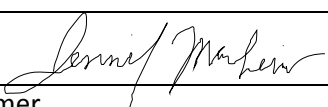


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	04/21/2016		
Media:	Water		
Regulatory Program(s)	SDWA		
Company Name:	El Rancho Mobile Home Park Santa Fe		
Facility Name:	El Rancho Mobile Home Park Santa Fe		
Facility Physical Location:	58A Evergreen Lane		
(city, state, zip code)	Santa Fe, NM 87506		
Mailing address:	58A Evergreen Lane		
(city, state, zip code)	Santa Fe, NM 87506		
County/Parish:	Santa Fe County		
Facility Contact:	Jack Shelburn	Operator, Manager, Owner	
	505.455.7261		
FRS Number:	110013111202		
Identification/Permit Number:	NM3570426		
NAICS:	N/A		
SIC:	4941		
Personnel participating in inspection:			
Jack Shelburn	El Rancho MHP	Facility Manager, Operator, Landowner	505.455.7261
Gus Vigil	El Rancho MHP	Landowner, Southern Property	
Angela Restivo	EPA/6WQ-SD	Compliance Officer	214.665.7123
Jenna Manheimer	EPA/6EN-WR	Enforcement Officer	214.665.7318
EPA Lead Inspector Signature/Date	 Jenna Manheimer		6/7/2016
			Date
Supervisor Signature/Date			
	Mehdi Taheri, acting for Willie Lane, Jr.		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Jenna Manheimer and Angela Restivo arrived at El Rancho Mobile Home Park (MHP) Santa Fe on April 21, 2016, for an announced inspection of the drinking water system. We met with Jack Shelburne, Operator, Manager and Landowner at El Rancho MHP, and Gus Vigil, Landowner. I presented my credentials to Mr. Shelburne, and informed him that this was an EPA inspection to assess progress in complying with the Safe Drinking Water Act (SDWA), specifically with the maximum contaminant level (MCL) for uranium and the Groundwater Rule (GWR). The scope of the inspection was to evaluate the drinking water system, including the groundwater source, storage, treatment, pumps, distribution, operations and management, and to determine progress in addressing violations cited in the EPA administrative order (AO), issued on May 20, 2014 (Appendix 2), and deficiencies cited in a sanitary survey by the New Mexico Environment Department (NMED), conducted on March 13, 2015 (Appendix 3).

FACILITY DESCRIPTION

El Rancho MHP is located west of Pojoaque, just north of highway 502. The drinking water system serves 38 residents, and consists of two active wells, each with a production capacity of 16 gallons per minute (gpm). Each well reaches a total depth of approximately 200 feet, with the intakes at 120 ft. Water was pumped alternatively from each well, with only one running at any given time. Each well feeds into the same distribution piping, running in series directly behind (east of) the property lots.

El Rancho MHP has a history of uranium contamination at both Well 1 and Well 2; however, since April 2014, samples at Well 1 have, on average, been significantly lower in uranium than historical results, and below the MCL running annual average (RAA) of 30 µg/L. Therefore, as of February 2016, Mr. Shelburne stopped using Well 2, and began pumping solely from Well 1. However, Well 2 was not disconnected from the water system, and can be utilized at any time. Although Well 1's uranium levels are within regulatory limits, there is concern that relying on this source will stress the pump and supply, making it an unsustainable long-term solution for El Rancho MHP.

There was coliform contamination in 2014 at various sample sites in El Rancho MHP, both in distribution and at Well 1. Well 1 was flushed and batch chlorinated at that time, while one home suspected to be the source was disconnected from the main distribution line.

Mr. Shelburne recently sold property to family members, including Well 2. Since both sides of the MHP property will continue to be operated as a single water system, serving 37 residents through 17 service connections and one distribution system, this property transfer does not alter the size or public water system (PWS) status of El Rancho MHP, confirmed on March 15, 2016, by NMED's Office of General Counsel.

Section II – OBSERVATIONS

Well 1 is located in the middle of a parking lot, inside an underground vault (Appendix 1, Photo 1). The well was protected by a bolted metal covering, but had no well pad, and was surrounded by dirt reaching approximately three inches from top of casing (Appendix 1, Photos 2 & 3). Water from Well 1 flows approximately 50 ft. into a control vault, where it is pressurized by a 120 gallon diaphragm tank. Inside the control vault, there is a flow meter and an abandoned well, which appeared well sealed but close to the floor (Appendix 1, Photo 4). There was also a Culligan filter that, according to Mr. Shelburn, is no longer operable. The corners of the vault have holes dug into the flooring, apparently to collect water, though there were no outlets or drains from these holes to the outside (Appendix 1, Photo 5). According to Mr. Shelburn and Mr. Vigil, the vault has never flooded. Water inside the vault T's, with one side going to a home and the other side leading to the rest of distribution. The valve to the home was closed following the coliform positives in 2014, as Mr. Shelburn suspected that the frost free tap on that house was the source of contamination.

Well 2 is located just less than a ¼ of a mile from Well 1 in a vault, next to a frost free spigot (Appendix 1, Photo 6). Water from this spigot is used by NMED as a finished water entry point sample tap for compliance for both wells, according to Mr. Shelburn. This tap would represent Well 2 when this source is running, but could only represent Well 1 if Well 2 is off and water from Well 1 were allowed to flow through distribution and over to this spigot.

Since use of Well 2 ceased, its power supply was turned off; however, the pressure gauge adjacent to well showed a reading of about 50 psi at the time of inspection (Appendix 1, Photo 7). Also, the flow meter down the line from Well 2 and pressure tank was moving, and the valve flowing into distribution along this same line was open (Appendix 1, Photo 8). Well 2's casing terminates close to the vault floor, and a sideways hose bib tap is connected to the top of wellhead (Appendix 1, Photo 7).

Section III – AREAS OF CONCERN

Uranium

- Uranium fluctuates at Well 1, and is consistently high at Well 2. Uranium levels at Well 1 could increase in the future. There is currently no adequate treatment plan proposed for either well, as funding is an issue.
- Without adequate backup, Well 1's pump or supply could be stressed.
- One private consultant, Goodwater, has worked with El Rancho MHP in the past, but since the technology offered was never purchased, this company is no longer interested in doing business with Mr. Shelburn. Plans submitted to NMED in April 2014 for treatment with Metsorb media were incomplete, lacking proper data from field testing that demonstrated effective removal. Reverse osmosis (RO) is approved for uranium removal, while other patented media must be approved for use based on robust performance results.

Well 1

- Needs a well pad around casing that extends 3 ft. in each direction to prevent contamination of aquifer.

- Wellhead must be raised 12-18 inches above grade. If left inside vault, it should be raised as high as possible to the top of vault chamber.

Well 2

- Casing must terminate 12-18 inches above grade. Since well is inside a vault, it should terminate at least 12-18 inches above the floor of vault.
- Hose bib taps do not provide adequate seals and must be removed from wellhead.
- If Well 2 will not be used as a primary source, it must be adequately disconnected from the distribution system (at a minimum, valves should be closed to ensure that water is not entering distribution).

Operations

- NMED's 2015 sanitary survey cited deficiencies that remain unaddressed, including no emergency response plan and inadequate sampling plans (Appendix 3).

Section IV – FOLLOW UP

- Collaborate with NMED to determine if current frost-free spigot next to Well 2 is an appropriate entry point sample site for finished water from both wells.
- On May 2, 2016, EPA called Goodwater Company to obtain history about El Rancho MHP and information on the proposed uranium removal technology. Nancy Prosser at Goodwater referred EPA to the manufacturer of Metsorb media, Graver Industries. Nichole Pennisi from Graver stated that Metsorb adsorption media works well to remove heavy metals, and on May 3, 2016, provided letters from Maricopa County in Arizona approving Metsorb for arsenic removal, after the completion of a 12 month pilot test.

In order to approve Metsorb technology for uranium removal, NMED or any other regulatory agency would need pilot test data specifically demonstrating adequate reduction of uranium. This data was requested in a follow-up emails from EPA to Graver on May 3, 2016 and May 25, 2016, pending response.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos, taken 4/21/2016

Appendix 2 – Enforcement History

Appendix 3 – NMED's Sanitary Survey, conducted March 13, 2015

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 6-Well 1 Pad & Closed Vault.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:43

Photographer: Angela Restivo

Description: Well 1 sealed with metal covering in the middle of parking lot.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 7B-Well 1 Vault.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:37

Photographer: Jenna Manheimer

Description: Inside Well 1 – loose gravel around casing and no well pad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 8-Well 1.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:38

Photographer: Jenna Manheimer

Description: Inside Well 1 – loose dirt and gravel surrounded casing, reaching approximately 3 inches from top of wellhead.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 2-Well 1 Flow Meter & Abandoned Well.JPG

Date of Photo: 4/21/2016

Time of Photo: 11:49

Photographer: Jenna Manheimer

Description: Inside control vault for Well 1, there was a flow meter and abandoned well, which appeared well sealed, but close to the floor.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 4-Well 1 Pressure Tank, Filter & Pipes.JPG

Date of Photo: 4/21/2016

Time of Photo: 11:57

Photographer: Jenna Manheimer

Description: 120 gallon pressure tank and inoperable Culligan filter in control vault for Well 1, with holes dug out of corners and no outlet to the outside.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 9A-Well 2 Vault & Frost Free Spigot.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:45

Photographer: Angela Restivo

Description: Well 2 is located in a vault, next to a frost free spigot.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM

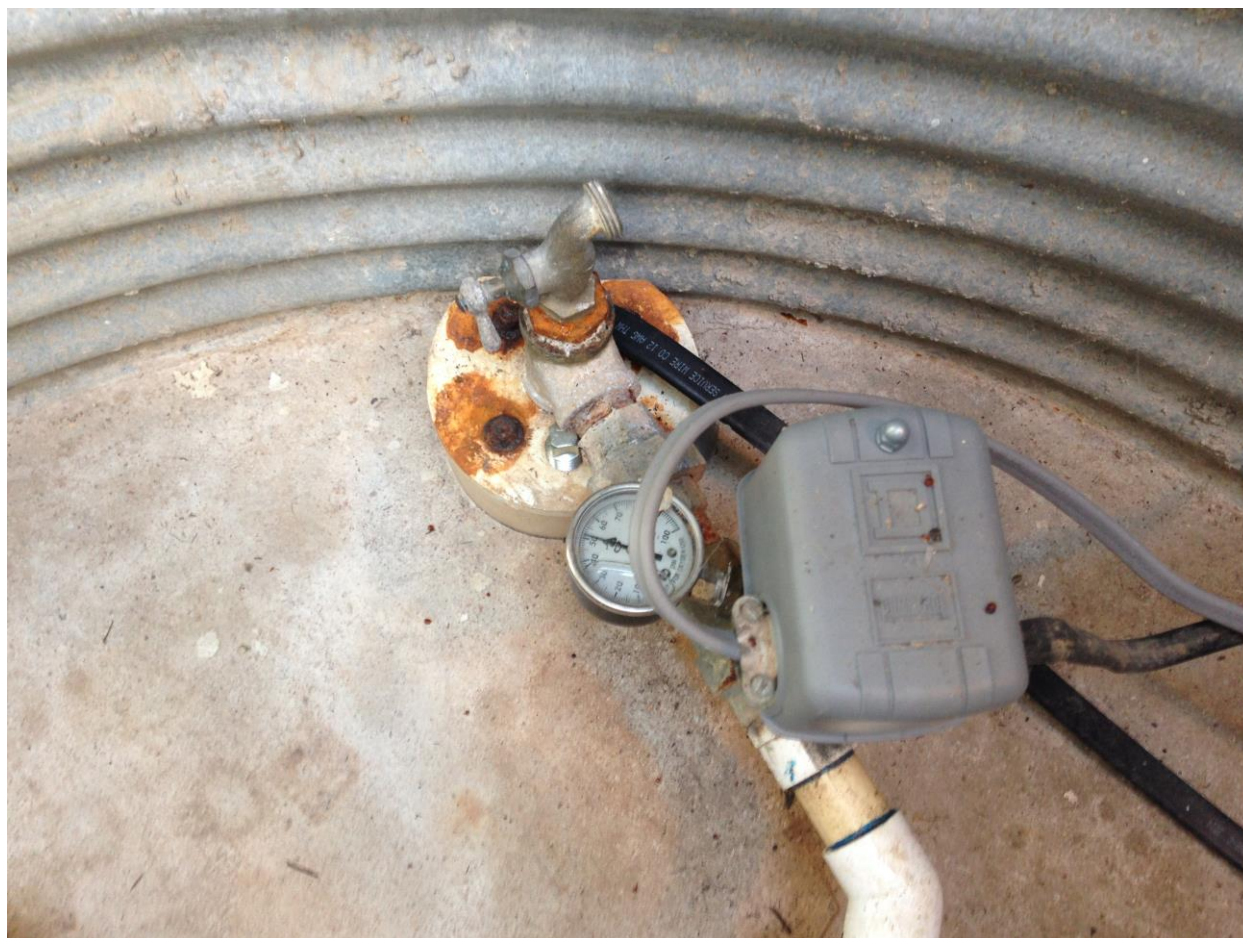


Photo File Name: 10A-Well 2.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:46

Photographer: Jenna Manheimer

Description: Well 2 is capped with a hose bib tap, its casing terminates just above vault floor, and pressure gauge showed a reading of about 50 psi.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: El Rancho Mobile Home Park Santa Fe Water System		
City: Santa Fe	County/Parish: Santa Fe	State: NM



Photo File Name: 11-Well 2 Vault, Tank, Pipes & Flow Meter.JPG

Date of Photo: 4/21/2016

Time of Photo: 12:47

Photographer: Jenna Manheimer

Description: Flow meter downstream from Well 2 and pressure tank was moving, and the valve along line into distribution was open.

Appendix 2

Enforcement History



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

MAY 20 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7005 1820 0003 7451 3165

Ms. Louise Vigil
d/b/a El Rancho Mobile Home Park
64 Evergreen Lane
Santa Fe, NM 87506

Re: Administrative Order, Docket Number: SDWA-06-2014-1326
PWS ID Number: NM3570426

Dear Ms. Vigil:

Enclosed is an Administrative Order (Order) issued to you, doing business as El Rancho Mobile Home Park, for violation of the Safe Drinking Water Act (Act), 42 U.S.C. § 300f, et seq., and its implementing regulations, 40 C.F.R. Part 141. Specifically, this Order is issued for failure to provide drinking water that complies with the maximum contaminant level (MCL) for uranium. The Environmental Protection Agency (EPA) finds that El Rancho Mobile Home Park owns or operates the public water system (PWS) identified in the Order and is therefore subject to these regulations. This Order requires certain actions and information demands.

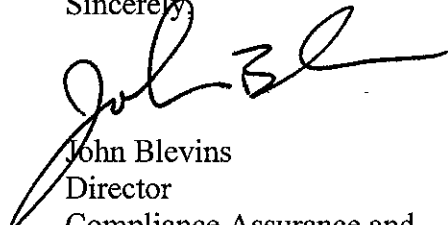
This Order requires compliance with the MCL for uranium as set forth in Section 1412 of the Act, 42 U.S.C. § 300g-1. If immediate compliance is not possible, you must submit a treatment alternative with a construction and/or repair schedule that will achieve compliance no later than eighteen (18) months from the effective date of the enclosed Order. Compliance with the uranium MCL is based on a running annual average. As described in the enclosed Order, El Rancho Mobile Home Park is required to deliver drinking water that meets the national standard for uranium and to conduct quarterly monitoring to ensure compliance with the MCL. Please be aware that failure to comply with this Order may subject you to additional enforcement action by EPA, including the initiation of legal proceedings to seek monetary penalties.

The PWS is also required to comply with all applicable New Mexico regulations and provisions of 20.7.10.100 NMAC, incorporating 40 C.F.R. § 141. Most treatment options require the submittal of engineering plans and specifications to the New Mexico Environment Department (NMED). Please send engineering submittals to NMED's Drinking Water Bureau address referenced in Section "9(e)" in the enclosed Order and include the EPA Docket number.

Re: Administrative Order 2
Louise Vigil d/b/a El Rancho Mobile Home Park

If you need assistance, or have questions regarding the Order, please contact
Ms. Tonia Biggs, of my staff, at (214) 665-8551.

Sincerely,



John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc: Maria J. Medina, Enforcement Coordinator
New Mexico Environment Department
Drinking Water Bureau
P.O. Box 5469
Santa Fe, NM 87502-5469



U.S. ENVIRONMENTAL PROTECTION AGENCY-REGION 6
FINDINGS OF VIOLATION, COMPLIANCE ORDER, AND
INFORMATION DEMAND

In the Matter of El Ranch Mobile Home Park Public Water System
Owned/Operated by Louise Vigil, d/b/a El Rancho Mobile Home Park, Respondent
Docket No. SDWA-06-2014-1326, PWS ID # NM3570426

STATUTORY AUTHORITY

The following findings are made and Order issued under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA"), by Sections 1414(g) and 1445 of the Safe Drinking Water Act ("the Act"), 42 U.S.C. §§ 300g-3(g) and 300j-4. The Administrator delegated the authority to issue this Order to the Regional Administrator of EPA Region 6 who delegated such authority to the Director of the Compliance Assurance and Enforcement Division.

FINDINGS

1. Ms. Louise Vigil, doing business as El Rancho Mobile Home Park ("Respondent"), is a "person," as defined by Section 1401(12) of the Act, 42 U.S.C. § 300f(12).

2. At all times relevant to the violations alleged herein ("relevant time period"), Respondent owned or operated the El Rancho Mobile Home Park water system, a public water system ("PWS"), as defined by Section 1401(4) of the Act, 42 U.S.C. § 300f(4), located in Santa Fe, Santa Fe County, New Mexico ("facility"), designated as PWS number NM3570426.

3. As a PWS and a "supplier of water," Respondent is subject to the regulations promulgated by EPA pursuant to Section 1412 of the Act, 42 U.S.C. § 300g-1, entitled National Primary Drinking Water Regulations ("NPDWR").

4. During the relevant time period, Respondent's PWS served as a "community water system," as defined by Section 1401(15) of the Act, 42 U.S.C. § 300f(15).

5. The New Mexico Environment Department ("NMED") and EPA have enforcement authority for the PWS provisions of the Act in the State of New Mexico. NMED and EPA have consulted regarding this Order, and it has been agreed that EPA would initiate this enforcement action.

6. During the relevant time period, Respondent's PWS was required to conduct monitoring to determine compliance regarding uranium, which is a radionuclide. Respondent is required to comply with a running annual average maximum contaminant level ("MCL") of 30 µg/L for uranium as specified in 40 C.F.R. § 141.66(e). Respondent monitored for uranium during the last four quarters from the 2nd quarter of 2013 through the 1st quarter of 2014, resulting in a running annual average of 39.75 µg/L, at sampling point

"SP704260011," and in a running annual average of 39 µg/L at sampling point "SP704260021," which is a violation of the MCL specified in 40 C.F.R. § 141.66(e).

7. Respondent is required to comply with the uranium requirements of the Act, as set forth in Section 1412 of the Act, 42 U.S.C. § 300g-1.

SECTION 1414(g) COMPLIANCE ORDER

8. Based on these findings and pursuant to the authority of Section 1414(g) of the Act, 42 U.S.C. § 300g-3(g), EPA orders Respondent to take the following actions:

- a. Respondent shall comply with 40 C.F.R. § 141.31(b) and notify both EPA and NMED within forty-eight (48) hours in the event of uranium MCL violations.
- b. If Respondent has not provided public notice, as required by 40 C.F.R. § 141.201, regarding the violations specified in paragraph 6, Respondent shall, within thirty (30) days of issuance of this Order, provide a public notice of the violations as set forth in 40 C.F.R. § 141.201. Respondent shall submit a copy of the public notice for uranium to EPA and NMED within forty (40) days of the effective date of this Order.
- c. Within fifteen (15) calendar days of the effective date of this Order, Respondent shall contact Ms. Tonia Biggs, in writing, informing her whether Respondent will comply with the terms of this Order.
- d. Respondent shall immediately comply with 40 C.F.R. § 141.66(e) regarding the uranium MCL. If immediate compliance is not technically feasible, then Respondent must comply with "8e" in the Compliance Order and "9a" through "9e" in the Information Demand below.
- e. Respondent shall achieve and maintain compliance with 40 C.F.R. § 141.66(e) no later than eighteen (18) months after the effective date of this Order.

SECTION 1445 INFORMATION DEMAND

9. Based on these findings and pursuant to the authority of Section 1445 of the Act, 42 U.S.C. § 300j-4, Respondent is required to do the following:

- a. Within ninety (90) days of the effective date of this Order, Respondent shall submit to EPA an initial report on the progress made to bring the PWS into compliance with the uranium MCL. Following the initial report, a quarterly progress report shall be submitted to EPA within ten (10) days after the end of each calendar quarter. Respondent shall notify EPA when all improvements have been completed.
- b. Within one hundred and twenty (120) days of the effective date of this Order, Respondent shall submit to EPA a detailed plan to bring the System into compliance with the MCL for uranium. The plan shall include: 1) a system modification proposal; 2) a cost analysis of system modifications; and 3) a construction schedule for the project. The schedule shall include specific milestone dates and a final compliance date that is no later than eighteen (18) months from the effective date of this Order. The plan must be submitted to EPA for approval before construction can commence.
- c. The approved schedule for construction and completion of modifications will be incorporated into this Order or an Amended Administrative Order will be issued incorporating the approved schedule for construction and completion of modifications.
- d. The reporting required by this Order must be provided by Respondent to EPA at the following address:

Ms. Tonia Biggs
Water Enforcement Branch (6EN-W)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

- e. Regarding Parts "8a" and "8b" in the Order Section, Respondent shall submit a copy of the public notice to NMED at the following addresses:

Maria J. Medina, Enforcement Coordinator
New Mexico Environment Department
Drinking Water Bureau
P.O. Box 5469
Santa Fe, NM 87502-5469

GENERAL PROVISIONS

This Order is effective upon receipt by Respondent.

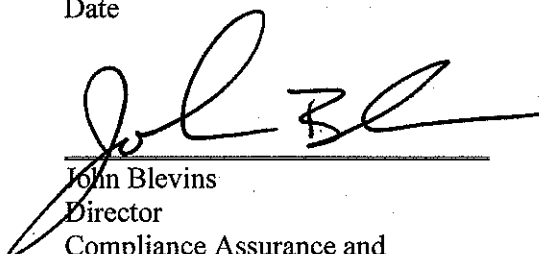
Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. Section 706, which is set forth at <http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title5-section706&num=0&edition=prelim>, states the scope of such review.

This Section 1414(g) Compliance Order and the Section 1445 Information Demand do not constitute a waiver, suspension, or modification of the requirements of 40 C.F.R. Part 141 or other applicable federal and state requirements, which remain in full force and effect. Issuance of this Section 1414(g) Compliance Order and Section 1445 Information Demand is not an election by EPA to forego any civil or any criminal action otherwise authorized under the Act.

Violation of any term of this Section 1414(g) Compliance Order and the Section 1445 Information Demand or the Act may subject Respondent to an administrative civil penalty of up to \$32,500 under Section 1414(g) of the Act, 42 U.S.C. § 300g-3(g), or a civil penalty of not more than \$37,500 per day per violation, assessed by an appropriate United States District Court under Section 1414(g)(3)(A) of the Act, 42 U.S.C. § 300g-3(g)(3)(A).

This Order shall be binding on the PWS cited herein and all its successors and assigns. No change in ownership of the PWS shall alter the responsibility of the PWS under this Order.

5.20.14
Date


John Blevins
Director
Compliance Assurance and
Enforcement Division

Appendix 3
NMED Sanitary Survey
Conducted March 13, 2015



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

5500 San Antonio Dr NE
Albuquerque, NM 87109
Tel. 505-222-9590 • Fax 505-222-9510
Toll Free 1-877-654-8720
www.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

3/30/2015

Jack Shelburn
El Rancho Mobile Home Park Santa Fe, NM3570426
58 A Evergreen Lane
Santa Fe, NM 87506

RE: 2015 Sanitary Survey Report

Dear Jack Shelburn:

Enclosed is the Sanitary Survey Report for the El Rancho Mobile Home Park Santa Fe water system, conducted on 3/13/15 by Jeff Pompeo of the New Mexico Environment Department Drinking Water Bureau (DWB).

During the survey three significant deficiencies were identified and no recommendation(s) were provided. El Rancho Mobile Home Park Santa Fe water system must consult with the DWB within 30 days and take corrective action on the three significant deficiencies no later than 120 days after receipt of this sanitary survey report, or be in compliance with a DWB-approved schedule and plan for correcting these deficiencies within the same 120 day period. Failure to correct any significant deficiency will result in a treatment technique violation of NMAC 20.7.10.100 incorporating 40 C.F.R. 141 Subpart S.

If you have any questions or need to send additional information/documentation concerning this report please call 505-222-9590 or e-mail jeff.pompeo@state.nm.us.

Respectfully,

Jeff Pompeo, Compliance Officer
Drinking Water Bureau
Water Protection Division

Enclosures: Sanitary Survey Report

Cc: Region Supervisor (electronic)
El Rancho Mobile Home Park Santa Fe water system Area Office file
Magneto system file



SANITARY SURVEY REPORT

For

El Rancho Mobile Home Park Santa Fe NM3570426

*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: Jeff Pompeo

New Mexico Environment Department
1190 St. Francis
PO Box 5469
Santa Fe, NM 87502-5469
505.476.8620

3/13/15

**State of New Mexico
Environment Department
Environmental Health Division
Drinking Water Bureau**

5500 San Antonio Dr NE
Albuquerque, NM 87109



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. The information and data was prepared by Jeff Pompeo Compliance Officer.

NMED APPROVING AUTHORITY: _____ Date: _____
Jeff Pompeo Compliance Officer

Introduction

A sanitary survey enables the NMED Drinking Water Bureau Water (DWB) to provide a comprehensive and accurate 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 purpose of the sanitary survey is to evaluate and document the capabilities of the water system's sources, treatment, storage, distribution network, operation and maintenance, and overall management to ensure the provision of safe water. As part of a sanitary survey the DWB conducted a site inspection of the El Rancho Mobile Home Park Santa Fe water system. The site inspection was conducted by Compliance Officer Jeff Pompeo, and accompanied by El Rancho Mobile Home Park Santa Fe water system operator, Jack Shelburn. In addition to the site inspection, DWB reviewed various operational, managerial, and financial documents submitted by the El Rancho Mobile Home Park Santa Fe water system and conducted a review of DWB compliance files for the water system.

System Description

The El Rancho Mobile Home Park Santa Fe water system has approximately 40 year round and is classified as a Community water system according to the New Mexico Drinking Water Regulations 20.7.10 NMAC. The water system consists of two wells, three pressure tanks, and distribution. The two wells can produce a total of 25 gallons per minute (GPM). The pressure tanks have a capacity of 60 gallons and 100 gallons respectively. The distribution network consists of all PVC piping.

The El Rancho Mobile Home Park water system was issued an Administrative Order (AO) dated September 15, 2009 for exceeding the Uranium MCL at both wells.

Survey Findings

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. The following significant and minor deficiencies were identified during the sanitary survey.

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)]. Water systems must consult with DWB within 30 days and take corrective action for any significant deficiencies found during the sanitary survey no later than 120 days after receiving written notification of such deficiencies, or be in compliance with a DWB-approved schedule and plan for correcting these deficiencies within the same 120 day period [NMAC 20.7.10.100 incorporating 40 CFR §141.403(a)(4) and §141.403(a)(5)(i)-(ii)]. Failure to remedy any significant deficiency will result in a treatment technique violation of NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S.

A total of three significant deficiencies were identified at the El Rancho Mobile Home Park Santa Fe water system during the survey.

1. Deficiency: 001W. Lack of an Emergency Response Plan

Regulatory Citation: 20.7.10.400.E NMAC

Concern/Description: Operation/Management. Lack of an adequate Emergency Plan could lead to extended delays in supplying safe potable drinking water during minor or major emergencies. Public Water Systems that assess their vulnerabilities and adopt thorough emergency response plans are minimizing the likelihood of major delays in supplying safe potable drinking water to their customers. Emergency plan is not functional.

Corrective Action: Please submit a copy of an adequate Emergency Response Plan that is specific to El Rancho Mobile Home Park Santa Fe.

2. Deficiency: 003R. No or inadequate sampling plans and/or schedules for Total Coliform Rule, Lead and Copper Rule, collection of SOC, VOC, IOC, Radionuclide, and Nitrate-Nitrite samples

Regulatory Citation: 40 CFR 141.33(f)

Concern/Description: Confirmation/Monitoring. Lack of a sampling plan can result in a water system failing to collect samples or collecting them from the wrong location. If samples are not collected or collected from the wrong location the system will be unaware if they are exceeding the MCL. Exceeding the MCL can result in health issues.

Corrective Action: Please submit a copy of an adequate sampling plan that is specific to the El Rancho Mobile Home Park Santa Fe.

3. Deficiency: 001L. Well head or spring box is not secured from the elements or intrusion or is susceptible to flooding

Regulatory Citation: 20.7.10.400.C NMAC

Concern/Description: Direct contamination. Properly protected well heads, spring boxes and casings prevent contaminated water, insects, vermin, or other potential contaminants from entering the well and/or aquifer. Facilities which are susceptible to flooding have an increased potential for contamination by surface water. Potential for cross contamination.

Corrective Action: Access port on well that is no longer in use needs to be sealed.

Minor Deficiencies:

The following are minor deficiencies which DWB recommends be corrected before the next sanitary survey to ensure the deficiencies do not become significant.

- 1. Deficiency:** No minor deficiencies were found, therefore, there are no recommendations at this time.

Conclusion

The sanitary survey for the El Rancho Mobile Home Park Santa Fe water system was completed on 3/13/15. Based upon the onsite inspection and review of various operational and managerial documents and of DWB compliance files, three significant deficiencies were identified and no minor deficiencies

were identified. The El Rancho Mobile Home Park Santa Fe water system must comply with the following bullets in the correction of these deficiencies.

- Upon receipt of this report, the El Rancho Mobile Home Park Santa Fe water system must consult with the DWB within 30 days for all significant deficiencies (i.e., provide written documentation to DWB within 30 days of receipt of this report stating how and when each significant deficiency will be addressed).
- Failure to consult with DWB within 30 days on all significant deficiencies will result in a monitoring and reporting violation of NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S.
- The El Rancho Mobile Home Park Santa Fe water system must take corrective action on all significant deficiencies no later than 120 days after receiving written notification of such deficiencies, OR be in compliance with a DWB approved schedule and plan for correcting these deficiencies within 120 days.
- Failure to correct any significant deficiency in accordance with the previous bullet will result in a treatment technique violation of NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S.
- In addition, the El Rancho Mobile Home Park Santa Fe must provide written documentation to the DWB within 30 days of completing corrective action for each significant deficiency. Failure to submit documentation within 30 days will result in a monitoring and reporting violation of NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S.

If you have any questions or need to send additional information/documentation concerning this report please call 505-222-9590 or e-mail jeff.pompeo@state.nm.us.