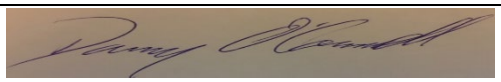
EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	06/07/2023	
Media Program:	Water	
Regulatory Program(s)	AWIA/SDWA	
Facility Name:	**Mountain Top Water Association Public Water System**	
Facility Physical Location:	1200 Heber Springs Rd.	
(city, state, zip code)	Heber Springs, AR 72543	
Mailing address:	1200 Heber Springs Rd.	
(city, state, zip code)	Heber Springs, AR 72543	
County/Parish:	Cleburne	
Facility Phone Number	501-362-5803	
Facility Contact:	Preston Anderson	
	System Manager	
FRS Number:	N/A	
Identification/Permit Number:	AR0000454	
Media Identifier Number:	N/A	
NAICS:	N/A	
SIC:	N/A	
Personnel participating in inspection:		
Preston Anderson	Mountain Top Water	System Manager
Kristen Miller	Mountain Top Water	Office Manager
Danny O'Connell	PG Environmental	EPA Contract Inspector
Jake Okun	PG Environmental	EPA Contract Inspector
Sami Fares	Arkansas Department of Health	District Engineer
EPA Lead Inspector: Danny O'Connell Signature/Date		7/31/2023
	Danny O'Connell	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On June 7, 2023, U.S Environmental Protection Agency (EPA) Region 6 contract inspectors from PG Environmental (hereinafter, the EPA Inspection Team) conducted an announced American Water Infrastructure Act (AWIA) Risk and Resiliency Assessment (RRA) and Emergency Response Plan (ERP) program/document inspection of the Mountain Top Water Association Public Water System (System), ID No. AR0000454. The inspection process began at approximately 8:30 a.m. on June 7, 2023, and finished at approximately 3:00 p.m. Sami Fares, a district engineer from the Arkansas Department of Health (ADH), was also present for the inspection.

Danny O'Connell and Jake Okun of PG Environmental presented their SDWA inspector credentials to the System representatives upon arrival. They informed them that this was an inspection to observe compliance with the Safe Drinking Water Act (SDWA) Section 1433(a) and (b), which requires community water systems that serve more than 3,300 people to complete a RRA and develop an ERP. To facilitate the inspection process, a checklist outlining the requirements of SDWA Section 1433(a) and (b) was used during the document review (refer to Appendix 1, Safe Drinking Water Act (SDWA) Sections 1433(a) and (b) Checklist). The EPA Inspection Team met with Preston Anderson, the System Manager, and Kristen Miller, Office Manager, for the opening conference.

As a component of the RRA and ERP document review, the following field assets were also observed:

Finished Water Storage Tanks:

- Hopewell Tank
- Rosebud Tank
- Liberty Hill Tank
- Joy Tank
- Tank #1
- Ridgecrest Tank

Master Meters/Pump Stations:

- Pump Station #1 (Master Meter #1)
- Pump Station #2 (Master Meter #2)

FACILITY DESCRIPTION

The Mountain Top Water Association System (System) is a purchase water system that purchases from two sources, including Heber Springs Waterworks and Lonoke White Public Water Authority (LWPWA). The System serves a population of approximately 8,838 people. The System does not contain a water treatment plant and does not provide any additional treatment to the water that is purchased for distribution. The System contains three master meters, two of which transfer treated purchase water from LWPWA and one of which from Heber Springs. The System contains seven booster pumping facilities and 11 storage facilities.

ASSET WALKTHROUGH

Storage Facilities

As a component of the RRA and ERP review, several assets were observed to cross-reference the information listed in the documents with what was actually being implemented in the field. System representatives were dealing with a water line break at the time of the inspection and therefore could not join the EPA Inspection Team during the morning. Because of this, many of the storage tanks were observed from outside fence line.

First, the EPA Inspection Team observed the Hopewell Water Tank. The Hopewell Tank was elevated and had a capacity of 250,000 gallons. The tank was surrounded by a locked perimeter fence with barbed wire (refer to Appendix 2, Photograph 1). [redacted] System representatives said that alarms associated with the water tank were tied into their supervisory control and data acquisition (SCADA) system [redacted]

Following the Hopewell Tank, the Rosebud Water Tank was observed (refer to Appendix 2, Photograph 5). The Rosebud Tank is a 59,000 gallon standpipe tank. The tank was surrounded by a locked perimeter fence with barbed wire (refer to Appendix 2, Photograph 6). [redacted] An overflow pipe extending out of the top of the tank did not contain a flapper (refer to Appendix 2, Photograph 8). There were signs of erosion (e.g., no grass and exposed rocks in a low laying area) beneath the overflow line (refer to Appendix 2, Photograph 9). It was unclear what size screen was placed over the opening of the overflow pipe.

The Liberty Hill Water Tank was observed next (refer to Appendix 2, Photograph 11). The Liberty Hill Water Tank is a 199,400 gallon standpipe tank. The tank was surrounded by a locked perimeter fence with barbed wire (refer to Appendix 2, Photograph 12). [redacted] An overflow pipe extended out of the top of the tank; it was unclear if the pipe opening was covered by a screen (refer to Appendix 2, Photograph 14).

After the Liberty Hill Water Tank, the Joy Water Tank was observed (refer to Appendix 2, Photograph 15). The Joy Water Tank is a 28,950 gallon standpipe tank. The tank was surrounded by a locked perimeter fence with barbed wire (refer to Appendix 2, Photograph 16). The bottom rungs of the ladder were removed, and there was a locked security shield over the ladder. There was some rust at the top of the tank, and an overflow pipe extended from the top of the tank (refer to Appendix 2, Photograph 17). It was unclear if the overflow pipe opening was covered by a screen.

Water Tank #1 was also observed. The road leading up to the tank had a fallen tree across it, making it so that vehicles could not pass (refer to Appendix 2, Photograph 18). Additionally, the dirt road was heavily eroded due to past rainfall. [redacted] The lower rungs of the tank ladder were removed, and there was a locked security shield over the lower rungs of the ladder (refer to Appendix 2, Photograph 20). An overflow pipe extended from the top of the tank; it was unclear if the opening of the pipe was covered by a screen.

Finally, the Ridgecrest Water Tank was observed (refer to Appendix 2, Photograph 23). A "No Trespassing" sign was present on the perimeter security fence which was locked and had barbed wire (refer to Appendix 2, Photograph 24). The System Manager stated that the Ridgecrest Tank received extensive maintenance approximately one year ago, and that it was their most updated tank. [redacted] The tank contained an overflow pipe that extended out of the top of the tank down to the ground (refer to Appendix 2, Photograph 25). The pipe opening had a flapper valve that was open. There was no concrete splash pad beneath the pipe's terminus (refer to Appendix 2, Photograph 26). A 24-inch mesh screen was present inside of the pipe (refer to Appendix 2, Photograph 27). Alarms associated with the tank were tied into the System's SCADA system. [redacted]

Master Meters/Pump Stations

The two pump stations, each containing a master meter, were observed with the System Manager. [redacted] First, Pump Station #1 was observed. The System Manager stated that the master meter at this pump station (Master Meter #1) was used for water purchased from Heber Springs, and that there were three pumps at the pump station (with two in use and one on standby). He stated that the meter was checked daily, and the pump station was monitored using a daily rounds sheet. He also stated that activity at the master meter was monitored using the SCADA system. There was a telemetry tower positioned next to the pump station (refer to Appendix 2, Photograph 30).

A backup generator was positioned next to the pump/meter room at the pump station (refer to Appendix 2, Photograph 31). The System Manager stated that the generator was not functional and that they were in the process of fixing it. The generator did not contain a battery. The fuel tank standing next to the generator was empty. [redacted]

Pump Station #2 was observed next, and it contained Master Meter #2. The System Manager stated that this meter was used for water purchased from LWPWA, and that there were three pumps at the pump

station (with two in use and one on standby). He stated that, like Pump Station #1, this meter was checked daily, and the pump station was monitored using a daily rounds sheet. He also stated that activity at the master meter was monitored using the SCADA system. The backup generator sitting next to this pump station was also not functional, but it contained a new battery (refer to Appendix 2, Photographs 32 and 33). The fuel tank standing next to the generator was empty and there was some sludge at the bottom of the tank. [redacted]

SYSTEM SECURITY AND MONITORING

The System has a SCADA system which is used to monitor tank levels, alerts, and other activity in the distribution system. [redacted] Access is secure, and only certain team members have administrative access to the SCADA system. [redacted]

In terms of physical security, the assets are surrounded by a locked perimeter fence with barbed wire [redacted] Most of the perimeter fences did not contain "No Trespassing" or other security signs, and some of the signs were on the ground next to the fence. [redacted]

RRA AND ERP GENERATION

The System purchased a software titled "SEMS Technologies" from Arkansas Rural Water Association (ARWA) to complete their RRA and ERP. The software contains RRA and ERP templates that are designed to comply with SDWA 1433(a) and (b).

RISK AND EMERGENCY RESPONSE EXAMPLES

As a component of the RRA and ERP document review, and to provide an example of emergency response and risk assessment, the EPA Inspection Team asked System representatives to describe their response to three specific challenges that many/all of the systems in Arkansas have faced within the last few years:

The "deep freeze" event of February, 2021 which impacted much of the American southern region. During this event, temperatures were below freezing for a prolonged period of time causing water related infrastructure to freeze. Mountain Top System representatives stated that their response was not formally documented anywhere and there were no standard operating procedures (SOPs) that were generated to document how an event like this should be responded to in the future.

Tornados, which are a common occurrence in Arkansas. Mountain Top System representatives had no formal plans or SOPs written to respond to a tornado.

The transfer of knowledge from older System representatives to new staff members after older staff members are no longer employed by the System. Mountain Top System representatives stated that operational knowledge was not formally written down anywhere in the form of SOPs. The System Manager stated that the last System Manger had recently passed away unexpectedly, and that he was hired within the last several weeks prior to the inspection as his replacement. Due to the lack of formal SOPs, he was still in the process of learning the System and its various assets.

Section II - OBSERVATIONS

The following observations pertain to the SDWA Section 1433(a), Risk and resilience assessments.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(i), states that "Risk and resilience assessments shall include an assessment of the risk to the system from malevolent acts and natural hazards."

Observation 1. An assessment of the risk to the system from malevolent acts and natural hazards was included in the RRA document, but it was incomplete. All assets listed in the system were marked as "low priority" and a "Low, Tier 4" risk. System representatives stated that they did have high priority assets in their treatment system.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(ii), states that "Risk and resilience assessments shall include 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."

Observation 2. An assessment of the resilience of specific assets in the System was included in the RRA document, but none of the assets were listed as "critical" or "high" priority. Some assets in the resilience assessment were characterized as "medium" priority, while the majority were characterized as "low" priority.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(iii), states that "Risk and resilience assessments shall include an assessment of the monitoring practices of the system."

Observation 3. Monitoring practices were not described in the RRA, but system representatives stated that they had a SCADA system [redacted] that could be used to monitor their assets. An operator stated that only select staff members had secure administrative access to their SCADA system.

While it was not described in the RRA, System representatives stated that community members that lived near the various assets would call to report any suspicious activity seen at the assets. Additionally, operators perform rounds to check on the assets. [redacted]

The Safe Drinking Water Act, Section 1433(a)(1)(A)(iv), states that "Risk and resilience assessments shall include an assessment of the financial infrastructure of the system."

Observation 4. A generic financial consequence scale was observed within the RRA, and it displayed the financial impact of possible threats to the system. It appeared that the scale was universal to the SEMS software template. However, the financial impact of threats to specific assets and infrastructure in the Mountain Top system were not discussed in the RRA document.

The Safe Drinking Water Act, Section 1433(a)(1)(A)(v), states that "Risk and resilience assessments shall include an assessment of the use, storage, or handling of various chemicals by the system."

Observation 5. "None" was written in the RRA document that addressed chemical storage and handling of various chemicals. However, since this system is exclusively a purchase system that does not provide any additional chemical treatment, this section should state "Not Applicable," rather than "None."

The Safe Drinking Water Act, Section 1433(a)(1)(A)(vi), states that "Risk and resilience assessments shall include an assessment of the operation and maintenance of the system."

Observation 6. The impact to the operation and maintenance (O&M) of the treatment system as a result of a threat was not developed in the RRA, and System representatives stated that they did not have any O&M documents. However, the System recently completed extensive maintenance to the Ridgecrest Water Tank.

The following observations pertain to the SDWA Section 1433(b), Emergency response plan.

The Safe Drinking Water Act, Section 1433(b)(4), states that "The emergency response plan shall include 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 7. [redacted]

The Safe Drinking Water Act, Section 1433(b)(3), states that "The emergency response plan shall include 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."

Observation 8. Heber Springs and Lonoke White Public Water Authority are both listed as purchase water sources for the system, and they were each listed as alternate water sources in the ERP. The operator stated that either water system could supply enough water to keep water moving through the distribution system if one of the two sources became threatened. In terms of backup power, the generators at Pump Station #1 and Pump Station #2 were not functional. They would not be able to keep the pumps running in the event of a power outage.

The Safe Drinking Water Act, Section 1433(b)(2), states that "The emergency response plan shall include 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."

Observation 9. Plans and procedures that can be implemented in the event of a malevolent act or natural hazard were not developed in the ERP. However, the SEMS software (used to generate the ERP and RRA) does have a form letter-style warning notice for use when the water is not safe to drink.

The Safe Drinking Water Act, Section 1433(c), Coordination, states that "Community water systems shall, to the extent possible, coordinate with existing local emergency planning committees established pursuant to the Emergency Planning and Community Right-To-Know Act of 1986 (42 U.S.C. 11001 et seq.) when preparing or revising an assessment or emergency response plan under this section."

Observation 10. The ERP listed local law enforcement (the county sheriff) as the emergency first responder. The ERP also listed the Arkansas Department of Health (ADH) as a contact to coordinate with in the event of a threat to the water system.

The Safe Drinking Water Act, Section 1433(b)(1), states that "The emergency response plan shall include strategies and resources to improve the resilience of the system, including the physical security and cybersecurity of the system."

Observation 11. This item was not discussed in the ERP. [redacted]

The following observations pertain to the field assets that were observed during the walkthrough component of the review.

Observation 12. [redacted]

Observation 13. [redacted]

Observation 14. [redacted]

Observation 15. [redacted]

Observation 16. The terminus of the overflow pipe extending out of the Rosebud Water Tank was near the top of the tank, and there was no splash pad beneath the pipe at the bottom of the tank (refer to Appendix 2, Photograph 8). Additionally, the screen covering the pipe opening was covered by a coarse mesh rather than 24-inch mesh, and it was unclear if a finer mesh was present inside the pipe. There were signs of erosion beneath the overflow pipe (e.g., no grass and exposed rocks in a low-lying area) (refer to Appendix 2, Photograph 9).

Observation 17. [redacted]

Observation 18. [redacted]

Observation 19. The terminus of the overflow pipe extending out of the Liberty Hill Water Tank was near the top of the tank, and there was no splash pad beneath the pipe at the bottom of the tank (refer to Appendix 2, Photograph 14).

Observation 20. The terminus of the overflow pipe extending out of the Joy Water Tank was near the top of the tank, and there was no splash pad beneath the pipe at the bottom of the tank (refer to Appendix 2, Photograph 17). Additionally, it was unclear if the opening of the overflow pipe was covered by a mesh screen.

Observation 21. The terminus of the overflow pipe extending out of Water Tank #1 was near the top of the tank, and there was no splash pad beneath the pipe at the bottom of the tank (refer to Appendix 2, Photograph 21). Additionally, erosion was observed next to the water tank beneath the terminus of the overflow pipe (refer to Appendix 2, Photograph 22).

Observation 22. [redacted]

Observation 23. [redacted]

Observation 24. There was no splash pad beneath the terminus of the overflow pipe at the Ridgecrest Water Tank (refer to Appendix 2, Photograph 26). Additionally, the flapper valve was open when the EPA Inspection Team arrived.

Observation 25. There was a potable water leak occurring from one of the valves adjacent to Pump Station #2 (refer to Appendix 2, Photographs 34 and 35). The water was leaking out of the valve and running downhill toward the pump station. The System Manager stated that he was aware of the leak, and the ground had been painted to reflect the location of future repairs to the line (refer to Appendix 2, Photograph 36).

Observation 26. The hillside of Pump Station #2 sloped toward the location of the generator, there was some erosion occurring just uphill of the pump station on either side of the building (refer to Appendix 2, Photograph 37). It appeared that rainfall would flow toward the generator during a heavy rain event.

Section IV – CLOSING CONFERENCE

On June 7, 2023, the EPA Inspection Team met with the System Manager and the Office Manager for a closing conference at approximately 2:45 p.m. Danny O'Connell and Jake Okun reviewed observations with the System representatives and explained that all observations were preliminary and did not constitute any formal compliance determination.

Section V – FOLLOW UP

No additional information was received by EPA after exiting the Facility on June 7, 2023.

Section VI – LIST OF APPENDICES

Appendix 1 – Safe Drinking Water Act (SDWA) Sections 1433(a) and (b) Checklist
Appendix 2 – Photograph Log

Appendix 2

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 1. Perimeter Fence, Hopewell Water Tank View of the locked perimeter fence with barbed wire that surrounded the Hopewell Water Tank. The tank was approximately 50 yards from a church.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 2. Security Ladder Shield, Hopewell Water Tank View of the security shield that was covering the bottom rungs of the ladder at the Hopewell Water Tank. [redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 5. Rosebud Water Tank View of the Rosebud Water Tank located at the end of a grass covered dirt and graveled road in a heavily wooded, undeveloped area. The tank is 59,000 gallons and was surrounded by a locked perimeter fence.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 8. Overflow Pipe, Rosebud Water Tank View of the overflow pipe that extended out of the top of the Rosebud Water Tank. There appeared to be a coarse screen over the opening of the pipe, but it was unclear what size the screen was. There was no splash pad beneath the pipe.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 11. Liberty Hill Water Tank View of the Liberty Hill Water Tank located in an open field approximately 150 yards from local homes. The Liberty Hill Water Tank is a 199,400 gallon standpipe tank, and it was surrounded by a locked perimeter fence with barbed wire.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 12. Perimeter Fence Lock, Liberty Hill Water Tank View of the locks on the security fence that was surrounding the Liberty Hill Water Tank. The fence also contained barbed wire.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 14. Overflow Pipe, Liberty Hill Water Tank View of the overflow pipe that extended out of the top of the Liberty Hill Water Tank. It was unclear if the pipe was covered by a screen, and there was no splash pad beneath the pipe.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 15. Joy Water Tank View of the Joy Water Tank. The Joy Water Tank is a 28,950 gallon standpipe tank, and it was surrounded by a locked perimeter fence with barbed wire. The tank is approximately 50 yards from the nearest home.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

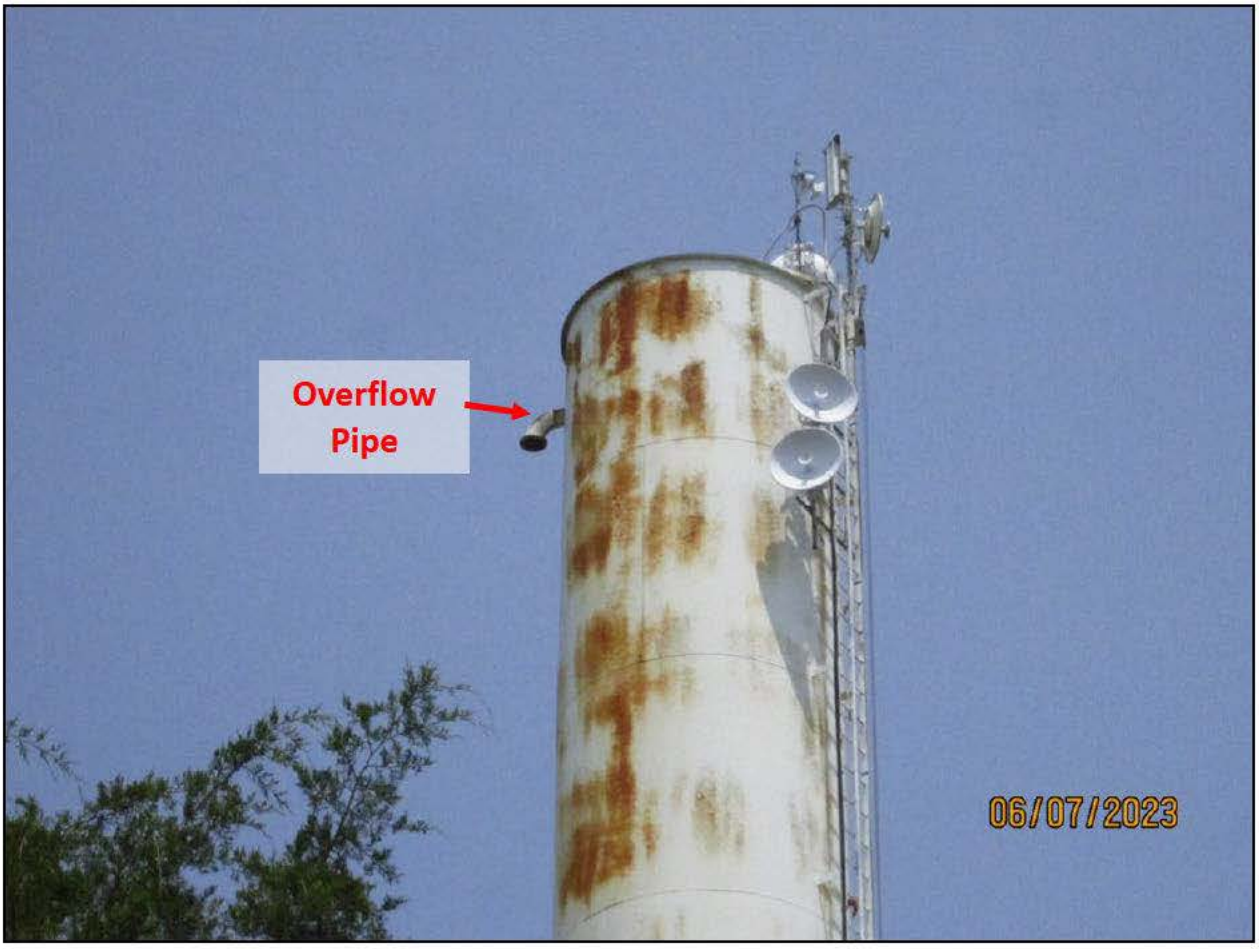
Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas



Photograph 17. Joy Water Tank View of the overflow pipe at the Joy Water Tank. It was unclear if the opening of the pipe was covered by a screen, and there was no splash pad beneath the pipe. Also visible in this image is rust on the side of the tank. There were multiple pieces of communication equipment attached to the tank's ladder structure (not the tank shell).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 18. Access Road, Water Tank #1 View of a fallen tree that was blocking the access road to Water Tank #1. The tree made it so that vehicles could not access the tank. Also visible in this image is heavy erosion in the road due to rainfall.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 20. Security Ladder Shield, Water Tank #1 View of the security ladder shield at Water Tank #1. The security shield was locked.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 21. Water Tank #1 View of the overflow pipe extending out of the top of Water Tank #1. There was no splash pad beneath the overflow pipe.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

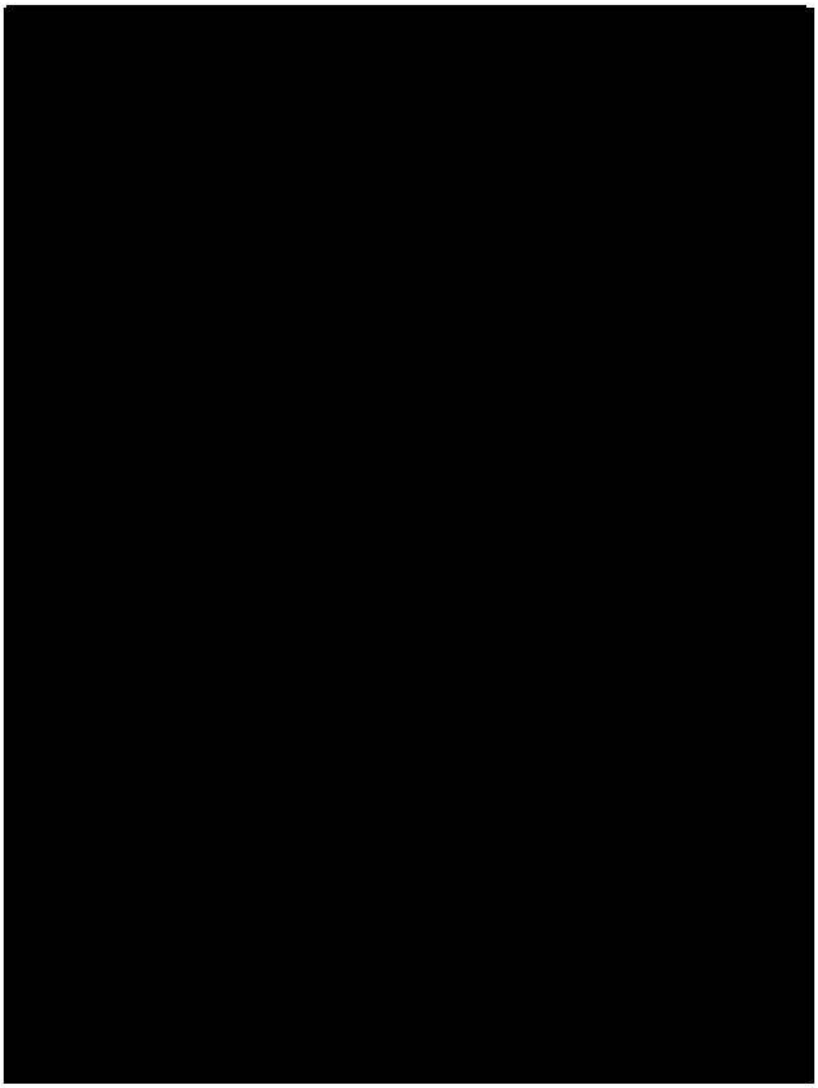
Photograph 22. Water Tank #1 View of the erosion underneath the overflow pipe at Water Tank #1.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 24. Perimeter Security Fence, Ridgecrest Water Tank View of a "No Trespassing" sign that was posted on the security fence of the Ridgecrest Water Tank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 25. Ridgecrest Water Tank View of the overflow pipe that extended off of the side of the Ridgecrest Water Tank to the ground.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 26. Overflow Pipe, Ridgecrest Water Tank View of the end of the overflow pipe that extended out of the Ridgecrest Water Tank. The flapper valve was open and there was no concrete splash pad beneath the pipe.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 27. Overflow Pipe, Ridgecrest Water Tank View of the inside of the overflow pipe that extended off of the Ridgecrest Water Tank. The opening was covered by a 24-inch mesh screen beneath a flapper valve.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

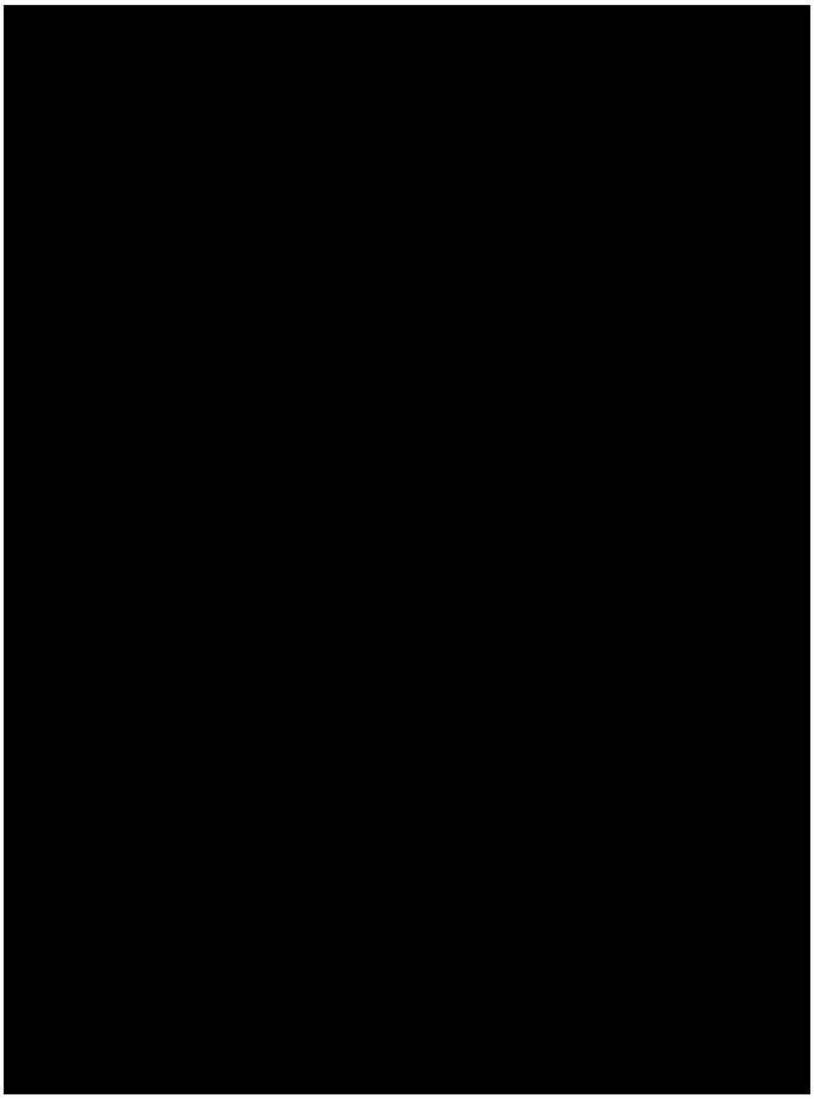
Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas



[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 31. Backup Generator, Pump Station #1 View of the backup generator that was positioned next to Pump Station #1. The generator was not functional and did not contain a battery.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

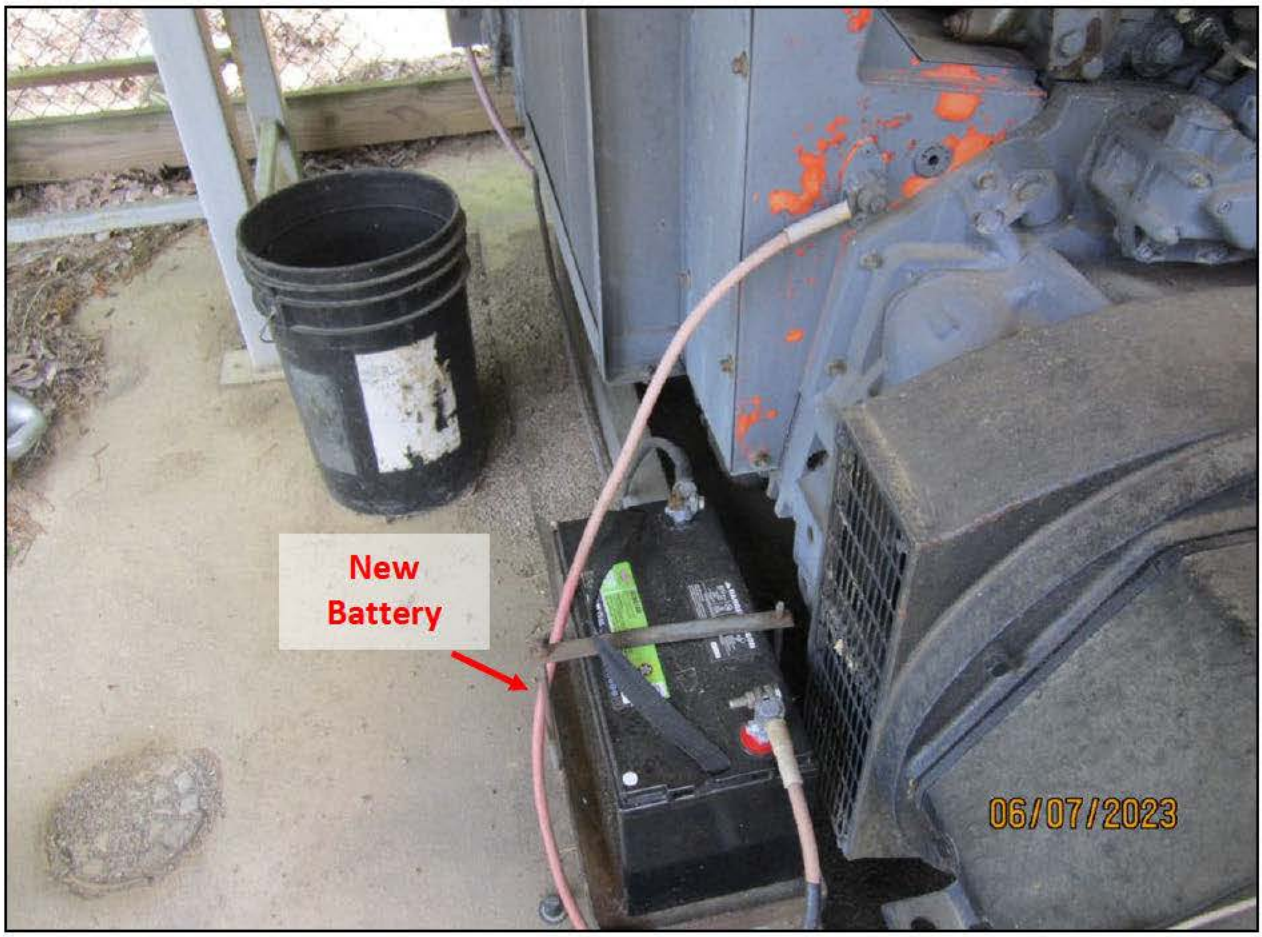
Photograph 32. Backup Generator, Pump Station #2 View of the backup generator that was positioned next to Pump Station #2. The generator was not functional, and there was sludge at the bottom of the diesel fuel tank next to the generator.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas



Photograph 33. Backup Generator, Pump #2 View of the battery sitting next to the backup generator next to Pump #2. The generator was not functional, but System representatives stated that the battery was new.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 34. Valve Port, Pump Station #2 View of a valve box PVC line to valve stem that was leaking potable water. The water was running down the hill toward the pump station, and the System Manager stated that he was aware of the leak. The area had blue spray paint line on the ground in preparation for excavation.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 35. Valve, Pump Station #2 View of hill sloping toward Pump Station #2 where potable water leaking from the valve was draining. Blue paint was observed on the ground in this area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 36. Valves, Pump Station #2 View of the ground at Pump Station #2, downhill of the leaking valve. Paint showed where water lines were located so that the scheduled excavation and repairs could take place.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: Mountain Top Water Association Public Water System		
City: Heber Springs	County/Parish: Cleburne	State: Arkansas

Photograph 37. Pump Station #2 View of the erosion next to Pump Station #2. The hill was sloped toward the pump station, causing rainwater to erode the ground on either side.