

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	05/21/2025	
Media Program:	Water	
Regulatory Program(s)	SDWA-PWS	
Company Name:	EOL Water Supply Corporation	
Facility Name:	EOL WSC	
Facility Physical Location:	9645 Elk Road	
(city, state, zip code)	Axtell, TX, 76624	
Mailing address:	9645 Elk Road	
(city, state, zip code)	Axtell, TX, 76624	
County/Parish:	McLennon	
Facility Phone Number	(903) 457-3190	
Facility Contact:	MR FRED KUBITZA	EOL LEAD OPERATOR
	fkubitza@yahoo.com	
FRS Number:		
Identification/Permit Number:	TX1550025	
Media Identifier Number:		
NAICS:		
SIC:		
Personnel participating in inspection:		
Craig Young	EPA-Region 6 ECAD-WR	Enforcement Coordinator
Ruben Alayon-Gonzalez	EPA-Region 6 ECAD-WR	ECAD Water Resources Supervisor
Chelo Hall	EPA-Region 6 ECAD-WR	Enforcement Coordinator
Daniel Kim	EPA-Region 6 ECAD-WR	Enforcement Coordinator
Mariela Reyna	EPA-Region 6 ECAD-WR	Enforcement Coordinator
Fatima Shaikh	EPA-Region 6 ECAD-WR	Enforcement Coordinator
Janet Cherry	ERG	Contract Inspector
Maura Harbaugh	ERG	Contract Inspector
Elizabeth Luke	TCEQ	Compliance Officer
Robert Mathis	EOL WSC	Operator
Terri Lindsay	EOL WSC	Secretary
EPA Lead Inspector Signature/Date	CRAIG YOUNG  Digitally signed by CRAIG YOUNG Date: 2025.07.03 09:17:39 -05'00'	
	{Inspector name}	Date
Supervisor Signature/Date		
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The EPA inspection team arrived at EOL WSC at 9:00 am on May 21, 2025, for an announced inspection. The inspection team included EPA Region 6 employees Craig Young, Ruben Alayon-Gonzalez, Chelo Hall, Daniel Kim, Mariela Reyna and Fatima Shaikh; Eastern Research Group (ERG) contract inspectors Janet Cherry and Maura Harbaugh; and TCEQ compliance officer Elizabeth Luke. We met with Elk Oak Lake (EOL) operators Fred Kubitza and Robert Mathis as well EOL secretary Terri Lindsay. The inspection team presented our credentials to Mr. Kubitza and informed him that this was an EPA inspection to determine compliance with the Safe Drinking Water Act, and the EPA Administrative Order SDWA 06-2011-1342 for arsenic Maximum Contaminant Level (MCL) violations.

FACILITY DESCRIPTION

The EOL WSC is a community water system managed by four employees: three operators, and a secretary. The system obtains water from three wells and serves approximately 686 service connections. The system also supplies water to the Moores Water System (TX1550127) and serves as an emergency connection for Axtell WSC (TX1550016) and Prairie Hill (TX1470011). Wells No. 1 and No. 3 pump water to three interconnected ground storage tanks, with gaseous chlorine injected prior to storage. Water from the storage tanks circulates through a cooling tower to two service pumps that take suction from the ground storage tanks and pump to the distribution system, with a pressure tank floating on the system. Water from Well No. 2 is pumped through a cooling tower and then to two interconnected ground storage tanks, with gaseous chlorine injected prior to storage. Two service pumps take suction from the storage tanks and pump to the distribution system with a pressure tank floating on the system.

Section II - OBSERVATIONS

Opening Conference

- We discussed the purpose of the inspection, the timeline for the inspection report and expected follow-up actions from the inspection
- We discussed the system's sources, asset management, water demands and treatment processes
- We discussed technical and financial challenges faced by the facility as well as the system's efforts to return to compliance with the arsenic MCL violations
- We discussed the system's plan to receive a line extension from the city of Waco to blend and ensure compliance with the arsenic MCL
- We discussed the systems Technical Managerial and Financial (TMF) capacity including the system's organization, inter-system connections, history of funding, rate increases, current treatment techniques, anticipated treatment changes once connected to the city of Waco, as well as staffing, customer base and sampling requirements

- We reviewed documents concerning the system's cross connections, tank inspections, sampling, and reporting

Plant 2

- We observed the system's emergency generator (Photo 2)
- We observed system's chlorine injection/pump room (Photos 3-4)
- We observed the system's chlorine storage (Photos 5-7)
- We observed the system's two 50k gallon storage tanks, and hydrostatic pressure tank (Photos 8-10)
- We observed the foundation for the system's 100k gallon mixing tank
- We observed the system's cooling tower
- We observed Well 2

Plant 3

- We observed Well 3 (Photos 11-12, 20)
- We observed the system's emergency generator (Photo 11)

Plant 1

- We observed the system's chlorine injection/pump room (Photo 14)
- We observed the system's chlorine storage
- We observed the system's emergency generator
- We observed the system's two 50k and 100k gallon storage tanks, and hydrostatic pressure tank (Photo 15-18)
- We observed the foundation for the system's 100k gallon mixing tank
- We observed the system's cooling tower (Photo 19)
- We observed Well 1

Section III – AREAS OF CONCERN

1. The chlorine room at Plants 2 and 1 did not have a viewing window, crash bar, alarm, or chlorine sensor (Photos 6,14)
2. The chlorine room ventilation at Plants 2 and 1 was not tied to automatic switches
3. The entrance of Plants 2 and 1 did not contain signage warning of chlorine gas storage (Photos 1, 13)
4. Spent chlorine gas tanks were unchained at Plants 2 and 1 (Photos 5, 7,14)
5. Ground storage tanks at Plants 2 and 1 were missing adequate climb protection (Photos 9, 15, 18)
6. A ground storage tank at Plant 2 housed a wasp's nest in the overflow valve (Photo 10)
7. Well 3 at Plant 3 was missing a 24-mesh screen on the air relief valve (Photo 20)
8. There were exposed openings in the wellhead at Plant 3 (Photo 12)
9. A flapper valve at Plant 1 would not self-close once opened (Photo 16)

10. An overflow flapper valve contained painter's tape that prevented the valve from fully closing at Plant 1 (Photo 17)
11. There was a heavy leak at the cooling tower of Plant 1 (Photo 19)

The EPA inspection team conducted a closing conference at the EOL office at 12:15 pm on May 21, 2025, following the inspection. During the closing conference, the inspection team reviewed the Areas of Concern noted during the inspection.

Section IV – FOLLOW UP

On July 1, 2025, representatives of EOL provided EPA documentation of the corrected areas of concern.

Section V – LIST OF APPENDICES

- Appendix 1 – Photo Log – 20 photos taken 5/21/25
- Appendix 2 – Opening and closing conference sign-in sheets
- Appendix 3 – Process flow diagram
- Appendix 4 – Corrective Actions

Appendix 1

Photograph Log

Unless otherwise indicated herein, all photographs were taken by Fatima Shaikh of EPA during the inspection. The displayed date and time are the local time (CST). 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

Photo No. 1

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5842

Description: Signage on entrance to Plant 2 with no warning of chlorine gas storage on site



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5843

Description: Emergency generator located at Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5846

Description: Chlorine injection and pump room



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5847

Description: Chlorine injection and service pumps



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5855

Description: Unchained spent chlorine gas cylinder



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5857

Description: Door of chlorine gas room missing viewing window



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5858

Description: Chlorine gas room missing alarm and chlorine gas sensor



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 8

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5866

Description: Ground storage tanks and hydrostatic pressure tank at Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5867

Description: Ground storage tank at Plant 2 missing adequate climb protection



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5868

Description: Wasp's nest discovered in ground storage tank overflow



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 11

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5895

Description: Well 3 and accompanying emergency generator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5897

Description: Well head of Well 3 with openings for exposure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5899

Description: Signage on entrance to Plant 1 with no warning of chlorine gas storage on site



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5900

Description: Door of chlorine gas room missing viewing window and unchained spent chlorine gas cylinder



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5901

Description: Ground storage tank at Plant 1 missing adequate climb protection



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5915

Description: Flapper on overflow valve of ground storage tank would not self-close once opened



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5921

Description: Flapper on overflow valve of ground storage tank covered in painters tape preventing proper sealing



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas

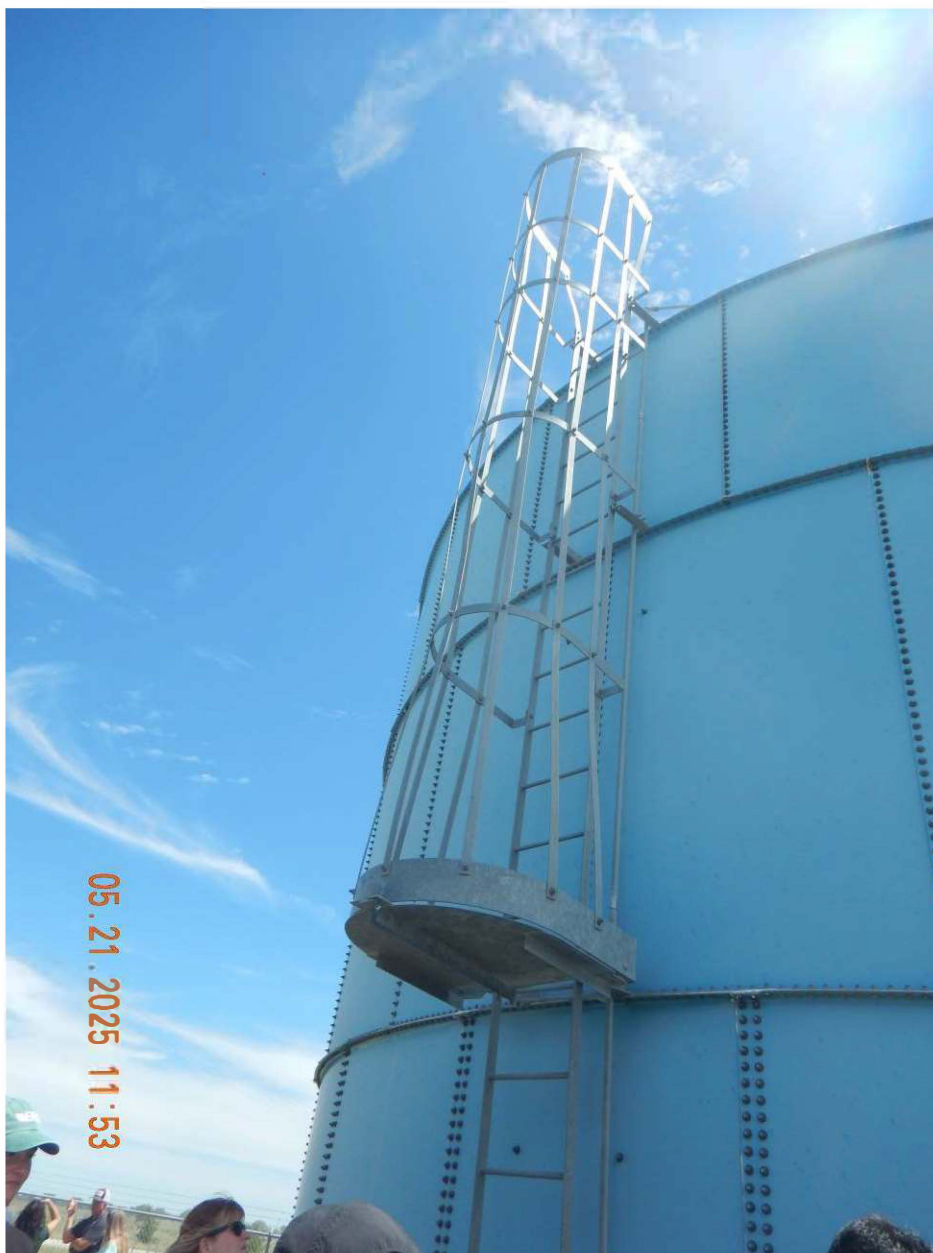


Photo File Name: DSCN5932

Description: Climb protection at ground storage tank at Plant 1 missing lock



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: DSCN5946

Description: Leak at the cooling tower at Plant 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: P1010572

Photographer: Maura Harbaugh

Description: Air relief valve at Well 3 missing a 24-mesh screen

Appendix 2

Opening and Closing Conference Sign-in Sheet

INSPECTION SIGN-IN SHEET

Facility: E.O.L WSC

PWS ID No.: TX1550025

Date: May 21, 2025

Name	Title	Agency/Company	Phone	Email	Present for Opening Conference?	Present for Closing Conference?
Maura Harbaugh	EPA contract inspector	ERG	924-216-4579	Maura.Harbaugh@erg.com	✓	✓
FRED Hubitz	Operator	EOL	354-744-3388	FHubitz@erghous.com	✓	✓
Robert Mathis	Manager/Operator	EOL	(854) 716-7815	Robmathisjr@hotmail.com	✓	✓
Daniel Kim	EPA Inspector	EPA R6	(214)-665-6671	Kim.Daniel@epa.gov	✓	✓
Elizabeth Luke	Compliance Officer	TCEQ	512-239-1148	elizabeth.luke@tceq.texas.gov	✓	✓
Erin Young	EPA R6	EPA	214-665-2275	Young.Erin@epa.gov	✓	✓
Mariele Reyna	EPA inspector EPA R6	EPA R6	214-665-7177	reyna.mariele@epa.gov	✓	✓
Chelo Hall	EPA R6	EPA R6	214-665-2716	hall.chelo@epa.gov	✓	✓
Fatima Shaikh	EPA inspector EPA R6	EPA	214-665-7188	Shaikh.Fatima@epa.gov	✓	✓
Ruben Alayon-Gonzalez	EPA R6 Sponsor	EPA R6	214-665-2785	alayon.gonzalez.ruben@epa.gov	✓	✓
Terri Lindsay	EOL WSC sec	EOL	254-863-0404	terri.lindsay@eolwsc.com	✓	✓
Janet Cherry	Inspector	ERG	360-870-8971	janet.cherry@erg.com	✓	✓

Appendix 3

Process Flow Diagram

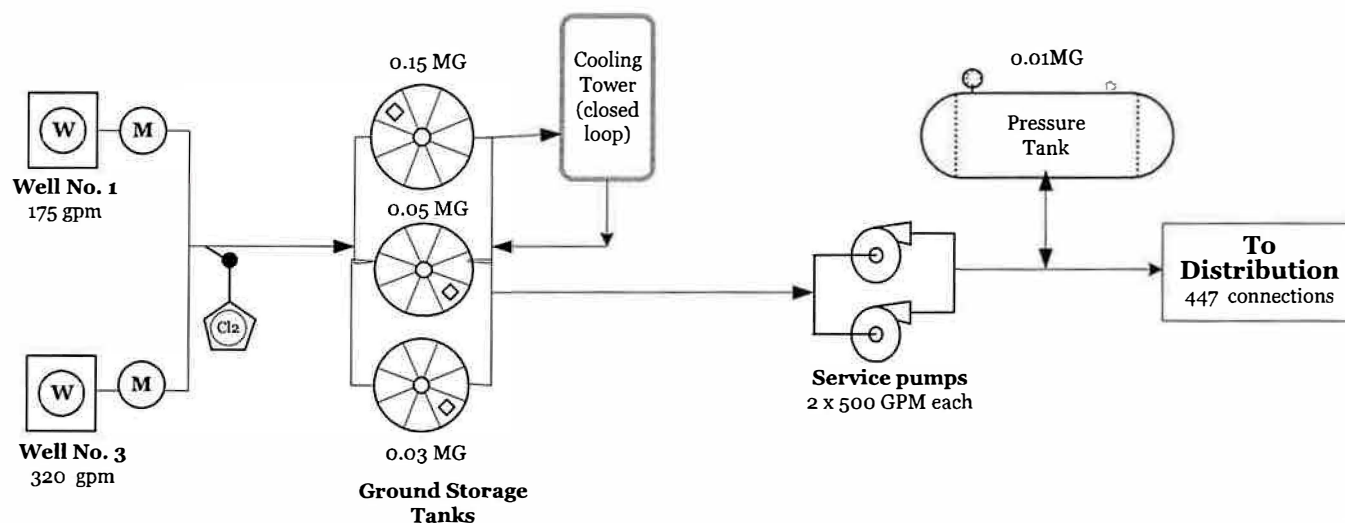
Elk Oak Lake Water Supply Corporation

August 22, 2023

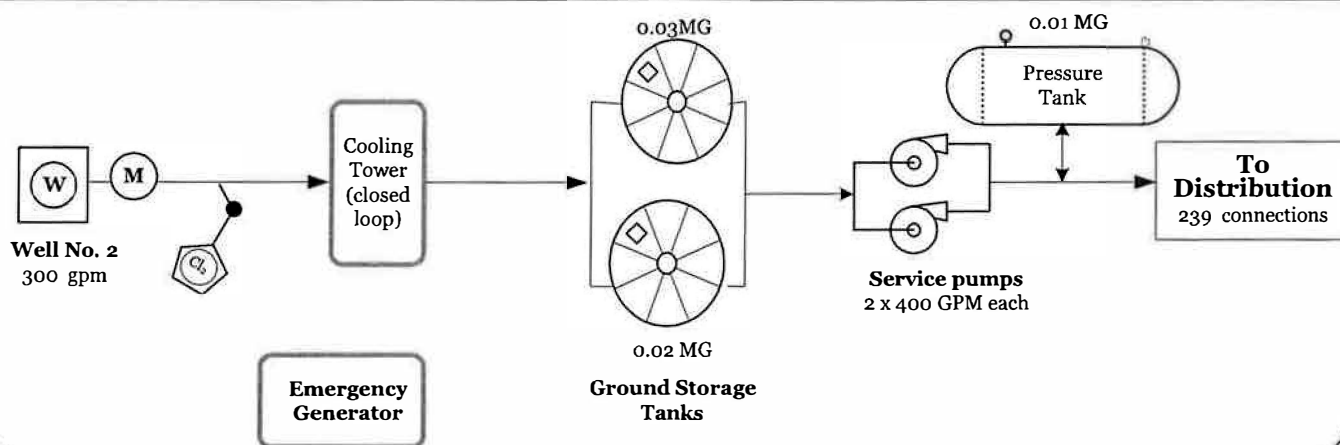
PWS ID No.: 1550025

Linette Ly

Plant 1



Plant 2



Note: System sketch not to scale

Appendix 4

Corrective Actions



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 1

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250623_133712

Description: Signage at Plant 1 warning of chlorine gas storage



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 2

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 20250623_133728

Description: Plant 1 Chlorine gas storage room with viewing window installed



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 3

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250623_133804

Description: Leak at Plant 1 cooling tower repaired



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 4

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 20250623_133951

Description: Climb protection installed on ground storage tank at Plant 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 5

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250623_133956

Description: Climb protection installed on ground storage tank at Plant 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 6

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250623_134355

Description: Openings in Well 3 repaired



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 7

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 20250623_135637

Description: Chlorine room at Plant 2 with viewing window installed



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 8

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 20250623_140041

Description: Signage at Plant 2 warning of chlorine gas storage



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 9

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250701_103431

Description: Climb protection installed on ground storage tank at Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 10

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas

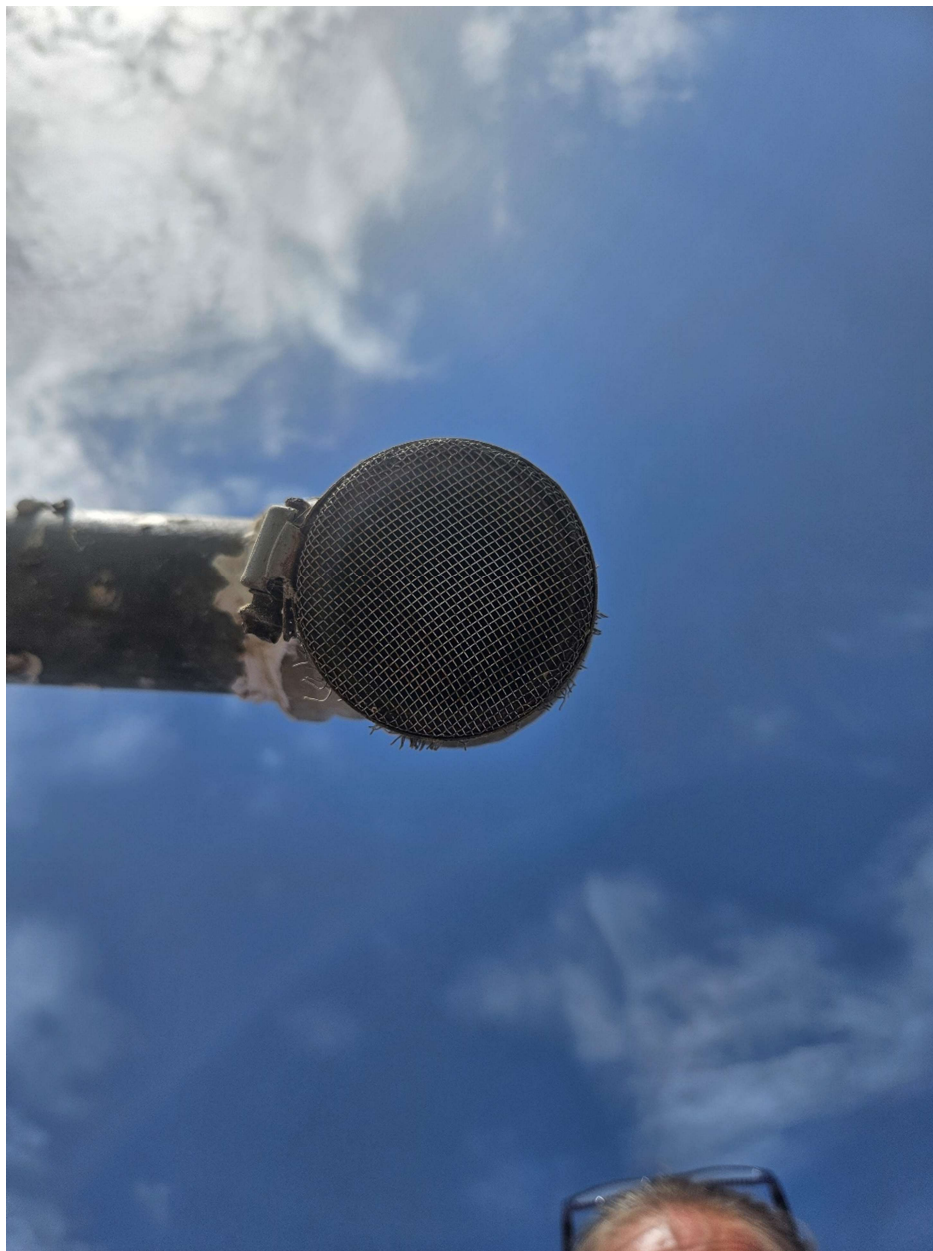


Photo File Name: 20250701_110415

Description: 24-mesh screen installed



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 11

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 20250701_110427

Description: 24-mesh screen installed



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 12

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 20250701_110844

Description: Overflow valve on ground storage tank self closes



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Corrective Actions

Photo No. 13

Location: EOL WSC		
City: Axtell	County: McClellan	State: Texas



Photo File Name: 138209451818409238

Description: Lock installed on climb protection at Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 14

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 227663563445070237

Description: Chlorine sensor installed Plant 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 15

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 1219669472642732727

Description: Chlorine sensor installed Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 16

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: -4665752508437909529

Description: Button installed for automatic ventilation of chlorine room Plant 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Corrective Actions

Photo No. 17

Location: EOL WSC		
City: Axtell	County: McClennan	State: Texas



Photo File Name: 6327594606417265017

Description: Switch installed for automatic ventilation of chlorine room Plant 2