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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 6, 2018

The Honorable Jack Coleman
Mayor of Gordon
PO Box 227
Gordon, Texas 76453

Re: Incident No. 286686

RECEIVED
AUG 08 2018

Dear Mayor Coleman:

On June 11 and 22, 2018, the Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (D/FW) Region Office received a complaint regarding discolored water and notification concerns at your City of Gordon public water system. The complaints were investigated by Environmental Investigator, Ms. Crystal Watkins.

The enclosed report describes the findings that were noted during the investigation.

The TCEQ appreciates your interest in protecting the quality of our environment. If you have any questions concerning these findings, or if we can be of further assistance, please contact Ms. Watkins directly at (817) 588-5804 or the DFW Region Office at (817) 588-5800.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Marshall".

Charles Marshall
Team Leader, Public Water Supply Program
D/FW Regional Office
Texas Commission on Environmental Quality

CM/cdw

Enclosure: Investigation Report No. 1505526 (w/out attachments)

PWS_1820007_CO_20180620_INVESTIGATION
Texas Commission on Environmental Quality
Investigation Report

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Customer: City of Gordon
Customer Number: CN600442735

Regulated Entity Name: CITY OF GORDON PWS

Regulated Entity Number: RN101406957

Investigation # 1505526	Incident Numbers 286686
Investigator: CRYSTAL WATKINS	Site Classification SW 251-1K CONNECTION
Conducted: 06/20/2018 -- 06/20/2018	SIC Code: 4941
Program(s): PUBLIC WATER SYSTEM/SUPPLY	NAIC Code: 221310
Investigation Type: Compliance Investigation	Location: INTERSECTION OF FM 919 & 193
Additional ID(s): 1820007	
Address: , , ,	Local Unit: REGION 04 - DFW METROPLEX Activity Type(s): PWSCMPL - PWS Complaint

Principal(s):

Role	Name
RESPONDENT	CITY OF GORDON

COPY

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	UTILITIES DIRECTOR	MR CHASE LERMA	Work (254) 693-5676 Cell (254) 485-4597
REGULATED ENTITY MAIL CONTACT	MAYOR	HON Jack Coleman	Work (254) 693-5676

Other Staff Member(s):

Role	Name
QA Reviewer	KENDALL KOTARA
Investigator	KENDALL KOTARA
Supervisor	CHARLES MARSHALL

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
PWS COMPLAINT INVESTIGATION	CMPL 1820007
PWS INVESTIGATION - EQUIPMENT MONITORING AND SAMPLING revised 06/2013	EMS 1820007

Investigation Comments:

INTRODUCTION

On June 11, 2018, a complaint about discolored water in the area served by the City of Gordon public water supply ("Gordon") were received at the Texas Commission on Environmental Quality (TCEQ) Dallas/Fort Worth (D/FW) Regional Office. The complaint, identified as Incident Number 286686, was assigned to TCEQ Environmental Investigator, Ms. Crystal Watkins, for investigation on June 19, 2018. On June 22, 2018, an additional complaint regarding the discolored water and the water system's notification of issues was received in the regional office.

On June 20, 2018, an unannounced on-site complaint investigation was conducted at Gordon. No alleged violations were noted during the investigation. A copy of the investigation report will be provided to the complainants and to the water system.

GENERAL FACILITY AND PROCESS INFORMATION

Gordon is a community water system located in Palo Pinto County, Texas. The water system serves 325 connections with an approximate population of 472 based on census data. The water system secures water from Lake C.B. Long which supplies one surface water treatment plant and two pressure planes. The water system also provides wholesale treated water to Barton Water Supply Corporation (PWS ID #1820008) and the City of Mingus (PWS ID#1820008).

For additional facility and process information, see Investigation Number 1273498.

BACKGROUND

The most recent Comprehensive Compliance Investigation, Investigation Number 1273498, was conducted on July 23, 2015. Several alleged violations were noted as a result of the investigation.

No other complaints have been filed against the water system in the last five years.

ADDITIONAL INFORMATION

On August 11, 2018, a complaint concerning the water quality was received from a resident of Gordon at the TCEQ D/FW Regional Office. The complainant indicated that the water had sand in it, was discolored, and had a bad odor. On June 22, 2018, another complaint was received from a customer of Gordon, indicating that they had experienced discolored water and concerns that Gordon was only communicating through social media regarding the discolored water.

Due to the nature of the complaint, Ms. Watkins, along with Environmental Investigator Ms. Kendall Kotara, conducted an unannounced complaint investigation at Gordon. A location on Clay Street was chosen for monitoring purposes. The location was monitored for disinfectant residual, pressure, odor, and water clarity. The following results were found at the location:

- Clay Street: 0.7 milligrams per liter (mg/L) total chlorine, 0.39 mg/L monochloramine, 0.23 mg/L free ammonia, 55 pounds per square inch (psi), slight chlorine odor and a slight yellow tint.

On June 26, 2018, Ms. Watkins contacted Mr. Chase Lerma, Utilities Director, regarding the complaint. He indicated that the water system has been having a problem with manganese in their raw water source for the last couple of weeks. In response, the water system began using sodium permanganate on June 5, 2018, which is used to treat the manganese through oxidation, and were flushing in the areas where the water system had received complaints of discolored water. The investigator also discussed the notification concern with Mr. Lerma. Mr. Lerma indicates that the water system was communicating with residents about the manganese issue through social media. Mr. Lerma indicated that the water system may look into alternative methods of notification for customers.

On June 27, 2018, the investigator emailed Mr. Lerma with additional questions. On June 29, 2018, Mr. Lerma responded, indicating that the manganese was causing complaints of yellow and brown water in the distribution systems. The water system responded by flushing the areas in which complaints were received. He also indicated that the part of the distribution system that had cast iron lines appeared to be the area impacted the most.

Mr. Lerma also provided analytical results that the water system collected for manganese. On June 12, 2018, the raw water samples collected noted that the total manganese level was 4.79 mg/L and in distribution was 1.77 mg/L. On June 19, 2018, the sample collected in distribution was noted to be 0.0292 mg/L.30 Texas Administrative Code (TAC) 290.105(b) states that the secondary constituent level (SCL) for manganese was 0.05 mg/L. It appears that the actions taken by the water system in response to the discolored water has lowered the amount of manganese in the water to below the SCL.

On July 26, 2018, the investigator followed up with Mr. Lerma, regarding the status of the manganese issue at Gordon and to request two months of flushing records. On July 29, 2018, Mr. Lerma provided the requested documentation. He indicated that the manganese issue had improved since the addition of the sodium permanganate. He also provided the requested flushing records and manganese test results for June and July. Manganese levels after treatment with the sodium permanganate were higher than the SCL until around July 3, 2018. The last manganese reading from the morning of July 29, 2018, noted that the manganese levels leaving the plan was 0.020 mg/L. The flushing records noted that Gordon was flushing at several locations for multiple hours.

Investigation Findings

During the site visit, the complaints of an odor and discolored water were substantiated. The water system indicated that the water system was experiencing an increase in manganese from their water source and began treating the discolored water with sodium permanganate and by flushing in specific areas. Recent analytical results submitted by the water system indicate that the response by the water system has lowered the amount of manganese in the distribution system. The water system has also indicated that they would research other ways of communicating information to the residents.

Attachment

- 1. Water System Documentation

No Violations Associated to this Investigation

Signed Crystal D. Walker
Environmental Investigator

Date 8/1/18

Signed [Signature]
Supervisor

Date 8/3/18

Attachments: (in order of final report submittal)

Enforcement Action Request (EAR)

Letter to Facility (specify type) : Complaint

Investigation Report

Sample Analysis Results

Manifests

Notice of Registration

Maps, Plans, Sketches

Photographs

Correspondence from the facility

Other (specify) :

