphosphate, cooling tower and gas chlorine.
13	Well No. 6	250	Polyphosphate, cooling tower and gas chlorine. Treated water is pumped to Plant 6 for arsenic removal treatment.

Tri-County currently has one active interconnection with another public water system, City of Riesel (TX1550040), that City of Riesel can use in an emergency; the interconnection does not allow City of Riesel to serve Tri-County SUD. Recent infrastructure improvements include the installation of six diesel

emergency generators at Plants 3, 5, 8, and 10, as well as at Well 7R and the administrative office. Two mobile diesel emergency generators are also available to provide backup power where needed.

Arsenic Treatment and Compliance Efforts

The Northern Section wells have elevated arsenic levels, and the System has a number of arsenic MCL violations (Refer to Appendix 2, Tri-County SUD Violations). A review of documents indicated raw water quality data from Well 4 as:

- Arsenic: 0.014 mg/L
- Iron: 0.1 mg/L

A review of documents indicated raw water quality data from Well 6 as:

- Arsenic: 0.023 mg/L
- Iron: 0.4 mg/L

Elevated arsenic levels and warm water temperatures along with high iron concentrations in the Northern Wells have historically presented treatment challenges for the System.

Plant 6 is the only arsenic treatment facility the System owns and operates; however other wells appear to exceed the arsenic MCL. The System has other wells where treatment includes polyphosphate, to address high iron, and chlorination. Site visits during this inspection were limited to Plants 6 and 11 given the arsenic MCL focus for the inspection.

The System pilot tested iron and arsenic treatment for Wells 4 and 6. The pilot studies proved successful, and in 2014, the System received approval to implement a full-scale arsenic treatment system for Well 4 (Plant 6) (Refer to Appendix 3, Photograph 1). Polyphosphate is injected into the raw water to sequester high iron in the water and then flows through a cooling tower where gaseous chlorine is injected for disinfection. The cooling tower provides a 20°F to 30°F temperature reduction.

Plant 6 also receives supplemental water from Plant 13 (not visited during the inspection), which draws from Well No. 6 pumping at 250 gpm. Plant 13 injects polyphosphate into the raw water and then routes water through a cooling tower where gaseous chlorine is injected into the basin before the water is transferred to Plant 6 for arsenic treatment.

At Plant 6, the cooled and disinfected water from Wells 4 and 6 is pumped to a 60,000-gallon ground storage tank, then it is directed into the arsenic removal system. Ferric chloride is dosed ahead of filtration to aid coagulation. The water then passes through three IRS-84 filters in parallel containing Omni-SORB media designed for catalytic removal of both iron and arsenic. Following filtration, treated water is stored in an 80,000-gallon ground storage tank. From there, it could be distributed via two high-

service pumps to a 200,000-gallon elevated tank. The water sent to distribution from Plant 6 then blends with all the water in the Northern section of the System. A pressure tank sitting on the distribution line ensures stable pressure levels.

The System uses a tank to capture filter backwash water, which is then returned to the treatment process. The sludge generated during treatment is treated with a solid's separator.

The full-scale treatment process is unable to consistently reduce arsenic below the MCL. The System worked with consultants on treatment solutions and revising the treatment process, but has been unsuccessful with reducing arsenic concentrations below the MCL. As of 2023, the Plant 6 arsenic treatment system has been offline. The System is working on a blending option to address the arsenic MCL violations.

Section II – INSPECTION ACTIVITY SUMMARY

Opening Conference
The EPA Inspection Team met with the System at the opening conference at the System's office, 5212 TX-7, Marlin, TX 76661, at 0900 on May 20, 2025. The EPA Inspection Team began by requesting a general overview of the System and discussing its overall operations, including the cybersecurity policies and procedures in place. The EPA Inspection Team proceeded to review the documentation provided by the System.

Records Review
All System documents requested by the EPA Inspection Team were readily available upon arrival. The following documents were reviewed on site during the opening conference:

- Tri-County Special Utility District Arsenic Treatment Project Update
- Tri-County Special Utility District – PWS ID No. 0730004 Arsenic and Iron Removal Pilot Study Report and Exception Request
- Omni-SORB As/Fe Removal – Pilot Test Report
- Tri-County Special Utility District Administrative Order Docket Number: SDWA-06-2011-1372 PWS ID Number: TX 0730004
- Filtration Inspection Report
- Tri-County SUD Pilot Study Report Well #4 Plant #6 and Well #6 Plant #13
- Tri-County SUD – Arsenic Removal System Plant No. 6 – Wells No. 4 & 6 – Daily Monitoring Form
- Texas Commission on Environmental Quality Lead/Copper Sample Site Pool Selection Form
- Water Sources
- Sources Treated for Arsenic
- Hydrant Flushing Records
- Revised Total Coliform Rule Site Sample Plan

- Lead and Copper Site Sample Plan
- Disinfection Byproducts Site Sample Plan
- Storage Tank Inspection Reports
- Risk and Resilience Assessment
- Emergency Response Plan

The System representatives stated they completed the lead service line inventory and submitted all information to TCEQ. The review of storage tank inspection reports revealed the tanks are professionally inspected annually and the System is currently rehabilitating a number of storage tanks. The System is negotiating an interconnection with a nearby water system and will use the additional water to blend with the System's wells high in arsenic. The additional water will also allow the System to add more connections. The System is currently planning the additional pipe, storage tanks, and pump stations for the interconnection.

Field Activities

Plant 6

At approximately 1340 local time, the EPA Inspection Team arrived at Plant 6. The entire site was fenced with a locked gate and properly signed. System personnel provided a comprehensive walkthrough, covering the former arsenic treatment process, the current treatment system, and the operational status of both active and offline assets.

The inspection began at the Well No. 4 wellhead, where the team observed a gap around the electrical conduit entering the well casing that supplies power to the submersible turbine pump. The team then proceeded to the chemical storage and mixing room, which also housed the high service pumps responsible for moving water from the ground storage tanks to the elevated tower and into the distribution system. Within the chemical room, no secondary containment was present beneath the polyphosphate injection barrel, and the polyphosphate dry barrel lacked an NSF-60 certification label. Additionally, System staff reported that the room's door is routinely propped open during summer months to prevent overheating the equipment.

The EPA Inspection Team then entered the gas chlorine room, where they observed that the door was not equipped with a crash bar and that there were no windows, gas sensors, or alarm systems present. Ventilation in the room was controlled by a manual switch, with no automatic activation or safety interlocks. Following the chlorine room, the team visited the cooling tower and noted that chlorine was injected at its base. The team inspected the three storage tanks at Plant 6. The 100,000-gallon ground storage tank exhibited vegetation growth around its foundation, and the ladder cage lacked a lock.

The three IRS-84 filters were observed as well as the backwash tank utilized when arsenic treatment was occurring. All arsenic related assets are offline and the System plans to remove all arsenic treatment equipment.

Plant 11

At approximately 1435, the EPA Inspection Team visited Plant 11. The entire site is fenced with a locked gate and is signed. The inspection began at the Well No. 5 wellhead, where the team observed an opening around the purge line and another where the vent was intended to be installed. System personnel explained that the well pump had been recently replaced and that the observed issues were in the process of being addressed. The team then proceeded to the chemical room. As with Plant 6, the polyphosphate dry barrel lacked an NSF-60 certification label. System staff also noted that the door to the chemical room is routinely propped open during the summer months to prevent equipment from overheating. Next, the team inspected the gas chlorine room, where they found that the door lacked a crash bar and the room was not equipped with windows, gas sensors, or alarm systems. Ventilation was manually controlled, with no automated safety mechanisms or interlocks in place. Afterward, the team visited the cooling tower and observed that chlorine was injected at its base. The inspection activities concluded with a review of the Plant's ground storage tank and standpipe.

Closing Conference

The EPA Inspection Team conducted a closing conference at the System's office, 5212 TX-7, Marlin, TX 76661, at 1530 on May 20, 2025. During the closing conference, the EPA Inspection Team reviewed the observations noted during the inspection and stated that the observation list was not exhaustive, as other observations could follow from additional document and/or photograph review. The EPA Inspection Team left the System at 1630 local time on May 20, 2025.

Section III – OBSERVATIONS

SDWA Section 1433(a), states: *SDWA Section 1433(a) requires a CWS serving more than 3,300 persons to conduct a Risk and Resilience Assessment ("RRA") of its system, including an assessment of:*

- *i. the risk to the system from malevolent acts and natural hazards;*
- *ii. 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;*
- *iii. the monitoring practices of the system;*
- *iv. the financial infrastructure of the system;*
- *v. the use, storage, or handling of various chemicals by the system; and*
- *vi. the operation and maintenance of the system.*

Section 1433(a)(3)(A) of the SDWA required a CWS serving greater than 3,300 but less than 50,000 persons to submit its certification to the EPA Administrator that it has conducted its RRA on or before June 30, 2021 and at least once every five years after the initial applicable deadline.

Observation 1. On May 20, 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 pursuant to SDWA Section 1433 and observed the following:

- The document was available at the time of the inspection.
- The RRA was dated to show that it was completed before the date of the certification of completion.
- The RRA does not address all required elements of 1433(a)(1)(A). It is missing a required element of SDWA Section 1433(a)(1)(A)(v) "the use, storage, or handling of various chemicals by the system*."*
- The RRA did not include a complete assessment of Section 1433 (a)(1)(A)(i) "an assessment of the risk to the system from malevolent acts and natural hazards" and SDWA Section 1433 (a)(1)(A)(iv) "the financial infrastructure of the system."

SDWA Section 1433(b): *Section 1433(b) of the SDWA requires a CWS serving a population greater than 3,300 to prepare or revise, where necessary, an emergency response plan ("ERP") that incorporates the findings of the RRA no later than six months after completion of its RRA. The ERP shall include:*

1. *strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system;*
2. *plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the CWS to deliver safe drinking water;*
3. *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; and*
4. *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 2. During the inspection, EPA inspectors also reviewed the Respondent's ERP and observed the following:

- The document was available at the time of the inspection.
- The ERP was dated to show that it was completed before the date of the certification of completion.
- The ERP included all required elements of Section 1433(b).
- The ERP contained incomplete sections covering the requirements in SDWA Section 1433 (b)(1) "strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system*,"* SDWA Section 1433

> (b)(2) "plans and procedures that can be implemented, and identification of equipment that can be utilized, in the event of a malevolent act or natural hazard that threatens the ability of the community water system to deliver safe drinking water," and SDWA Section 1433 (b)(3) "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."

Recommended Standards for Water Works (Ten States Standards), 2022 Edition, 5.8 (d) states:
"Chlorine gas feed and storage rooms shall be enclosed and separated from other operating areas. Both the feed and storage rooms shall be designed and constructed to comply with the following requirements:

1. A shatter resistant inspection window shall be installed in an interior wall.

2. All openings between the rooms and the remainder of the building shall be sealed.

3. Doors shall open outward only to the building exterior and be equipped with panic hardware.

4. A ventilation system with a capacity large enough to provide one air change per minute when the room is occupied shall be provided. Where this is not appropriate due to the size of the room, a lesser ventilation rate may be considered.

5. The ventilation system suction shall be near the floor and as far as possible from the door and air inlet. The ventilation system's discharge shall be screened and above grade outside of the building away from air inlets to any rooms or structures and designated walkway areas.

6. Air inlets with corrosion resistant louvers shall be airtight and installed near the ceiling.

7. Separate switches for the ventilation system and for the lights shall be located outside and at the inspection window. Outside switches must be protected from vandalism. A signal light indicating ventilation system operation shall be provided at each entrance when the system can be controlled from more than one point.

8. Floor drains are discouraged. Where provided, the floor drains must discharge to the outside of the building and not be directly connected to other internal or external drainage systems.

9. Provisions must be made to chemically neutralize or contain chlorine gas in the event of any measured chlorine release (or other acceptable measures as approved by the reviewing authority)

where feed and/or storage is located near residential or developed areas. The chemical neutralizing equipment must be sized to treat the entire contents of the largest storage container in service.

10. Automatic shut-off devices on in-service chlorine cylinders should be installed when impacts of a chlorine leak to the surrounding area are possible. These devices quickly and effectively stop the flow of gas through the feed line by closing the container valve. These devices may be operated remotely, by the use of pressure-sensing switches, and/or chlorine gas detection systems. Installation of an automatic shut-off device should not significantly impede or inhibit manual closing of the container valve or require the use of any tools other than the standard gas cylinder wrench."

Observation 3. The EPA Inspection Team observed the chlorine gas room door lacked panic hardware at Plant 6 (Refer to Appendix 3, Photograph 2) and Plant 11 (Refer to Appendix 3, Photograph 3).

Observation 4. The EPA Inspection Team observed the chlorine gas room lacked a viewing window at Plant 6 (Refer to Appendix 3, Photograph 2) and Plant 11 (Refer to Appendix 3, Photograph 3).

Recommended Standards for Water Works (Ten States Standards), 2022 Edition, Section 5.7.3 states: "…When pressurized chlorine gas is present, continuous chlorine leak detection equipment is required and shall be equipped with an audible alarm and a warning light."

Observation 5. The EPA Inspection Team observed the chlorine gas room lacked gas detectors and alarms at Plant 6 (Refer to Appendix 3, Photograph 4) and Plant 11 (Refer to Appendix 3, Photograph 3).

30 Tex. Admin. Code § 290.42(j) - Water Treatment, states: "Treatment chemicals and media. All chemicals and any additional or replacement process media used in treatment of water supplied by public water systems must conform to ANSI/NSF Standard 60 for Drinking Water Treatment Chemicals and ANSI/NSF Standard 61 for Drinking Water System Components. Conformance with these standards must be obtained by certification of the product by an organization accredited by ANSI."

Observation 6. Plant 6 (Refer to Appendix 1, Photograph 5) and Plant 11 polyphosphate chemical barrel did not have an NSF-60 certification label. The Safety Data Sheet stated that the product could be used for food processing and several industries including water treatment (Refer to Appendix 3, Photograph 6).

30 Tex. Admin. Code § 290.42(f)(1)(E)(ii) - Water Treatment, states: "Except as provided in this clause, adequate containment facilities shall be provided for all liquid chemical storage tanks."

Observation 7. The Plant 6 polyphosphate chemical feed barrel did not have secondary containment (Refer to Appendix 3, Photograph 7).

30 Tex. Admin. Code § 290.46(m) - Minimum Acceptable Operating Practices for Public Drinking Water Systems, states: "Maintenance and housekeeping. The maintenance and housekeeping practices used by a public water system shall ensure the good working condition and general appearance of the system's facilities and equipment. The grounds and facilities shall be maintained in a manner so as to minimize the possibility of the harboring of rodents, insects, and other disease vectors, and in such a way as to prevent other conditions that might cause the contamination of the water."

Observation 8. At Plant 6, vegetation was observed growing around the foundation of the 100,000-gallon ground storage tank and up the ladder (Refer to Appendix 3, Photograph 8).

Observation 9. At Plant 6 and Plant 11, the building for both the polyphosphate dry and mixing barrels, as well as the booster pumps, was stated and observed to have its door propped open during the summer. Wasps were present inside the building, and the open door left the interior and its equipment exposed to outdoor elements, posing potential risks to both equipment integrity and operational safety.

30 Tex. Admin. Code § 290.41(c)(3)(K) - Water Sources, states: "Wellheads and pump bases shall be sealed by a gasket or sealing compound and properly vented to prevent the possibility of contaminating the well water. A well casing vent shall be provided with an opening that is covered with 16-mesh or finer corrosion-resistant screen, facing downward, elevated and located so as to minimize the drawing of contaminants into the well. Wellheads and well vents shall be at least two feet above the highest known watermark or 100-year flood elevation, if available, or adequately protected from possible flood damage by levees."

Observation 10. The EPA Inspection Team observed an unsealed opening in the wellhead for the submersible pump's electrical conduit at Plant 6, Well No. 4 (Refer to Appendix 3, Photograph 9). The vent on Well No. 4 also lacked a screen.

Observation 11. The EPA Inspection Team observed an unsealed opening in the wellhead for the purge line at Plant 11, Well No. 5 (Refer to Appendix 3, Photograph 10).

Observation 12. The EPA Inspection Team observed an opening in the wellhead where the vent was previously installed at Plant 11, Well No. 5. The wellhead lacked a screened vent (Refer to Appendix 3, Photograph 10).

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 13. At Plant 6, the 100,000-gallon ground storage tank was equipped with a fixed ladder that extended to the ground and lacked a security barrier or lock (Refer to Appendix 3, Photograph 8).

Section IV – FOLLOW UP

A document titled 'NSF 60 Documentation for Tripolyphosphate' was provided to the EPA Inspection Team after the team had exited the System on May 20, 2025, as seen below. However, the information in the document does not correspond to the product observed on site. As a result, the EPA Inspection Team was unable to verify that the product used onsite is NSF-60 certified (Observation 6). The System also provided photos after the inspection to document actions taken to address observations and photos are presented below. In addition, the System provided an email and video to document actions taken to address ventilation at Plant 6 and Plant 11 chlorine gas room. The video demonstrates the ventilation turns on automatically when the door is opened.

PRAYON

CERTIFICATE OF ANALYSIS

Prayon
1610 Marvin Griffin Road
Augusta, GA 30906
Phone 706-798-4346 Fax 706-798-0015

Date: July 08, 2024

Ship To: Casey Ingredients
San Antonio, Texas 78247 USA

Product: **CARFOSEL™ 994**
Sodium Tripolyphosphate, Granular
Complies with the current specifications of the Food Chemicals Codex and the European Community Regul
Certified as Kosher and Pareve for food use including Passover

Purchase Order No:	60437	Customer Material No:	N/A
Batch No:	24084174	Manufacture's Site:	Engis, Belgium
Date of Manufacture:	March 15, 2024	Quantity Shipped:	20000.0 LB
Expiration Date:	March 15, 2026	Package:	400 Bags

General Description: Hygroscopic white granular. Risk of caking.
Identification Test: Positive for Sodium and Phosphate

CHARACTERISTICS	UNITS	TEST RESULTS	SPECIFICATIONS
Assay (Na5P3O10)	%	96.5	85.0 Minimum
P2O5, anhydrous	%	58.0	56.0 to 58.0
pH (1% solution)	-	10.1	9.1 to 10.1
Insoluble matters	%	<0.01	0.10 Maximum
Loss on dessication @ 150°C	%	<0.02	0.50 Maximum
Arsenic (as As)	ppm	0.0	1.0 Maximum
Fluoride (as F)	ppm	1.1	10.0 Maximum
Lead (as Pb)	ppm	<1.0	1.0 Maximum
Cadmium (as Cd)	ppm	<0.2	1.0 Maximum
Mercury (as Hg)	ppm	<0.1	0.1 Maximum
Bulk Density	g/cm3	0.44	0.35 to 0.46
Granulometry			
Retained on:			
150 µm	%	87.6	80.0 Minimum
850 µm	%	0.0	5.0 Maximum

Delivery Number: 0080023140
* Guaranteed Analysis

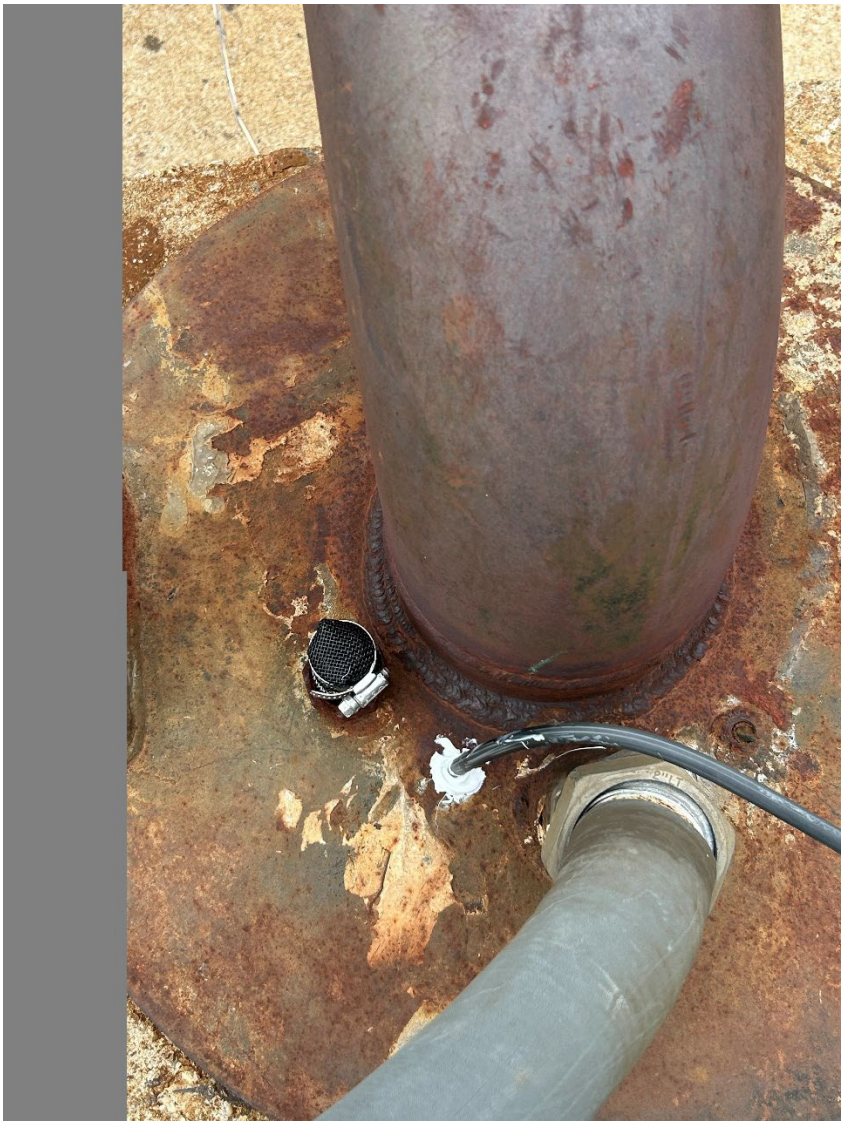
Page 1 of 1

Jim Finlay
QC Laboratory

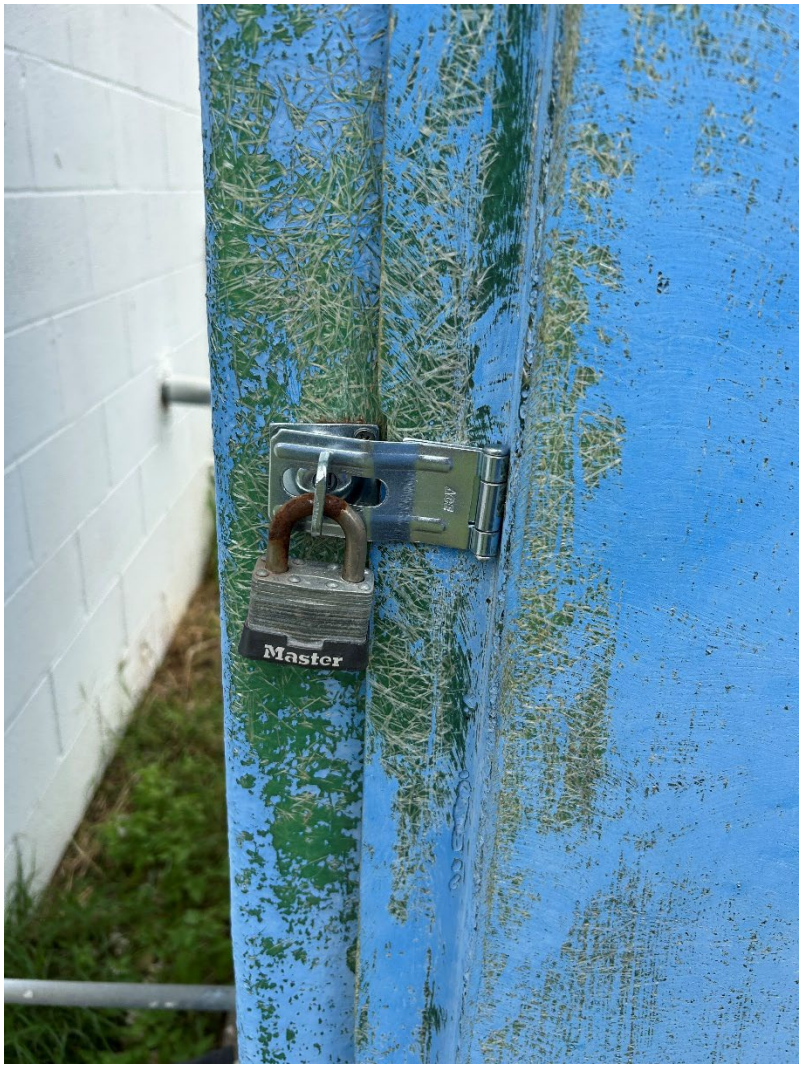
Description: Documentation provided on chemical used at Plants 6 and 11 (Observation 6).

Description: Plant 6. Well No. 4 wellhead with conduit penetration sealed and vent screen installed (Observation 10). Photo received June 6, 2025.

Description: Plant 6. Vent with screen installed on Well No. 4 (Observation 10). Photo received June 6, 2025.



Description: Plant 11. Well No. 5 wellhead with screened vent and sealed opening for the purge line (Observations 11 and 12). Photo received June 20, 2025.



Description: Lock installed on Plant 11 chlorine gas room. Photo received June 20, 2025.

Description: Containment provided for polyphosphate feed barrel at Plant 6 (Observation 7). Photo received June 24, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Opening and Closing Conference Sign-in Sheet
Appendix 2 – Tri-County SUD Violations
Appendix 3 – Photo Log

Section VI – APPENDICES

APPENDIX 1 – OPENING AND CLOSING CONFERENCE SIGN-IN SHEET

INSPECTION SIGN-IN SHEET

Facility: Tricounty Special Utility District | PWS ID No.: TX0730004 | Date: May 20, 2025

Name	Title	Agency/Company	Phone	Email	Present for Opening Conference?	Present for Closing Conference?
Maura Harbaugh	EPA Contractor (Inspector)	ERG	724-216-4579	Maura.Harbaugh@erg.com	✓	✓
Janet Cherry	ERG EPA Contractor	ERG	360-870-8971	janet.cherry@erg.com	✓	✓
Tim O'Neil	President Board of Directors	TRI CO	832-651-2812	trstc@msn.com	—	✓
Chris Trainer	Outside manager Tri county S.U.D	Tri CO	254-981-6696	Tri.countysud@Gmail	✓	✓
Elizabeth Lutke	Compliance Officer	TCEQ	512-239-1148	elizabeth.lutke@tceq.texas.gov	✓	✓
Daniel Kim	EPA Inspector ~~Enforcement~~ PK	EPA R6	214-665-6691	Kim.Daniel@epa.gov	✓	✓
Fatima Shaikh	EPA Inspector	EPA R6	214-665-7188	Shaikh.fatima@epa.gov	✓	✓
Ruben Alayon-Gonzalez	EPA Region 6	EPA	214-665-2705	alayon-gonzalez.ruben@epa.gov	✓	✓
Chelo Hall	EPA Region 6	EPA	214-665-~~35~~ 2716	hall.chelo@epa.gov	✓	✓
Craig Young	EPA Region 6	EPA	214-665-2275	young.craig@yahoo.com	✓	✓
Melissa Lloyd	Office Manager Tri-Co SUD	TRI-CO	254-803-3553	tricountysud@ctwa.com	✓	✓

APPENDIX 2 – TRI-COUNTY SUD VIOLATIONS

Table 2 indicates violations listed in Texas Drinking Water Watch (DWW). The last five years of violations have been included in this report.

- EP001 – Plant 1
- EP002 – Plant 6
- EP004 – Plant 11

Table 2. Tri-County SDWA Violations 2021-2025 (from TX DWW)

Compliance Period	Violation Name	Facility ID	Sample Result (mg/L)	Running Annual Average (mg/L)	Analyte	Has the Violation been Addressed? (On the Path to Compliance)	Has the Violation been Resolved? (Returned to Compliance)
01-01-2025-03-31-2025	MCL, AVERAGE	EP002	0.0146	0.014	ARSENIC	Yes - Informal	No
01-01-2025-03-31-2025	MCL, AVERAGE	EP004	0.0219	0.019	ARSENIC	Yes - Informal	No
01-01-2025-03-31-2025	MCL, AVERAGE	EP001	0.021	0.021	ARSENIC	Yes - Informal	No
10-01-2024-12-31-2024	MCL, AVERAGE	EP002	0.0134	0.014	ARSENIC	Yes - Informal	No
10-01-2024-12-31-2024	MCL, AVERAGE	EP004	0.0198	0.020	ARSENIC	Yes - Informal	No
10-01-2024-12-31-2024	MCL, AVERAGE	EP001	0.0234	0.020	ARSENIC	Yes - Informal	No
03-01-2022-OPEN	FAILURE TO SUBMIT AN APPROVABLE EMERGENCY PREPAREDNESS PLAN	N/A	N/A	N/A	N/A	Yes - Informal	No
07-01-2024-09-30-2024	MCL, AVERAGE	EP004	0.0197	0.019	ARSENIC	Yes - Formal and Informal	No
07-01-2024-09-30-2024	MCL, AVERAGE	EP002	No Lab Result	0.014	ARSENIC	Yes - Formal and Informal	No

07-01-2024-09-30-2024	MCL, AVERAGE	EP001	No Lab Result	0.020	ARSENIC	Yes - Formal and Informal	No
04-01-2024-06-30-2024	MCL, AVERAGE	EP004	0.0162	0.020	ARSENIC	Yes - Formal and Informal	No
04-01-2024-06-30-2024	MCL, AVERAGE	EP002	0.014	0.014	ARSENIC	Yes - Formal and Informal	No
04-01-2024-06-30-2024	MCL, AVERAGE	EP001	0.0217	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2024-03-31-2024	MCL, AVERAGE	EP002	0.0144	0.015	ARSENIC	Yes - Formal and Informal	No
01-01-2024-03-31-2024	MCL, AVERAGE	EP004	0.0231	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2024-03-31-2024	MCL, AVERAGE	EP001	0.0187	0.021	ARSENIC	Yes - Formal and Informal	No
10-01-2023-12-31-2023	MCL, AVERAGE	EP002	0.0141	0.015	ARSENIC	Yes - Formal and Informal	No
10-01-2023-12-31-2023	MCL, AVERAGE	EP001	0.0234	0.023	ARSENIC	Yes - Formal and Informal	No
10-01-2023-12-31-2023	MCL, AVERAGE	EP004	0.0172	0.020	ARSENIC	Yes - Formal and Informal	No
07-01-2023-09-30-2023	MCL, AVERAGE	EP004	0.0217	0.021	ARSENIC	Yes - Formal and Informal	No
07-01-2023-09-30-2023	MCL, AVERAGE	EP001	0.0216	0.022	ARSENIC	Yes - Formal and Informal	No
07-01-2023-09-30-2023	MCL, AVERAGE	EP002	0.0152	0.015	ARSENIC	Yes - Formal and Informal	No
04-01-2023-06-30-2023	MCL, AVERAGE	EP002	0.015	0.015	ARSENIC	Yes - Formal and Informal	No
04-01-2023-06-30-2023	MCL, AVERAGE	EP004	0.0219	0.021	ARSENIC	Yes - Formal and Informal	No
04-01-2023-06-30-2023	MCL, AVERAGE	EP001	0.0203	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2023-03-31-2023	MCL, AVERAGE	EP002	0.015	0.015	ARSENIC	Yes - Formal and Informal	No

01-01-2023-03-31-2023	MCL, AVERAGE	EP001	0.025	0.023	ARSENIC	Yes - Formal and Informal	No
01-01-2023-03-31-2023	MCL, AVERAGE	EP004	0.021	0.021	ARSENIC	Yes - Formal and Informal	No
10-01-2022-12-31-2022	MCL, AVERAGE	EP002	0.0135	0.015	ARSENIC	Yes - Formal and Informal	No
10-01-2022-12-31-2022	MCL, AVERAGE	EP004	0.0194	0.021	ARSENIC	Yes - Formal and Informal	No
10-01-2022-12-31-2022	MCL, AVERAGE	EP001	0.0194	0.022	ARSENIC	Yes - Formal and Informal	No
07-01-2022-09-30-2022	MCL, AVERAGE	EP001	0.0205	0.023	ARSENIC	Yes - Formal and Informal	No
07-01-2022-09-30-2022	MCL, AVERAGE	EP004	0.0216	0.022	ARSENIC	Yes - Formal and Informal	No
07-01-2022-09-30-2022	MCL, AVERAGE	EP002	0.0145	0.015	ARSENIC	Yes - Formal and Informal	No
04-01-2022-06-30-2022	MCL, AVERAGE	EP001	0.0261	0.023	ARSENIC	Yes - Formal and Informal	No
04-01-2022-06-30-2022	MCL, AVERAGE	EP002	0.0163	0.015	ARSENIC	Yes - Formal and Informal	No
04-01-2022-06-30-2022	MCL, AVERAGE	EP004	0.0229	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2022-03-31-2022	MCL, AVERAGE	EP004	0.0216	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2022-03-31-2022	MCL, AVERAGE	EP001	0.0229	0.022	ARSENIC	Yes - Formal and Informal	No
01-01-2022-03-31-2022	MCL, AVERAGE	EP002	0.0146	0.017	ARSENIC	Yes - Formal and Informal	No
10-01-2021-12-31-2021	MCL, AVERAGE	EP004	0.0212	0.020	ARSENIC	Yes - Formal and Informal	No
10-01-2021-12-31-2021	MCL, AVERAGE	EP002	0.0148	0.017	ARSENIC	Yes - Formal and Informal	No
10-01-2021-12-31-2021	MCL, AVERAGE	EP001	0.0212	0.022	ARSENIC	Yes - Formal and Informal	No

07-01-2021-09-30-2021	MCL, AVERAGE	EP002	0.0134	0.016	ARSENIC	Yes - Formal and Informal	No
07-01-2021-09-30-2021	MCL, AVERAGE	EP001	0.0214	0.022	ARSENIC	Yes - Formal and Informal	No
07-01-2021-09-30-2021	MCL, AVERAGE	EP004	0.0195	0.020	ARSENIC	Yes - Formal and Informal	No
04-01-2021-06-30-2021	MCL, AVERAGE	EP004	0.0221	0.021	ARSENIC	Yes - Formal and Informal	No
04-01-2021-06-30-2021	MCL, AVERAGE	EP002	0.025	0.017	ARSENIC	Yes - Formal and Informal	No
04-01-2021-06-30-2021	MCL, AVERAGE	EP001	0.0243	0.023	ARSENIC	Yes - Formal and Informal	No
01-01-2021-03-31-2021	MCL, AVERAGE	EP001	0.0219	0.021	ARSENIC	Yes - Formal and Informal	No
01-01-2021-03-31-2021	MCL, AVERAGE	EP002	0.0128	0.014	ARSENIC	Yes - Formal and Informal	No
01-01-2021-03-31-2021	MCL, AVERAGE	EP004	0.0188	0.021	ARSENIC	Yes - Formal and Informal	No
10-01-2020-12-31-2020	MCL, AVERAGE	EP004	0.0199	0.022	ARSENIC	Yes - Formal and Informal	No
10-01-2020-12-31-2020	MCL, AVERAGE	EP001	0.0221	0.021	ARSENIC	Yes - Formal and Informal	No
10-01-2020-12-31-2020	MCL, AVERAGE	EP002	0.014	0.015	ARSENIC	Yes - Formal and Informal	No
07-01-2020-09-30-2020	MCL, AVERAGE	EP001	0.0247	0.021	ARSENIC	Yes - Formal and Informal	No
07-01-2020-09-30-2020	MCL, AVERAGE	EP004	0.0219	0.022	ARSENIC	Yes - Formal and Informal	No
07-01-2020-09-30-2020	MCL, AVERAGE	EP002	0.0152	0.017	ARSENIC	Yes - Formal and Informal	No
04-01-2020-06-30-2020	MCL, AVERAGE	EP001	0.0145	0.022	ARSENIC	Yes - Formal and Informal	No
04-01-2020-06-30-2020	MCL, AVERAGE	EP002	0.0142	0.017	ARSENIC	Yes - Formal and Informal	No

04-01-2020-06-30-2020	MCL, AVERAGE	EP004	0.0215	0.023	ARSENIC	Yes - Formal and Informal	No
01-01-2020-03-31-2020	MCL, AVERAGE	EP002	0.017	0.018	ARSENIC	Yes - Formal and Informal	No
01-01-2020-03-31-2020	MCL, AVERAGE	EP001	0.023	0.024	ARSENIC	Yes - Formal and Informal	No
01-01-2020-03-31-2020	MCL, AVERAGE	EP004	0.023	0.023	ARSENIC	Yes - Formal and Informal	No

APPENDIX 3 – PHOTO LOG

Unless otherwise indicated herein, all photographs were taken by Janet Cherry or Maura Harbaugh of ERG during the inspection. The displayed date and time are the local time (CST 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.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 1. 05/20/2025 01:57 P1010523.JPG
Description: Filters containing media for arsenic removal and backwash tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 2. 05/20/2025 02:13 P1010534.JPG
Description: Plant 6. Gas chlorine room with no crash bar or window.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 3. 05/20/2025 02:47 P1010543.JPG
Description: Plant 11. Gas chlorine room with no crash bar, window, gas sensors, or alarms.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

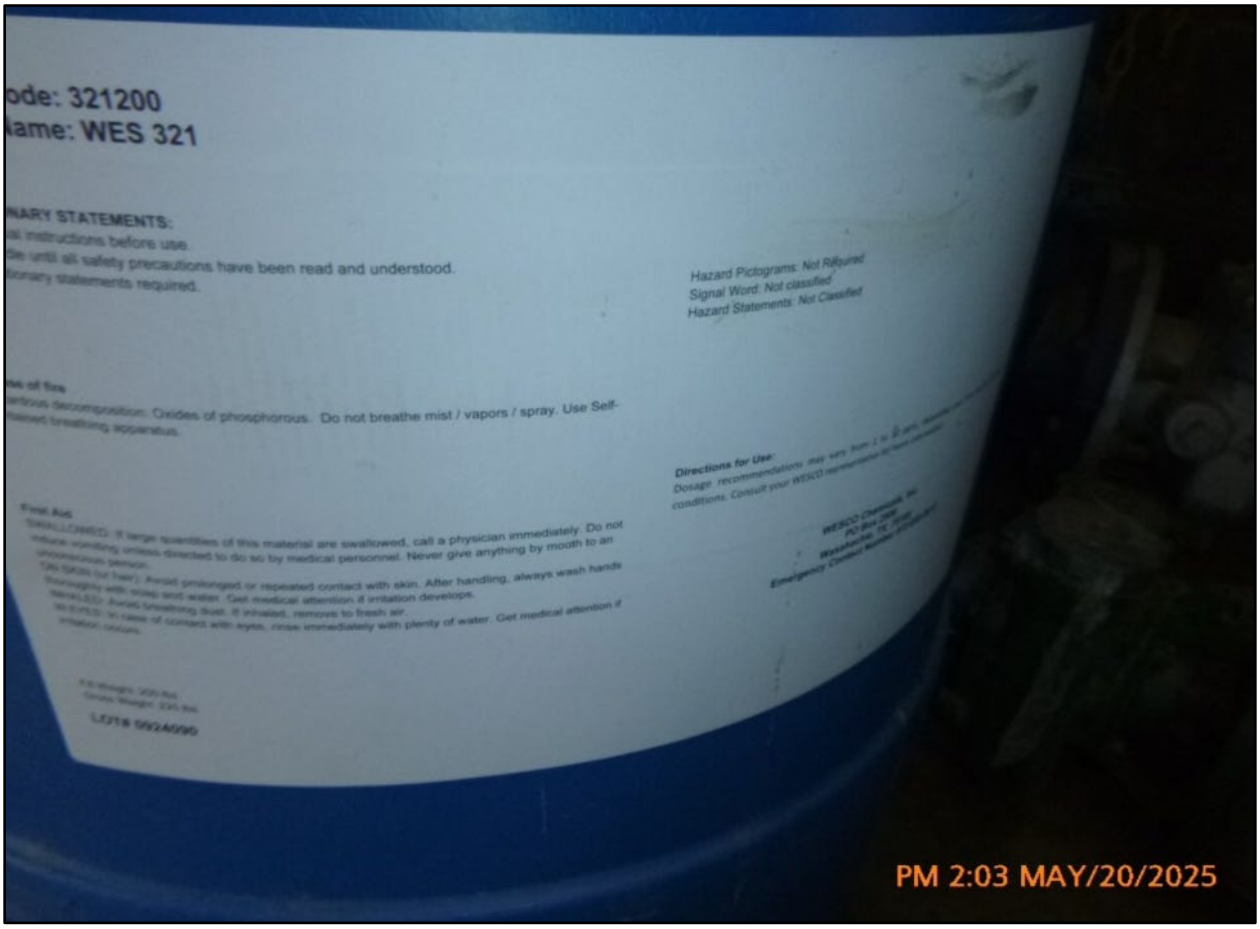
Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 4. 05/20/2025 02:13 P1010532.JPG
Description: Plant 6. Chlorine room with no gas sensors or alarms.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas



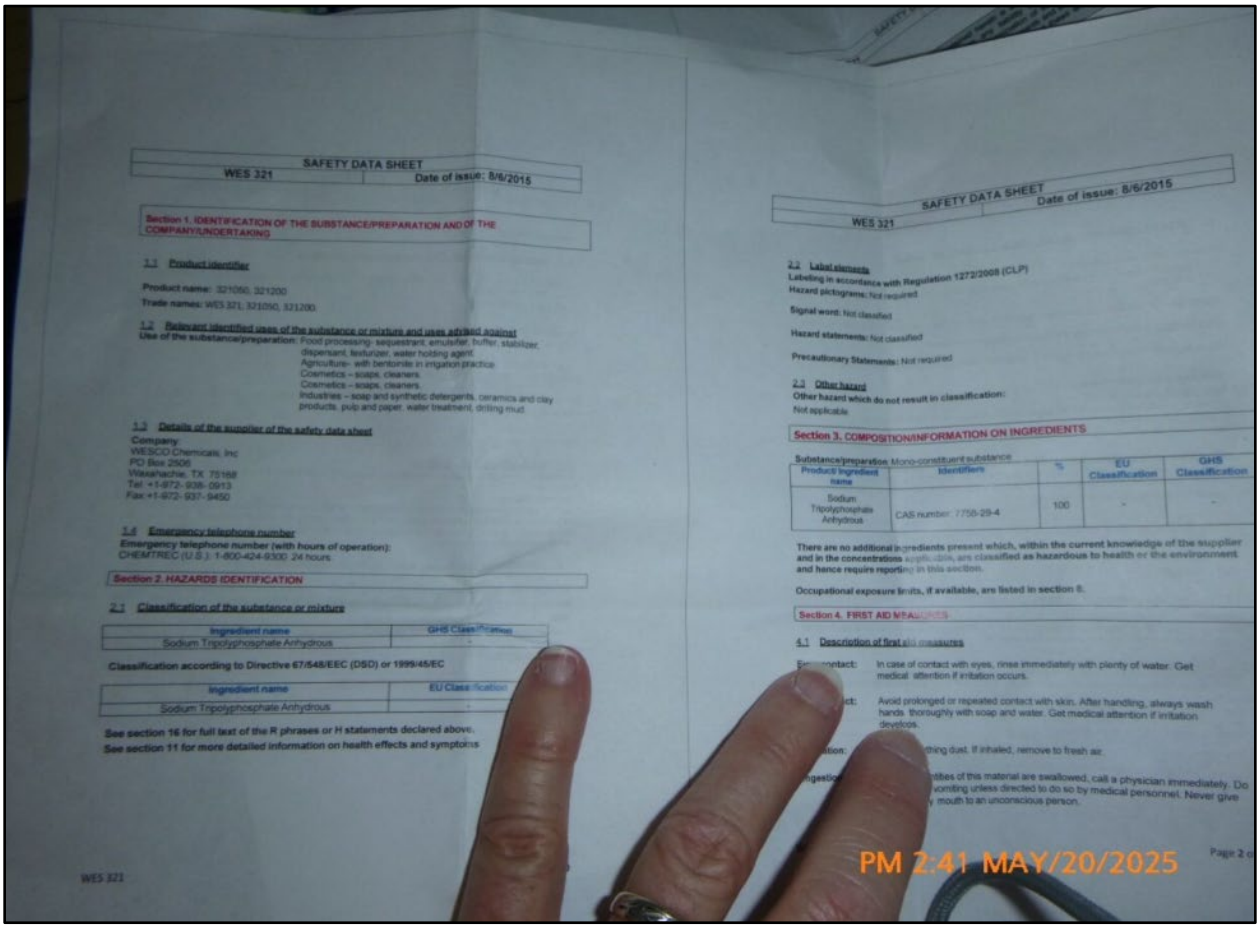
Photograph 5. 05/20/2025 02:03 P1010524.JPG

Description: Plant 6. Polyphosphate dry barrel lacks an NSF-60 label. This condition is also representative of what was observed at Plant 11.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas



Photograph 6. 05/20/2025 02:03 P1010524.JPG
Description: Plant 11. Safety Data Sheet for polyphosphate dry barrel with no NSF-60 certification.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 7. 05/20/2025 02:03 P1010525.JPG
Description: Plant 6. Polyphosphate chemical feed barrel without secondary containment.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 8. 05/20/2025 01:53 P1010521.JPG
Description: Plant 6. Fixed ladder extending to the ground and lacking a lock on the 100,000-gallon ground storage tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 9. 05/20/2025 01:46 P1010519.JPG
Description: Plant 6. Opening in the electrical conduit on the Well No. 4 wellhead.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: Tri-County SUD Water System		
Tri-County SUD	County: Falls	State: Texas

Photograph 10. 05/20/2025 02:36 P1010538.JPG
Description: Plant 11. Openings in the Well No. 5 wellhead around the purge line and lack of screen on the vent opening.