

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/2/2023	
Media Program:	Water	
Regulatory Program(s)	SDWA-PWS	
Company Name:	Hudson Water Supply Corporation (WSC)	
Facility Name:	Hudson - WSC	
Facility Physical Location:	199 S FM 1194	
(city, state, zip code)	Lufkin, TX 75904	
Mailing address:	199 S FM 1194	
(city, state, zip code)	Lufkin, TX 75904	
County/Parish:	Angelina County	
Facility Phone Number	936-875-2146	
Facility Contact:	Brad Naron	Head Operator
	hwscorp@yahoo.com	
FRS Number:		
Identification/Permit Number:		
Media Identifier Number:	TX0030023	
NAICS:		
SIC:		
Personnel participating in inspection:		
Jessica Moore	ECDWR	Lead Inspector
Sami Doupnik	ECDWR	Inspector
Brad Naron	Hudson WSC	Head Operator
Scott Barbe	Hudson WSC	Operator
Clint Kirby	Hudson WSC	Operator
EPA Lead Inspector Signature/Date	<i>Jessica Moore</i>	4/17/2023
	Jessica Moore	Date
Supervisor Signature/Date	CURRY JONES	4/17/2023
	Curry Jones	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Jessica Moore and Sami Doupnik arrived at Hudson WSC at 9:00 am on 03/02/2023 for an announced inspection. Hudson WSC agreed to participate in a training exercise conducted by the National Enforcement Investigation Center (NEIC) and EPA Region 6 for roughly 25 inspectors from Oklahoma, Texas, Louisiana, and EPA Region 6. We met with Brad Naron, Lead Operator, Clint Kirby, Operator, and Scott Barbe, Operator. I presented my credentials to Mr. Naron and informed him that this was an EPA inspection to determine compliance with the Safe Drinking Water Act and train new state and federal inspectors. The scope of the inspection is to inspect the physical water plants and associated storage facilities. The inspection is not a full Sanitary Survey, nor does it take the place of the Texas Commission on Environmental Quality Comprehensive Compliance Investigations, performed triennially. The training specifically focused on evaluating Disinfection By-Product reduction for water systems.

FACILITY DESCRIPTION

Hudson WSC provides water to one pressure plane through two water plants and three drinking water wells. Water Plant 4 consists of Well No. 5 and a remote well (Well No.7). At the time of the inspection, Well No. 5 was having casing replaced and the plant was fully supported by the remote well. The plant utilizes blended phosphate injection for sequestration and corrosion control, an aeration unit to remove hydrogen sulfide, and gas chlorine for disinfection. The plant has one 0.10 MG ground storage tank, one 1.0 MG ground storage tank with mixer and three 800 GPM transfer pumps, two 600 GPM transfer pumps, one 0.15 MG elevated storage tank, and a generator. Water Plant 5 has one well (Well No. 6), an aeration unit to remove hydrogen sulfide, gas chlorine for disinfection, one 0.2 MG ground storage tank, and three 800 GPM transfer pumps. The water system has three elevated storage tanks that receive blended water from both plants before entering the distribution system [Mt. Carmel (0.1 MG), Highway 94 (1.0 MG), and FM 706 (0.75 MG)].

The inspectors met with three of the operators employed by the water system.

Section II – OBSERVATIONS

The training group visited the two groundwater plants for the purpose of the inspection. The observations are limited to the two groundwater plants and the Emergency Response and Risk and Resiliency plans (ERP, RRA) EPA administers through America's Water Infrastructure Act (AWIA).

Plant 4 Observations

- At the time of inspection Plant 4 was receiving water solely from the remote Well No. 7
- The plant is located near the smaller ground storage tank with the aeration unit on the top (Photo 1)
- Well No. 5 was having casing replaced at the time of inspection (Photo 2)

- Water from Well No. 7 enters aeration tank before entering ground storage tank, which is top filled (Photo 3)
- Chlorine can be injected both before and after aeration (Photos 4 and 12- 13)
- Gravel from the base of the 0.1 MG ground storage tank was settling or missing in some locations (Photo 5)
- Overflow outlet on 0.1 MG ground storage tank had flap closure with small amount of rust observed (Photo 6)
- Gas chlorine cylinders stored in shed behind ground storage tank, one rotameter requires dosing shift depending on well supplying water (Photo 7)
- Unlabeled Chemical storage tank without secondary containment (Photo 8)
- The level gauge was observed to be in non-working condition on the chemical storage tank (Photo 9)
- Water from groundwater tank pumped to elevated storage using two high service pumps (Photo 10)
- Overflow outlet from 1 MG ground storage tank has flap closure and some rust present (Photo 11)
- Pre-aeration chlorine injection at 1 MG ground storage tank (Photo 12)
- Screening on hatch observed to be loose on aeration unit for 1 MG ground storage tank (Photo 14 & 15)

Plant 5 Observations

- Well 6 recently repaired where oil fed to lubricate well (Photo 16)
- Level gauge on ground storage tank observed to be in non-working condition (Photo 17)
- Overflow outfall had flap closure and large amount of rust present (Photo 18 & 19)

AWIA Plan Observations

- ERP and RRA certified through online system by board
- Plan on site used incorrect format
- Many plan requirements were not observed

Section III – AREAS OF CONCERN

- Plant 4 was receiving water from remote well No. 7 while Well No. 4 was repaired. Remote well may not have capacity to fully supply demand in summer/high demand season
 - Aeration tank on 1 MG had a loose mesh screen
 - Overflow outfalls from both ground storage tanks at Plant 4 had small amounts of rust
 - Overflow outfall at Plant 5 had large amount of rust present at flap closure which may cause flap closure to fail to provide full seal - recommend screening outfall if flap not providing full seal
- The ERP and RRA were observed to be incomplete

EPA Region 6 inspectors Jessica Moore and the training group conducted a closing conference at Hudson WSC at 12 pm on March 2, 2023, for the inspection. During the closing conference, Jessica Moore reviewed the five Areas of Concern noted during the inspection and offered compliance assistance for incomplete AWIA plans.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on March 2, 2023.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 19 photos taken 03/02/2023

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1576

Date of Photo: 3/2/2023

Time of Photo: 10:24

Photographer: Sami Doupnik

Description: Plant number 4, aeration tank, and ground storage tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1577

Date of Photo: 03/02/2023

Time of Photo: 10:24

Photographer: Sami Doupnik

Description: Water plant 4, aeration and ground storage tank, large ground storage tank, well casing work.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1578

Date of Photo: 03/02/2023

Time of Photo: 10:31

Photographer: Sami Doupnik

Description: Aeration setup entering ground storage tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1579

Date of Photo: 03/02/2023

Time of Photo: 10:33

Photographer: Sami Doupnik

Description: Chemical injection before aeration at Plant 4, arrow added for clarity



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1580

Date of Photo: 03/02/2023

Time of Photo: 10:33

Photographer: Sami Doupnik

Description: Gravel eroding beneath ground storage tank foundation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1581

Date of Photo: 03/02/2023

Time of Photo: 10:33

Photographer: Sami Doupnik

Description: Overflow outlet with small amount of rust and flap closure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1582

Date of Photo: 03/02/2023

Time of Photo: 10:36

Photographer: Sami Doupnik

Description: Chlorine cylinder storage



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1583

Date of Photo: 03/02/2023

Time of Photo: 10:40

Photographer: Sami Dounik

Description: Unlabeled chemical container



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1584

Date of Photo: 03/02/2023

Time of Photo: 10:40

Photographer: Sami Dounik

Description: Level gauge broken on chemical storage



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1585

Date of Photo: 03/02/2023

Time of Photo: 10:51

Photographer: Sami Doupnik

Description: Pumps for water leaving ground storage tank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1586

Date of Photo: 03/02/2023

Time of Photo: 10:54

Photographer: Sami Doupnik

Description: Overflow outlet with small amount of rust on large ground storage tank at Plant 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1587

Date of Photo: 03/02/2023

Time of Photo: 10:58

Photographer: Sami Doupnik

Description: Chlorine injection location at Plant 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1588

Date of Photo: 03/02/2023

Time of Photo: 10:58

Photographer: Sami Doupnik

Description: Chlorine injection location on 1 MG ground storage tank, arrow added for clarity



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1589

Date of Photo: 03/02/2023

Time of Photo: 11:00

Photographer: Sami Dounik

Description: Loose screen at top of aeration tank at Plant 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1590

Date of Photo: 03/02/2023

Time of Photo: 11:00

Photographer: Sami Doupnik

Description: Loose screen on aeration tank at Plant 4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1591

Date of Photo: 03/02/2023

Time of Photo: 11:12

Photographer: Sami Doupnik

Description: Well No. 6 at Plant 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1592

Date of Photo: 03/02/2023

Time of Photo: 11:22

Photographer: Sami Doupnik

Description: Water level indicator on ground storage tank in non-working status



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1593

Date of Photo: 03/02/2023

Time of Photo: 11:25

Photographer: Sami Doupnik

Description: Overflow outfall with flap closure and rust



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Hudson WSC		
City: Lufkin	County/Parish: Angelina	State: Texas



Photo File Name: DSCN1594

Date of Photo: 03/02/2023

Time of Photo: 11:25

Photographer: Sami Doupnik

Description: Overflow outfall with flap closure and rust