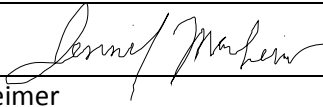


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	04/18/2016		
Media:	Water		
Regulatory Program(s)	SDWA		
Company Name:	Santa Socorro Trailer Park		
Facility Name:	Santa Socorro Trailer Park		
Facility Physical Location:	3149 Highway 47		
(city, state, zip code)	Los Lunas, NM 87031		
Mailing address:	P.O. Box 537		
(city, state, zip code)	Los Lunas, NM 87031		
County/Parish:	Valencia County		
Facility Contact:	Hilda Montano	Owner	
	505.865.9898		
FRS Number:	110064843193		
Identification/Permit Number:	NM3577532		
NAICS:	N/A		
SIC:	4941		
Personnel participating in inspection:			
Hilda Montano	Santa Socorro	Owner	505.865.9898
Lorina Sandoval	Santa Socorro	Manager	505.507.4313
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		5/20/2016 Date
Supervisor Signature/Date	 Willie Lane, Jr.		 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Jenna Manheimer and Angela Restivo arrived at the Santa Socorro Trailer Park at 9:25 am on April 18, 2016, for an announced inspection. We drove around the property to assess how many lots are connected to the well, and where the well(s) are located. We located three wells, though could not decipher which well belonged to which property.

We met with Lorina Sandoval, Property Manager, at 9:30 am and Hilda Montano, Property Owner, at 9:40 am. I presented my credentials to Hilda Montano and informed her that this was an EPA inspection to determine compliance with the Safe Drinking Water Act (SDWA). The scope of the inspection was to determine progress in addressing the Environmental Protection Agency's (EPA) administrative order (AO), issued on September 21, 2015, for failure to collect routine and repeat total coliform (TC) samples, and failure to correct sanitary deficiencies identified by the New Mexico Environment Department (NMED) during a sanitary survey, conducted on June 19, 2014 (Appendix 2). The purpose of the inspection was also to confirm that Santa Socorro Trailer Park operates a public water system (PWS), and to discuss sampling requirements in detail.

FACILITY DESCRIPTION

Santa Socorro Trailer Park is located southeast of Los Lunas on Highway 47. The drinking water system consists of one active well, located just west of Lot C and north of the storage facility (Appendix 1, Photo 1), one abandoned well, located on lot Q, and four hydropneumatic storage/pressure tanks. The trailer park has one septic system for every two trailers. There was no certified operator or sampler to service the water system at the time of inspection, though at least one of Ms. Montano's family members is a plumber, and assists with water system maintenance.

Santa Socorro Trailer Park has a history of positive coliform bacteria, both at the source and in distribution. In June and July of 2015, a total of five routine and repeat samples in distribution were positive for TC, while one sample at Well 1 was positive. The well was reportedly shut down for 24 hours while all storage tanks were drained and chlorine was poured down the wellhead. Following disinfection, all lines were flushed by the operator at that time, Matthew Maez, on July 14, 2015, about two weeks after the first positive TC was collected. Subsequent TC samples from distribution were negative through December 2015; Ms. Montano then ceased monitoring in January 2016, as she believed that Santa Socorro should not be regulated as a PWS.

Section II - OBSERVATIONS

Ms. Montano contests that Santa Socorro Trailer Park is a PWS, though according to a population count provided by her, there are just over 25 residents. A county law passed last year prohibits travel trailers from stationing on private property such as Santa Socorro, and as a result, five trailers were forced to move off of the property, leading to a loss of 10-15 residents. According to Ms. Montano, Santa Socorro

has only 10 homes on 12 lots, three of which are empty, and a total of 27 residents, including a newborn baby. She provided us with a list of property lots and resident names (Appendix 3); however, several lots appear to be missing from the list.

Ms. Montano stated that Lots N and R are not being used and could therefore be disconnected from the water supply, if it would allow her to avoid regulation as a PWS. Ms. Montano stated several times during the inspection that she does not want to operate a PWS. She anticipates that the trailer park will lose at least two residents in the near future, which would put her right at the threshold of a PWS, according to her population count. However, Ms. Montano and Ms. Sandoval mentioned at least two residents, whose names were not disclosed on the sheet provided, indicating that the total number of residents may be well over 25. At the time of inspection, EPA told Ms. Montano that Santa Socorro Trailer Park is a PWS due to both population and number of service connections, and that she must comply with the SDWA, namely sampling and certified operator requirements.

NMED's 2014 sanitary survey cited a lack of site security at the well head. Well #1 is 120 feet deep and is protected by metal bars to prevent cars from running it over. Since the sanitary survey, the wellhead has been adequately protected with a heavy, sealed, locked metal covering (Appendix 1, Photo 2). Ms. Montano removes the covering, and well cap is sealed tightly, and well pad is intact with approximately 2.5 feet of concrete on each side. Screening underneath cap is loose and not 24 mesh (Appendix 1, Photo 3).

Lot C, located about two hundred feet from Well 1, is available for camper parking, but was not being used at the time of inspection (Appendix 1, Photo 4). However, Lot C's service connection is a hose that was lying on the ground surrounded by debris (Appendix 1, Photo 5). The tap opened easily, but would not close completely. There were two Well-X-Trol hydropneumatic pressure tanks on Lot C, stored inside of a shed with insulation. The line connecting storage tanks to the rest of system was leaking (Appendix 1, Photo 6).

We inspected two additional storage tanks, located inside a shed on Lot Q that also contains an inactive well (Appendix 1, Photos 7 & 8). Ms. Montano claimed that the abandoned well was in a different location nearby, but did not remember exactly where. She stated that her husband sealed it with a cap below ground over 10 years ago, though it could be rehabilitated if necessary. The well we observed inside the shed was unprotected – there was no well pad, and the ground surrounding well was uneven, cracked and full of debris (Appendix 1, Photo 8). The cap on well was loose, not sealed, and electrical connection entering wellhead appears intact and is unsealed.

Section III – AREAS OF CONCERN

- There was no certified drinking water operator employed at Santa Socorro Trailer Park at the time of inspection.
- Screen on Well 1 should be 24 mesh, sealed tightly around wellhead.

- The service connection on Lot C was a cross connection and a potential source of contamination into distribution. Due to its proximity to Well 1 and tendency to leak, it is imperative to either disconnect the line, or retrofit it with a hose that is not subject to contamination from dirt and surrounding debris.
- Water lines on inlet/outlet of storage tanks on Lot C were leaking.
- The inactive well on Lot P presents a direct pathway of contamination into the aquifer and must be protected with a tight seal around cap and wellhead. The inactive well should have an intact, concrete pad, and electrical conduit should be disconnected and sealed. Alternatively, the inactive well on Lot P should be abandoned according to NMED standards.
- All contaminant sampling must commence at Santa Socorro Trailer Park, in accordance with the SDWA and sampling schedules set by NMED, including coliform monitoring.
- Due to past bacteriological contamination at the source and lack of disinfection, it is imperative to correct all sanitary defects, eliminate cross connections, and prevent potential pathways of contamination.

Section IV – FOLLOW UP

Following the conclusion of EPA's inspection, Aaron Beckworth from NMED assisted in locating a certified sampler and operator, and a coliform sample was collected in distribution on April 28, 2016.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos, taken 4/18/2016

Appendix 2 – NMED Sanitary Survey, conducted 6/19/2014

Appendix 3 – List of residents, provided by Ms. Montano 4/18/2016

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 1-Well 1 Overview.JPG

Date of Photo: 4/18/2016

Time of Photo: 11:58

Photographer: Angela Restivo

Description: Well #1 located near Hwy 47, protected from cars with vertical metal bars.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 2-Well 1.JPG

Date of Photo: 4/18/2016

Time of Photo: 11:59

Photographer: Angela Restivo

Description: Metal case with lock added to Well #1 for wellhead protection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 4-Well 1 Mesh Seal.JPG

Date of Photo: 4/18/2016

Time of Photo: 12:01

Photographer: Angela Restivo

Description: Sealed cap on Well #1, but screen is loose and not 24 mesh.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 7-Lot C Overview.JPG

Date of Photo: 4/18/2016

Time of Photo: 11:58

Photographer: Angela Restivo

Description: Lot C overview with debris.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 5-Lot C Running Service Connection.JPG

Date of Photo: 4/18/2016

Time of Photo: 11:56

Photographer: Angela Restivo

Description: Lot C with exposed, active service connection subject to cross contamination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 10-Connection to Lot C STs.JPG

Date of Photo: 4/18/2016

Time of Photo: 12:11

Photographer: Angela Restivo

Description: Hydropneumatic pressure tanks are stored inside shed on Lot C; water line flowing into/out of tanks is leaking.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 14-Lot P Shed with STs.JPG

Date of Photo: 4/18/2016

Time of Photo: 12:19

Photographer: Angela Restivo

Description: Hydropneumatic pressure tanks are stored inside shed on Lot P, covered with insulation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Santa Socorro Trailer Park Water System		
City: Los Lunas	County/Parish: Valencia County	State: NM



Photo File Name: 13-Lot P Older Well.JPG

Date of Photo: 4/18/2016

Time of Photo: 12:20

Photographer: Angela Restivo

Description: Inactive well inside shed on Lot P is not properly sealed or protected.

Appendix 2

New Mexico Environment Department Sanitary Survey

Conducted June 19, 2014



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

3082 32nd St. Bypass, Suite D
Silver City, NM 88061
Phone (575) 388-1934 Fax (575) 388-3258
www.nmenv.state.nm.us

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

8/20/2014

Hilda Montano
Santa Socorro Trailer Park, NM3577532
P.O. Box 537
Los Lunas, NM 87031

RE: 2014 Sanitary Survey Report

Dear Hilda Montano:

Enclosed is the Sanitary Survey Report for the Santa Socorro Trailer Park water system, conducted on June 19, 2014 by Adam Offutt of the New Mexico Environment Department Drinking Water Bureau (DWB).

During the survey one significant deficiency was identified. The Santa Socorro Trailer Park water system must consult with the DWB within 30 days and take corrective action on the significant deficiency 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 additional clarification concerning this report please call 575-388-1934 or e-mail adam.offutt@state.nm.us.

Respectfully,

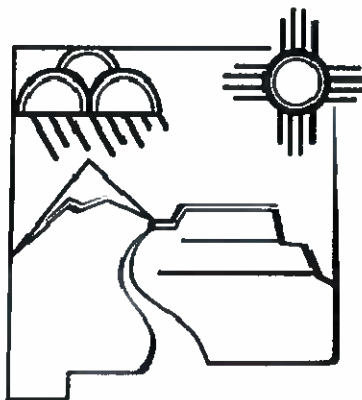
Adam Offutt
Compliance Officer, Silver City Area Office

Enclosures: Sanitary Survey Report

xc: Region Manager (electronic)
Silver City System file
Magneto system file

NMED

New
Mexico
Environment
Department



SANITARY SURVEY REPORT

For

Santa Socorro Trailer Park NM3577532

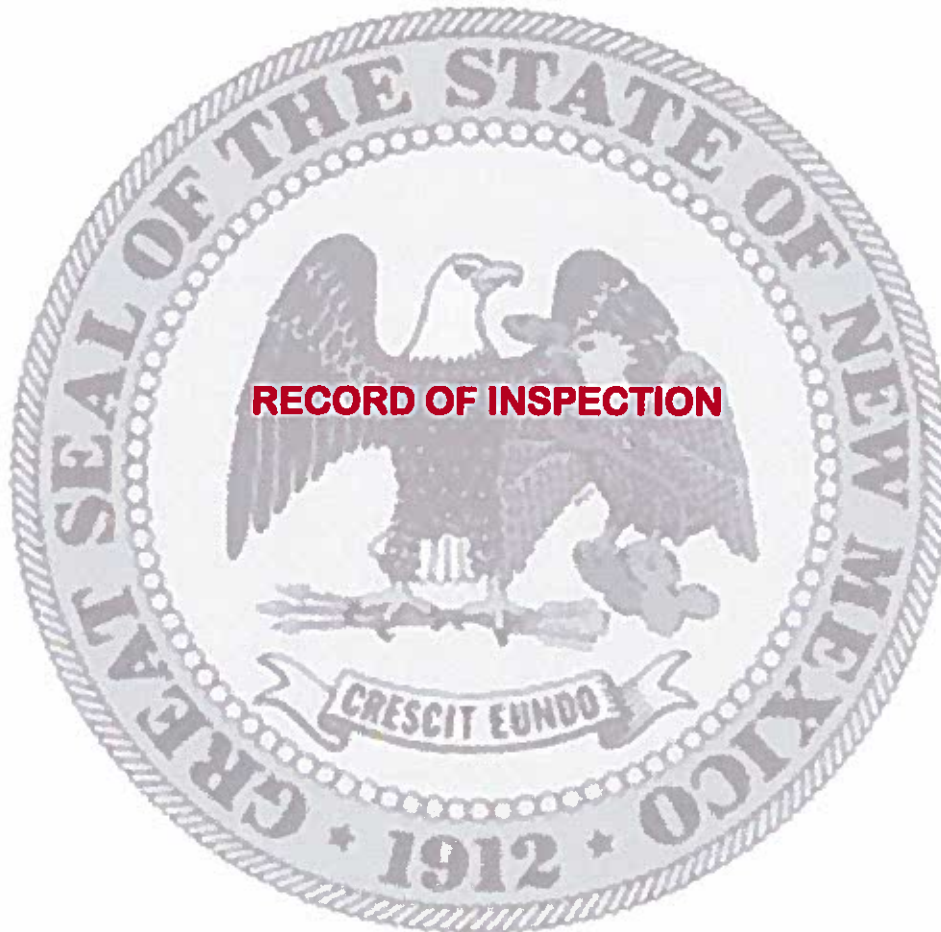
*Este informe contiene información importante acerca de su agua potable.
Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.*

Prepared by:

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

6/19/2014

State of New Mexico
Environment Department
Environmental Health Division
Drinking Water Bureau
3082 32nd Street Bypass, Suite D
Silver City, NM 88061



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 Adam Offutt Compliance Officer.

NMED APPROVING AUTHORITY: Adam Offutt Date: 8/20/2014
Adam Offutt, 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 Santa Socorro Trailer Park water system. The site inspection was conducted by Compliance Officer Adam Offutt, who was accompanied by Santa Socorro Trailer Park water system owner Hilda Montano. In addition to the site inspection, DWB conducted a review of DWB compliance files for the water system.

System Description

The Santa Socorro Trailer Park water system has approximately 33 residents 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 one well and distribution. The well is capable of producing an estimated 50 gallons per minute. The distribution network consists of 17 unmetered connections and is plumbed in PVC piping.

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.

One significant deficiency was identified at the Santa Socorro Trailer Park water system during the survey.

1. Deficiency: (001J) Lack of site security at the well

Regulatory Citation: 20.7.10.400.B NMAC: "Any part or component of a public water system including but not limited to spring junction boxes, well houses, storage reservoirs, collection devices, pump facilities, and treatment facilities shall be constructed, operated and maintained to prevent:

- (1) unauthorized entry to the water supply;
- (2) flooding of the water supply; and
- (3) contamination of, the water supply."

Concern/Description: Direct Contamination, Delivery – Unauthorized access can result in the water system being contaminated and key components being compromised which could result in a water outage.

Corrective Action: Secure the well head to prevent unauthorized access. This could be accomplished by installation of a high security fence or a locking vault around the well head. Submit photo documentation of corrective action.

Minor Deficiencies:

- No minor deficiencies were identified during the survey.

Conclusion

The sanitary survey for the Santa Socorro Trailer Park water system was completed on June 19, 2014. Based upon the onsite inspection and review of the DWB compliance files, one significant deficiency was identified. The Santa Socorro Trailer Park water system must comply with the following bullets in the correction of these deficiencies.

- Upon receipt of this report, the Santa Socorro Trailer Park 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 Santa Socorro Trailer Park 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 Santa Socorro Trailer Park 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 additional clarification concerning this report please call 575-388-1934 or e-mail adam.offutt@state.nm.us.

SANTA SOCORRO TRAILER PARK 2014 SURVEY PHOTOS



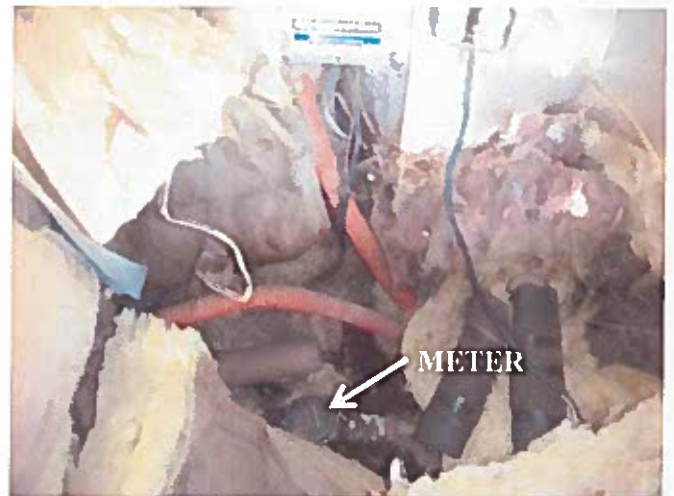
WELL #1



WELL #1



PRESSURE TANK BUILDING



MASTER METER

Appendix 3

List of Residents

Provided by Hilda Montano
April 18, 2016

SANTA SOCORRO MOBILE HOME PARK

STORAGE	NO WATER	A	0
SANDAVOL	LORENA & ANTHONY	B	3
CAR & CAMPER	NO WATER	C	0
POWERS	RICHARD	D	2
MONTANO	MONICA	E-	2
BACA	RAY	F	1
SUNIGA	EILEEN	G	3
LOCKHART	JESSICA	H	2
WINDEBIL	MELVIN	I	3
VALLEGOS	BERLINDA	J	2
WILLIAMS	MARY ANN	K	1
HATTER	DAVE	L	1
MONTANO	DAVID	M	1
EMPTY		N	0
ROMERIZ	YOLANDA	O	3
FERNANDEZ	YUZEMA	P	3
EMPTY		R	0
****TOTAL*****			27

No Q

(16
connections)

Just surveyed