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GOVERNOR

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CABINET SECRETARY

Notification Sent Via Email

November 16, 2022

Hilda Penhallurick, hildecpa@comcast.net
La Mesa Water Coop, NM3500123
PO Box 53
Placitas, NM 87043

Re: 2022 Sanitary Survey

Dear Hilda Penhallurick,

The New Mexico Environment Department, Drinking Water Bureau (NMED-DWB) will be conducting a sanitary survey of the La Mesa Water Coop, on November 22, 2022 at 1:00 am. The purpose of the sanitary survey is to evaluate the adequacy of the system, its sources and operations and the distribution of safe drinking water [NMAC 20.7.10.100 incorporating 40 CFR §141.401].

To limit the risk of COVID-19 transmission NMED-DWB staff are required to follow all **NMED COVID-Safe Practices for Field Activities**. Successfully implementing these practices will require cooperation from water system staff.

The sanitary survey process will begin with an opening in person meeting. Among other topics, the discussion will cover recordkeeping and documentation requirements. The attached **Sanitary Survey Records Review Checklist** identifies specific records and planning documents requested via electronic submittal in advance of the conference. All other records shall be located and organized in a manner that will facilitate an effective discussion. When electronic submittal of records and/or planning documents is not feasible, hardcopies shall be mailed or provided to NMED-DWB as explained below.

In addition to required documents and records, ready access to the [Drinking Water Watch](#) website may contribute to the discussion. Prior to the opening telephone conference, it is recommended that all water system staff view the Drinking Water Watch Tutorial available on the [NMED-DWB](#) homepage.

The opening telephone conference has provided the opportunity to schedule the sanitary survey process, and onsite inspection of the water system, which has been set for November 22, 2022 at 1:00 pm. The number of persons involved shall be limited to the minimum required. Attendees will meet at an outdoor location and will maintain six-foot distance and wear face coverings throughout the inspection. If hardcopy records and/or planning documents are to be provided during the onsite inspection, they shall be placed in flexible folders or other suitable containers and transferred in a manner that maintains distancing.

Once you have reviewed this notice and all attachments provided, please contact me at 505-469-1323 or by e-mail to frank.baca@env.nm.gov to schedule the opening telephone conference.

Respectfully,

Frank Baca

Frank Baca, Compliance Officer
Drinking Water Bureau
Water Protection Division

cc: Wayne Jeffs, Northern Compliance Supervisor (electronic)
Electronic File System



Sanitary Survey Records Review Checklist:

***The following records and planning documents must be provided to NMED-DWB for review as part of the sanitary survey. It is requested that electronic copies be provided in advance of the opening telephone conference. ***

Certified Operator Information

- Copies of certification card(s) for the Certified Operator(s) of your water system
- Operator contract (*if system is operated by contract operator*)

Sampling Plans

Current and updated sampling plans (DSSP) to include the following:

- The Revised Total Coliform Rule
- The Lead and Copper Rule (*if applicable by regulation*)
- The Disinfection Byproduct Rule (*if applicable by regulation*)
- Collection of entry point chemical contaminant samples (*if applicable by regulation*)
- Collection of asbestos samples (*if applicable by regulation*)

Water System Maps

At a minimum your maps should have the following:

- Locations of all sources
- Locations of pipelines, valves, & blow-offs
- Pressure zone boundaries (if system has multiple pressure zones)
- Locations of interconnections to other systems
- All water system facilities, such as water treatment plants, water storage tanks, pumping stations, disinfection units.

Operation & Maintenance Plan

At a minimum, the operations & maintenance plan should contain the following:

- Define your organizational structure
- Formalize general and detailed description of system components and treatment units
- Schedule standard operating, maintenance and sampling procedures (SOPs, SMPs and SSPs)
- Define specifications for new installations and repairs
- Identify chemical, appurtenance and equipment suppliers and contractors

Emergency Response Plan (community water systems only)

At a minimum, the emergency response plan should contain the following:

- Identifies likely threats to the system and assigns a severity level and response to each type of event
- Routine operating emergencies such as:
 - line breaks, pump malfunctions, acute MCL exceedances, power outages
- Non-routine emergencies such as:
 - chemical spills, drought, wind/ice storms, fire, floods, earthquakes or other natural occurrences, intentional acts of sabotage
- Identifies appropriate contact personnel within and outside the system in the event of an emergency
- Formalizes emergency event communication protocol
- Contains Boil Water Advisory Notification template and protocol
- Inventory and assesses critical equipment
- Identifies critical or vulnerable customers

***The following records shall be located and available for discussion during the opening telephone conference. (Recordkeeping requirements for groundwater systems are defined in 40 CFR § 141.33 and § 141.405.) ***

- Monitoring results for the following:
 - Total coliform samples
 - All chemical samples
 - Disinfectant residuals (*if applicable*)
- Most recent three years of official correspondence with the NMED-DWB
- Public Notice and Public Notice Certification Forms



Sanitary Surveys:

Preparing for an inspection of your public water system

What is a sanitary survey?

A sanitary survey serves as a review of the water source(s), facilities, equipment, operation, maintenance, and monitoring compliance of a public water system to evaluate the adequacy of the system, its sources and operations and the distribution of safe drinking water. The sanitary survey encompasses eight specific elements that are evaluated during the survey. Those eight elements are listed below.

- Source (protection, physical components, and condition)
- Treatment
- Distribution system
- Finished water storage
- Pumps, pump facilities, and controls
- Monitoring, reporting, and data verification
- System management, and operation
- Operator compliance with State requirements

A Compliance Officer from the New Mexico Environment Department, Drinking Water Bureau (NMED-DWB) will conduct your sanitary survey. They will contact you when it's due and arrange a date and time for the inspection.

We want your sanitary survey to be successful. This guidance will help you prepare and avoid significant deficiencies.

How do I prepare for the sanitary survey?

- Set aside time for the Compliance Officer.** Have knowledgeable personnel available to tour the Compliance Officer through the water system and to review and discuss documents and records.
- Be prepared to access all parts of the system.** This includes accessing each source, storage tank, treatment facility, and pump station. Make sure you have access to all locked facilities, including gated areas.
- Have records on hand and organized for review.** This includes well logs, monitoring results, past sanitary survey reports, official correspondence with NMED-DWB, public notices, and as-built drawings.
- Have questions prepared for the Compliance Officer.** This is an excellent opportunity to address any questions you may have regarding monitoring, reporting results, compliance, public notification requirements, etc.

Before the onsite inspection

- Inventory all structures and land use within 100 feet of each water source.** Identify all microbial and chemical contaminant threats. Prepare a plan to eliminate or mitigate them and be prepared to discuss your plan with the Compliance Officer.
- Inspect your water source facilities.** Verify the integrity of seals and screens used to keep contaminants out of the well casing or spring box. A source water sample tap must be available for each individual source.

- Inspect your treatment facilities.** Verify water treatment chemicals are NSF-approved for use in public water systems. You can search for NSF Standard 60 product listings at <http://info.nsf.org/Certified/PWSChemicals/>
- Inspect your storage tank facilities.** Verify that the roof hatch, vent, and roof structure are weatherproof. Verify the integrity of the screens installed over the vent and overflow outlet.
- Ensure that each well house, treatment facility, storage tank, and pump station is secured from unauthorized access.
- Be prepared with photographs of the parts of your water system the Compliance Officer may not be able to access. For example, photograph the storage tank roof that must be climbed. Photographs should verify all storage tank roof vents, hatches, overflows, drains and openings where the level gauge wire enters each tank are sealed or properly screened to keep contaminants out.

After your sanitary survey

- The Compliance Officer sends you a completed sanitary survey letter and report of findings. Be sure to read the report carefully. It describes any deficiencies found during the inspection and the associated corrective action you must take.
- You must address significant deficiencies within the stated timeframes. Please review any observations and recommendations noted in the survey report.
- You must submit a Corrective Action Plan with a timeline indicating when items will be corrected. You must provide appropriate compliance documentation as outlined in the survey report when you complete the necessary corrections. If unable to make the corrections by the due date, you must submit a request for extension with a timeline indicating when items will be corrected. Any proposed Corrective Action Plan and/or extension request must be approved by the Compliance Officer.
- Keep a copy of the sanitary survey report and all other survey-related documentation and correspondence (including your own) for your records.
- Don't wait for the next sanitary survey. Make self-inspections of source and storage tank vents, covers, seals, and screens part of your routine operation and maintenance program.

Significant Deficiencies

A significant deficiency is defined as any deficiency that is causing or has the potential to cause a threat to public health [New Mexico Administrative Code (NMAC) 20.7.10.100 incorporating 40 Code of Federal Regulations (CFR) §141.403(a)(4)].

Significant deficiencies include, but are not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage, or distribution system that the State determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers.

Water System Projects

All public water systems are required to obtain written approval from the NMED-DWB before they undertake a public water system project. A public water system project is defined as the construction of a new public water system, modification to an existing public water system, or conversion of a non-public water system to a public water system. Information is available at https://www.env.nm.gov/drinking_water/water-system-projects/