

0000-0000-0051-4235

Document Control Sheet

Sheet Title:	PWS - OLS
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Record Series Name:	WS / Public Water Supply
Record Series:	PWS
Primary ID:	1120014
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Date:	5/28/2021 12:00AM
Title:	Investigation
Tertiary ID	

PWS\_1120014\_CP\_20210528\_INVESTIGATION  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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**Customer: Gafford's Chapel Water Supply Corporation**  
**Customer Number: CN600670277**

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**Regulated Entity Name: GAFFORD CHAPEL WSC**  
**Regulated Entity Number: RN101440733**

**Investigation #** 1723926

**Investigator:** ALEX LAIRD

**Conducted:** 05/28/2021 -- 05/28/2021

**Program(s):** PUBLIC WATER SYSTEM/SUPPLY

**Investigation Type:** Compliance Invest File Review

**Additional ID(s):** 1120014

**Address:** 203 JEFFERSON ST E,  
SULPHUR SPRINGS, TX , 75482

**Incident Numbers**

**Site Classification** GW 251-1K CONNECTION

**No Industry Code Assigned**

**Location:** CR 4784 in the Ridgeway Community in  
Hopkins County.

**Local Unit:** REGION 05 - TYLER

**Activity Type(s):** COV - Flag code for activities which were modified due to restrictions related to COVID-19. Should only be used with activities used to meet federal commitments for CAA, TPDES, PWS, RCRA, or Energy Act.  
PWSCCICMOD - A modified investigation (sanitary survey) of a community system to determine compliance with applicable regulations. This activity code should only be used at management direction for fulfilling the federal requirements during periods with declared disas  
WPL - An activity code used to identify an investigation related to the Workplan Leveling project. This activity code can be associated to any investigation type for any media. It is not necessary to associate more than one WPL activity to an investigation.  
Thi

RECEIVED

JUL 26 2021

TCEQ  
CENTRAL FILE ROOM

**Principal(s):**

**Role**

RESPONDENT

**Name**

GAFFORD CHAPEL WSC

**Contact(s):**





**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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Role	Title	Name	Phone
PARTICIPATED IN	OPERATOR	MR DANIEL L ROMANS	Cell (903) 439-5049 Work (903) 885-6996
NOTIFIED	OPERATOR	MR DANIEL L ROMANS	Work (903) 885-6996 Cell (903) 439-5049
REGULATED ENTITY CONTACT	OPERATOR	MR DANIEL L ROMANS	Work (903) 885-6996 Cell (903) 439-5049
REGULATED ENTITY MAIL CONTACT	PRESIDENT	MR MICHAEL RAWSON	Work (903) 885-6996

**Other Staff Member(s):**

Role	Name
Supervisor	CARA FISHER
QA Reviewer	CARA FISHER

**Associated Check List**

<u>Checklist Name</u>	<u>Unit Name</u>
PWS MODIFIED CCI	CCI
PWS GENERIC VIOLATIONS	Violations

**Investigation Comments:****INTRODUCTION**

A routine Comprehensive Compliance Investigation (CCI) was conducted on the Gafford Chapel (PWS ID No. 1120014) water system on May 28, 2021. Water system personnel participating in the investigation included Mr. Daniel Romans, Chief Water Operator, mailing address PO Box 1160 Sulphur Springs, TX 75483 (Phone number 903-885-6996). Mr. Romans received prior notification by telephone and email of the investigation on April 12, 2021. An exit interview was conducted with Mr. Romans on May 28, 2021.

A limited investigation was conducted at the facility due to the on-going Coronavirus Disease 19 (COVID-19) pandemic. The investigator was not able to conduct an on-site investigation of the facilities due to state and/or local guidelines requiring social distancing and the prevention of mass gatherings. These requirements were put in place to help prevent the spread of COVID-19. The investigation therefore consisted of a review of applicable records remotely (by email) submitted by the regulated entity.

**GENERAL FACILITY AND PROCESS INFORMATION**

Gafford Chapel WSC is a ground water system that consists of 3 active wells at two plants, gas chlorination, ground storage, service pumps, pressure storage, and distribution in two pressure planes. At the Ridgeway Plant, water is pumped from wells # 1 and #2, gas chlorinated, and stored in a 0.05 MG ground storage tank. From there, water is sent to the Ridgeway plane via three service pumps ((1) 210 GPM, (2) 650 GPM) service pumps. Pressure in the plane is maintained by a 0.01 MG pressure tank. The Ridgeway plant is interconnected through an air-gapped connection into the storage tank with the City of Sulphur Springs via a pressure-regulated cla-valve.

At the Mt. Zion plant, water is pumped from well # 3, gas chlorinated, and stored in a 0.085 MG ground storage tank. From there, water is sent to the Mt. Zion plane via three service pumps ((1) 90 GPM, (2) 280 GPM) service pumps. Pressure in the plane is maintained by a 0.00250 MG pressure tank. The Mt. Zion plant is interconnected through an air-gapped connection into the storage tank with the City of Commerce via a pressure-regulated cla-valve.

The Mt. Zion and Ridgeway plants are interconnected with each other and can supply each other with water

**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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through a gravity fed connection from Ridgeway to Mt. Zion, and pumps from Mt. Zion to Ridgeway.

**BACKGROUND**

The most recent Comprehensive Compliance Investigation (CCI) was conducted on June 26, 2018. Please see CCEDS investigation 1503863 for more information about the most recent CCI. The following violations remained open from the previous CCI:

- 1) Failure to have an adequate up-to-date monitoring plan (tracking no. 686555);
- 2) Failure to conduct annual tank inspection on the pressure tank at Ridgeway (tracking no. 686557);
- 3) Failure to have an adequate plant operation manual (tracking no. 686560);
- 4) Failure to update the drought contingency plan (tracking no. 686562);
- 5) Failure to maintain the high-level vents in the chlorine room at Ridgeway and Mt. Zion plants (tracking no. 686564);
- 6) Failure to maintain the sealing block at the Mt. Zion well (tracking no. 686565);

**ADDITIONAL INFORMATION**

An additional issue was documented concerning the system's pressure tank capacity on the Mt. Zion pressure plane. Also, one new violation was documented during the CCI conducted on May 28, 2021 as follows:

Failure to meet the capacity requirements for ground storage on the Ridgeway pressure plane (tracking no. 778656).

Sufficient documentation was received during the CCI to resolve the violations regarding the pressure tank inspections (tracking no. 686557), the drought contingency plan (tracking no. 686562), the chlorine room vents (tracking no. 686564), and the well sealing block (tracking no. 686565).

The other two violations regarding the monitoring plan (tracking no. 686555) and the plant operations manual (tracking no. 686560) have been carried forward into this investigation with a compliance due date of August 16, 2021. When these two documents were reviewed as part of the CCI, they were lacking required information.

One violation regarding the water system's well capacity (tracking no. 590739) was referred to TCEQ's Enforcement Division and remains "under resolution schedule" status.

A Notice of Violation was sent to the water system on June 16, 2021. System facilities are listed in the attached TNET database. See schematic for list of facilities, which is attached to printed CCEDS report. Responsible Official: Mr. Michael Rawson, President, PO Box 1160, Sulphur Springs, TX 75483.

**NOV Date** 06/16/2021 **Method** WRITTEN

**OUTSTANDING ALLEGED VIOLATION(S)**  
**ASSOCIATED TO A NOTICE OF VIOLATION**

**Track Number:** 686555

**Compliance Due Date:** 08/16/2021

**Violation Start Date:** 6/26/2018

**30 TAC Chapter 290.121(a)**

**Alleged Violation:**

**Investigation:** 1503863

**Comment Date:** 08/03/2018

Failure to have an adequate up-to-date monitoring plan.



During the CCI conducted on 06/26/2018, the investigator documented that the water system did not have an adequate monitoring plan. The monitoring plan was lacking a lab approval form, lead and copper sample sites, and the revised total coliform rule samples. According to 30 TAC §290.121(a) All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

**Investigation: 1723926**

Comment Date: 06/01/2021

Failure to have an adequate up-to-date monitoring plan.

During the Comprehensive Compliance Investigation (CCI), conducted on May 28, 2021, the monitoring plan for the water system was evaluated. The monitoring plan is still missing information regarding lead and copper sites, the lab approval form, and RTCR sites. According to 30 TAC §290.121(a) All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan.

**Recommended Corrective Action:** Please submit compliance documentation by August 16, 2021. The documentation should demonstrate what actions have been taken to correct the violation, and may include photographs, purchase orders, results of analysis, etc.

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**Track Number:** 686560

**Compliance Due Date:** 08/16/2021

**Violation Start Date:** 6/26/2018

**30 TAC Chapter 290.42(l)**

**Alleged Violation:**

**Investigation: 1503863**

Comment Date: 08/03/2018

Failure to have an adequate plant operation manual.

During the CCI conducted on 06/26/2018, the investigator documented that the water system did not have an adequate plant operation manual. The manual was lacking the normal, daily, weekly, monthly, and annual operations. According to 30 TAC §290.42(l) A thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency. If operating a reverse osmosis or nanofiltration membrane system, the manual must also include the system's configuration, baseline performance data, and any set point for membrane cleaning or replacement.

**Investigation: 1723926**

Comment Date: 06/01/2021

Failure to have an adequate plant operation manual.

During the Comprehensive Compliance Investigation (CCI), conducted on May 28, 2021, the plant operations manual for the water system was evaluated. The plant operations manual is still missing information regarding the system's emergency contact phone numbers. According to 30 TAC §290.42(l), a thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

**Recommended Corrective Action:** Please submit compliance documentation by August 16, 2021. The documentation should demonstrate what actions have been taken to correct the violation, and may include photographs, purchase orders, results of analysis, etc.

**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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**Track Number:** 778656

**Compliance Due Date:** To Be Determined

**Violation Start Date:** 5/28/2021

**30 TAC Chapter 290.45(b)(1)(D)(ii)**

**Alleged Violation:**

**Investigation:** 1723926

**Comment Date:** 06/02/2021

Failure to meet the capacity requirements for ground storage on the Ridgeway pressure plane.

During the investigation, the investigator documented that the water system has 375 connections on the Ridgeway pressure plane and 0.05 MG of ground storage. According to 290.46(b)(1)(D)(ii), ground water systems larger than 250 connections are required to have a minimum 200 gallons of ground storage per connection. Therefore, the water system should have at least 0.075 MG of ground storage on this pressure plane ( $375 \times 200 = 0.075$  MG). The water system is 67% deficient for ground storage on this pressure plane ( $0.05/0.075 = 66.7\%$ )

**Recommended Corrective Action:** Please submit a compliance plan by August 16, 2021. The plan should include the proposed action to be taken to correct the alleged violations and a schedule for the completion of corrections. If the violations have already been corrected, please submit compliance documentation, such as a photograph, purchase order, etc., demonstrating what actions were taken.

**ALLEGED VIOLATION(S) NOTED AND RESOLVED**

**ASSOCIATED TO A NOTICE OF VIOLATION**

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**Track Number:** 686557

**Resolution Status Date:** 6/1/2021

**Violation Start Date:** 6/26/2018

**Violation End Date:** 5/20/2021

**30 TAC Chapter 290.46(m)(1)**

**Alleged Violation:**

**Investigation:** 1503863

**Comment Date:** 08/03/2018

Failure to conduct annual tank inspection on the pressure tank at Ridgeway.

During the CCI conducted on 06/26/2018, the investigator documented that the annual inspection for the pressure tank had not been conducted. According to 30 TAC §290.46(m)(1) Each of the system's ground, elevated, and pressure tanks shall be inspected annually by water system personnel or a contracted inspection service.

**Investigation:** 1723926

**Comment Date:** 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 20, 2021, the water system submitted compliance documentation demonstrating that the pressure tank at Ridgeway had been inspected as of January 26, 2021. The documentation was sufficient to resolve the violation.



**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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**Track Number:** 686562

**Resolution Status Date:** 6/1/2021

**Violation Start Date:** 6/26/2018

**Violation End Date:** 5/20/2021

**30 TAC Chapter 288.20(c)**

**Alleged Violation:**

**Investigation:** 1503863

**Comment Date:** 08/03/2018

Failure to update the drought contingency plan.

During the CCI conducted on 06/26/2018, the investigator documented that the water system had not updated the drought contingency plan since 2012. According to 30 TAC 288.20(c) The retail public water supplier shall review and update, as appropriate, the drought contingency plan, at least every five years, based on new or updated information, such as the adoption or revision of the regional water plan.

**Investigation:** 1723926

**Comment Date:** 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 20, 2021, the water system submitted compliance documentation demonstrating that the Drought Contingency Plan had been updated as of February 2019. The documentation was sufficient to resolve the violation.

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**Track Number:** 686564

**Resolution Status Date:** 6/1/2021

**Violation Start Date:** 6/26/2018

**Violation End Date:** 5/31/2021

**30 TAC Chapter 290.42(e)(4)(C)**

**Alleged Violation:**

**Investigation:** 1503863

**Comment Date:** 08/03/2018

Failure to maintain the high-level vents in the chlorine room at Ridgway and Mt. Zion plants.

During the CCI conducted on 06/26/2018, the investigator observed that the high-level vents at both plants were not functional. According to 30 TAC §290.42(e)(4)(C) Adequate ventilation, which includes both high level and floor level screened vents, shall be provided for all enclosures in which gas chlorine is being stored or fed. Enclosures containing more than one operating 150-pound cylinder of chlorine shall also provide forced air ventilation which includes: screened and louvered floor level and high level vents; a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent; and a fan switch located outside the enclosure.

**Investigation:** 1723926

**Comment Date:** 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 31, 2021, the water system submitted compliance documentation which included a video demonstrating that the vent fans at both plants had been replaced and were functioning. The documentation was sufficient to resolve the violation.

**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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Track Number: 686565

Resolution Status Date: 6/1/2021

Violation Start Date: 6/26/2018

Violation End Date: 5/27/2021

30 TAC Chapter 290.46(m)

**Alleged Violation:**

**Investigation: 1503863**

Comment Date: 08/03/2018

Failure to maintain the sealing block at the Mt. Zion well.

During the CCI conducted on 06/26/2018, the investigator observed that the sealing block at Mt. Zion major cracks. According to 30 TAC §290.46(m) 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.

**Investigation: 1723926**

Comment Date: 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 27, 2021, the water system submitted compliance documentation demonstrating that the well sealing block at Mt. Zion had been repaired. The documentation was sufficient to resolve the violation.

**Additional Issues**

**Description**

Item 8

**Additional Comments**

The system provides 0.0025 MG of pressure tank capacity on the Mt. Zion pressure plane, and the required amount is 0.0025 MG (125 connections X 20 = 0.0025MG). The system is operating at 100% of the required pressure tank capacity. A retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 of this title shall submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certified area. The water system is required to submit a planning report indicating what measures would be taken to increase capacity should the connections increase. The planning report should be submitted within 90 days.

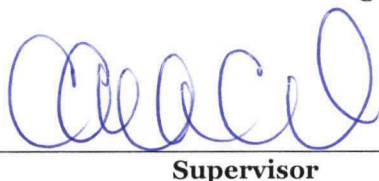
Signed

  
Environmental Investigator

Date

6/10/21

Signed

  
Supervisor

Date

6/10/2021



**GAFFORD CHAPEL WSC - SULPHUR SPRINGS**

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**Attachments: (in order of final report submittal)**

\_\_\_ Enforcement Action Request (EAR)

\_\_\_ Letter to Facility (specify type) : \_\_\_\_\_

Investigation Report

\_\_\_ Sample Analysis Results

\_\_\_ Manifests

\_\_\_ Notice of Registration

\_\_\_ Maps, Plans, Sketches

\_\_\_ Photographs

\_\_\_ Correspondence from the facility

\_\_\_ Other (specify) : \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Jon Niermann, *Chairman*  
Emily Lindley, *Commissioner*  
Bobby Janecka, *Commissioner*  
Toby Baker, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 16, 2021

**CERTIFIED MAIL 9171 9690 0935 0261 3632 31**  
**RETURN RECEIPT REQUESTED**

Mr. Michael Rawson, President  
Gafford Chapel WSC  
PO Box 1160  
Sulphur Springs, Texas 75483

Re: Notice of Violation for the Comprehensive Compliance Investigation at:  
Gafford Chapel WSC,  
Located on CR 4784, in the Ridgeway Community, in (Hopkins County), Texas  
RN101440733, TCEQ Additional ID No.: 1120014, Investigation No.: 1723926

Dear Mr. Rawson:

On May 28, 2021, Mr. Alex Laird of the Texas Commission on Environmental Quality (TCEQ) Tyler Regional Office conducted an investigation of the above-referenced system to evaluate for compliance with applicable requirements for public water supply systems. Enclosed is a summary which lists the investigation findings, along with an additional issue which needs your attention. During the investigation, certain outstanding alleged violations were identified for which compliance documentation is required.

Please submit compliance documentation by **August 16, 2021** for the outstanding alleged violations by track nos.: **686555 and 686560**. The documentation should demonstrate what actions have been taken to correct the violations and may include photographs, purchase orders, result of analysis, etc.

In addition, please submit a compliance plan by **August 16, 2021**, for the following violation by track no.: **778656**. The plan should include the proposed actions to be taken to correct the alleged violation and a schedule for the completion of the corrections. If the violation has already been corrected, please submit compliance documentation, such as photographs, purchase orders, results of analyses, etc., demonstrating what actions were taken.

In the listing of the alleged violation(s), we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.texas.gov> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Tyler Regional Office at (903) 535-5100 or the Central Office Publications Ordering Team at (512) 239-0028.

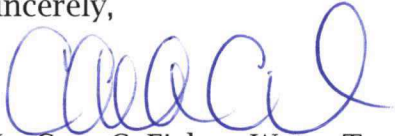


Mr. Michael Rawson, President  
Page 2  
June 16, 2021

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation(s) documented in this notice. Should you choose to do so, you must notify the Tyler Regional Office within 10 days from the date of this letter. At that time, Mr. Ross B. Morgan, Water Section Manager, will schedule a violation review meeting to be conducted *within 21 days from the date of this letter*. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the attached Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Mr. Alex Laird in the Tyler Regional Office at (903) 535-5143.

Sincerely,



Ms. Cara C. Fisher, Water Team Leader  
Tyler Regional Office

CCF/ASL/dfy

Enclosures: Summary of Investigation Findings

## Summary of Investigation Findings

GAFFORD CHAPEL WSC

203 JEFFERSON ST E

SULPHUR SPRINGS, HOPKINS COUNTY, TX 75482

Investigation #

1723926

Investigation Date: 05/28/2021

Additional ID(s): 1120014

### OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 686555

Compliance Due Date: 08/16/2021

30 TAC Chapter 290.121(a)

#### Alleged Violation:

Investigation: 1503863

Comment Date: 08/03/2018

Failure to have an adequate up-to-date monitoring plan.

During the CCI conducted on 06/26/2018, the investigator documented that the water system did not have an adequate monitoring plan. The monitoring plan was lacking a lab approval form, lead and copper sample sites, and the revised total coliform rule samples. According to 30 TAC §290.121(a) All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan. Monitoring plans are subject to the review and approval of the executive director. A copy of the monitoring plan must be maintained at each water treatment plant and at a central location.

Investigation: 1723926

Comment Date: 06/01/2021

Failure to have an adequate up-to-date monitoring plan.

During the Comprehensive Compliance Investigation (CCI), conducted on May 28, 2021, the monitoring plan for the water system was evaluated. The monitoring plan is still missing information regarding lead and copper sites, the lab approval form, and RTRC sites. According to 30 TAC §290.121(a) All public water systems shall maintain an up-to-date chemical and microbiological monitoring plan.

**Recommended Corrective Action:** Please submit compliance documentation by August 16, 2021. The documentation should demonstrate what actions have been taken to correct the violation, and may include photographs, purchase orders, results of analysis, etc.

Track No: 686560

Compliance Due Date: 08/16/2021

30 TAC Chapter 290.42(I)

#### Alleged Violation:

Investigation: 1503863

Comment Date: 08/03/2018

Failure to have an adequate plant operation manual.

During the CCI conducted on 06/26/2018, the investigator documented that the water system did not have an adequate plant operation manual. The manual was lacking the normal, daily, weekly, monthly, and annual operations. According to 30 TAC §290.42(I) A thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency. If operating a reverse osmosis or nanofiltration membrane system, the manual must also include the system's configuration, baseline performance data, and any set point for membrane cleaning or replacement.

Investigation: 1723926

Comment Date: 06/01/2021



Failure to have an adequate plant operation manual.

During the Comprehensive Compliance Investigation (CCI), conducted on May 28, 2021, the plant operations manual for the water system was evaluated. The plant operations manual is still missing information regarding the system's emergency contact phone numbers.

According to 30 TAC §290.42(l), a thorough plant operations manual must be compiled and kept up-to-date for operator review and reference. This manual should be of sufficient detail to provide the operator with routine maintenance and repair procedures, with protocols to be utilized in the event of a natural or man-made catastrophe, as well as provide telephone numbers of water system personnel, system officials, and local/state/federal agencies to be contacted in the event of an emergency.

**Recommended Corrective Action:** Please submit compliance documentation by August 16, 2021. The documentation should demonstrate what actions have been taken to correct the violation, and may include photographs, purchase orders, results of analysis, etc.

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Track No: 778656

Compliance Due Date: To Be Determined

30 TAC Chapter 290.45(b)(1)(D)(ii)

**Alleged Violation:**

Investigation: 1723926

Comment Date: 06/02/2021

Failure to meet the capacity requirements for ground storage on the Ridgeway pressure plane.

During the investigation, the investigator documented that the water system has 375 connections on the Ridgeway pressure plane and 0.05 MG of ground storage. According to 290.46(b)(1)(D)(ii), ground water systems larger than 250 connections are required to have a minimum 200 gallons of ground storage per connection. Therefore, the water system should have at least 0.075 MG of ground storage on this pressure plane ( $375 \times 200 = 0.075$  MG). The water system is 67% deficient for ground storage on this pressure plane ( $0.05/0.075 = 66.7\%$ ).

**Recommended Corrective Action:** Please submit a compliance plan by August 16, 2021. The plan should include the proposed action to be taken to correct the alleged violations and a schedule for the completion of corrections. If the violations have already been corrected, please submit compliance documentation, such as a photograph, purchase order, etc., demonstrating what actions were taken.

### ALLEGED VIOLATION(S) NOTED AND RESOLVED ASSOCIATED TO A NOTICE OF VIOLATION

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Track No: 686557

30 TAC Chapter 290.46(m)(1)

**Alleged Violation:**

Investigation: 1503863

Comment Date: 08/03/2018

Failure to conduct annual tank inspection on the pressure tank at Ridgeway.

During the CCI conducted on 06/26/2018, the investigator documented that the annual inspection for the pressure tank had not been conducted. According to 30 TAC §290.46(m)(1) Each of the system's ground, elevated, and pressure tanks shall be inspected annually by water system personnel or a contracted inspection service.

Investigation: 1723926

Comment Date: 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 20, 2021, the water system submitted compliance documentation demonstrating that the pressure tank at Ridgeway had been inspected as of January 26, 2021. The documentation was sufficient to resolve the violation.

Track No: 686562

30 TAC Chapter 288.20(c)

**Alleged Violation:**

Investigation: 1503863

Comment Date: 08/03/2018

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Failure to update the drought contingency plan.

During the CCI conducted on 06/26/2018, the investigator documented that the water system had not updated the drought contingency plan since 2012. According to 30 TAC 288.20(c) The retail public water supplier shall review and update, as appropriate, the drought contingency plan, at least every five years, based on new or updated information, such as the adoption or revision of the regional water plan.

Investigation: 1723926

Comment Date: 06/01/2021

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The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 20, 2021, the water system submitted compliance documentation demonstrating that the Drought Contingency Plan had been updated as of February 2019. The documentation was sufficient to resolve the violation.

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Track No: 686564

30 TAC Chapter 290.42(e)(4)(C)

**Alleged Violation:**

Investigation: 1503863

Comment Date: 08/03/2018

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Failure to maintain the high-level vents in the chlorine room at Ridgway and Mt. Zion plants.

During the CCI conducted on 06/26/2018, the investigator observed that the high-level vents at both plants were not functional. According to 30 TAC §290.42(e)(4)(C) Adequate ventilation, which includes both high level and floor level screened vents, shall be provided for all enclosures in which gas chlorine is being stored or fed. Enclosures containing more than one operating 150-pound cylinder of chlorine shall also provide forced air ventilation which includes: screened and louvered floor level and high level vents; a fan which is located at and draws air in through the top vent and discharges to the outside atmosphere through the floor level vent; and a fan switch located outside the enclosure.

Investigation: 1723926

Comment Date: 06/01/2021

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The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 31, 2021, the water system submitted compliance documentation which included a video demonstrating that the vent fans at both plants had been replaced and were functioning. The documentation was sufficient to resolve the violation.

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Track No: 686565

30 TAC Chapter 290.46(m)

**Alleged Violation:**

Investigation: 1503863

Comment Date: 08/03/2018

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Failure to maintain the sealing block at the Mt. Zion well.

During the CCI conducted on 06/26/2018, the investigator observed that the sealing block at Mt. Zion major cracks. According to 30 TAC §290.46(m) 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.

Investigation: 1723926

Comment Date: 06/01/2021

The violation has been evaluated during the Comprehensive Compliance Investigation (CCI) conducted on May 28, 2021. The violation has been resolved due to the receipt of sufficient compliance documentation during the CCI.

**Resolution:** On May 27, 2021, the water system submitted compliance documentation demonstrating that the well sealing block at Mt. Zion had been repaired. The documentation was sufficient to resolve the violation.

## ADDITIONAL ISSUES

### Description

Item 8

### Additional Comments

The system provides 0.0025 MG of pressure tank capacity on the Mt. Zion pressure plane, and the required amount is 0.0025 MG (125 connections X 20 = 0.0025MG). The system is operating at 100% of the required pressure tank capacity. A retail public utility that possesses a certificate of public convenience and necessity that has reached 85% of its capacity as compared to the most restrictive criteria of the commission's minimum capacity requirements in Chapter 290 of this title shall submit to the executive director a planning report that clearly explains how the retail public utility will provide the expected service demands to the remaining areas within the boundaries of its certified area. The water system is required to submit a planning report indicating what measures would be taken to increase capacity should the connections increase. The planning report should be submitted within 90 days.

Central Files Coding:

PWS\_1120014\_CP\_20210528\_INVESTIGATION

Certified No.:

9171 9690 0935 0261 3632 31

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
Tyler, Texas  
TYLER REGIONAL OFFICE  
PWS SECTION

**FACILITY:** Gafford Chapel WSC, Located on CR 4784, in the Ridgeway Community, in (Hopkins County), Texas

RN101440733, TCEQ Additional ID No.: 1120014, Investigation No.: 1723926

Acknowledgment of receipt of TCEQ letter dated June 16, 2021 regarding:

**Notice of Violation for the Comprehensive Compliance Investigation**

Affix Acknowledgment Receipt (Green Card) Here

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature <i>X Marynell Bryant</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Mr. Michael Rawson, President Gafford Chapel WSC P.O. Box 1160 Sulphur Springs TX 75483	B. Received by (Printed Name) C. Date of Delivery
 9590 9402 6028 0069 3507 91	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
9171 9690 0935 0261 3632 31	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt



## TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

<b>Regulated Entity/Site Name</b>	Gafford Chapel WSC			<b>TCEQ Add. ID No. RN No (optional)</b>	TX1120014
<b>Investigation Type</b>	PWS	<b>Contact Made In-House (Y/N)</b>	Y	<b>Purpose of Investigation</b>	CCI
<b>Regulated Entity Contact</b>	Mr. Daniel Romans			<b>Telephone No.</b>	903-885-6996
				<b>FAX #/Email address</b>	
				<b>FAX/Email date</b>	06/02/2021

**NOTICE:** The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.	
No.	Type <sup>1</sup>	Rule Citation (if known)	Description of Issue
1	AV	290.121(a)	Failure to have an adequate up-to-date monitoring plan.
2	AV	290.42(l)	Failure to have an adequate plant operation manual.
3	AV	290.45(b)(1)(D)(ii)	Failure to meet the capacity requirements for ground storage on the Ridgeway pressure plane.

**Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)**

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

**Document Acknowledgment.** Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Alex Laird	06/02/2021		
<b>Investigator Name (Signed &amp; Printed)</b>	<b>Date</b>	<b>Regulated Entity Representative Name (Signed &amp; Printed)</b>	<b>Date</b>

**If you have questions about any information on this form, please contact your local TCEQ Regional Office.**

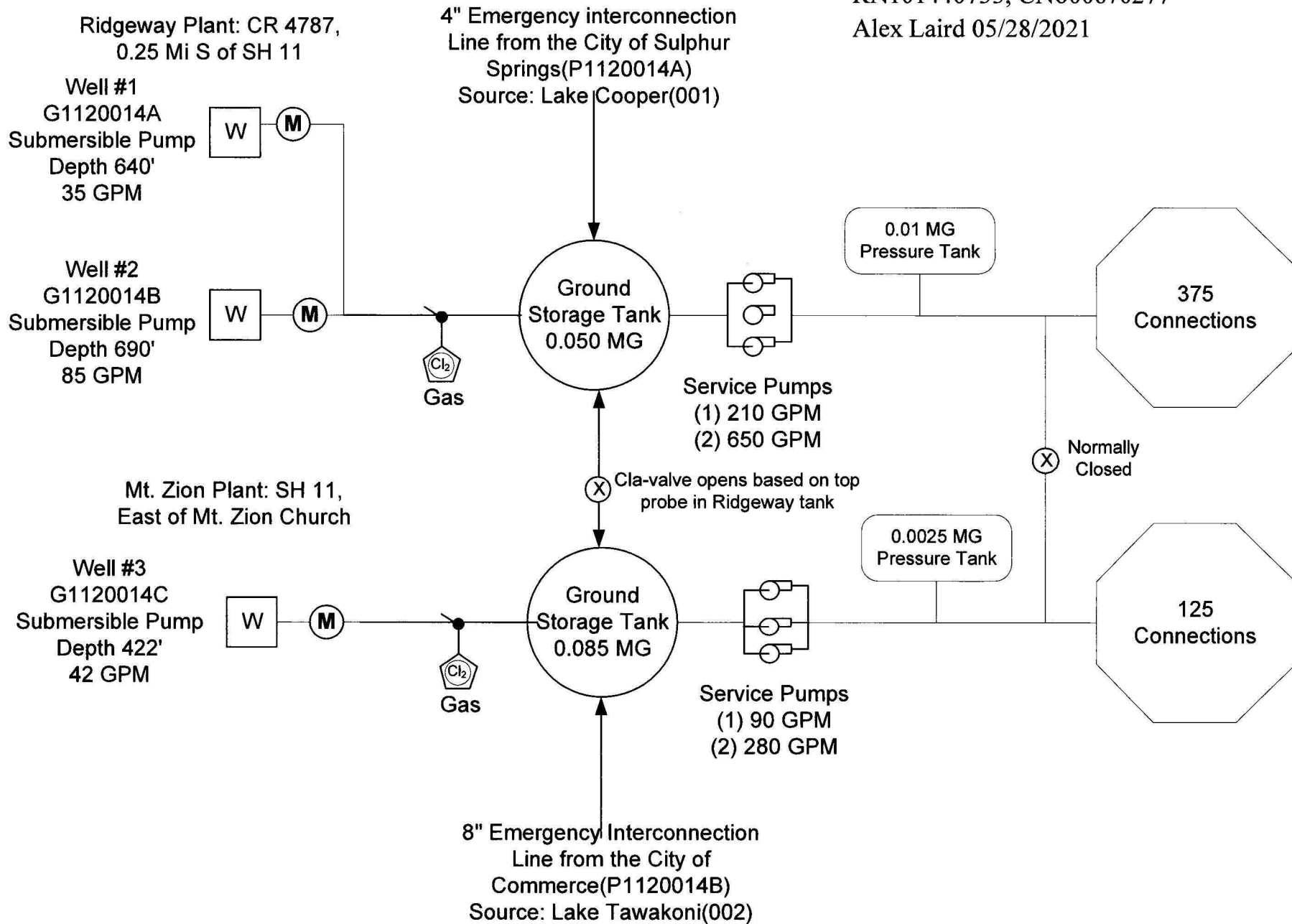
Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.

**Gafford Chapel WSC, Hopkins County**

PWS #: 1120014; CCN:10473

RN101440733, CN600670277

Alex Laird 05/28/2021



## Capacity Calculations Worksheet

**Community Systems (Groundwater)****System Name:** Gafford Chapel*\*Fill in green cells only\**

PWS ID: 1120014

Inv. No.: 1710866

Community (Y/N) Y

MHP (≥ 8 units/ac) or Apts? (Y/N) N

CCN? (Y/N) Y

Number of Connections 375

Population 1125

Maximum Daily Demand (MDD): 0.174 MGD

Average Daily Demand (ADD): 0.0895 290.38(43)

MDD Date (mm/dd/yyyy): 8/24/2020

ADD Dates (mm/dd/yyyy): 1/1/2020 to 12/31/2020

	Rate	Units	Conn.	Required	Units	Provided	85% Rule	% Short	Sufficient?(Y/N)
Prod. Capacity:	0.6	gpm/conn	375	225	gpm	120	188%	47%	N
Production ACR:		gpm/conn							
Pressure Storage (HD):	20	gal/conn	375	0.0075	MG	0.01	75%	N/A	Y
HD ACR:		gal/conn							
Elevated Storage (EL):	0	gal/conn	375	0	MG		N/A	N/A	Meets HD req.
EL ACR:		gal/conn							
Ground Storage (GR):						0.05			
Total Storage*:	200	gal/conn	375	0.075	MG	0.05	150%	33%	N
Tot. Storage ACR:		gal/conn							
*Total Storage = GR + EL + ST									
SP Capacity:	2	gpm/conn	375	750	gpm	1510	50%	N/A	Y
SP ACR:		gpm/conn							
SP Capacity: (w/largest pump out of service)					gpm				
SP Peaking Factor:	1.85	-	375	0	gph	0	N/A		N/A

**Bacti Samples:**

Wholesale Contract? (Y/N) N

Maximum Purchase Rate? MGD

Required Submitted

Distribution 2 2

Raw 0 0



6/2/2021

## TCEQ DWW Water System Summary Sheet

PWS IDPWS NameCentral Reg RN

TX1120014

GAFFORD CHAPEL WSC

RN101440733

Organization / CustomerCentral Reg CN

GAFFORD CHAPEL WSC

CN600670277

TX1120014

## All Water System Contacts

GAFFORD CHAPEL WSCADDR1 PO BOX 1160JOBTITLE SULPHUR SPRINGS TX 75483-1160POCTYPE PURPOSE CODE PHONE NUMBER EXT

OW

RAWSON, MICHAELADDR1 PO BOX 1160JOBTITLE PRESIDENT SULPHUR SPRINGS TX 75483-1160POCTYPE PURPOSE CODE PHONE NUMBER EXT

AC BUS 903-885-6996

ROMANS, DANIEL, LADDR1 PO BOX 1160JOBTITLE CHIEF WATER OPERATOR SULPHUR SPRINGS TX 75483-1160POCTYPE PURPOSE CODE PHONE NUMBER EXT

PWS BUS 903-885-6996

PWS BUS 903-885-7339

PWS MOB 903-439-5049

BRYANT, HAROLD, AADDR1 254 COUNTY ROAD 4705JOBTITLE SULPHUR SPRINGS TX 75482-1831POCTYPE PURPOSE CODE PHONE NUMBER EXT

ECS BUS 903-885-3523

ROMANS, DANIEL, LADDR1 PO BOX 1160JOBTITLE CHIEF WATER OPERATOR SULPHUR SPRINGS TX 75483-1160POCTYPE PURPOSE CODE PHONE NUMBER EXT

EC MOB 903-439-5049

EC BUS 903-885-6996

EC BUS 903-885-7339

OWNER TYPE Water Supply Corporation

TX1120014

Population Type Population Served # of Connections

Residential 1500 500

TOTAL 1500 500

## INTERCONNECTIONS

TX1120014

Purchases (Buys From) 2Wholesales (Sells To)WATERTYPE BlendPURCHASEFLAG YESSYSTEM TYPE COMMUNITYACTIVITY STATUS A

<u>TOTAL PRODUCT</u>	<u>AVG DAILY USG</u>	<u>MAX DAILY DMD</u>	<u>TOT STORG MSR</u>
0.233	0.09	0.174	0.135
<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>
MGD	MGD	MGD	MG
<u>TOTL ELEV STORG</u>	<u>SERV PUMP CAP</u>	<u>MAX PURCH CAP FLOW RATE</u>	<u>TOTAL PRES TANK CAP</u>
	3.11		12500
<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>	<u>UNITS</u>
	MGD		GAL

Number of Treatment Plants

2

### ACTIVE SOURCES

<u>Source Number</u>	<u>SOURCE NAME</u>	<u>Activity Status</u>	<u>Oprtnl Status</u>	<u>SOURCE TYPE</u>	<u>WELL DEPTH</u>	<u>TESTED FLOW RATE</u>	<u>RATED FLOW RATE</u>
G1120014C	3 - MT ZION PLANT / SH 11	A	P	G	422	42 GPM	31 GPM
<u>Drill Date</u>	<u>SOURCE SUMMATION</u>				<u>Plant Num</u>	<u>TYPE</u>	<u>CODE</u>
07/14/1987	NACATOC				TP7940	WL	
<u>GPS Latitude</u>	<u>GPS Longitude</u>	<u>GPS ELEVATION</u>		<u>GPS DATE</u>	<u>SELLER PWS ID</u>		
33.202585	-95.836316	0		08/16/2010	Not Purchasing		

### TREATMENT PLANT

<u>ENTRY PNT</u>	<u>EP Name, Source, Status</u>	<u>Plant Name &amp; Status</u>	<u>Plant Num</u>
EP001	TRT-TAP / Purchased Surface Water / A	PLANT - MT ZION (A)	TP7940

parts in red are hard coded

<u>Chemical Mon Type</u>	<u>Chemical Sample Point</u>	<u>Distribution Mon Type</u>	<u>Distribution Sample Point</u>
	NO		NO

### TREATMENT PLANT

<u>ENTRY PNT</u>	<u>EP Name, Source, Status</u>	<u>Plant Name &amp; Status</u>	<u>Plant Num</u>
EP002	TRT-TAP / Purchased Surface Water / A	PLANT - MT ZION (A)	TP7940

parts in red are hard coded

<u>Chemical Mon Type</u>	<u>Chemical Sample Point</u>	<u>Distribution Mon Type</u>	<u>Distribution Sample Point</u>
	NO		NO

### TREATMENTS

<u>TRAIN</u>		Unnamed		<u>PLANT NUM</u>	TP7940
<u>Disinfection Zone</u>	<u>Treatment Sequence</u>	<u>OBJ CD</u>	<u>OBJECTIVE</u>	<u>Process</u>	<u>Treatment</u>
null	null	D	DISINFECTION	403	GASEOUS CHLORINATION, PRE

## ACTIVE SOURCES

<u>Source Number</u>	<u>SOURCE NAME</u>	<u>Activity Status</u>	<u>Oprtnl Status</u>	<u>SOURCE TYPE</u>	<u>WELL DEPTH</u>	<u>TESTED FLOW RATE</u>	<u>RATED FLOW RATE</u>
<b>G1120014A</b>	1 - RIDGEWAY PLANT / S OF SH 11	A	P	G	640	35 GPM	89 GPM
<u>Drill Date</u>	<u>SOURCE SUMMATION</u>			<u>Plant Num</u>	<u>TYPE</u>	<u>CODE</u>	
06/25/1990	NACATTOCH			TP7941	WL		
<u>GPS Latitude</u>	<u>GPS Longitude</u>	<u>GPS ELEVATION</u>	<u>GPS DATE</u>	<u>SELLER PWS ID</u>			
33.182389	-95.778225	0	08/16/2010	Not Purchasing			
<u>Source Number</u>	<u>SOURCE NAME</u>	<u>Activity Status</u>	<u>Oprtnl Status</u>	<u>SOURCE TYPE</u>	<u>WELL DEPTH</u>	<u>TESTED FLOW RATE</u>	<u>RATED FLOW RATE</u>
<b>G1120014B</b>	2 - WNW OF RIDGEWAY PLANT	A	P	G	680	85 GPM	30 GPM
<u>Drill Date</u>	<u>SOURCE SUMMATION</u>			<u>Plant Num</u>	<u>TYPE</u>	<u>CODE</u>	
03/08/1985	NACATTOCH			TP7941	WL		
<u>GPS Latitude</u>	<u>GPS Longitude</u>	<u>GPS ELEVATION</u>	<u>GPS DATE</u>	<u>SELLER PWS ID</u>			
33.185361	-95.782647	0	08/16/2010	Not Purchasing			

## TREATMENT PLANT

<u>ENTRY PNT</u>	<u>EP Name, Source, Status</u>	<u>Plant Name &amp; Status</u>	<u>Plant Num</u>
EP001	TRT-TAP / Purchased Surface Water / A	PLANT - RIDGEWAY (A)	TP7941
parts in red are hard coded			
<u>Chemical Mon Type</u>	<u>Chemical Sample Point</u>	<u>Distribution Mon Type</u>	<u>Distribution Sample Point</u>
	NO		NO

## TREATMENTS

<u>TRAIN</u>		Unnamed		<u>PLANT NUM</u>	TP7941
<u>Disinfection Zone</u>	<u>Treatment Sequence</u>	<u>OBJ CD</u>	<u>OBJECTIVE</u>	<u>Process</u>	<u>Treatment</u>
null	null	D	DISINFECTION	403	GASEOUS CHLORINATION, PRE

## INACTIVE / OFFLINE SOURCES

<u>SOURCE ID</u>	<u>SOURCE NAME</u>	<u>TYPE</u>	<u>STATUS</u>	<u>AVAIL - ABILITY</u>	<u>FACID</u>	<u>WATER TYPE</u>
G1120014D	OLD WELL 1 / PLUGGED	WL	I	P		GW

## PUMPS

<u>PUMP ID</u>	<u>PUMP NAME</u>	<u>FACILITY TYPE</u>	<u>ACTIVITY STATUS</u>	<u>AVAIL ABILITY</u>	<u>FLOW RATE NAME</u>	<u>TESTED FLOW</u>	<u>TESTED UOM</u>
PF16199	MT ZION - 280 GPM - SP	PF	A	P	SPCP	280	GPM
PF4147	MT ZION - 280 GPM - SP	PF	A	P	SPCP	280	GPM
PF4148	MT ZION - 90 GPM - SP	PF	A	P	SPCP	90	GPM
PF4149	RIDGEWAY - 210 GPM - SP	PF	A	P	SPCP	210	GPM
PF4150	RIDGEWAY - 650 GPM - SP	PF	A	P	SPCP	650	GPM
PF4151	RIDGEWAY - 650 GPM - SP	PF	A	P	SPCP	650	GPM



## STORAGE TANKS

<u>TANK ID</u>	<u>TANK NAME</u>	<u>TANK</u> <u>TYPE</u>	<u>ACTIVITY</u> <u>STATUS</u>	<u>AVAIL</u> <u>ABILITY</u> <u>CODE</u>	<u>STOR</u> <u>AGE</u> <u>TYPE</u>	<u>CON STR</u> <u>MATRL</u> <u>TP</u>	<u>MEASURE</u> <u>QUANTITY</u>	<u>UOM</u>	<u>MEASURE</u> <u>NAME</u>
ST4252	MT ZION - 0.0025 MG - HD	ST	A	P	HD	ST	2500.000	GAL	CAP
ST4253	RIDGEWAY - 0.010 MG - HD	ST	A	P	HD	ST	0.010	MG	CAP
ST4254	MT ZION - 0.085 MG - GR	ST	A	P	GR	ST	0.085	MG	STC
ST4255	RIDGEWAY - 0.050 MG - GR	ST	A	P	GR	ST	0.050	MG	STC

END OF REPORT