

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Dates:	10/22/2025 and 10/23/2025	
Media Program:	Drinking Water	
Regulatory Program(s)	Safe Drinking Water Act (SDWA)	
System Owner:	City of San Antonio	
System Name:	San Antonio Water System (SAWS)	
System Physical Location:	SAWS Headquarters Tower 2 2800 U.S. Hwy 281 North	
(city, state, zip code)	San Antonio, Texas, 78212	
Mailing address:	P.O. Box 2449	
(city, state, zip code)	San Antonio, Texas, 78298	
County:	Bexar County, parts of Medina, Kendall, and Atascosa Counties	
System Phone Number	210-233-3536	
System Contact:	Scott Halty scott.halty@saws.org	SAWS Director of Resource Protection & Compliance
System Classification	Community Water System (CWS)	
PWS ID:	TX0150018	
Primary personnel participating in inspection:		
Chris Padilla	ERG / chris.padilla@erg.com	Inspector
Maura Harbaugh	ERG / maura.harbaugh@erg.com	Inspector
Leticia De Leon	TCEQ / leticia.deleon@tceq.texas.gov	Technical Specialist for the Office of Water Emergency Preparedness and Response Section
Iryna Kushnirsky	TCEQ / iryna.kushnirsky@tceq.texas.gov	Manager of the Office of Water Emergency Preparedness and Response Section
Rogelio Placencia	SAWS / rogelio.placencia@saws.org	Director
Jeff Haby	SAWS / jeff.haby@saws.org	Senior Vice President of Production Operations
Donovan Burton	SAWS / dburton@saws.org	Senior Vice President of Water Resources & Governmental Relations
Robert Piña	SAWS / robert.piña@saws.org	Vice President and Chief Information Officer
Michael Kampstra	SAWS / michael.kampstra@saws.org	Vice President and Chief Information Security Officer
Eric Cloudt	SAWS / eric.cloudt@saws.org	Senior Director of Security, Emergency Management, and the Emergency Operations Center
Scott Halty	SAWS / scott.halty@saws.org	Director of Resource Protection & Compliance
Floramie Welch	SAWS / floramie.welch@saws.org	Environmental Analyst III
Victor Gonzalez	SAWS / victor.gonzalez@saws.org	Enterprise Security Architect
David Mendoza	SAWS / david.mendoza@saws.org	Information Security Manager
Steven Tijerina	SAWS / steven.tijerina@saws.org	Section Manager

EPA Lead Inspector Signature/Date		12/1/2025
	Chris Padilla, ERG (EPA Contract Inspector)	Date
Supervisor Signature/Date	RUBEN ALAYON-GONZALEZ  Digitally signed by RUBEN ALAYON-GONZALEZ Date: 2025.12.19 13:20:01 -06'00'	RUBEN ALAYON-GONZALEZ
	Ruben Alayon-Gonzalez, EPA Region 6, Enforcement and Compliance Assurance Division, Water Resources Section	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

From October 22, 2025 through October 23, 2025, the United States Environmental Protection Agency's (EPA) contract inspectors from Eastern Research Group, Inc. (ERG) (hereinafter the EPA inspection team) conducted an announced Compliance Evaluation Inspection under Section 1445 of the Safe Drinking Water Act (SDWA), 42 U.S.C. §300j-4, of the San Antonio Water System (SAWS) (referred to as the System) (TX0150018). EPA notified Scott Halty of the System via email that an inspection would be conducted on October 22 and 23, 2025. The EPA inspection team informed the System representatives that this was an EPA inspection to determine compliance with SDWA Section 1433, which requires community water systems serving more than 3,300 people to complete a Risk and Resilience Assessment (RRA) and develop an Emergency Response Plan (ERP). The EPA Inspection Team also informed System representatives that it would conduct a cybersecurity evaluation alongside the Section 1433 review. To facilitate the inspection process, the EPA inspection team used a checklist outlining the requirements of SDWA Section 1433 during the document review.

This report is based on information supplied by the System representatives through interviews and written statements, observations made by the EPA inspection team, and records and reports maintained by the System. As part of the inspection process, the EPA inspection team made direct observations, took photographs, and reviewed relevant documents. Information gathered from EPA, state, and public records prior to, during, or after the onsite inspection is referenced in this report as applicable.

SYSTEM DESCRIPTION

According to Drinking Water Watch (DWW), the System is owned and operated by the City of San Antonio, serves a population of 2,113,151, and has 762,243 residential service connections and 1,624 commercial service connections. It is a community water system as defined by 40 C.F.R., Part 141, Subpart A. The Texas Commission on Environmental Quality (TCEQ) maintains the DWW database, which records the System's owner, operator, size, facilities, sampling schedules, and water quality analytical results. The EPA inspection team confirmed the above information from DWW with the System during the inspection, through conversations and document review.

The System primarily uses groundwater and, in some areas, surface water. In 2024, the System was 98% groundwater based and 2% surface water-based utilizing surface water in one part of the surface area. The System estimated that 48.7% of its supply came from the Edwards Aquifer, with the remainder drawn from the Carrizo, Simsboro, Trinity, and Lower Wilcox aquifers. The System also utilizes the Aquifer Recovery and Storage (ASR) Facility at the SAWS H2Oaks Facility campus. The System diversifies its supply with purchased treated surface water from the Guadalupe Blanco River Authority Western Canyon Plant (PWS ID: TX0460239), purchased Trinity/Cow Creek Aquifer groundwater from the Oliver Ranch Plant (PWS ID: TX0150539), purchased Trinity/Cow Creek Aquifer groundwater from the Water Exploration Company, also known as Stein Roger Well Field (PWS ID: TX0150562), purchased water from the the Schertz Seguin Local Government Corporation, (PWS ID: TX0940094), and Vista Ridge, LLC (PWS ID: TX0260051).

According to DWW, the System has approximately 7,908 miles of water mains, 59 distinct pressure zones, 147 storage tanks, 177 active wells, 353 distribution pumps, and 93 treatment facilities. Water

treatment consists primarily of disinfection with on-site generation (OSG) of a 0.6 percent sodium hypochlorite solution and fluoridation with hydrofluosilicic acid. Brackish water from the Lower Wilcox Aquifer is treated in a reverse-osmosis desalination plant at the [REDACTED] Facility.

The System provides water through a wholesale meter to the East Central Special Utility District – Palm Park (PWS ID: TX0150132 serving 294 connections), through a wholesale meter to The Oaks Water Supply Corporation (PWS ID: TX0150399 serving 397 connections), and is the sole provider of water through four wholesale meters to the City of Elmendorf (PWS ID: TX0150048 serving 1,344 connections). Finally, the System provides water to the Kendall County Water Control and Improvement District Number 3 (PWS ID: TX1300082 serving one connection). The total number of wholesale connections served is 2,036.

MANAGEMENT AND OPERATION

According to System representatives, annual capital improvement projects total between \$607.8 and \$681.8 million, with wastewater collection and water distribution projects accounting for the majority. Water production and district cooling projects are also included in that total.

In 2012, SAWS merged with the Bexar Metropolitan Water District.

Section II – INSPECTION ACTIVITY SUMMARY

The EPA inspection team conducted interviews and field activities to discuss and observe the System operations and maintenance (O&M) activities and to assess the condition of the drinking water system assets. Due to time constraints and the large system size, field activities were limited to a representative subset of assets. The physical inspection occurred over two days. The following subsections describe the inspection activities completed by the EPA inspection team. The information in this report is based on document review, conversations with System representatives, and observations made during this inspection.

OPENING CONFERENCE

The EPA inspection team arrived at the System, located at SAWS Headquarters Tower 2, 2800 U.S. Hwy 281 North, San Antonio, TX, at approximately 8:00 AM on October 22, 2025, for the inspection. The EPA inspection team was accompanied by Leticia De Leon and Iryna Kushnirsky of TCEQ; refer to Appendix B for the Opening Conference Sign-in Sheet. Chris Padilla presented credentials to Eric Cloudt and other System representatives and informed them that it was an EPA Region 6 inspection to determine compliance with SDWA Section 1433.

The opening conference included a discussion of the System's history, drinking water sources, treatment and distribution system facilities, staffing and management strategy, emergency response plans and preparedness, cybersecurity practices, Supervisory Control and Data Acquisition (SCADA) systems, and other topics discussed in more detail in the remainder of Section II.

RECORDS REVIEW

The EPA inspection team reviewed the System's Section 1433 RRA and ERP onsite on October 22, 2025. The team also reviewed the System's cybersecurity practices.

FACILITY WALKTHROUGH

The EPA inspection team conducted an array of field activities to evaluate drinking water system assets, including inspections of the System's control center, on-site data center, and various facility campuses.

The following descriptions are based on information provided by System representatives to the EPA inspection team and observations made during the inspection. Areas of concern and observations are described in Section III of this report.

[REDACTED]

The System operates a [REDACTED] equipped with several interfaces essential to providing safe drinking water and maintaining high operational uptime. The System uses [REDACTED] to track operator movements and activities. [REDACTED] also features an outage map, which provides real-time data on system service interruptions. During the inspection, [REDACTED] SCADA operators were stationed in [REDACTED], while one operator worked remotely. Operators work [REDACTED]. Additionally, a team of individuals was observed answering calls and reports regarding customer complaints and inquiries.

The EPA inspection team also visited [REDACTED], [REDACTED] [REDACTED] utilized by the System.

[REDACTED]

The [REDACTED] consist of the following assets:

- [REDACTED] wells ranging from [REDACTED] capacity,
- A [REDACTED] concrete raw water storage tank [REDACTED],
- A [REDACTED] steel raw water storage tank [REDACTED] and slated for replacement by a concrete tank [REDACTED]
- An electrical building with a generator to supply back-up power to facility controls only,
- An OSG building to produce sodium hypochlorite,
- A fluoridation building, and
- [REDACTED] high-service pumps that deliver water to two different pressure zones.

[REDACTED] wells typically run simultaneously, pumping into the raw water storage tanks. The high service pumps draw water from the storage tanks through the OSG disinfection process and fluoridation process. Treated water is pumped into the two pressure zones; [REDACTED] pumps send water to the Pressure Zone 1111' and three pumps to the Pressure Zone 994'.

System representatives stated that a bid for a new [REDACTED] diesel generator has been awarded. The generator will have the capacity to provide backup power for two days to the entire facility. The site was secured with [REDACTED].

The EPA inspection team observed a threaded sample tap on the [REDACTED] concrete tank and a visible gap in the overflow pipe flap valve's seal. The EPA inspection team observed that all [REDACTED] wells had air-relief valves that lacked downturned and properly screened discharge ports. The EPA inspection team also

observed a leaking motor shaft for High Service Pump [REDACTED]. The air relief discharge ports of the Pressure Zone 1111' High Service Pumps and the Pressure Zone 994' High Service Pumps [REDACTED] were not screened with #16-gauge mesh.

[REDACTED]

The [REDACTED] complex, in [REDACTED] part of Bexar County, consists of:

- [REDACTED] ASR wells, [REDACTED] wells drawing directly from the Carrizo Aquifer, and [REDACTED] wells drawing from the Lower Wilcox Aquifer (brackish) (refer to Figure 1),
- A [REDACTED] conventional treatment plant that serves as pre-treatment,
- A [REDACTED] reverse osmosis desalination plant (with expansion capability to [REDACTED]) that treats the Lower Wilcox wells,
- A gaseous chlorine feed building,
- A fluoridation process building,
- A re-mineralization process building with pH adjustment and calcite contactors for alkalinity adjustment,
- Brine injection wells to send saline reject water from the desalination plant to the saline portion of the Edwards Aquifer,
- A [REDACTED] water storage tank, and
- Pumping facilities to deliver water to Pressure [REDACTED]

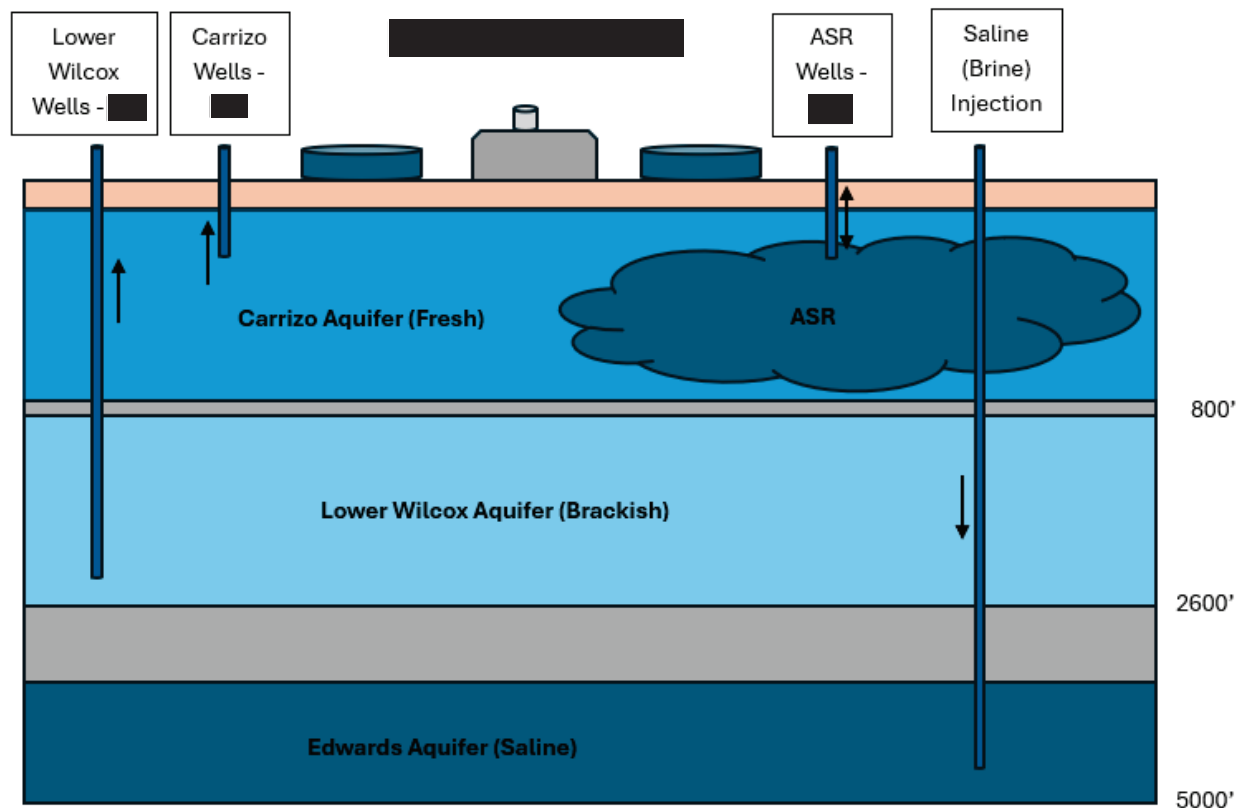


Figure 1. Simplified diagram of the [REDACTED] facilities.

The [REDACTED] Lower Wilcox wells are first treated at the conventional treatment plant, then processed through the reverse-osmosis desalination plant, re-mineralized in calcite contactors, and stored in the [REDACTED] storage tank. The [REDACTED] Carrizo wells are pumped to the [REDACTED] storage tank, along with the ASR wells used for withdrawal. Before being pumped into the distribution system's various pressure zones, water from the [REDACTED] storage tank undergoes disinfection and fluoridation.

The EPA inspection team observed a leaking calcite contactor at the desalination plant, with water running down the driveway. The EPA inspection team also noted missing protective guards on the calcite contactor feedwater pumps' rotating line shafts. The entire campus was securely fenced, with security guards staffing stations at each campus entry point, and cameras and intrusion detection devices were installed at all facilities on the site.

[REDACTED]

The [REDACTED] consist of the following assets:

- A [REDACTED] steel raw water storage tank [REDACTED],
- [REDACTED] wells used during extreme high demand periods, drawing from the Edwards aquifer (from a higher depth that is not saline),
- An OSG building,
- A fluoridation building, and
- High service pumps delivering water [REDACTED]

The wells pump to the raw water storage tank, while the high service pumps draw water from the storage tank through the OSG disinfection process and fluoridation process. Treated water is sent to [REDACTED]

The [REDACTED] Facilities have dual electric feeds for redundancy. The site was secured with [REDACTED]

In the OSG room, the EPA inspection team observed a hose without a vacuum breaker, posing a cross-connection control hazard, and an open electrical box, posing an electrical shock hazard. The EPA inspection team also observed that the raw water sample taps on the wells were threaded rather than smooth-nosed. The duckbill valve on the [REDACTED] tank overflow did not seal completely, and the High Service Pumps [REDACTED] lacked protective guards on rotating shafts/parts.

[REDACTED]

The [REDACTED] Facilities, [REDACTED], receive water from a neighboring utility, managed by [REDACTED] raw water main. This public-private partnership provides raw water to the [REDACTED] treatment process, which consists of [REDACTED] prestressed wire-wound concrete raw water storage tanks [REDACTED] pressurized filtration vessels, lime slaking conditioning, disinfection, and fluoridation.

On-site natural gas generators provide backup power to all [REDACTED] Facilities. The site was secured with [REDACTED].

The EPA inspection team observed that the ladder on the [REDACTED] tank was not protected from unauthorized access up to 12 feet; however, System representatives stated that a ladder guard was on order. The EPA inspection team also noted that the [REDACTED] tank's foundation seal was brittle and missing at several perimeter locations. The EPA inspection team observed that the [REDACTED] tank had a threaded sample tap and moisture at various locations along the foundation seal.

[REDACTED]

The [REDACTED] consist of

- [REDACTED] wells,
- A [REDACTED] steel ground storage tank,
- An OSG process building, and
- [REDACTED] high service pumps, which provide water to the [REDACTED] section of San Antonio.

The [REDACTED] wells pump into the [REDACTED] storage tank, which flows through disinfection before being pumped to the [REDACTED] section of the distribution system. The site was secured with [REDACTED]

The EPA inspection team observed that all air relief valves on the high service pump header were not downturned or properly screened. The EPA inspection team also observed that the duckbill valve on the overflow of the ground storage tank was not properly sealed and that the sampling tap on the tank was threaded.

CLOSING CONFERENCE

The EPA inspection team held a closing conference with System personnel at 3:30 PM on October 23, 2025, in a conference room at SAWS Headquarters. The EPA inspection team discussed preliminary observations identified during the field component of the inspection. The EPA inspection team reiterated to the System representatives that these preliminary observations were not compliance determinations. Preliminary observations shared during the closing conference are subject to further investigation by EPA upon the review of additional records and documentation. Therefore, this inspection report may include observations that were not identified at the time of the closing conference. Observations are described in Section III. Observations regarding the Risk and Resilience Assessment, the Emergency Response Plan, and cybersecurity practices were shared verbally with the System. The inspection concluded at approximately 4:15 PM.

A sign-in sheet for the closing conference is provided in Appendix B.

Section III – AREAS OF CONCERN

SDWA Section 1433(a): *SDWA Section 1433(a)(1)(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 100,000 persons to submit its certification to the EPA Administrator that it has conducted its RRA on or before March 31, 2020, and at least once every five years after the initial applicable deadline.

Area of Concern 1. On October 22, 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:

- a. The document was available at the time of the inspection.
- b. The RRA was dated to show that it was timely and completed before the date of the certification of completion.
- c. The RRA assesses all required elements of 1433(a)(1)(A).
- d. The RRA included a complete assessment of Section 1433 (a)(1)(A)(v) the use, storage, or handling of various chemicals by 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.*

Area of Concern 2. During the inspection, EPA inspectors also reviewed the System's ERP pursuant to SDWA Section 1433 and observed the following:

- a. The ERP was available at the time of the inspection.
- b. The ERP was dated to show that it was completed before the certification of completion.
- c. The ERP included all required elements of Section 1433(b).
- d. The ERP covered all required elements of Section 1433(b) completely.

40 CFR §141.63(e)(3) Maximum contaminant levels (MCLs) for microbiological contaminants, "proper maintenance of the distribution system, including appropriate pipe replacement and repair procedures,

main flushing programs, proper operation and maintenance of storage tanks and reservoirs, cross-connection control, and continual maintenance of positive water pressure in all parts of the distribution system.”

Texas Administrative Code (TAC) Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.46(m), “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.”

TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.44 (h)(1), Backflow, siphonage, “No water connection from any public drinking water supply system shall be allowed to any residence or establishment where an actual or potential contamination hazard exists unless the public water facilities are protected from contamination.

Area of Concern 3. The [REDACTED] OSG room had a hose for cleaning that lacked a vacuum breaker at the spigot (Photograph 1).

Recommended Standards for Water Works, 2022 Edition, 2.11 “Sample taps shall be provided so that water samples can be obtained from each water source and from appropriate locations in each unit operation of treatment, and from the finished water. Taps shall be consistent with sampling needs and shall not be of the petcock type. Taps used for obtaining samples for bacteriological analysis shall be of the smooth-nosed type without interior or exterior threads, shall not be of the mixing type, and shall not have a screen, aerator, or other such appurtenance.”

Area of Concern 4. The [REDACTED] concrete storage tank tap used for bacteriological sampling was a threaded spigot instead of the non-threaded standard smooth-nosed style (Photograph 2).

Area of Concern 5. The sample taps used for bacteriological sampling [REDACTED] were threaded, not smooth-nosed style spigots (Photograph 3).

Area of Concern 6. The sample tap used for bacteriological sampling on the [REDACTED] concrete tank was threaded (Photograph 4).

Area of Concern 7. The sample tap used for bacteriological sampling on the [REDACTED] [REDACTED] ground tank was threaded (Photograph 5).

TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.43(c)(3) “Overflows shall be designed in strict accordance with current [American Water Works Association] (AWWA) standards. If the overflow terminates at any point other than the ground level, it shall be located near enough and at a position accessible from a ladder or the balcony for inspection purposes. The overflow(s) shall be sized to handle the maximum possible fill rate without exceeding the capacity of the overflow(s). The discharge opening of the overflow(s) shall be above the surface of the ground and shall not be subject to submergence. The discharge opening shall be covered with a gravity-hinged and weighted cover, an elastomeric duckbill valve, or other approved device to prevent the entrance of insects and other nuisances. When the tank is not overflowing, the cover shall close automatically and fit tightly with no gap over 1/16 inch.”

Area of Concern 8. The flapper valve on the [REDACTED] concrete storage tank overflow did not properly seal (Photograph 6).

- Area of Concern 9.** The duckbill valve on the [REDACTED] storage tank overflow did not seal properly (Photograph 7).
- Area of Concern 10.** The duckbill valve on the [REDACTED] ground tank overflow did not seal properly (Photograph 8).
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TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.41(c)(3)(Q) “The construction, disinfection, protection, and testing of a well to be used as a public water supply source must meet the following conditions...If an air release device is provided on the discharge piping, it shall be installed in such a manner as to preclude the possibility of submergence or possible entrance of contaminants. In this respect, all openings to the atmosphere shall be covered with 16-mesh or finer, corrosion-resistant screening material or an acceptable equivalent.”

Recommended Standards for Water Works, (Ten States Standards) (2022 Edition) Section 8.5.2

“The open end of an air relief pipe from automatic valves shall: extended to at least one foot above grade and provided with a screened, downward facing elbow...”

- Area of Concern 11.** The air relief valves on [REDACTED] discharge piping lacked downturned and properly screened relief ports (Photograph 9).
- Area of Concern 12.** The air relief valves of all six high-service pumps [REDACTED] lacked downturned relief ports (Photograph 10).
- Area of Concern 13.** The air relief ports on [REDACTED] were not securely screened with a #16-gauge mesh.
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TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.46(m)(6) “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...Pumps, motors, valves, and other mechanical devices shall be maintained in good working condition.”

- Area of Concern 14.** The motor shaft for the [REDACTED] had excessive water leakage (Photograph 11).
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TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.46(m)(4) “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... All water treatment units, storage and pressure maintenance facilities, distribution system lines, and related appurtenances shall be maintained in a watertight condition and be free of excessive solids.”

- Area of Concern 15.** [REDACTED], the calcite contactor had a substantial water leak with water flowing into the driveway (Photograph 12).

EPA's How to Conduct a Sanitary Survey Guide, August 2019, 5.10 "Inspecting pumping facilities also includes observing any unsafe conditions that could pose a safety risk to the operator or other staff involved in the operation of the PWS."

Area of Concern 16. [REDACTED], the calcite contactor water feed line pumps lacked protective guards around rotating parts (Photograph 13).

Area of Concern 17. [REDACTED] lacked protective guards around rotating parts (Photograph 14 and Photograph 15).

TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.46(v) "Electrical wiring. All water system electrical wiring must be securely installed in compliance with a local or national electrical code."

AWWA G100-11, 4.2.4 Housekeeping procedures and cleanliness. "Areas of the plant shall be maintained in a neat and orderly condition. Operation and maintenance functions should be conducted in such a manner that plant site safety and water quality are not compromised."

Area of Concern 18. There were open electrical boxes with exposed wires in the [REDACTED]

TAC Title 30, Part 1, Chapter 290, Subchapter D, Rule §290.43(c) "Design and construction of clearwells, standpipes, ground storage tanks, and elevated tanks. All facilities for potable water storage shall be covered and designed, fabricated, erected, tested, and disinfected in strict accordance with current [AWWA] standards and shall be provided with the minimum number, size and type of roof vents, man ways, drains, sample connections, access ladders, overflows, liquid level indicators, and other appurtenances as specified in these rules."

AWWA M42-13, Chapter 2, Page 33 "Exterior ladders, cages, and platforms designed to meet Occupational Safety and Health Administration (OSHA) standards are recommended (Figure 2-6). Either the ladder should terminate at least 8 ft (2.4 m) above grade or a solid locking door, provided to discourage unauthorized access to the tank, should be installed on the lower 8–20 ft (2.4–6.1 m) of the exterior ladder. Certain areas will require a locking door and anti-climb screening at the bottom of the ladder cage to discourage unauthorized access."

Area of Concern 19. The ladder on the [REDACTED] pre-load concrete tank was not protected from unauthorized entry up to 8 feet (Photograph 16).

EPA How to Conduct a Sanitary Survey of Drinking Water Systems (2022) Section 10.4.8 "Concrete foundations should be inspected to ensure that there is minimal spalling (ground level tanks) and no cracks (elevated tanks). Anchor bolts should not be rusted so much that their material strength has been compromised. Column shoes should be clean and painted, and grout under the shoes and riser plates should be in good condition. There should not be any pooled water, erosion, weeds, or shrubs around a tank's foundation."

Area of Concern 20. The seal between the [REDACTED] pre-load concrete tank and foundation was brittle and missing in places (Photograph 17).

Area of Concern 21. The EPA inspection team observed small areas of moisture at the foundation seal of the [REDACTED] concrete tank (Photograph 18).

Section IV – Follow-UP

On January 12, 2026, the SAWS facility responded to the areas of concerns noted during the inspection. In the response, the SAWS facility noted that each of the areas of concern cited during the inspection process were either addressed or were not required pursuant to TAC Title 30, Part 1, Chapter 290, Subchapter D.

Section V – LIST OF APPENDICES

Appendix A – Photograph Log

Appendix B – Inspection Sign-in Sheets



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas

APPENDIX A – PHOTOGRAPH LOG

Unless otherwise indicated herein, all photographs were taken by Maura Harbaugh of ERG during the inspection. The displayed date and time are the local time (CDT). Photographs were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photograph.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 1. 10/23/2025 11:42AM PA240077.JPG

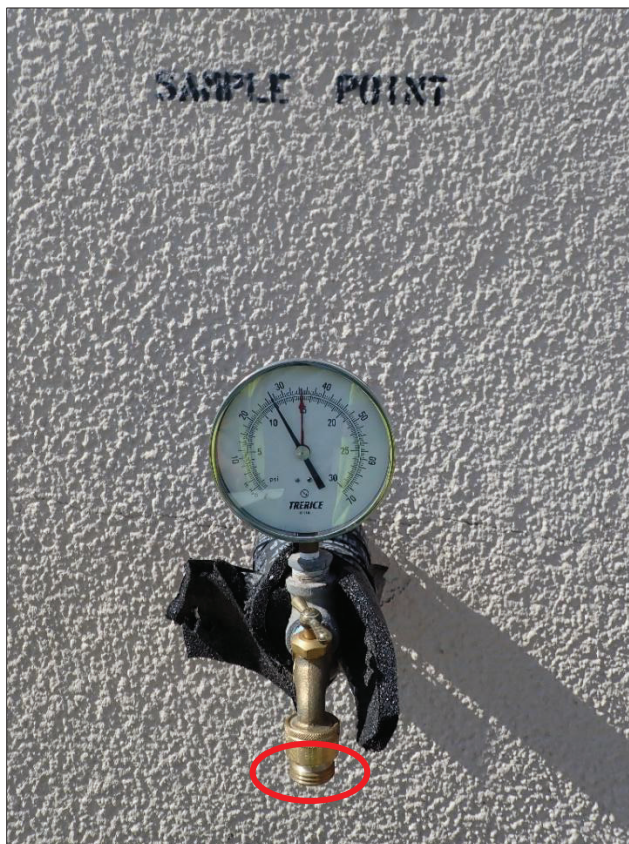
Description: Cleaning hose in [REDACTED] without a vacuum breaker at the spigot.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 2. 10/22/2025 02:59PM PA230001.JPG

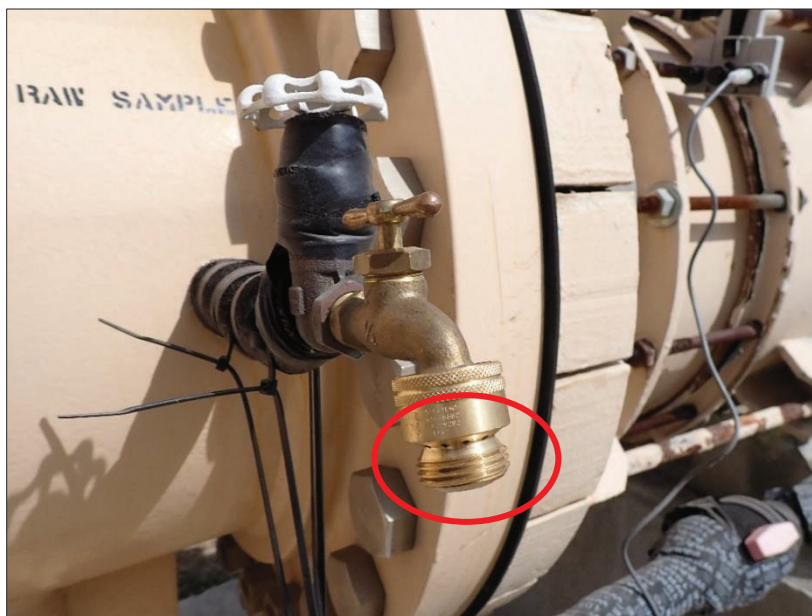
Description: Threaded sample tap on [REDACTED] concrete storage tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 3. 10/23/2025 11:48AM PA240079.JPG

Description: Threaded sample tap on a [REDACTED] discharge piping.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 4. 10/23/2025 02:24PM PA240108.JPG

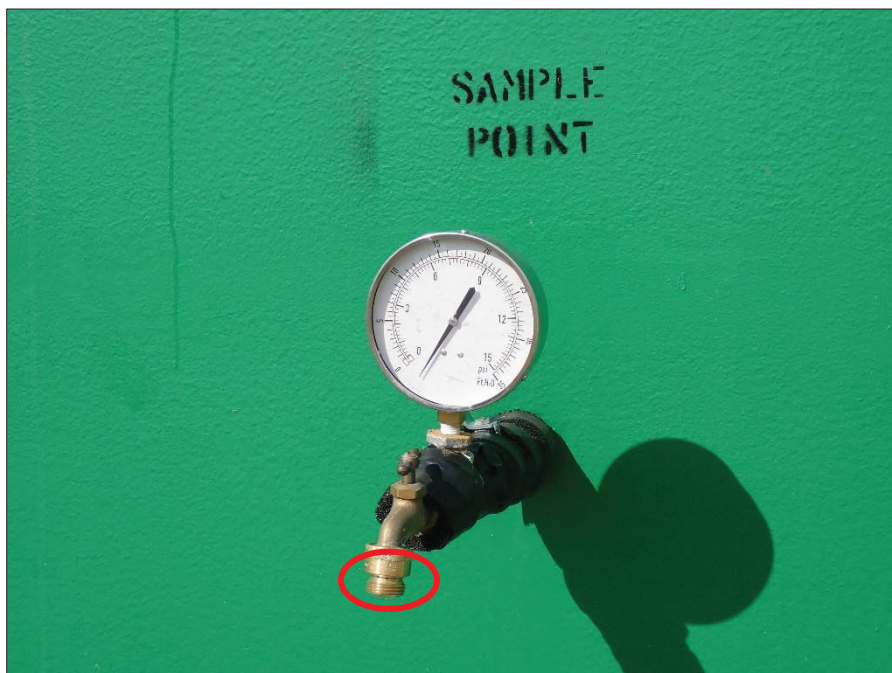
Description: Threaded sample tap on [REDACTED] concrete storage tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 5. 10/23/2025 03:22PM PA240125.JPG

Description: Threaded sample tap on [REDACTED] ground storage tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 6. 10/22/2025 03:07PM PA230008.JPG

Description: [REDACTED] concrete storage tank overflow with unsealed flapper valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 7. 10/23/2025 11:58AM PA240081.JPG

Description: [REDACTED] storage tank overflow with an unsealed duckbill valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 8. 10/23/2025 03:20PM PA240124.JPG

Description: [REDACTED] ground tank overflow with unsealed duckbill valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 9. 10/22/2025 03:46PM PA230022.JPG

Description: [REDACTED] air relief lacking a downturned port and loosely screened with #16-gauge mesh.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 10. 10/23/2025 03:15PM PA240121.JPG

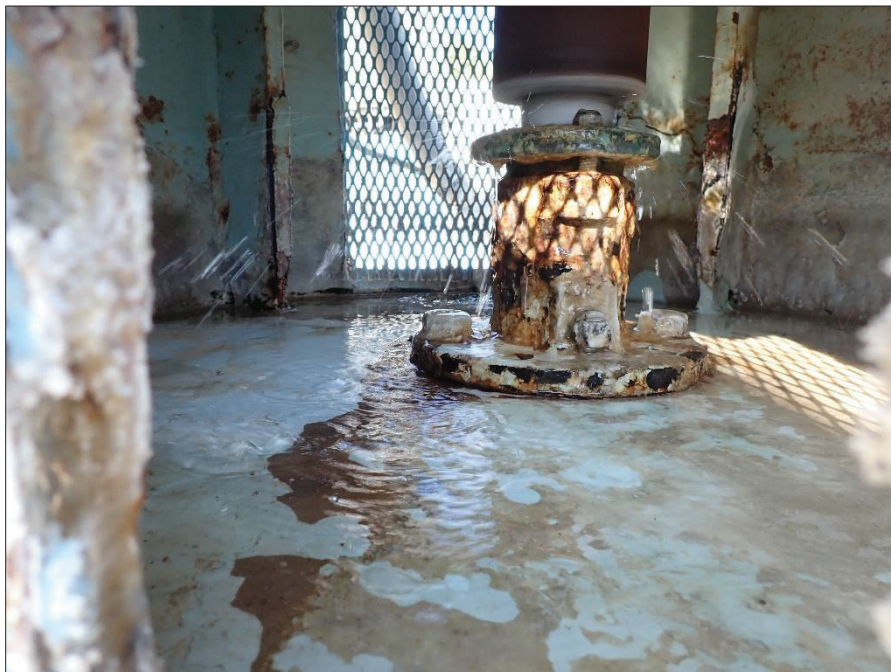
Description: [REDACTED] high-service pump without a downturned relief port.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 11. 10/22/2025 04:02PM PA230048.JPG

Description: [REDACTED] motor shaft with excessive water leakage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 12. 10/23/2025 09:19AM PA230054.JPG

Description: Water flowing into the driveway from the [REDACTED] calcite contactor leak.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 13. 10/23/2025 09:21AM PA230056.JPG

Description: [REDACTED] calcite contactor water feed line pump without protective guard around rotating motor shaft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 14. 10/23/2025 12:00PM PA240085.JPG

Description: [REDACTED] without a protective guard around the rotating pump/motor shaft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 15. 10/23/2025 12:01PM PA240086.JPG

Description: [REDACTED] without a protective guard around the rotating pump/motor shaft.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 16. 10/23/2025 02:01PM PA240090.JPG

Description: [REDACTED] concrete tank with ladder terminating at ground level and no ladder cage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 17. 10/23/2025 02:00PM PA240088.JPG

Description: Missing seal between the [REDACTED] concrete tank and its foundation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Location: City of San Antonio Public Water System		
City of San Antonio	County: Bexar	State: Texas



Photograph 18. 10/23/2025 02:26PM PA240110.JPG

Description: Small areas of moisture at the foundation seal of the [REDACTED] concrete tank.

APPENDIX B – INSPECTION SIGN-IN SHEETS

SDWA PWSS Inspection Sign-In Sheet

System Name: San Antonio Water System Meeting: Opening Conference Date: October 22, 2025 (8:10AM START)

Name	Affiliation, Title	Email Address	Phone Number
Chris Padilla	Inspector, ERG	Chris.Padilla@erg.com	607-227-7646
Maura Harbaugh	Inspector, ERG	Maura.Harbaugh@erg.com	724-216-4579
ROGELIO PLACENCIA	SAWS / DIRECTOR	Rogelio.Placencia@saWS.org	210.233.2367
JEFF HARDY	VICE PRESIDENT/SAWS	JEFF.HARDY@SAWS.ORG	(210)233-3747
DONOVAN BURTON	SR VP - WATER RESOURCES	DBURTON@SAWS.ORG	(210)233-3632
Robert Pina	VP - CIO	Robert.Pina@saWS.org	210-233-2366
Michael Kampstra	VP - CISO	Michael.Kampstra@SAWS.ORG	210-233-3479
Eric Cloudt	Sr. Director - Security & ES	eric.cloudt@saWS.org	210-233-3086
Scott Halty	Director - Res. Protection	Scott.Halty@saWS.org	210-233-3536
Leticia De Leon	TCEQ - Tech Specialist	leticia.deleon@tceq.texas.gov	512.965.2371
IRYNA KUSHNIRSKY	TCEQ - WSD	IRYNA.KUSHNIRSKY@tceq.texas.gov	512-239-1471
Floramie Welch	SAWS	Floramie.Welch@saWS.org	210 233 3744
Victor Gonzalez	Security Architect	victor.gonzalez@saWS.org	210-233-3778
David Mendoza	Information Security Mgr.	david.mendoza@saWS.org	210-233-2206

SDWA PWSS Inspection Sign-In Sheet

System Name: San Antonio Water System Meeting: Closing Conference Date: October 23, 2025 @ 3:45 PM

Name	Affiliation, Title	Email Address	Phone Number
Chris Padilla	Inspector, ERG	Chris.Padilla@erg.com	607-227-7646
Maura Harbaugh	Inspector, ERG	Maura.Harbaugh@erg.com	724-216-4579
JEFF HANN	SAWS / V.P. PROD.	JEFF.HANN@SAWS.ORG	(210) 233-3747
Floramie Welch	SAWS	Floramie.Welch@saws.org	210 233 3744
Eric Clough	SAWS	eric.clough@saws.org	210-233-7086
Robert Pine	SAWS / VP- CIO	Robert.Pine@saws.org	210-233-2366
STEVEN TIJERINA	SAWS / SEC MGR	Steven.tijerina@saws.org	210-233-3197
Scott Halty	SAWS / Dir. RPC	Scott.Halty@saws.org	210-233-3536
ROGELIO PLACENCIA	SAWS / Sr. Director	Rogelio.Placencia@saws.org	210.233.2367