

REPORT OF COMPLIANCE EVALUATION INSPECTION

AT
City of Salina Public Water Supply
300 West Ash Street
Salina, Kansas 67402

Public Water Supply ID #: KS2016914

October 7-9, 2025

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

INTRODUCTION

I conducted a Public Water Supply (PWS) and National Pollution Discharge Elimination System (NPDES) Compliance Evaluation Inspection (CEI) at the City of Salina Public Water Supply (PWS) on October 7-9, 2025. The inspection was conducted under the authority of Section 1445 of the Safe Drinking Water Act (SDWA) and Section 308(a) of the Federal Water Pollution Control Act and in accordance with EPA Region 7 Standard Operating Procedures. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

City of Salina Public Water Supply

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FACILITY DESCRIPTION AND HISTORY

The City of Salina PWS operates a surface water (SW) treatment system. The public water system provides drinking water to the residents and businesses of Salina, KS. The PWS is classified as a community water system (CWS) that serves a population of 46,480 people daily, through 20,473 service connections, according to the Kansas Drinking Water Watch (DWW)

database. The system also sells water on a wholesale basis to Saline County Rural Water District 3. The system does not purchase, on a regular or emergency basis and has an emergency basis, treated water from any other PWS.

The PWS is designed to produce a maximum of 23.5 million gallons per day (MGD), with an average daily use of approximately 5 MGD according to system personnel. Summertime production reaches approximately 9.5 MGD according to facility personnel. The system does not provide treated water to any other public water supply systems.

The PWS has two different treatment plants, which source raw water from the multiple locations. The Downtown Plant sources raw water from the Smoky Hill River and groundwater wells in the North Wellfield. The South Plant sources raw water from the South Wellfield. Raw surface water for the Downtown Plant is pumped from an intake structure on the Smokey Hill River approximately one mile away from the plant and from wells located throughout the northern part of the city. At the time of the inspection, the City had a contractor trying to remove a large log jam from the river near the intake structure, so the downtown plant was being operated on 100% groundwater due to the raw water turbidity caused by the log jam removal. The downtown plant consists of an equalization (EQ) tank, two air strippers, a flocculation and sedimentation basin, multiple control structures, two softening basins, two final clarifiers, 16 composite media rapid sand filters and two clearwells.

The South Plant consists of a splitter structure, a softening basin, composite media rapid sand filters, a transfer pump station, a clearwell, a backwash basin and two sludge basins.

The system has 11 finished water storage facilities and five booster pump stations. The system's finished water storage structures have a total capacity of 8 MGD.

According to state regulations, the system requires a certified operator at the Grade 4 level to manage the water treatment and distribution operations. At the time of inspection, the facility employed six Grade 4 operators and 5 certified operators of varying grades.

Compliance History

The system was last inspected by KDHE on September 12, 2023, (attachment 2). The inspection report findings included no significant deficiencies, one recommendation and one general observation. The recommendation was cited for six of the finished water storage structures having not been inspected in the last three to five years. The general observation was that the system had scheduled to have all of their finished water storage structures inspected on October 9, 2023.

A review of DWW found that the system had no violations in the past five years.

NOTICE OF INSPECTION

State Notice

On September 22, 2025, KDHE staff were notified, in writing, of the EPA's intention to inspect the City of Salina PWS (Attachment 3). This notification was conducted pursuant to Section 1445(b)(2) of SDWA, 42 U.S.C. § 300j-4(b)(2).

Public Water System Notice

On September 23, 2025, Ms. Tasker was contacted by telephone and notified of EPA's intention to conduct the inspection. A follow-up email verifying the notification was sent the next day (attachment 4). This notification was conducted pursuant to Section 1445(b)(1) of SDWA, 42 U.S.C. § 300j-4(b)(1).

INSPECTION PROCEDURES

Facility personnel were notified prior to the inspection so appropriate staff would be on-site and able to answer operational questions. I arrived at the facility at approximately 10:00 hours on October 7, 2025, and conducted the opening conference. I introduced myself, presented my EPA credentials and explained the purpose of the inspection to facility personnel.

I explained the purpose of the inspection was to conduct a compliance evaluation inspection. I stated we would focus the inspection on the system's source, treatment, finished water storage structures, distribution system, monitoring and reporting.

FINDINGS AND OBSERVATIONS

During the inspection 64 photographs were taken. The photographs are included with this report as attachment 1. The following preliminary findings were noted during the inspection and were discussed with facility personnel at the exit meeting prior to the conclusion of the inspection. The preliminary findings were recorded on the Notice of Preliminary Findings (NOPF) provided to the system at the close of the inspection. The narrative inspection report provides a summary of the observations and findings identified as a result of the compliance inspection.

Source Water

During the inspection, I observed the system's raw water pump station and intake structure on the Smokey Hill River. The intake structure is concrete with bar screens that allow river water to gravity flow to a wet well. From the wet well, the intake pump station pumps raw water to the Downtown Plant. The system does not add any chemicals or have any treatment processes prior to the treatment plant.

I also observed each groundwater well in the system. The North Wellfield is comprised of 17 wells throughout the northern part of Salina. Six of the wells in the wellfield (wells 8, 11, 12, 13,

14 and 15) have had their motors and pumps pulled out of the wells and had pieces of plywood set over the well hole at the time of inspection. System personnel explained that they were currently evaluating the wells to determine the best way to put them back in service, and they were most likely not going to abandon the wells. The plywood pieces were not bolted down and had portions of the well open to possible contaminations (photos 48, 50, and 53-55). This was noted as preliminary finding #2 on the Notice of Preliminary Findings that was left with the system after the inspection. In the system's October 10, 2025, response to the two of the initial findings on the NOPF, the system showed that they had secured the plywood boards, properly covering the wells (attachment 5), and no further actions were taken.

I also observed that the air relief valve (ARV) overflow pipe on multiple wells that were not screened and were open to possible contamination (photos 51, 52, and 60). This was noted as part of preliminary finding #4 on the NOPF provided to the system. The wells appeared to be well maintained and in proper working condition during my inspection.

The South Wellfield is comprised of five wells on the southern end of Salina. Well 101 was out of service at the time of inspection. System personnel explained that the well is not being abandoned but is being evaluated for future use. Wells 102-105 appeared to be well maintained and in proper working condition.

System personnel explained that the surface water intake and all wells are regularly visited at a minimum of once per week for inspection and maintenance. They are typically visited more often as workload allows.

Treatment

Groundwater enters the Downtown Plant at the equalization (EQ) tank where chlorine is added. From the EQ tank, water flows to air strippers and is mixed with raw surface water at one of two locations. Raw surface water enters the plant at the rapid mix tank where groundwater can be added as need for tempering. Supernate recycle water also comes back to the rapid mix tank when being recycled. From the rapid mix tank, where the system adds chlorine, polymer and alum, water flows through the flocculation zone and then to the sedimentation basin. From the sedimentation basin, water flows through a v-notch weir to a control structure where alum can be added. Groundwater from the air strippers is typically added to the treatment process in line between the v-notch weir and the control structure. From the control structure, water flows to one of two softening basins where soda ash and lime are added for the softening process. From the softening basins, water flows to another control structure where ammonia and carbon dioxide are added before flowing to the final clarifiers. After the final clarifiers, sodium fluorosilicate and sodium hexametaphosphate are added as the water flows to the filter gallery, and then to the clearwells after filtration.

Raw water for the South Plant is pumped from the South Wellfield directly to the South Plant. Raw water enters the plant in a splitter structure where sodium permanganate and alum are added

prior to flowing to a softening basin where polymer, lime and soda ash are added. After the softening basin sodium hypochlorite and carbon dioxide are added as the water flows to the filter gallery. After filtration, orthophosphate and sodium hypochlorite are added before being pumped to the clearwell. Fluoride and ammonia are added after the clearwell when water is pumped into the distribution system. Backwash from the filters and sludge from the softening basin go to sludge lagoons, and supernatant from the lagoons is recycled through the treatment process beginning at the splitter structure.

At the time of inspection, I observed ARVs on finished water pumps throughout both plants that had discharge pipes that were not properly screened (photo 26). This was noted as part of preliminary finding #4 on the NOPF that was left on-site.

At the South Plant, I observed the backwash basins had a large amount of woody vegetation growing in the berms and around the inlet structure (photos 30-31). I explained to system personnel that this vegetation needs to be removed to ensure the integrity of the basin berms are maintained and to keep the intake structure from being damaged. This was noted as item #6 on the NOPF that was left on-site.

Finished Water Storage

As described above, the system has 11 finished water storage structures, including seven elevated towers and one ground storage tanks in the distribution system. There are also two reservoir clearwells at the Downtown Plant and one ground storage clearwell at the South Plant. During the inspection, I visited and observed all of the system's finished water storage structures (photos 14, 18, 22, 33, 35, 43, 46, 62, and 63). All of the system's finished water storage structures were generally in good condition. System personnel had inspection reports for the eight structures in the distribution system, all of which were conducted in October and November of 2023. The inspection records can be found in the ECAD digital record database.

Inspection records for the three clearwells were not produced. System personnel stated that the clearwells were not inspected at the same time as the other finished water structures and thought they were last inspected in 2014. I explained that clearwells are considered finished water storage structures and should be inspected at the same frequency as any other finished water storage structure, recommended to be every three to five years. The South Plant clearwell was constructed at the same time as the South Plant, going into service in 2021. This would put the clearwell of the South Plant within the 3-5 year inspection recommendation. I noted the lack of inspections for the Downtown Plant clearwells as preliminary finding #7 on the NOPF that was left on-site. After the inspection, system personnel provided me with a signed inspection proposal (attachment 6) from 2014 that documents the system had at least intended to have the clearwells inspected. No reports were submitted with the submittal. If the clearwells had been inspected in 2014 after this proposal was signed, it would have still been approximately 11 years since the system had the clearwells inspected.

While reviewing the inspection report for the Sunset Tower (attachment 7), I read the summary which included “*Seal weld/repair openings (2) at upper shell. Repair by welding the secondary access hatch at balcony. This is a priority item.*” This was noted as a “Sanitary Component” and specifically states that it does not meet American Water Works Association (AWWA) standards. The report did not include any photos of the openings, so I was unable to ascertain the type or severity of the openings from my review of the report. During my discussion with system personnel, I asked if the openings discovered had been repaired. System personnel stated that they did not know for sure if the holes had been repaired and were unable to find any documentation of the repairs. System personnel explained that this tower was scheduled to be re-coated with in 2026/2027. I explained that this is considered a sanitary defect since it a possible point of contamination for the water system, and the holes would need to be at least temporarily repaired soon. System personnel state they understood. This was noted as preliminary finding #1 on the NOPF that was left on-site. On October 10, 2025, I received an email that stated system personnel had confirmed that the openings discussed in the report were rigging holes and had been sealed with NSF-61 approved caulk and included photos (attachment 5), so no further action was taken on this finding.

While inspecting the system’s finished water storage structures, I also observed that multiple overflow pipes were screened with mesh larger than 24-mesh (photo 39) or were missing a screen (photos 19, 21, 36, and 61). This was noted as preliminary finding #3 on the NOPF that was left on-site. In the system’s October 10, 2026, response, they noted that KDHE minimum design standards (MDS) required screens to have openings less than 0.25-inch (4-mesh) on overflow pipes. System personnel asked if Region 7 recommended the less than 0.25-inch screen or the 24-mesh screen. While the system would only be required to use the less than 0.25-inch screen in KDHE’s MDS, EPA highly recommends system’s use 24 mesh screen or smaller. Also, KDHE’s MDS requires that if the overflow pipe has a flap gate, it must be self-closing and have an integral screen.

Also, while inspecting the system’s finished water storage structures, I observed that the system’s Gold Tower overflow appeared to be directly connected into the city’s storm sewer system without a visible screen or other backflow prevention (photo 44). This was noted as preliminary finding #5 on the NOPF that was left on-site. After the inspection, I found that the Gold Tower overflow is properly air-gapped and screened inside the tower. This can be seen in the 2023 inspection report for the Gold Tower (attachment 8).

Overall, the system’s finished water storage structures appeared to be well maintained. At the time of inspection, the system had recently (within 2025) re-coated two towers and were actively re-coating the Schilling Tower (photo 33) at the time of inspection. System personnel explained that all of the system’s towers were to be re-coated in three phases, with the Schilling Tower being the last tower in the first phase. System personnel stated they planned on all the tower’s having new coatings within the next few years.

Distribution

The distribution system consists of approximately 430 miles of water distribution lines, constructed primarily of cast iron pipe, with the rest of the system constructed of PVC, ductile iron, copper, HDPE and lead. Water line sizes are between 1" and 36" but consist primarily of 6-12" pipe. This number includes approximately 65 miles of abandoned pipe. The system has Geographic Information System (GIS) maps of the distribution system and uses them to track repairs and other issues.

System personnel stated that the current water loss is approximately 11 percent. System personnel stated that they are always tracking water loss and try to keep it as accurate as possible considering billing, production, and usage discrepancies.

The distribution system also includes five booster stations. I observed all five booster stations (photos 15, 34, and 37) during my inspection. All of the booster stations appeared to be in good condition and no issues were observed. The booster stations are inspected weekly by system personnel and preventative maintenance is completed monthly to ensure proper operation.

During my inspection, I reviewed the system's backflow protection ordinance and records of backflow prevention testing. The records showed that backflow devices are regularly inspected on an annual basis as required.

During my review of records, I discussed the system's valve exercise process. System personnel explained that they have a valve exercising program and procedures. The system has the distribution system broken into 24 zones and try to exercise two zones worth of valves each month, cycling through all of the valves every two years.

We also discussed the system's distribution line flushing program. System personnel explained that they try to flush all hydrants in the system every spring and every fall. The system notifies the public with a flyer and flushes from the center of the distribution system out to the edges.

Monitoring Plans

During my record review, I asked facility personnel for the system's Revised Total Coliform Rule (RTCR), Lead and Copper Rule (LCR) and Stage 2 Disinfection Byproducts (DBP) Rule sampling plans. All three plans were available for my review at the time of inspection. All three of the system's sampling plans appeared to be complete and adequate to the requirements.

Americas Water Infrastructure Act (AWIA)

While onsite I asked to review the PWS's Risk and Resiliency Assessment (RRA) and the Emergency Response Plan (ERP) to determine whether they meet the criteria established under AWIA Section 2013. I obtained copies of both the RRA and ERP. The requirements of the RRA and ERP are described at <https://www.epa.gov/waterresilience/awia-section-2013>.

On June 18, 2021, the system self-certified with the EPA that the RRA had been developed. The system provided me with a copy of the assessment dated June 2, 2021, and I reviewed the RRA

against the requirements established in SDWA 1433(a). I determined that the RRA was complete and met all of the requirements of SDWA 1433(a).

On December 16, 2021, the system self-certified with the EPA that the ERP had been developed. System personnel provided me with the system's ERP, which was dated December 16, 2021. I reviewed and evaluated the ERP against the requirements of SDWA 1433(b). Based on the review, I determined that ERP was complete and met all of the requirements of SDWA 1433(b).

Following the review and discussion of the RRA and ERP, I discussed cybersecurity with system personnel. Prior to the inspection, I provided the system with a cybersecurity checklist to complete to evaluate the system's cybersecurity efforts. System personnel returned the checklist, lacking information for systems that were used at the water plants. After the inspection, system personnel submitted a second checklist with the information for the water plants.

SUMMARY AND CONCLUSION

On October 9, 2025, I conducted an exit briefing with Ms. Tasker and Messrs. Shamburg, Peterson and Taylor. I went over the facility's rights to claim confidential business information (CBI) and explained the preliminary findings that I observed during the inspection. After the inspection, system personnel emailed me the complete CBI form, claiming CBI on certain documents (Attachment 9). I explained the preliminary findings that I observed during the inspection. A NOPF was left on-site with the following preliminary findings (Attachment 10):

- 1) Ensure there are no unrepaired opening(s) on the sunset water tower as described in (the) tank inspection report.
- 2) Ensure open groundwater wells are capped and sealed.
- 3) Multiple tank overflow pipes were not properly screened.
- 4) Air relief valves throughout system were not screened.
- 5) Gold tower overflow goes directly to stormwater inlet without screen or backflow prevention (determined to be acceptable after inspection).
- 6) Remove woody vegetation and weeds from sludge lagoon berms at South Plant.
- 7) Clearwells at Downtown Plant have not been inspected since 2014.

On October 10, 2025 (attachment 5) and October 22, 2025 (attachment 11), system personnel submitted responses to the preliminary findings. The system's responses provided actions taken or plans to address each finding.

**BRIAN
D'ALFONSO**
Brian D'Alfonso
Life Scientist, WB/DWIS

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D'ALFONSO
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**JODI
BRUNO**
Nicole Moran
Supervisor, WB/DWIS

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Attachments:

1. Digital Photographs (66 pages)
2. September 12, 2023, KDHE Sanitary Survey (3 pages)
3. Inspection Notification Email to KDHE (2 pages)
4. Inspection Notification Email to Salina PWS (3 pages)
5. October 10, 2026, Initial Response Email (13 pages)
6. 2014 Downtown Plant Clearwell Inspection Proposal (2 pages)
7. November 2023 Sunset Tower Inspection Report (17 pages)
8. November 2023 Gold Tower Inspection Report (17 pages)
9. October 17, 2025, Confidential Business Information Form (4 pages)
10. October 9, 2025, NOPF (1 pages)
11. October 22, 2025, System Response (3 pages)



United States Environmental Protection Agency – Region 7

Digital Image Log

1. Facility Name: City of Salina Public Water Supply		3. Inspector Name: Brian D'Alfonso	
2. PWS ID #: KS2016914			
4. Photographer (if Different):		5. Date of Inspection: October 7-9, 2025	
6. Street Address of Digital Images: 300 West Ash Street and other locations		7. City: Salina	8. State: KS
		9. Zip: 67402	
10. Image Numbers: DSCN5108 – DSCN5170		11. File Name: IR PhotoLog FY25 KS Salina	

Digital Image Number	File Name	Description	Date and Time Digital Image Taken
1	DSCN5108.JPG	Chlorine tanks at the downtown plant	2025:10:07 11:52:12
2	DSCN5109.JPG	Surface water rapid mix	2025:10:07 11:57:17
3	DSCN5110.JPG	Sed basin – Not being used at time of inspection due to no surface water usage	2025:10:07 12:01:25
4	DSCN5111.JPG	Same sed basin as photo #3	2025:10:07 12:01:29
5	DSCN5112.JPG	Softening basin	2025:10:07 12:07:22
6	DSCN5113.JPG	Sludge pumps – one missing for maintenance	2025:10:07 12:10:31
7	DSCN5114.JPG	Clarifier – down due to low flows	2025:10:07 12:17:55
8	DSCN5115.JPG	Clarifiers in operation	2025:10:07 12:18:08
9	DSCN5116.JPG	Air stripper	2025:10:07 12:34:52
10	DSCN5117.JPG	Piping showing heavy corrosion and rusting	2025:10:07 12:41:06
11	DSCN5118.JPG	Groundwater well #3, on location at the downtown water plant	2025:10:07 12:47:25
12	DSCN5119.JPG	Composite media rapid sand filter in operation	2025:10:07 13:08:40
13	DSCN5120.JPG	Air relief valve (ARV) not screened on finished water pump	2025:10:07 14:08:17
14	DSCN5121.JPG	Overview of the Downtown Plant. Throughout the center of the photo are the underground clearwells.	2025:10:07 14:16:28
15	DSCN5122.JPG	Indiana Booster Station	2025:10:07 14:41:20
16	DSCN5123.JPG	Raw Water Pump Station	2025:10:07 14:55:08
17	DSCN5124.JPG	Gypsum Hill tower overflow running underground. Overflow discharge on street in photo 17.	2025:10:07 15:10:22
18	DSCN5125.JPG	Gypsum Tower	2025:10:07 15:15:09
19	DSCN5126.JPG	Gypsum tower overflow discharge at street curb. Overflow had a flapper gate, but did not have an integral screen.	2025:10:07 15:16:06

20	DSCN5127.JPG	Flapper gate had a good seal.	2025:10:07 15:16:32
21	DSCN5128.JPG	Markley Tower overflow. Had a flapper gate without an integral screen.	2025:10:07 15:34:16
22	DSCN5129.JPG	Markley Tower with new coating.	2025:10:07 15:34:36
23	DSCN5130.JPG	South Plant raw water splitter structure.	2025:10:08 07:29:49
24	DSCN5131.JPG	South Plant softening basin in use.	2025:10:08 07:32:27
25	DSCN5132.JPG	South Plant softening basin, not in use due to low flows.	2025:10:08 07:32:31
26	DSCN5133.JPG	Unscreened ARV overflow pipe.	2025:10:08 08:09:44
27	DSCN5134.JPG	South Plant finished water pump station.	2025:10:08 08:22:45
28	DSCN5135.JPG	South Plant clearwell and pumps.	2025:10:08 08:23:01
29	DSCN5136.JPG	South Plant chemical storage room.	2025:10:08 08:33:37
30	DSCN5137.JPG	South plant sludge holding basin with woody vegetation in the berms.	2025:10:08 08:42:07
31	DSCN5138.JPG	South plant sludge holding basin with woody vegetation in the berms and next to the intake structure.	2025:10:08 08:42:40
32	DSCN5139.JPG	South Well Field typical groundwater well setup.	2025:10:08 09:10:07
33	DSCN5140.JPG	Schilling Tower, out of operation at the time of inspection due to active re-coating project. Painters were priming the bottom of the tower (grey).	2025:10:08 09:52:52
34	DSCN5141.JPG	Burma Booster Station.	2025:10:08 09:59:13
35	DSCN5142.JPG	Burma Tank	2025:10:08 10:07:13
36	DSCN5143.JPG	Burma Tank overflow pipe with flapper and no integral screen.	2025:10:08 10:10:34
37	DSCN5144.JPG	Cloud Booster Station.	2025:10:08 10:48:24
38	DSCN5145.JPG	Sunset Tower overflow pipe erosion and settling soil/sod.	2025:10:08 10:51:16
39	DSCN5146.JPG	Sunset Tower overflow pipe screen larger than 24-mesh.	2025:10:08 10:51:31
40	DSCN5147.JPG	Minor degradation of the support concrete at Sunset Tower.	2025:10:08 10:53:29
41	DSCN5148.JPG	Minor degradation of the support concrete at Sunset Tower.	2025:10:08 10:54:31
42	DSCN5149.JPG	Minor degradation of the support concrete at Sunset Tower.	2025:10:08 10:54:44
43	DSCN5150.JPG	Gold Tower	2025:10:08 11:19:28
44	DSCN5151.JPG	Gold Tower overflow pipe in the city stormsewer.	2025:10:08 11:31:28
45	DSCN5152.JPG	Stormsewer inlet and manhole at Gold Tower.	2025:10:08 11:31:48
46	DSCN5153.JPG	Wyatt Tower	2025:10:08 12:53:46
47	DSCN5154.JPG	Bulk fill station backflow prevention device.	2025:10:08 13:00:58

48	DSCN5155.JPG	Well #15, no motor or pump, with plywood covering the well opening.	2025:10:08 13:20:18
49	DSCN5156.JPG	Well #10, no issues.	2025:10:08 13:30:32
50	DSCN5157.JPG	Well #14, no motor or pump, with plywood covering the well opening.	2025:10:08 13:39:51
51	DSCN5158.JPG	Well #7, no screen on the ARV discharge pipe.	2025:10:08 13:44:44
52	DSCN5159.JPG	Well #11, no screen on the ARV discharge pipe.	2025:10:08 13:52:46
53	DSCN5160.JPG	Well #12, no motor or pump, with plywood covering the well opening.	2025:10:08 13:58:15
54	DSCN5161.JPG	Well #13, no motor or pump, with plywood covering the well opening.	2025:10:08 14:04:26
55	DSCN5162.JPG	Well #8, no motor or pump, with plywood covering the well opening.	2025:10:08 14:11:16
56	DSCN5163.JPG	Well #20. Newer submersible pump with surrounding.	2025:10:08 14:16:41
57	DSCN5164.JPG	Well #20 overview shot.	2025:10:08 14:17:51
58	DSCN5165.JPG	Piping to well #20 in old well house.	2025:10:08 14:34:16
59	DSCN5166.JPG	Well #19.	2025:10:08 14:36:37
60	DSCN5167.JPG	Well #5, no screen on the ARV discharge pipe.	2025:10:08 14:53:15
61	DSCN5168.JPG	Key Acres tower overflow discharge. Flapper was missing and had no screen.	2025:10:08 15:14:18
62	DSCN5169.JPG	Key Acres Tower	2025:10:08 15:23:18
63	DSCN5170.JPG	Sunset Tower	2025:10:09 10:39:56

Number

Photo

1







4



5



6













12







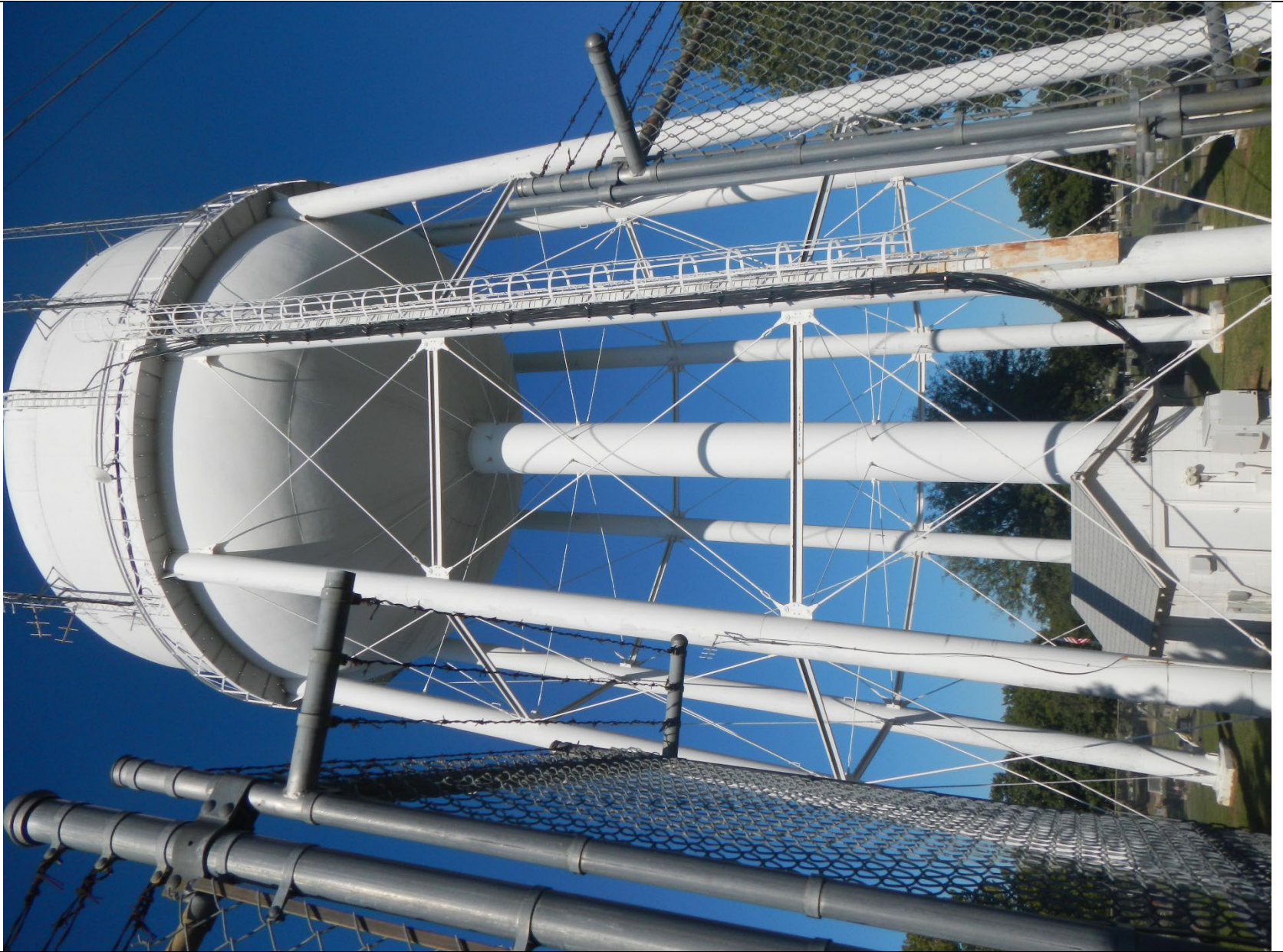
15





17













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