



Notification provided via E-mail

November 18, 2021

Gretchen Van Doren; wcwua@outlook.com
Waterfall Community WUA, NM3564319
3 Monk Drive
Cloudcroft, NM 88317

RE: 2021 Sanitary Survey Report

Dear Gretchen Van Doren:

On October 28, 2021 the New Mexico Environment Department Drinking Water Bureau (DWB) conducted a sanitary survey site visit at the Waterfall Community WUA water system.

The Waterfall Community WUA must submit a written Corrective Action Plan (CAP) to DWB within 30 days of the sanitary survey cover letter date and take corrective action for any significant deficiencies found during the sanitary survey no later than 120 days after the sanitary survey cover letter date, or be in compliance with a DWB-approved schedule and plan for correcting these deficiencies [NMAC 20.7.10.100 incorporating 40 CFR §141.403(a)(4) and §141.403(a)(5)(i)-(ii)]. For your convenience, a CAP form is included at the end of the sanitary survey report. Enter the date of completion or expected completion next to each deficiency listed. Sign and date the form prior to submittal.

Failure to correct and provide documentation of significant deficiency corrections within the established timeframes, will result in treatment technique violation(s) being issued to Waterfall Community WUA.

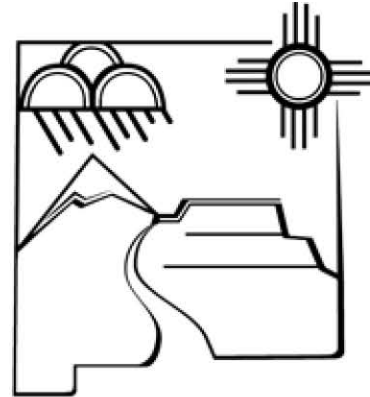
NMED DWB appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's drinking water. If you or members of your staff have any questions or need additional clarification concerning this report, please feel free to contact me at 575-973-0642 or by e-mail at john.pijawka@state.nm.us

Respectfully,

A handwritten signature in black ink that reads "John Pijawka".

John Pijawka - Compliance Officer
Drinking Water Bureau
Water Protection Division

cc: Brandi Littleton – Las Cruces Area Compliance Supervisor (electronic)
Electronic Central File



SANITARY SURVEY REPORT

For

Waterfall Community WUA NM3564319

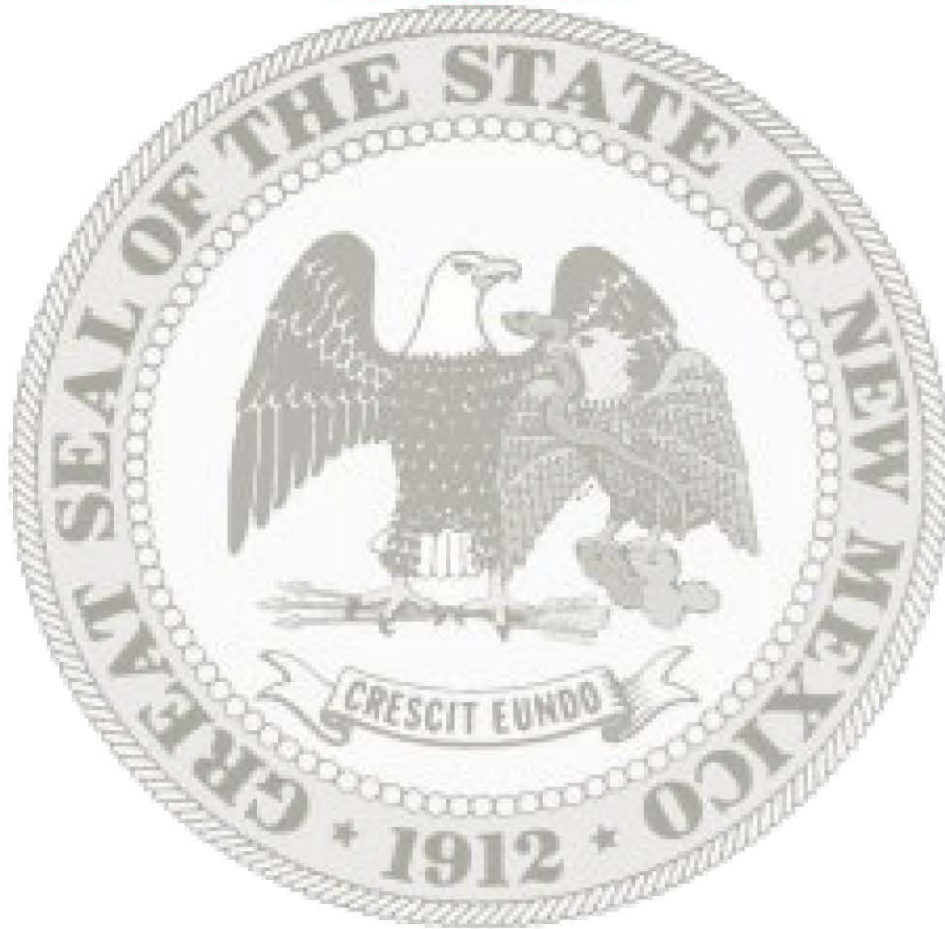
*Este informe contiene información importante acerca de su agua potable.
Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.*

Prepared by: John Pijawka – Compliance Officer
New Mexico Environment Department
1216 Mechem Drive
Ruidoso, New Mexico 88345

**State of New Mexico
Environment Department
Water Protection Division
Drinking Water Bureau**

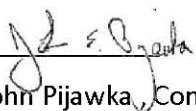
1216 Mechem Drive
Ruidoso, New Mexico 88345

RECORD OF INSPECTION



This Sanitary Survey Report fulfills the requirements of New Mexico Administrative Code 20.7.10.100 incorporating 40 Code of Federal Regulations 141.21(d) (ii) (2) and 142.16(o)(2) for completing a State approved survey.

Compliance Officer Signature: _____


John Pijawka, Compliance Officer

Date: 11/18/2021

INTRODUCTION

A sanitary survey enables the New Mexico Environmental Department Drinking Water Bureau (NMED DWB) to provide a comprehensive review of the components of a water system, to assess the operating condition and adequacy of the water system, and to determine if past recommendations have been implemented effectively. The Sanitary Survey encompasses eight specific elements that are evaluated during the survey. Those eight elements are:

- Source (Protection, Physical Components, and Condition);
- Treatment
- Distribution System
- Finished Water Storage
- Pumps/Pump Facilities and Controls
- Monitoring/Reporting/Data Verification
- Water System Management/Operations
- Operator Compliance with State Requirements

Each element may not be specifically mentioned within this report; however, a significant deficiency or area of concern will be noted if any issues are discovered with any of these eight (8) elements.

The Administrative Contact, for the Waterfall Community WUA was given prior notification of the sanitary survey. The preliminary sanitary survey letter provided a list of required records which would be reviewed as part of the sanitary survey as well as a checklist for preparing for the sanitary survey. The letter requested that specific records be provided to the Compliance Officer prior to the sanitary survey.

The sanitary survey was conducted by John Pijawka Compliance Officer of the NMED DWB on October 28, 2021. Also, in attendance was Board Member Charles Wood and system operator Dave Swope.

BACKGROUND

The previous sanitary survey at Waterfall Community WUA was conducted on November 27, 2018 by Compliance Supervisor Brandi Littleton. During the previous sanitary survey, two (2) significant deficiencies were cited. All significant deficiencies identified during the previous sanitary survey were corrected.

- Lack of an adequate operations and maintenance plan
 - The water system corrected this deficiency on February 4, 2019
- Lack of an adequate emergency response plan
 - The water system corrected this deficiency on February 4, 2019

SYSTEM DESCRIPTION

The Waterfall Community WUA is a ground water system with an approximate population of 290 with 110 total service connections. The population for the Waterfall Community WUA was calculated in accordance with 20.7.10.9.A NMAC. The Waterfall Community WUA is classified as a community water system according to the New Mexico Drinking Water Regulations 20.7.10 NMAC. The water system consists of one spring, one disinfection unit that utilizes 10% hypochlorite, two booster pump stations, four storage tanks and distribution. The storage tanks are both steel and polyethylene with a total capacity of 45,000 gallons. Two storage tanks are plumbed direct while two storage tanks "float" on the distribution system. The distribution network consists of PVC piping.

FIELD ANALYSIS

During the sanitary survey the following field analysis were conducted, and the results are shown below:

- Pressure - 94 psi from the lowest point in distribution.
- Total Source/Spring Production - 200 Gallons Per Minute (GPM)
- Chlorine Residual – 0.09 mg/L free chlorine from distribution system

SANITARY SURVEY FINDINGS & CORRECTIVE ACTIONS

Sanitary surveys serve as a proactive public health measure and can provide important information on a water system's design and operations, can identify minor and significant deficiencies for correction before they become major problems, and can improve overall system compliance.

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) or § 141.723(b)]. Public Water Systems are required to take corrective action for all significant deficiencies found during the sanitary survey. Corrective actions taken by the public water system must be acceptable to the DWB.

One (1) significant deficiency was identified at the Waterfall Community WUA during the sanitary survey. The significant deficiency is noted in the attached Significant Deficiency Summary page.

Corrective Action Plans and Corrective Action:

The Waterfall Community WUA must submit a written Corrective Action Plan to DWB within 30 days of the sanitary survey cover letter date and take corrective action for any significant deficiencies found during the sanitary survey no later than 120 days after the sanitary survey cover letter date, or be in compliance with a DWB-approved schedule and plan for correcting these deficiencies [NMAC 20.7.10.100 incorporating 40 CFR §141.403(a)(4) and §141.403(a)(5)(i)-(ii)].

The Waterfall Community WUA will be held to the above due dates unless an alternate schedule is requested as part of the Corrective Action Plan.

CONCLUSION

The sanitary survey site visit for the Waterfall Community WUA was completed on October 28, 2021.

Failure to submit a Corrective Action Plan or take corrective action for any significant deficiencies identified during the sanitary survey and noted in the attached Significant Deficiency Summary page will result in treatment technique violations as per [NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S].

If you have any questions or need additional clarification concerning this report, please contact me at 575-973-0642 or by e-mail at john.pijawka@state.nm.us

Significant Deficiency Summary

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) or § 141.723(b)].

1. **Significant Deficiency Code:** 001Q- Storage facility is not secure from elements

Regulatory Citation: 20.7.10.400.D

Significant Deficiency Description: The 3000-gallon polyethylene Storage Tank #4 (008) hatch does not create a water-tight seal.

Photo Documentation:



Required Corrective Action Plan: The Waterfall Community WUA must submit a written Corrective Action Plan to DWB within 30 days of the sanitary survey cover letter date.

Required Corrective Action: The Waterfall Community WUA must submit a photograph or other documentation acceptable to DWB, indicating that the hatch is watertight and flush with the opening.

Notes and Recommendations Summary

Notes and Recommendations are defined as any issue which in the estimation of the DWB, is not currently significant enough to be considered as a Significant Deficiency, however, the issue should be further investigated or addressed by the water system so as to not negatively contribute to the poor operations, management, or adequacy of the water system. Recommendations may be escalated to significant deficiencies if they are not addressed before the next sanitary survey.

The following Notes & Recommendations were identified at the Waterfall Community WUA during the survey.

1. **Notes & Recommendations:** It is recommended that the system spring be sampled to determine if it is under the influence of surface water. (GWUDI)

2. **Note:** It was noted that the operator was using expired free DPD reagent for residual chlorine testing

Recommended Action: It is recommended that the system purchase up to date reagent DPD for residual testing. Any analysis performed with expired reagent can be rejected and not used for compliance determination.

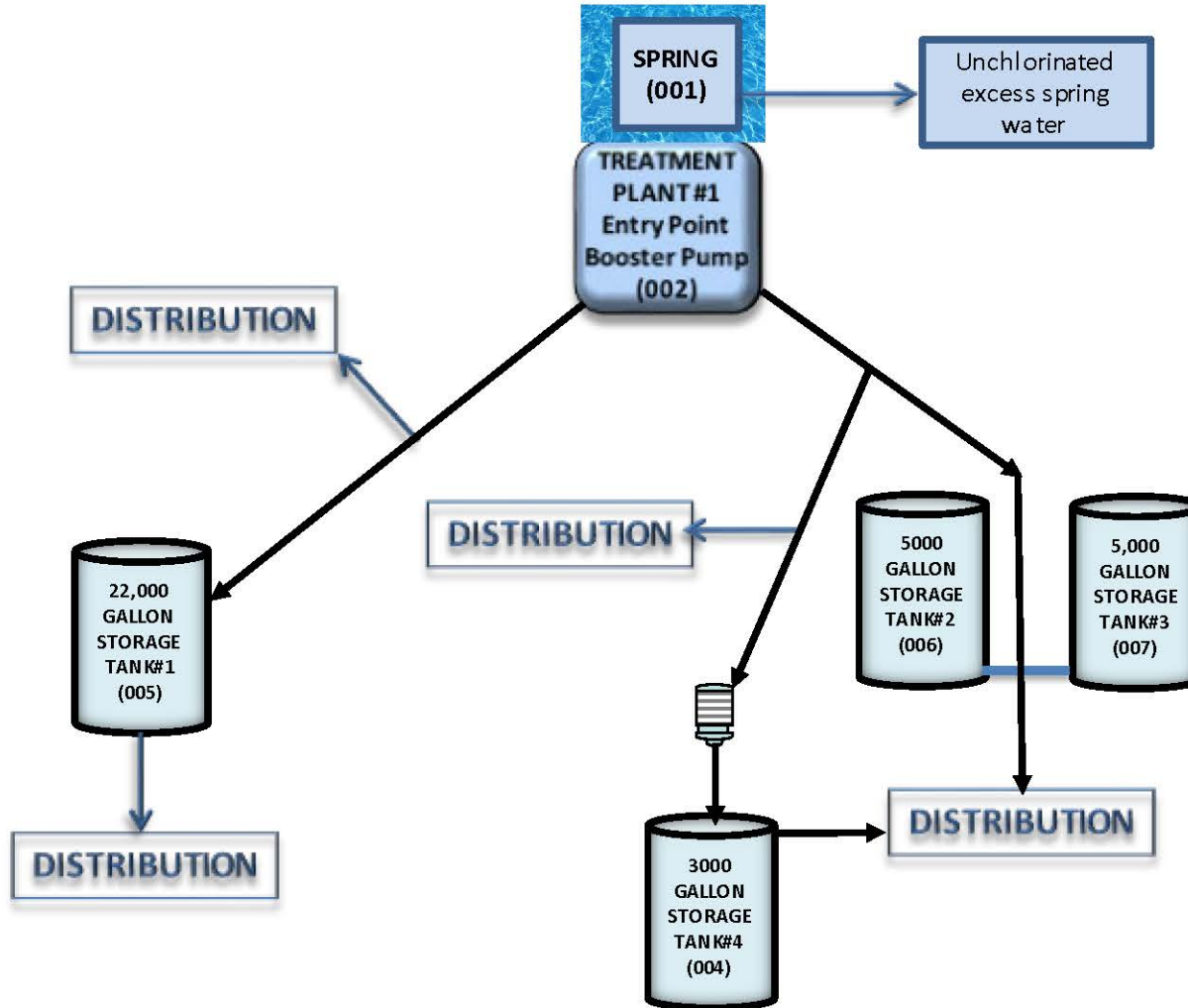
3. **Notes & Recommendations:** It is recommended that the system construct a Standard Operating Procedure (SOP) for in house tank inspection and cleaning supported by photo documentation for all 4 storage tanks. It was stated by the operator that he does not climb the 22,000 gallon storage tank due to health issues.

4. **Notes & Recommendations:** The operations & maintenance plan provided by the Waterfall Community WUA appeared to be outdated and in need of updating.

Recommended Action: The Waterfall Community WUA should review the contents of their operations and maintenance plan in order to determine if it meets their current needs.



NMED - Drinking Water Bureau System Schematic Waterfall Community WUA; 3564319





Sanitary Survey Corrective Action Plan (CAP)

Ground water systems must submit a CAP within 30 days of issuance of the sanitary survey report. Surface water and GWUDI systems must submit a CAP within 45 days of the issuance of the sanitary survey report

PWSS Name	Waterfall Community WUA
PWSS ID	NM3564319
Sanitary Survey Date:	October 28, 2021
Date report was issued:	November 18, 2021

Deficiency Listing– Shaded Section is to be filled out by water system representative

Deficiency Code	Description	Choose one and fill in date:	
		Date Deficiency was addressed	Expected date of completion
001Q	Hatch does not have a watertight seal for the 3000 gallon storage tank		
Comments:			

If a deficiency has been addressed, submit documentation to the compliance staff listed below.

Submit this form to:

John Pijawka at john.pijawka@state.nm.us

Corrective Action Plan submitted by:

Signature

Printed Name

Date