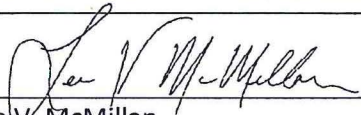
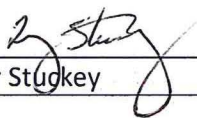


**Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT**

Inspection Date(s):	06/11/2019		
Media:	FIFRA		
Regulatory Program(s)	Section 12		
Company Name:	ONG Consulting LLC (formerly known as SaniTec H2O)		
Facility Name:			
Facility Physical Location:	2513 Winners Circle		
(city, state, zip code)	Heath, TX 75126		
Mailing address:	519 E. Interstate 30, Ste. 154		
(city, state, zip code)	Rockwall, TX 75058		
County/Parish:	Rockwall County		
Facility Contact:	Fredrick B. Ongeche	Chief Chemist/Owner	
FRS Number:	N/A		
Identification/Permit Number:	N/A		
Media Number:			
NAICS:			
SIC:			
Personnel participating in inspection:			
Fredrick B. Ongeche	ONG Consulting, LLC	Chief Chemist/Owner	(316) 617-3921
Lee McMillan	EPA Region 6 – Pesticide Enforcement	Environmental Engineer/Inspector	(214) 665-6404
Henry Krusekopf	Texas Department of Agriculture - Pesticides	Assistant Regional Director	(214) 631-0265
EPA Lead Inspector Signature/Date	 Lee V. McMillan		8/5/2019 Date
Supervisor Signature/Date	 H. Troy Stuckey		8-5-19 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Lee McMillan and Texas Department of Agriculture inspector, Henry Krusekopf met for an announced joint inspection regarding ONG Consulting, LLC's production of an unregistered pesticide. On June 11, 2019, at approximately 1:15 PM, we arrived at the mailing address located at 519 E. Interstate 30, Ste. 154, Rockwall, TX 75058. We were able to confirm that the business does not have a physical location at this address and photos were taken. We then proceeded to the second location at 2513 Winners Circle Heath, TX 75126. I was able to confirm that the address was the home office of ONG Consulting, LLC (ONG). I presented my credentials to Mr. Fredrick Ongeche along with a Notice of Inspection and informed him that this was an EPA inspection to investigate a potential unregistered pesticide. The scope of the inspection is the evaluation of company's distribution and sale of copper-ion generators used to treat zebra mussels in the water treatment process with regard FIFRA regulation (Section 12(a)(1)(A) – Unregistered Pesticides).

FACILITY DESCRIPTION

ONG is a privately held limited liability company founded in 2005, in the State of Kansas and authorized to do business in Texas. The company's primary focus has been on the production of fouling controls for water distribution systems. The company has two patents filed and three in the pre-application process. The ONG's team includes, electrical engineers, chemists, microbiologist, fabricators, and sales. The company has a home office in Heath, TX. The electrical/electronic design takes place in Milwaukee, WI. The equipment is fabricated in Colorado Springs, CO, then assembled, tested, and sold from Wichita, KS. ONG is considered a Category III sized business under FIFRA Enforcement Response Policy.

Section II – OBSERVATIONS

At approximately 1:34 PM we arrived at the home office of ONG. No products were on hand or being produced at the address. Inspector, Henry Krusekopf and I had a conversation with Mr. Ongeche and provided compliance assistance answering questions about the process of the investigation. I included the photos taken to document the locations in Appendix 1.

Section III – AREAS OF CONCERN

I observed the installation of two ONG Fortress MC system copper-ion generators for the control of zebra mussels at the Lewisville water production facility on April 16, 2019. Neither of the Fortress MC systems had pesticide registrations under the regulations of FIFRA. Inspector Henry Krusekopf and I made Mr. Ongeche aware of the status of the generators and presented the him with a copy of the Federal Register Notice [EPA- HQ--OPP- 2007--0949; FRL-8149-4]: Pesticide Registration; Clarification for Ion-Generating Equipment. Additional documentation was also requested at this time. Mr. Ongeche

stated that he would be taking measures to come into compliance by addressing the areas of concern and expected to have his product registered by July 2019. The inspection was concluded at approximately 2:40 PM and I exited the premises.

Section IV – FOLLOW UP

The following information was received by EPA after exiting the office on June 11, 2019:

- A Brief Company History
- Invoices and Contracts (CBI)
- Marketing Materials and
- EPA Registration Documents

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 3 photos taken

Appendix 2 – Notice of Inspection

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: ONG Consulting, LLC		
City: Rockwall	County/Parish: Grayson	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-068 ONG Consulting (Citizen)\Photos\DSC_0001.JPG

Date of Photo: June 11, 2019

Time of Photo: 01:16 PM

Photographer: Lee McMillan

Description: Official address of ONG Consulting, LLC located at 519 E. Interstate 30, Ste. 154, Rockwall, TX 75058



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: ONG Consulting, LLC		
City: Rockwall	County/Parish: Grayson	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-068 ONG Consulting (Citizen)\Photos\DSC_0002.JPG

Date of Photo: June 11, 2019

Time of Photo: 01:17 PM

Photographer: Lee McMillan

Description: Post office box for ONG Consulting



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: ONG Consulting, LLC		
City: Rockwall	County/Parish: Grayson	State: Texas



Photo File Name: H:\6PD\6MM-XP\Enforcement\ENFORCEMENT SENSITIVE\FY2019\2019-068 ONG Consulting (Citizen)\Photos\DSC_0004.JPG

Date of Photo: June 11, 2019

Time of Photo: 02:37 PM

Photographer: Lee McMillan

Description: Business office of ONG Consulting LLC

Appendix 2

Notice of Inspection



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection

Office of Enforcement and Compliance Assurance

Facility Name ONG Consulting, LLC	Facility Address 2513 Winners Circle, Heath, TX 75126 519 E. Interstate 30, Ste. 154, Rockwall, TX 75058
Name of Facility Official Fredrick Ongeche	Title Owner/Chief Chemist

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature:

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale (FIFRA § 9(a) (7 U.S.C. § 136g)); and for the purpose of inspecting and obtaining copies of those records specified in FIFRA § 8 (7 U.S.C. § 136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

- | | |
|--|--|
| ☐ Routine Inspection | Violation |
| ☒ For Cause Inspection | Suspected: FIFRA Section 12 (a)(1)(A) - Unregistered Pesticide |

Additional Information:

Investigating the manufacturing of Fortress MC copper ion-generator used in water treatment.

Name of Inspector	Lee V. McMillan
Signature of Inspector	Date June 11, 2019
Title	Time 1:40 pm
Address EPA Region 6, 1201 Elm Street, Ste. 500, Dallas TX 75270	

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.