



Notification provided via E-mail

January 12, 2023

Juan Carlos Crosby; juancarlosc@donaanacounty.org
Camino Real Regional Utility Authority, NM3502507
PO Box 429
Sunland Park, NM 88063

RE: Camino Real Regional Water Utility Authority pH Investigation

Dear Juan Carlos Crosby:

On December 2, 2023, the New Mexico Environment Department Drinking Water Bureau (NMED DWB) conducted an investigation into the cause of the elevated pH issues that the Camino Real Regional Utility Authority (CRRUA) water system reported to NMED on Friday December 1, 2023. Attached is the report of the NMED investigation findings. As a result of that investigation, NMED issued CRRUA a Notice of Violation at the time of the site inspection for Failure to Provide Public Notification.

Based on the failure to notify persons affected by the high levels of pH, the New Mexico Environment Department Drinking Water Bureau (DWB) requires the Camino Real Regional Utility Authority to notify customers as required in 20.7.10.100 NMAC [incorporating 40 CFR Section 141.202(a)(9)]. Notice must be provided to all customers and others who drink the water within twenty-four (24) hours after the system learns of the violation and must be issued every three (3) months as long as the exceedance persists. In order to reach all people served, water systems are to use, at a minimum, one or more of the following forms of delivery: appropriate broadcast media (such as radio and television), hand or direct delivery and posting in conspicuous locations. This notice must remain posted as long as the violation persists.

NMED is evaluating additional enforcement actions related to the elevated pH issues that may include the issuance of an Administrative Compliance Order and civil penalties. NMED also reserves the right to take additional enforcement actions, including the issuance of civil penalties, for the findings identified in the Sanitary Survey Inspection conducted by NMED DWB on December 6, 2023.

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 505-469-5207 or by e-mail at martin.torrez@env.nm.gov.

Respectfully,

Martin Torrez

Martin Torrez, Public Water System Supervision Manager
Drinking Water Bureau
Water Protection Division

cc: Brandi Littleton, Compliance Supervisor (electronic)
Electronic Central File



INVESTIGATION REPORT

For

Camino Real Regional Utility Authority NM3502507

*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: Martin Torrez– Public Water System Supervision Manager and Antonio Romero
New Mexico Environment Department
2301 Entrada Del Sol
Las Cruces, NM 88001

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

2301 Entrada Del Sol
Las Cruces, NM 88001

RECORD OF INSPECTION



NMED DWB Staff Signature: *Martin Torrez* Date: 01/12/2024
Martin Torrez, Public Water System Supervision Manager

INTRODUCTION

On December 1, 2023, the Camino Real Regional Water Utility Authority (CRRUA) Assistant Executive Director Juan Carlos Crosby contacted Mr. Antonio Romero with the New Mexico Environment Department (NMED) Drinking Water Bureau (DWB) to report elevated pH levels in the CRRUA distribution system. The initial information provided by CRRUA indicated that the possible source of the high pH was coming from their Santa Teresa Industrial Park Arsenic Treatment Plant. Mr. Crosby reported that pH levels at that time were reported to be approximately 10.68. Mr. Crosby also stated that the CRRUA would be issuing a Do Not Drink Order (see attachment #1) to their customers as a result of the high pH levels. To mitigate high pH levels, CRRUA's operators, with the assistance from Dona Ana County Fire Department, were flushing the Santa Teresa Industrial Park Arsenic Treatment Plant storage tanks and distribution system concurrently while monitoring the pH levels.

Upon learning of the elevated pH issue, DWB staff, which included members from Technical Assistance, Emergency Response, Compliance, and NMED Communications Team immediately began a plan of action to determine the extent of the issue and to notify appropriate agencies of this potential emergency at CRRUA. DWB staff contacted NMED Ground Water Quality Bureau staff due to the initial reports of water with elevated pH levels being flushed from the system. NMED DWB also contacted our partners at the New Mexico Department of Health, as well as the New Mexico Department of Homeland Security and Emergency Management. Finally, DWB contacted officials from the Dona Ana County Emergency Manager to determine their situational awareness of the CRRUA drinking water emergency.

DWB staff began planning for an onsite investigation to determine the cause and the extent of the issue. DWB Public Water System Supervision (PWSS) Group Manager Martin Torrez and DWB Technical Assistance Specialist Antonio Romero conducted the initial investigation at CRRUA. Aracely Tellez, with the NMED Ground Water Quality Bureau also attended the initial investigation looking into potential ground water quality discharge issues. Any findings associated with the GWQB investigation are not included in this report.

SYSTEM OVERVIEW

The CRRUA water system is a ground water system that serves an approximate population of 19,466 with 7,318 total service connections. The population for CRRUA was calculated in accordance with 20.7.10.9.A NMAC and is classified as a community water system. The system serves the areas in and around Sunland Park, Santa Teresa, Santa Teresa Industrial Park and the Dona Ana County Border Region. All four areas have been incorporated into one single distribution. Additional information regarding the water system can be found in the 2023 Sanitary Survey Inspection Report which was issued to CRRUA on December 12, 2023.

Santa Teresa Industrial Park Arsenic Treatment Plant

The Santa Teresa Industrial Park area contains several wells that produce drinking water for the community. The water flows through gas chlorine disinfection and an arsenic treatment plant prior to being served to customers. The infrastructure in this area of the system contains the following:

- Well #5 -STIP (010) is equipped with a submersible pump that produces an average of 550 gallons per minute (gpm).

- Well #6A-STIP (017) is equipped with a submersible pump that can produce an average of 700 gpm.
- Well #14A-STIP (057) is equipped with a vertical turbine pump that can produce an average of 800 gpm.
- Gas chlorination for pre-treatment and disinfection
- 4.5 million-gallon arsenic treatment plant
- 104,000 Back-wash storage tank
- 2,000,000-gallon storage tank
- 261,000-gallon storage tank

Raw water produced from all three wells flows to Treatment Plant #3 (011) where the water is injected with gas chlorine for arsenic pre-treatment prior to entering the Industrial Park Arsenic Treatment Plant (012). After arsenic treatment, treated water is stored in the 261,000-gallon storage tank named "Small Tank-STIP" (014) and the 2,000,000-gallon storage tank named "Large Tank-STIP". Treated water is also sent, via a small transfer booster station, to the 920,000-gallon storage tank named the "Airport Tank-STIP" (020) before it is again sent to other parts of their distribution system. The acronym "STIP" in each of these facility names indicates that the facility is part of the Santa Teresa Industrial Park area of their system.

The arsenic treatment plant can treat up to 4.5 million gallon per day (MGD) and includes three horizontal filters; ferric chloride chemical storage tank, sulfuric acid chemical storage tank, and caustic soda chemical storage tanks and chemical feed pumps, backwash recycle system; and solids handling system including a storage tank for settling and sludge drying beds. During the treatment process, sulfuric acid is injected to lower the pH of the water in order to oxidize arsenic in the water. Ferric Chloride is also used to help precipitate the arsenic which is eventually removed through filtration. After the removal of arsenic, the pH is increased by the addition of a caustic soda solution before being sent to storage tanks and customers.

INVESTIGATION FINDINGS

On December 2, 2023, at approximately 9:00 am, the NMED Team met CRRUA Assistant Executive Director Juan Carlos Crosby and CRRUA's Water & Wastewater Lead Operator Mr. Ernest Carranza at the Santa Teresa Industrial Park Arsenic Treatment Plant.

The investigation began at the 261,000-gallon Small Tank-STIP and the 2,000,000-gallon Large Tank-STIP storage tanks. NMED Staff observed that CRRUA staff had been flushing the water from the storage tanks into an overflow detention pond. The detention pond is approximately 1/2 acre, and roughly 6 feet deep. CRRUA staff estimated that approximately 800,000 gallons of water had been flushed from the two storage tanks at that time and NMED staff observed the retention pond to be full of water (see image # 1). At that time, CRRUA Staff conducted pH sampling of the water in the detention pond and the readings were 9.41 and 9.39.

NMED staff then moved on to inspecting the Santa Teresa Industrial Park Area arsenic treatment plant. At that time, Mr. Carranza stated that the treatment plant had been taken offline and that water from wells 5, 6, and 14 were only being treated with gas chlorine prior to being sent to the 2 MG and

261,000-gallon storage tanks, bypassing the arsenic treatment plant. Mr. Carranza also stated that two pH sensors and chemical feed pump at the treatment plant had recently been replaced by CRRUA operator Frank Lerma on November 27, 2023. During this portion of the investigation, NMED staff observed that the pH sensor at the treatment plant showed a negative pH value (see Image #4). The pH sensor displaying a negative value should have indicated a treatment failure to CRRUA operations staff. During additional discussions with CRRUA operations staff, NMED learned that these sensors control the injection of caustic soda during the final stages of the arsenic treatment process. Caustic Soda is used as a pH adjustment to raise the treated water's pH back to normal levels. A failure of the pH sensors and a failure by CRRUA operations staff to recognize that failure led to an unknown amount of caustic soda to be injected into the water system. At the time inspection, NMED staff confirmed that caustic soda chemical tank was 62.9% full (see image #5).

Caustic Soda is an alkaline solution having a pH greater than 7. Caustic soda can cause a "soapy" or "slick" feeling to the touch, which may explain "slimy water" complaints experienced by customers.

On December 7, 2023, NMED staff were able to download a log of the pH controller data from both the Process and Finish water pH controllers. This data download from the finish water pH Controller indicated that a failure of the pH meter may have occurred as early as Tuesday November 21, 2023, where pH values began showing negative values (see attachment #2)

At the time of the investigation, CRRUA's operations staff stated that the caustic soda tank holds approximately 4,000 gallons of solution. NMED staff observed this tank to be approximately 62.9 % full of solution (see image #5), which also indicated that approximately 1,484 gallons of caustic soda may have been injected into the water supply causing the elevated pH levels. NMED staff were unable to calculate the exact amount of caustic soda injection due to the lack of monitoring process control and recordkeeping by CRRUA operations staff.

NMED staff also noted that CRRUA did not utilize their emergency response plan once the emergency was identified. NMED and EPA require that public water systems develop an emergency response plan to be utilized during these types of emergencies. The failure to utilize their emergency response plan is another operations failure by CRRUA staff.

During the initial site visit on December 2, 2023, NMED staff also observed CRRUA operations staff flushing water throughout their distribution system (see image #7). NMED staff noted that the pH levels at that time ranged from 9.92 to 8.82. NMED staff also conducted daily site visits to CRRUA between December 4 and December 11, 2023, to verify the pH levels within the CRRUA distribution system and received daily logs with pH readings (see attachment #3) with daily pH calibration bench-sheet (see attachment #4). This was done to validate pH levels as CRRUA began lifting the Do Not Drink Advisory for various locations within their distribution system.

CONCLUSION

Based on the information obtained during this investigation, NMED DWB concluded that a pH sensor malfunction as well as a number of operational failures by CRRUA staff led to caustic soda being overfed into the treatment process and eventually causing the elevated pH levels within their

distribution system. Additionally, NMED DWB concluded that CRRUA staff also failed to fully investigate complaints from customers that were experiencing “slimy water” as early as Tuesday November 28, 2023.

NMED staff were also able to review historical data from the pH controller. The data showed that the pH probes and sensor were never calibrated and that the negative readings for finished water pH started as early as November 21,2023.

As a result of this incident, NMED DWB issued a Notice of Violation to CRRUA on December 12, 2023, for failing to notify their customers of high pH levels. New Mexico Drinking Water Regulations require public water systems to notify their consumers of appropriate action to protect themselves against any waterborne hazards.

Also, since the site visit, CRRUA’s lead and copper monitoring schedule has been increased from reduced monitoring back to standard monitoring, requiring CRRUA to take an additional 30 lead and copper samples every 6 months. The prior monitoring schedule had CRRUA taking 30 samples every 3 years.

REQUIRED CORRECTIVE ACTIONS

As a result of this investigation and the operational failures that were identified, NMED is requiring that CRRUA take corrective actions which were documented in the Sanitary Survey report that was completed and provided to CRRUA on December 12, 2023. Failure to correct and provide documentation of significant deficiency corrections within the established timeframes, will result in treatment technique violation(s) being issued to the CRRUA water system.

NOTICE OF VIOLATIONS

In addition to the significant deficiencies noted in the sanitary survey, DWB also issued a Notice of Violation to CRRUA for failing to properly notify persons served by their system of a waterborne hazard. As a result, NMED will require CRRUA to include a public notification processes to be specifically identified in their Emergency Response Plan.



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CRRUA Required Corrective Actions

Significant Deficiency	Required Corrective Action(s)
<p>Operation staff unfamiliar or lacks understanding of treatment method or process control.</p>	<p>No later than January 15, 2024, CRRUA must retain an operator that is familiar with effectively operating the water system arsenic treatment plants.</p>
	<p>No later than January 15, 2024, CRRUA must ensure that all operators who are tasked with any portion of the arsenic treatment plant operations, be provided with training on effective process control monitoring and recordkeeping.</p>
	<p>No later than January 15, 2024, CRRUA must develop a thorough written operations plan which provides specific process control operations and record keeping for each of the system's arsenic treatment plants.</p>
<p>Interruptions in treatment process.</p>	<p>No later than January 15, 2024, CRRUA water system must provide arsenic treatment and must provide documentation acceptable to DWB to verify that all arsenic treatment plants are in operation and that drinking water treated has an arsenic value under 0.010 mg/L.</p>
<p>Inadequate process control monitoring and record keeping</p>	<p>No later than January 15, 2024, the CRRUA water system must begin process control monitoring and record keeping based upon manufacturer recommendations and industry standards.</p>
<p>Chemical dosage records are insufficient to ensure proper operation of treatment.</p>	<p>No later than January 15, 2024, CRRUA water system must calibrate all chemical addition pumps. CRRUA must routinely check calibration of all chemical addition pumps and submit documentation that all chemical pumps have been calibrated and checked.</p>
<p>Inadequate construction at treatment plant. Santa Teresa Industrial Park Arsenic TP (012) caustic soda hold tank was leaking large amounts of caustic soda into the containment area. Caustic soda in the area was approximately 3 inches deep.</p>	<p>No later than January 31, 2024, CRRUA must submit a photograph or other documentation acceptable to DWB, indicating that corrections found at the treatment plants have been corrected.</p>

Materials in contact with potable water are not NSF approved. Industrial Park Arsenic Treatment Plant (012)- Chemicals stored in the arsenic treatment building are not ANSI/NSF approved for use in drinking water.	No later than <u>February 28, 2024</u> , CRRUA must submit a photograph or other documentation acceptable to DWB, indicating that all chemicals that are not ANSI/NSF approved have been stored in an alternate location.
Insufficient Emergency Response Plan	No later than <u>March 31, 2024</u> , CRRUA must submit a copy of an adequate emergency response plan that is specific to their water system. The plan must outline how emergencies are addressed and how customer complaints are processed and tracked.
Insufficient Operations and Maintenance (O&M) Plan	No later than <u>March 31, 2024</u> , CRRUA must submit a copy of an adequate operations & maintenance plan that is specific to their water system. CRRUA must also provide documentation that all operations staff have read and understood the Plan.
Lack of treatment plant alarms or automatic shutdown.	No later than <u>March 31, 2024</u> , CRRUA must install treatment plant alarms and automatic shutdown.
Inadequate replacement equipment for critical processes.	No later than <u>March 31, 2024</u> , CRRUA must have spare parts on hand for all essential components.
Administration is unfamiliar with New Mexico Drinking Water Regulations.	No later than <u>April 30, 2024</u> , CRRUA administration staff must arrange and attend detailed training on drinking water regulations.



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CRRUA Notice of Violation

20.7.10.600.C NMAC

If the safety of a water supply is endangered for any reason, the supplier of water shall notify persons served by the public water system of appropriate action to protect themselves against any waterborne hazards. If the supplier of water fails to take such action on its own, or at the direction of the department, the department may directly notify the persons served by the system.



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CRRUA Investigation Photographs

Image #1



Water from the flushing of the storage tank and being collected in an unlined reservoir. The reservoir is approximately 0.5 acres and 5-6 feet deep.

Image #2



2-million-gallon storage tank

Image #3



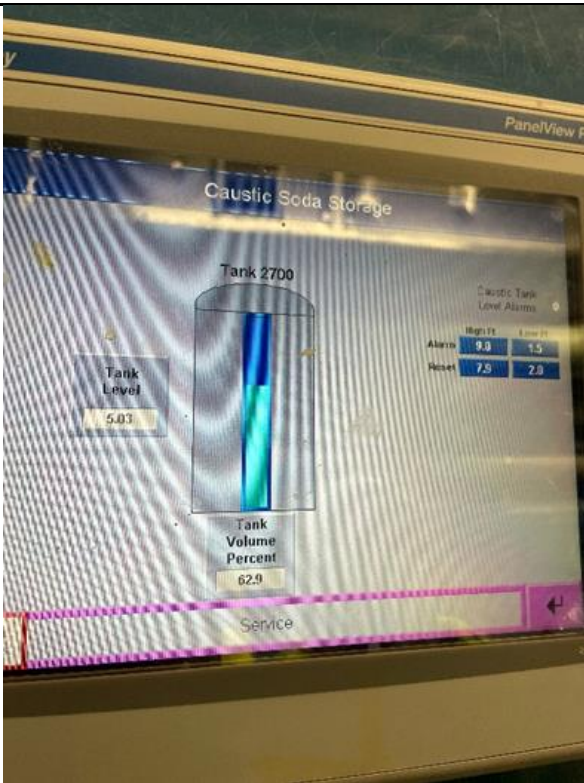
Caustic Soda injection point

Image #4



SC200 pH reading, 8.01 reading if for process water and Finished water is reading -1.89

Image #5



Caustic Soda Storage Tank Volume

Image #6



Caustic Soda chemical storage

Image #7



Flushing from hydrant at the intersection of Baywood Street and Elizebth Street.

**Attachment #1:
Do Not Drink Order**

Water Advisory Notice

for Santa Teresa and Sunland Park

Sent on behalf of Camino Real Regional Utility Authority

On Wednesday, Nov. 29, we received reports about bitter water conditions in the service areas of Sunland Park and Santa Teresa. CRRUA personnel responded quickly and discovered an issue with a pump that caused increased pH levels of the water supply, which was quickly corrected.

The following areas in Sunland Park and Santa Teresa, NM are impacted:

- Valencia Park
- Villa Valencia
- Mason Farms
- The Grove
- Edgemont
- Casas Lindas
- Bluffs

Due to the current pH level **residents in the affected areas are advised NOT to use the water coming out of the faucets for drinking, washing dishes, or bathing.**

CRRUA personnel is working with the Sunland Park Fire Department today and tomorrow to flush hydrants in the surrounding areas. Once the system has returned to normal pH levels, CRRUA will send out another notification.

The City of Sunland Park is working with CRRUA to deliver bottled water to locations in the affected area. CRRUA customers may pick up bottled water at the following locations from 5-10 p.m. today.

Locations for pickup

- Fire Station #2 – 5650 McNutt Rd., Sunland Park, NM
- The Sports Complex – 4700 McNutt Rd., Santa Teresa, NM
- Santa Teresa Elementary School, 201 Comerciantes Blvd., Santa Teresa, NM

For questions or more information, please call Brent Westmoreland, Executive Director of CRRUA at 575-649-9349.

Thank you for your patience and understanding as we work to address the issue.

Camino Real Regional Utility Authority

**Attachment #2:
pH data from sensors**

DeviceInfo	Time	Data	Data2
Serial Number: 232514225630			
Manufacture ID: 0			
Device Name: pHD sc			
Device ID: 52			
Device Location: pHD214225630			
Log Channels: 2			
	TIME	pH	TEMP
	11/21/2023 10:30:00	7.685766	30.213816
	11/21/2023 10:45:00	7.686041	30.234385
	11/21/2023 11:00:00	7.686350	30.244558
	11/21/2023 12:15:00	7.690402	30.254251
	11/21/2023 12:30:00	7.687248	30.286047
	11/21/2023 12:45:00	7.686478	30.302120
	11/21/2023 13:00:00	7.687953	30.301746
	11/21/2023 13:15:00	7.688363	30.287098
	11/21/2023 13:30:00	7.688156	30.279118
	11/21/2023 13:45:00	7.688304	30.273876
	11/21/2023 14:00:00	7.687744	30.276398
	11/21/2023 14:15:00	7.688264	30.277561
	11/21/2023 14:30:00	7.688120	30.276903
	11/21/2023 14:45:00	7.688994	30.279995
	11/21/2023 15:00:00	7.688101	30.274096
	11/21/2023 15:15:00	7.688686	30.265545
	11/21/2023 15:30:00	7.689269	30.261421
	11/21/2023 15:45:00	7.687418	30.256969
	11/21/2023 16:00:00	7.690248	30.253725
	11/21/2023 16:15:00	7.690640	30.243420
	11/21/2023 16:30:00	7.689916	30.236248
	11/21/2023 16:45:00	7.692098	30.234867
	11/21/2023 17:00:00	7.690105	30.228069
	11/21/2023 17:15:00	7.690054	30.222040
	11/21/2023 17:30:00	7.691404	30.219891
	11/21/2023 17:45:00	7.692574	30.216009
	11/21/2023 18:00:00	7.691531	30.207743
	11/21/2023 18:15:00	7.692408	30.200594
	11/21/2023 18:30:00	7.691581	30.194082
	11/21/2023 18:45:00	7.692740	30.186495
	11/21/2023 19:00:00	7.694007	30.180267
	11/21/2023 19:15:00	7.691879	30.177372
	11/21/2023 19:30:00	7.693034	30.174128
	11/21/2023 19:45:00	7.693542	30.171188
	11/21/2023 20:00:00	7.690405	30.168755
	11/21/2023 20:15:00	7.690734	30.167177
	11/21/2023 20:30:00	7.689443	30.164568
	11/21/2023 20:45:00	7.688966	30.159830
	11/21/2023 21:00:00	7.690095	30.155840

11/21/2023 21:15:00	7.691812	30.154064
11/21/2023 21:30:00	7.690339	30.152353
11/21/2023 21:45:00	7.691433	30.147749
11/21/2023 22:00:00	7.692714	30.138714
11/21/2023 22:15:00	7.693725	30.129044
11/21/2023 22:30:00	7.692863	30.121326
11/21/2023 22:45:00	7.692534	30.115778
11/21/2023 23:00:00	7.692142	30.113256
11/21/2023 23:15:00	7.693003	30.115559
11/21/2023 23:30:00	7.693488	30.120207
11/21/2023 23:45:00	7.692577	30.127268
11/22/2023 00:00:00	7.692947	30.132334
11/22/2023 00:15:00	7.692618	30.135710
11/22/2023 00:30:00	7.692119	30.134241
11/22/2023 00:45:00	7.690967	30.138123
11/22/2023 01:00:00	7.689659	30.137289
11/22/2023 01:15:00	7.689391	30.127531
11/22/2023 01:30:00	7.690003	30.120405
11/22/2023 01:45:00	7.691499	30.121304
11/22/2023 02:00:00	7.688823	30.128298
11/22/2023 02:15:00	7.689636	30.131413
11/22/2023 02:30:00	7.691214	30.132223
11/22/2023 02:45:00	7.690703	30.132135
11/22/2023 03:00:00	7.689932	30.127905
11/22/2023 03:15:00	7.690907	30.125120
11/22/2023 03:30:00	7.691431	30.123190
11/22/2023 03:45:00	7.693293	30.120230
11/22/2023 04:00:00	7.692921	30.116545
11/22/2023 04:15:00	7.694138	30.114353
11/22/2023 04:30:00	7.695773	30.112642
11/22/2023 04:45:00	7.695174	30.112379
11/22/2023 05:00:00	7.695495	30.110823
11/22/2023 05:15:00	7.697537	30.110888
11/22/2023 05:30:00	7.697454	30.097183
11/22/2023 05:45:00	7.697861	30.078896
11/22/2023 06:00:00	7.698259	30.070805
11/22/2023 06:15:00	7.697171	30.070498
11/22/2023 06:30:00	7.697535	30.070015
11/22/2023 06:45:00	7.697716	30.070782
11/22/2023 07:00:00	7.699680	30.070059
11/22/2023 07:15:00	7.697443	30.073107
11/22/2023 07:30:00	7.696785	30.074575
11/22/2023 07:45:00	7.696013	30.076483
11/22/2023 08:00:00	7.695919	30.071243
11/22/2023 08:15:00	7.696651	30.077164
11/22/2023 08:30:00	7.695472	30.089684
11/22/2023 08:45:00	7.693791	30.110098

11/22/2023 09:00:00	7.692332	30.135315
11/22/2023 09:15:00	7.693105	30.160292
11/22/2023 09:30:00	7.691307	30.192327
11/22/2023 09:45:00	7.690724	30.228048
11/22/2023 10:00:00	7.691864	30.258396
11/22/2023 10:15:00	7.689190	30.285433
11/22/2023 10:30:00	7.691115	30.314640
11/22/2023 10:45:00	7.690586	30.333782
11/22/2023 11:00:00	7.692585	30.351324
11/22/2023 11:15:00	7.690774	30.361828
11/22/2023 11:30:00	7.689496	30.373055
11/22/2023 11:45:00	7.690723	30.379414
11/22/2023 12:00:00	7.691204	30.382002
11/22/2023 12:15:00	7.690442	30.386869
11/22/2023 12:30:00	7.693152	30.383032
11/22/2023 12:45:00	7.693408	30.380379
11/22/2023 13:00:00	7.693208	30.375336
11/22/2023 13:15:00	7.690568	30.368078
11/22/2023 13:30:00	7.692389	30.360842
11/22/2023 13:45:00	7.690688	30.349943
11/22/2023 14:00:00	7.694948	30.340536
11/22/2023 14:15:00	7.693372	30.332161
11/22/2023 14:30:00	7.691969	30.325165
11/22/2023 14:45:00	7.693985	30.316088
11/22/2023 15:00:00	7.694622	30.306944
11/22/2023 15:15:00	7.692796	30.300606
11/22/2023 15:30:00	7.695190	30.294050
11/22/2023 15:45:00	7.693878	30.285542
11/22/2023 16:00:00	7.693601	30.282757
11/22/2023 16:15:00	7.695386	30.282801
11/22/2023 16:30:00	7.695872	30.282450
11/22/2023 16:45:00	7.695530	30.278700
11/22/2023 17:00:00	7.694901	30.274622
11/22/2023 17:15:00	7.695417	30.270105
11/22/2023 17:30:00	7.696465	30.264273
11/22/2023 17:45:00	7.695821	30.260017
11/22/2023 18:00:00	7.696054	30.253265
11/22/2023 18:15:00	7.697580	30.243748
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Log Channels: 2			
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12/07/2023 12:30:00	-1.877733	29.508204
12/07/2023 12:45:00	-1.877529	29.515709
12/07/2023 13:00:00	-1.877548	29.515190
12/07/2023 13:15:00	-1.877691	29.509827
12/07/2023 13:30:00	-1.877877	29.502590

**Attachment #3:
pH log from distribution**

pH Levels of Water System

Address	Date	Time	pH Level
Valencia			
Silver Park	12/1/2023	1:20 PM	10.36
		3:53 PM	10
		5:04 PM	9.9
	12/2/2023	8:09 AM	9.95
		9:31 AM	9.91
		10:41 AM	9.87
		11:52 AM	9.67
		1:49 PM	9.49
		3:08 PM	9.59
		4:45 PM	9.42
	12/3/2023	3:10 PM	9.17
	12/4/2023	10:27 AM	8.72
Lorraine Park	12/3/2023	3:12 PM	9.12
Copperhill Park	12/1/2023	2:53 PM	10.13
Fhydrant (Brass Hill)	12/3/2023	3:08 PM	9.15
Fhydrant (Bronze Hill)	12/3/2023	3:03 PM	9.2
		4:20 PM	9.7
Fhydrant (Steel Hill Ave.)	12/4/2023	2:14 PM	8.72
FHydrant (Magnolia)	12/3/2023	12:00 PM	9.33
Fhydrant (Maple Park)	12/3/2023	10:33 AM	9.47
	12/4/2023	10:42 AM	8.85
Maple Park	12/5/2023	3:06 PM	8.18
Copper Hill	12/1/2023	2:53 PM	10.13
Villa Valencia Area			
Fhydrant (Villa Valencia)	12/2/2023	10:10 AM	9.79
Fhydrant (Elizabeth)	12/2/2023	11:18 AM	9.62
Fhydrant (Megan)	12/2/2023	12:35 PM	9.45
	12/4/2023	10:42 AM	8.85
	12/4/2023	1:11 PM	8.64

Santa Terrace Apt	12/4/2023	1:03 PM	8.63
Terrace Encanto Apt	12/4/2023	12:51 PM	8.65
5815 Elizabeth	12/5/2023	2:58 PM	8.41
Edgemont			
Fhydrant (Britain)	12/3/2023	10:10 AM	8.27
Fhydrant (England)	12/3/2023	10:20 AM	8.08
Edgemont	12/2/2023	8:10 AM	9.92
		9:29 AM	9.92
		10:37 AM	9.88
		11:56 AM	9.82
		1:56 PM	9.84
		3:31 PM	9.87
		4:45 PM	9.87
Sandpiper Drive	12/1/2023	1:20 PM	10.4
		3:53 PM	10.2
		5:04 PM	10.09
	12/2/2023	8:09 AM	9.81
		9:32 AM	9.77
Essex Court	12/3/2023	12:03 PM	8.1
Windermore Court	12/3/2023	1:00 PM	8.05
Tuscan Ridge			
Tuscan Ridge	12/3/2023	10:35 AM	7.96
Industrial Arsenic Water System Tank			
Industrial Arsenic Water System Tank	12/1/2023	2:10 PM	9.87
		4:18 PM	9.79
	12/2/2023	8:55 AM	9.41
		10:05 AM	9.41
	12/3/2023	10:00 AM	9.11
		11:50 AM	9.07
		3:00 PM	9.05
		4:06 PM	9

	12/4/2023	11:36 AM	8.75
	12/5/2023	12:38 PM	8.02
Industrial Booster	12/2/2023	8:55 AM	9.41
		10:05 AM	9.41
		11:16 AM	9.4
		12:27 PM	9.32
		1:47 PM	9.33
		12:43 PM	8.58
		4:23 PM	9.24
	12/3/2023	10:05 AM	9.15
		11:52 AM	9.09
		3:00 PM	9.25
Grove Area			
Grove	12/1/2023	1:55 PM	9.77
		3:53 PM	9.8
		5:04 PM	9.8
	12/2/2023	8:13 AM	8.82
		9:40 AM	8.83
North Wastewater Plant Potable Water			
North Plant	11/30/2023	2:59 PM	10.31
	12/1/2023	3:53 PM	10.22
		5:04 AM	8.94
	12/2/2023	8:15 AM	8.96
Desert Sage (Mason Farms)			
Desert Sage (Mason Farms)	12/2/2023	9:12 AM	8.36
		10:43 AM	8.42
		1:33 PM	8.4
		2:50 PM	8.43
Santa Terrace Apt	12/4/2023	1:03 PM	8.63
Terrace Encanto Apt	12/4/2023	12:51 PM	8.65
Industrial Area			
Fhydrant (Cummins& Steel)	12/3/2023	11:55 AM	9.29
Fhydrant (Colton)	12/3/2023	12:01 AM	9.57

		3:14 PM	9.24
	12/5/2023	7:10 AM	8:45
Fhydrant (Gallup)	12/3/2023	10:25 AM	9.4
Fhydant (Chihuaua Pacifico)	12/4/2023	10:57 AM	8.91
Fhydrant (Strauss Rd)	12/4/2023	12:11 PM	8.77
Fhydant (Constallation Dr.)	12/4/2023	11:05 AM	9.51
Francis Aviation	12/4/2023	11:11 AM	9.55
	12/5/2023	10:38 AM	9.24
	12/5/2023	3:22 PM	8.99
	12/6/2023	6:57 AM	8.94
	12/6/2023	9:53 AM	8.66
	12/6/2023	12:29 PM	8.61
	12/6/2023	1:42 PM	8.55
Fhydrant (FedEx)	12/4/2023	10:42 AM	8.85
	12/5/2023	7:10 AM	8.45
	12/5/2023	11:35 AM	8.39
Herrier Drive	12/5/2023	12:45 PM	9
	12/5/2023	3:27 PM	8.97
	12/6/2023	7:00 AM	8.88
	12/6/2023	9:59 AM	8.65
	12/6/2023	12:33 PM	8.61
	12/6/2023	1:42 PM	8.55
	12/6/2023	1:45 PM	8.52
Fhydrant (Love's)	12/5/2023	10:38 AM	9.33
	12/5/2023	3:17 PM	8.94
	12/6/2023	6:53 AM	8.88
	12/6/2023	9:49 AM	8.62
	12/6/2023	12:22 PM	8.63
	12/6/2023	1:37 PM	8.58
	12/7/2023	1:49 PM	8.52

**Attachment #4:
pH calibration bench-sheet**

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12/6/23	7:10	Matt	Water	7.70
Hach Sension + pH3						
4.00 pH	Date Purchased	8/1/23		Meter Type\Model		Hach 5010T
Lot #	Date Opened	8/9/23		Probe Type\Model		
3GE0156	Date Expires	May 1/25		Date Calibrated		12/6/23
	Clarity	Pink		Time of Analysis		7:30
7.00 pH	Date Purchased	8/1/23		Analyst		
Lot #	Date Opened	8/9/23		4 pH	Initial pH	4.66
3GC914	Date Expires	Nov 1/25			Calibrated pH	4.00
	Clarity	Yellow		7 pH	Initial pH	7.24
10.00 pH	Date Purchased	8/4/23			Calibrated pH	7.02
Lot #	Date Opened	8/9/23		10 pH	Initial pH	9.32
3GE0965	Date Expires	Feb 19/24			Calibrated pH	10.03
	Clarity	BLUE		Sample Temperature in °F		64.2 °F
pH Meter Slope						

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.18
 Influent Temp. 68.10 F

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

7008

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12/5/2023	8:08am	lg	Water	7.85
4.00 pH				Meter Type\Model		Hach Sension + pH3
Lot #	Date Purchased	8/11/2023		Probe Type\Model		Hach 50 10T
3GE0156	Date Opened	8/19/2023		Date Calibrated		12/5/2023
	Date Expires	11/24/2025		Time of Analysis		7:57a
	Clarity	Pink		Analyst		1615.9
7.00 pH	Date Purchased	8/11/2023			Initial pH	4.87
Lot #	Date Opened	8/19/2023		4 pH	Calibrated pH	4.00
3GC914	Date Expires	11/24/2025		7 pH	Initial pH	6.46
	Clarity	Yellow			Calibrated pH	7.02
10.00 pH	Date Purchased	8/14/2023			Initial pH	9.54
Lot #	Date Opened	8/19/2023		10 pH	Calibrated pH	10.05
3GE0965	Date Expires	Feb 9/2024			Sample Temperature in °F	16.6
	Clarity	blue				

pH Meter Slope
 Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8
 Influent pH 8.16
 Influent Temp. 60.7

CAMINO REAL REGIONAL UTILITY AUTHORITY

North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	West Mesa North Plant	12/4/23	9:50am	Rm 1	Water	7.67
Hach Sension + pH3						
4.00 pH	Date Purchased	8/1/23		Meter Type\Model		Hach 50 10T
Lot #	Date Opened	8/9/23		Probe Type\Model		
39E0156	Date Expires	May 125		Date Calibrated		12/4/23
	Clarity	pink		Time of Analysis		9:58am
7.00 pH	Date Purchased	8/1/23		Analyst		Rm 1
Lot #	Date Opened	8/9/23		4 pH	Initial pH	4.01
39C014	Date Expires	Mar 125			Calibrated pH	4.00
	Clarity	yellow		7 pH	Initial pH	7.31
10.00 pH	Date Purchased	8/4/23			Calibrated pH	7.03
Lot #	Date Opened	8/9/23		10 pH	Initial pH	9.74
39D0163	Date Expires	Feb 19/24			Calibrated pH	10.05
	Clarity	Blue			Sample Temperature in °C	68.2 °F
pH Meter Slope						

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.41

Influent Temp. 68.9 °F

CAMINO REAL REGIONAL UTILITY AUTHORITY

North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12-3-83	10:15	James	Water	7.80
4.00 pH	Date Purchased	8-1-23		Meter Type\Model		Hach Sension + pH3
Lot #	Date Opened	8-7-23		Probe Type\Model		Hach 50 10T
3GE0156	Date Expires	May-1-25		Date Calibrated		12-3-23
	Clarity	Pink		Time of Analysis		9:56
7.00 pH	Date Purchased	8-1-23		Analyst		Selena M
Lot #	Date Opened	8-9-23		4 pH	Initial pH	4.67
3GC914	Date Expires	March-1-25		7 pH	Calibrated pH	4.00
	Clarity	Yellow		10 pH	Initial pH	7.22
10.00 pH	Date Purchased	8-4-23		Sample Temperature in °F	Calibrated pH	7.02
Lot #	Date Opened	8-9-23			Initial pH	10.22
3GE0965	Date Expires	Feb-9-24			Calibrated pH	10.04
	Clarity	Blue				71.5°F
pH Meter Slope						

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.36
Influent Temp. 70.6°F

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

S&T

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12/2/2023	10:02 a	19	Water	7.98
4.00 pH	Date Purchased	8/1/2023		Meter Type\Model		Hach Sension + pH3
Lot #	Date Opened	8/9/2023		Probe Type\Model		Hach 50 10T
3GE0156	Date Expires	May 1/2025		Date Calibrated		12/2/2023
	Clarity	Pink		Time of Analysis		9:49 a
7.00 pH	Date Purchased	8/1/2023		Analyst		luic.g
Lot #	Date Opened	8/9/2023		Initial pH		4.44
3GC914	Date Expires	May 1/2025		Calibrated pH		4.00
	Clarity	yellow		Initial pH		6.48
	Date Purchased	8/4/2023		Calibrated pH		7.02
10.00 pH	Date Opened	8/9/2024		Initial pH		9.64
Lot #	Date Expires	8 Feb 9/2024		Calibrated pH		10.05
3GE0965	Clarity	B/W		Sample Temperature in °F		67.3
pH Meter Slope						

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.72
 Influent Temp. 70.0

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12/2/23	11:25	MG	Water	
Hach Sension + pH3						
4.00 pH	Date Purchased	8/1/23		Meter Type \ Model		Hach 50 10T
Lot #	Date Opened	8/9/23		Probe Type \ Model		
3GE0156	Date Expires	May 1/25		Date Calibrated		12/8/23
	Clarity	Pink		Time of Analysis		11:320M
				Analyst		MM
7.00 pH	Date Purchased	8/1/23		4 pH	Initial pH	4.44
Lot #	Date Opened	8/9/23			Calibrated pH	4.00
3GC914	Date Expires	May 1/25		7 pH	Initial pH	7.22
	Clarity	yellow			Calibrated pH	7.01
10.00 pH	Date Purchased	8/9/23		10 pH	Initial pH	10.10
Lot #	Date Opened	8/9/23			Calibrated pH	10.03
3GE0965	Date Expires	Feb 19/2024		Sample Temperature in °F		
	Clarity	BLUE				

pH Meter Slope

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH

Influent Temp.

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	12/1/23	7:33 AM		Water	7.87
4.00 pH				Meter Type\Model		Hach Sension + pH3
Lot #	Date Purchased	8/1/23		Probe Type\Model		Hach 50 10T
3GE0156	Date Opened	8/9/23		Date Calibrated		12/1/23
	Date Expires	May 11/25		Time of Analysis		7.45
	Clarity	PINK		Analyst		M
7.00 pH	Date Purchased	8/1/23		4 pH	Initial pH	4.34
Lot #	Date Opened	8/9/23		7 pH	Calibrated pH	4.0
3GC914	Date Expires	May 11/25		10 pH	Initial pH	7.28
	Clarity	Yellow			Calibrated pH	7.02
10.00 pH	Date Purchased	8/1/23			Initial pH	10.29
Lot #	Date Opened	8/9/23			Calibrated pH	10.06
3GE0965	Date Expires	Feb 19/2024			Sample Temperature in °F	69.00F
	Clarity	Blue				
pH Meter Slope						

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.75
 Influent Temp. 70.00F

Influent 8.75 70.00F
 Effluent 7.87 69.00F

Sink 10.33 69.30F

CAMINO REAL REGIONAL UTILITY AUTHORITY
North Plant
pH Benchsheet

SAMPLE	LOCATION	DATE	TIME	SAMPLER	TYPE	pH
Effluent	North Plant	11-30-23	7:48	Selena M	Water	7.87
4.00 pH	Date Purchased	8-1-23		Meter Type\Model		Hach Sension+ pH3
Lot #	Date Opened	8-9-23		Probe Type\Model		Hach 50 10T
3GE0156	Date Expires	May-1-25		Date Calibrated		11-30-23
	Clarity	Pink		Time of Analysis		8:00
7.00 pH	Date Purchased	8-1-23		Analyst		Selena M
Lot #	Date Opened	8-9-23		4 pH	Initial pH	4.40
3GC914	Date Expires	March-1-25		7 pH	Calibrated pH	4.00
	Clarity	Yellow		10 pH	Initial pH	7.30
10.00 pH	Date Purchased	8-4-23			Calibrated pH	7.02
Lot #	Date Opened	8-9-23			Initial pH	10.25
3GE0965	Date Expires	Feb-9-24			Calibrated pH	10.02
	Clarity	Blue			Sample Temperature in °F	66.3°F
	pH Meter Slope					

Standard Methods, 20th Edition Section 4500 H+ Electrometric Method, pg 4-8

Influent pH 8.93
 Influent Temp. 64.0°F

Attachment #5
NMED Notice of Violation



Notification provided via E-mail

December 12, 2023

Juan Carlos Crosby; juancarlosc@donaanacounty.org
Camino Real Regional Utility Authority, NM3502507
PO Box 429
Sunland Park, NM 88063

RE: Notice of Violation – Failure to Provide Public Notification

Attention Juan Carlos Crosby:

This letter serves as Notice of Violation that the Camino Real Regional Utility Authority failed to notify their customers of high pH levels and provide them with appropriate action to take in order to protect themselves against any waterborne hazards.

20.7.10.600 C. states that *“If the safety of a water supply is endangered for any reason, the supplier of water shall notify persons served by the public water system of appropriate action to protect themselves against any waterborne hazards. If the supplier of water fails to take such action on its own, or at the direction of the department, the department may directly notify the persons served by the system.”*

Based on your failure to notify persons affected by the high levels of pH, the New Mexico Environment Department Drinking Water Bureau (DWB) requires the Camino Real Regional Utility Authority to notify customers as required in 20.7.10.100 NMAC [incorporating 40 CFR Section 141.202(a)(9)]. Notice must be provided to all customers and others who drink the water within twenty-four (24) hours after the system learns of the violation and must be issued every three (3) months as long as the exceedance persists. In order to reach all people served, water systems are to use, at a minimum, one or more of the following forms of delivery: appropriate broadcast media (such as radio and television), hand or direct delivery and posting in conspicuous locations. This notice must remain posted as long as the violation persists.

Pursuant to 20.7.10.100 NMAC [incorporating 40 CFR Section 141.31(d)] the Camino Real Regional Utility Authority must certify that the notice was published and the method of publication, by submitting a completed copy of the enclosed Public Notification Certification Form to the DWB within 10 days of completing the public notification requirements. A representative copy of each type of notice distributed, published, posted or made available to the people served by the system must be included with the certification form.

Please fill out and return the enclosed Public Notice Certification Form to:
Tim Willy by email at tim.willy@env.nm.gov

Failure to comply with the public notice requirements will result in an additional violation(s) (failure to notify the public and the state) being issued without notice to the Camino Real Regional Utility Authority. Continued failure to comply with Public Notification Requirements, as defined in 20.7.10.100 NMAC [incorporating 40 CFR Sections 141.203 and 141.31(d)] will result in escalated enforcement actions including issuance of Administrative Orders with possible penalties assessed against the Camino Real Regional Utility Authority.

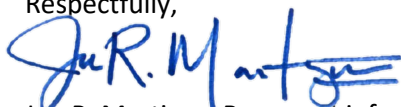
NMED-DWB reserves the right to take additional enforcement action regarding the violations identified in this NOV, to include the issuance of an Administrative Compliance Order compelling compliance and issuing civil penalties.

Pursuant to the NMED Delegation Order dated March 24, 2023, the Cabinet Secretary has delegated the authority to issue Notice of Violations to DWB Bureau Chief Joe R. Martinez.

Please note that your facility will appear on the Department's Enforcement Watch as a result of this NOV (see: <https://www.env.nm.gov/enforcement-watch/>). Further, the Department will issue a press release to local media highlighting your public water system as appearing on this webpage. Your public water system will remain on the Enforcement Watch website as an active matter until this matter is fully resolved.

If you have any questions or need assistance, please contact Tim Willy at 505-690-6657 or by e-mail at tim.willy@env.nm.gov.

Respectfully,

A handwritten signature in blue ink that reads "Joe R. Martinez". The signature is written in a cursive style with a horizontal line underlining the name.

Joe R. Martinez, Bureau Chief
Drinking Water Bureau
Water Protection Division

Enclosures: Public Notice Template
 Public Notice Certification Form

xc: Brandi Littleton, Southern Area Compliance Supervisor (electronic)
 Tim Willy, Compliance Officer (electronic)
 Electronic Central File

PUBLIC NOTICE

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER Camino Real Regional Utility Authority Failed to Notify Customers of High pH levels

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

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

Camino Real Regional Utility Authority failed to notify customers of high pH levels in drinking water.

What should I do?

- There is nothing you need to do. **You do not need to boil your water** or take corrective actions. However, if you have specific health concerns, consult your doctor.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your health care providers about drinking this water.

What is being done?

[Describe corrective action.] We anticipate resolving the problem within [estimated time frame].

For more information, please contact:

JC Crosby 575-589-1075
Camino Real Regional Utility Authority, NM3502507
PO Box 429
Sunland Park, NM 88063

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail



New Mexico Environment Department - Drinking Water Bureau

Public Notification Certification Form – All Tiers

Requirements Pursuant to 40 CFR 141 (Subpart Q)

****This form and a copy of your Notice to the Public must be submitted to the State within 10 days of notifying your customers. ****

PWSID#: NM3502507 **Water System Name:** Camino Real Regional Utility

Authority Violation or Situation Date: 12/12/2023

Individual Contaminant or Contaminant Group:

Violation or Situation Type: PN- Failure to report as required in 20.7.10.600 C.

Violation or Situation Public Notification Tier: Tier 1

Distributed the notice by the following method(s), and on the following date(s) in accordance with 40 CFR 141.201:

- | | |
|---|-------------|
| <input type="checkbox"/> Continuously Post | Date: _____ |
| <input type="checkbox"/> Separate Mailing to Customers | Date: _____ |
| <input type="checkbox"/> Hand Deliver Notice to Customers | Date: _____ |
| <input type="checkbox"/> Publish Notice in Newspaper | Date: _____ |
| <input type="checkbox"/> Release Notice to and Announced by Broadcast Media | Date: _____ |
| <input type="checkbox"/> Post Notice on System Website | Date: _____ |
| <input type="checkbox"/> Billing | Date: _____ |
| <input type="checkbox"/> Annual Report (Consumer Confidence Report) | Date: _____ |
| <input type="checkbox"/> Other: _____ | Date: _____ |

Attach a copy of the posted Public Notice(s) to this certification form.

The public water system named above hereby certifies that public notification has been provided to its consumers in accordance with all delivery, content, and format requirements specified in 40 CFR Part 141:

Water System Representative: _____
(Signature) (Print Name) (Phone Number)

Date of Certification: _____

Attachment #6
Sanitary Survey Report



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Notification provided via E-mail

December 12, 2023

Juan Carlos Crosby; juancarlosc@donaanacounty.org
Camino Real Regional Utility Authority, NM3502507
PO Box 429
Sunland Park, NM 88063

RE: 2023 Sanitary Survey Report

Juan Carlos (JC) Crosby:

On December 5-6, 2023, the New Mexico Environment Department Drinking Water Bureau (NMED DWB) conducted a sanitary survey at the Camino Real Regional Utility Authority water system.

During the sanitary survey, fifty-eight (58) significant deficiencies were identified. Camino Real Regional Utility Authority water system must take corrective action for all significant deficiencies found during the sanitary survey according to the schedule provided by NMED DWB.

Failure to correct and provide documentation of significant deficiency corrections within the established timeframes, will result in treatment technique violation(s) being issued to Camino Real Regional Utility Authority water system.

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 575-318-5767 or by e-mail at brandi.littleton@env.nm.gov

Respectfully,

A handwritten signature in blue ink that reads "Littleton".

Brandi Littleton, Compliance Supervisor
Drinking Water Bureau
Water Protection Division

cc: Joe Martinez, Bureau Chief (electronic)
Tim Willy, Compliance Officer
Electronic Central File

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

2301 Entrada Del Sol, Las Cruces, NM 88001 | 505-690-6657 | www.env.nm.gov



2023 SANITARY SURVEY REPORT

Camino Real Regional Utility Authority NM3502507

*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: Brandi Littleton– Compliance Supervisor
New Mexico Environment Department
2301 Entrada Del Sol
Las Cruces, NM 88001

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

2301 Entrada Del Sol
Las Cruces, NM 88001

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: *Brandi Littleton*
Brandi Littleton, Compliance Supervisor

Date: 12/12/2023

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 Camino Real Regional Utility Authority 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 Tim Willy-NMED DWB Compliance Officer, Joe Savage-NMED Rule Administrator and Brandi Littleton-Compliance Supervisor of the NMED DWB on December 5th and December 6th, 2023. Also in attendance was Assistant Executive Director Juan Carlos Crosby and Lead Operator Ernie Carranza.

On December 11, 2023, NMED DWB was notified of the resignation of Brent Westmorland as Director of Camino Real Regional Utility Authority. Juan Carlos Crosby (JC) is the Acting Director for the drinking water system.

BACKGROUND

The previous sanitary survey at Camino Real Regional Utility Authority was conducted on August 28, 2019, by Antonio Romero. During the previous sanitary survey, nine significant deficiencies were cited. NMED DWB was not provided documentation that the following deficiencies were corrected:

- No inspection report for Anapra Storage Tank
- No inspection report for Meadow Vista Storage Tank
- No inspection report for the Border Storage Tank

SYSTEM DESCRIPTION

The Camino Real Regional Utility Authority water system is a ground water system with an approximate population of 19,466 with 7,318 total service connections. The population for the Camino Real Regional Utility Authority was calculated in accordance with 20.7.10.9.A NMAC. The Camino Real Regional Utility Authority water system is classified as a community water system according to the New Mexico Drinking Water Regulations 20.7.10 NMAC. The system incorporates Sunland Park Water System, Santa Teresa Water System, Santa Teresa Industrial Park and the Dona Ana County Utilities Border Region. All four areas have been incorporated into one single distribution.

Santa Teresa Border Area

Well #2-STBC (002) is equipped with a submersible pump that can produce an average of 25 gallons per minute (gpm). Well #3 -STBC (004) is equipped with a vertical turbine type pump that can produce an average of 602 gpm. Raw water produced from both wells flow to Treatment Plant #1 (003) where it is injected with gas chlorine for arsenic pre-treatment before it enters the Border Area Arsenic Treatment Plant (056). Treated water is stored in the Border Tank -STBC (006) before it is boosted to distribution.

Border Tank-STBC (006) is a direct pump tank that has a separate inlet/outlet and is constructed of steel panels. Border Tank can store approximately 27,000 gallons.

Santa Teresa Industrial Park Area

Well #5 -STIP (010) is equipped with a submersible pump that produces an average of 550 gpm. Well #6A-STIP (017) is equipped with a submersible pump that can produce an average of 700 gpm. Well #14A-STIP (057) is equipped with a vertical turbine pump that can produce an average of 800 gpm. Raw water produced from all three wells flow to Treatment Plant #3 (011) where it is injected with gas chlorine for arsenic pre-treatment before it enters the Industrial Park Arsenic Treatment Plant (012). Treated water is stored in the Small Tank-STBC (014) and the Large Tank (048) before it flows through the STIP Booster Station (058) to distribution. Treated water is also boosted, via a small transfer booster station, to the Airport Tank (020) before it is again boosted again to distribution.

Small Tank-STIP (014) is a direct pump tank that has a single inlet/outlet and is constructed of steel panels. Small Tank can store approximately 261,000 gallons. Large Tank-STIP (048) is a direct pump tank that has separate inlet/outlet and is constructed of steel panels. Large Tank can store approximately 2,000,000 gallons.

Santa Teresa Community service Area

Well #19A-STC (053) is equipped with a vertical turbine pump that produces approximately 985 gallons per minute (gpm). Raw water produced flows to Treatment Plant #6 (026) where it is injected with gas chlorination for arsenic pre-treatment. From Treatment Plant #6 the treated water flows to the Santa Teresa Community Arsenic Treatment Plant (049). Finished water is stored in the Santa Teresa Community Tank-STC (050). When in demand, treated water is boosted to distribution.

Well #30A (STC) is a vertical turbine type pump that was out of service at the time of inspection. The well has been out of service for over a year.

Santa Teresa Community Tank is a direct pump tank that has a separate inlet/outlet and is constructed of steel panels. The tank can store approximately 2,000,000 gallons.

Sunland Park Area

Well #2-SP (032) is equipped with a submersible pump that produces approximately 450 gallons per minute (gpm). Raw water produced flows to Treatment Plant #8 (033) where it is injected with gaseous chlorine for disinfection. Pre-treated water then flows to Sunland Park Arsenic Treatment Plant (034) for arsenic removal.

Well #3-SP (037) is equipped with a submersible pump that produces approximately 40 gallons per minute (gpm). Raw water produced flows to Treatment Plant #9 (047) where it is injected with gaseous chlorine for arsenic pretreatment. Pre-treated water then flows to Sunland Park Arsenic Treatment Plant (034) for arsenic removal.

Well #11A-SP (039) is equipped with a submersible type pump that produces approximately 500 gallons per minute (gpm). Raw water produced flows to Treatment Plant #7 (036) where it is injected with gaseous chlorine for arsenic pre-treatment. Pre-treated water then flows to Sunland Park Arsenic Treatment Plant (034) for arsenic removal and to Santa Teresa Community Arsenic TP (049) for arsenic removal.

Well #4A-SP (054) is a vertical turbine type pump that was out of service at the time of inspection. The well has been out of service for over a year.

Finished water flows directly to distribution and to Tierra Madre Tank-SP (041). From the Tierra Madre Tank-stored water then flows to distribution.

The Tierra Madre Tank is a direct tank that has a single inlet/outlet and is constructed of steel panels with a capacity of 250,000 gallons. The Meadow Vista Tank-SP (040) is a floating tank that has separate inlet/outlet and is constructed of steel panels with a capacity of 100,000 gallons. The Anapra Tank-SP (035) is a floating tank that has separate inlet/outlet and is constructed of steel panels with a capacity of 100,000 gallons.

The Industrial Park Arsenic TP, Santa Teresa Arsenic TP and Sunland Park TP utilize treatment technologies including adsorption, coagulation-flocculation-sedimentation in order to remove Arsenic. Gas chlorine is used as a pre-treatment to react with Sulfuric Acid to lower pH and oxidize arsenic for precipitation with Ferric Chloride. The precipitate is then removed through filtration with a media. After the removal of arsenic, the pH is increased by the addition of Caustic Soda before entering distribution.

The newly constructed Border Area Arsenic Treatment Plant utilizes adsorption/filtration media and has a maximum design treatment capacity of 800 gpm with the ability to bypass 350 gpm of untreated well water to achieve a total blended production capacity of 1,150 gpm with arsenic concentrations less than the USEPA standard of 10 ppb. The new arsenic treatment system does not require the use of any chemicals. pH adjustment is also not required and there is no need to add ferric chloride to maximize the arsenic removal.

The distribution network consists of a mix of C900, Asbestos Concrete, HDPE, Copper and PVC piping.

FIELD ANALYSIS

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

- Chlorine Residual – 0.02 mg/L free chlorine from 4950 McNutt Rd
- Chlorine Residual – 0.62 mg/L free chlorine from Industrial Arsenic Treatment Plant

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.

Fifty-eight (58) significant deficiencies were identified at the Camino Real Regional Utility Authority water system during the sanitary survey. Those significant deficiencies are noted in the attached Significant Deficiency Summary page.

Corrective Action Plans and Corrective Action:

The Camino Real Regional Utility Authority water system must take corrective action for all significant deficiencies found according to the schedule provided by NMED DWB.

CONCLUSION

The sanitary survey site visit for the Camino Real Regional Utility Authority water system was completed on December 5th and December 6th, 2023. Failure to 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].

Significant Deficiency Summary

Significant Deficiencies:

1. **Significant Deficiency Code:** 005O-Operators staff unfamiliar or lacks understanding of treatment method or process control.

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: At the time of the sanitary survey, the operator in charge was not familiar with the arsenic treatment process utilized at Camino Real Regional Utility Authority.

Required Corrective Action: No later than December 22, 2023, Camino Real Regional Utility Authority must retain an operator that is familiar with effectively operating the water system arsenic treatment plants.

In addition, no later than December 31, 2023, Camino Real Regional Utility Authority must ensure that all operators who are tasked with any portion of the arsenic treatment plant operations, be provided with training on effective process control monitoring and recordkeeping. This training must be documented and provided to NMED as evidence that the training was completed.

Finally, no later than December 31, 2023, Camino Real Regional Utility Authority must develop a thorough written operations plan which provides specific process control operations and record keeping for each of the system's arsenic treatment plants. Operators that are tasked with any part of operating the treatment plants must review and understand the operations plan.

2. **Significant Deficiency Code:** 006C-Interruptions in treatment process

Regulatory Citation: 20.7.10.100 NMAC incorporating 40 CFR 141.63(d)(2)

Significant Deficiency Description: At the time of the sanitary survey, three of four arsenic treatment plants were intentionally bypassed, allowing untreated water into the distribution system.

Required Corrective Action: No later than December 31, 2023, Camino Real Regional Utility Authority water system must provide arsenic treatment and must provide documentation acceptable to DWB to verify that all arsenic treatment plants are in operation and that drinking water treated has an arsenic value under 0.010 mg/L.

3. **Significant Deficiency Code:** 005K-Inadequate process control monitoring and record keeping.

Regulatory Citation: 20.7.10.100 NMAC incorporating 40 CFR 141.63(d)(4)

Significant Deficiency Description:

At the time of the sanitary survey, Camino Real Regional Utility Authority water system was unable to describe or demonstrate that any process control of the Arsenic treatment plants was being conducted, and no documentation of monitoring, recording, maintenance or process control was produced by operations staff for review. Data retrieved during the sanitary survey indicated that the in-line finished

water pH probe at the Industrial treatment plant had been malfunctioning since at least 11/21/2023. Furthermore, at the time of the sanitary survey, no calibration documentation was provided for review and the operator stated that calibration and calibration checks were not performed.

Required Corrective Action: No later than December 31, 2023, the Camino Real Regional Utility Authority water system must begin process control monitoring and record keeping based upon manufacturer recommendations and industry standards.

In addition, no later than December 31, 2023, CRRUA must ensure that all operators who are tasked with any portion of the arsenic treatment plant operations, be provided with training on effective process control monitoring and recordkeeping. This training must be documented and provided to NMED as evidence that the training was completed.

Finally, no later than December 31, 2023, CRRUA must develop a thorough written operations plan which provides specific process control operations and record keeping for each of the system's arsenic treatment plants. Operators that are tasked with any part of operating the treatment plants must review and understand the operations plan.

Process control monitoring and recordkeeping shall at a minimum include routine calibrations and calibration checks of all in-line pH units including maintaining a handheld or benchtop pH meter in calibration using non-expired pH buffers. All in-line and benchtop/handheld pH meters must be routinely calibrated. Calibrations and daily calibration check records must be maintained for each unit. All chlorine meters must be in calibration and calibration checks must be performed and documented no less than every 5 days. The CRRUA water system must provide documentation acceptable to DWB to verify that this deficiency has been corrected.

- 4. Significant Deficiency Code:** 004P-Chemical dosage records are insufficient to ensure proper operation of treatment.

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: Camino Real Regional Utility Authority staff does not calibrate, check calibration, or maintain calibration records for chemical addition pumps.

Required Corrective Action: No later than December 31, 2023, Camino Real Regional Utility Authority water system must calibrate all chemical addition pumps. Camino Real Regional Utility Authority water system must routinely check calibration of all chemical addition pumps and submit documentation that all chemical pumps have been calibrated and checked.

Camino Real Regional Utility Authority must provide documentation acceptable to DWB to verify that procedures for calibration and calibration checks of all chemical feed pumps have been added to the O&M Plan.

- 5. Significant Deficiency Code:** 001I-Inadequate site security at treatment facilities

Regulatory Citation: 20.7.10.400.B

Significant Deficiency Description:

- a) Treatment Plant #3 (011) gas chlorination building was not locked at the time of the survey inspection.
- b) Treatment Plant #1 (003) gas chlorination building was not locked at the time of the survey inspection.
- c) Santa Teresa Community Arsenic Treatment Plant (049) backflow tank ladder gate was not locked.
- d) Santa Teresa Community Arsenic Treatment Plant (049) backflow tank access hatch was not locked.

Required Corrective Action: No later than January 31, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the treatment plant buildings are locked, and that the arsenic treatment plant backflow storage tank is equipped with a lock at the ladder gate and a lock on the access hatch.

6. Significant Deficiency Code: 001S-Inadequate site security at storage tank

Regulatory Citation: 20.7.10.400.B

Significant Deficiency Description:

- a) Anapra Storage Tank (041)-Security wire is falling off the top of the fence.
- b) Anapra Storage Tank (041)- Access hatch is unlocked.
- c) Meadow Vista Storage Tank (040)-Security wire is falling off the top of the fence.
- d) Meadow Vista Storage Tank (040)- Erosion underneath the gate allows for unauthorized access to the facility.
- e) Tierra Madre Tank (035)-The ground has eroded underneath the fence allowing for unauthorized access.
- f) Tierra Madre Tank (035)-The access hatch is unlocked.

Photo Documentation:

a)



b)



b)



d)



e)



f)



Required Corrective Action: No later than January 31, 2024, Camino Real Regional Utility Authority (CRRUA) must submit photographs or other documentation acceptable to DWB, indicating that the storage tank access hatch is secure with a lock. No later than March 31, 2024, CRRUA must provide documentation as proof that the fencing has been repaired, that the soil erosion has been backfilled.

7. Significant Deficiency Code: 001Q-Storage Facility not protected against contamination.

Regulatory Citation: 20.7.10.400.D NMAC

Significant Deficiency Description:

- a) Small Tank (014) overflow flap valve was stuck open.
- b) Large Tank (048) overflow is not screened or protected with a flap valve. Additionally, sediment buildup is blocking the drain.
- c) Airport Tank (020) overflow screen too large.
- d) Meadow Vista Storage Tank (040)-The overflow is not screened or protected with a flap valve. Additionally, sediment buildup is blocking the drain.
- e) Tierra Madre Tank (035)-Major erosion at the overflow. The erosion has caused the pipe to collapse, and the opening is buried in the sand.

Photo Documentation:

a.



b.



c.



d.



e.



Required Corrective Action: No later than January 31, 2024, the Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the flap valve has been replaced or maintained to open and close easily at the Small Tank. The Airport Tank overflow line must be screened with 24 mesh or fit with a flap valve. At the Large Tank, Meadow Vista tank and Tierra Madre Tank, the sediment buildup must be removed, and the access hatch must be fit with a screen and flap valve.

8. Significant Deficiency Code: 001L-Inadequate sanitary seal at the well

Regulatory Citation: 20.7.10.400.C NMAC

Significant Deficiency Description:

- a) Well #3 STBC (004) well vent does not have a properly sized screen.
- b) Well #3 SP (032)-well vent does not have a properly sized screen.
- c) Well #3 SP (032) Air relief valves are not screened.
- d) Well #5 STIP (010)-well casing lip was observed to have a hole in the lid.
- e) Well #6A STIP (017)-air relief valves was not downturned and screened

- f) Well #11A (039)-Inadequate seal at sounder cap
- g) Well #11A (039) inadequate seal around well cap plates.

Photo Documentation:

a.



b.



c.



c.



d.



f.



g.



Required Corrective Action: No later than January 31, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the well vents are downturned and screened with 24 mesh. Air relief valves must be downturned and sealed with 24 mesh.

9. Significant Deficiency Code: 004Y-Inadequate construction at pump unit

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description:

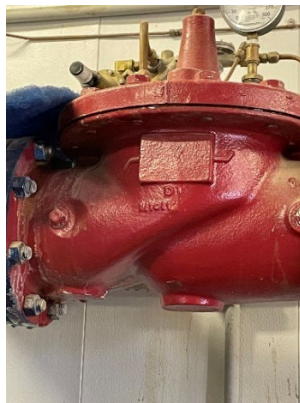
- a) STIP Booster Station (058)-major leak in booster pump building
- b) SP Booster Station (007)-air relief valve not screened with 24 mesh

Photo Documentation:

a)



b)



Required Corrective Action: No later than February 28, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the leaking in the booster station building has been repaired.

10. Significant Deficiency Code: 004W-Inadequate construction at treatment plant

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description:

- a) Santa Teresa Industrial Park Arsenic TP (012) caustic soda hold tank was leaking large amounts of caustic soda into the containment area. Caustic soda in the area was approximately 3 inches deep.
- b) Sunland Park Arsenic Treatment Plant (034) Leak in sludge discharge valve at the backwash tank.
- c) Sunland Park Arsenic Treatment Plant (034) Drain valves in the media tanks are leaking.
- d) Sunland Park Arsenic Treatment Plant (034) the overflow on the backwash tank had no screen or valve.

Photo Documentation:

a.



b.



c.



d.



Required Corrective Action: No later than January 31, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that corrections found at the treatment plants have been corrected.

11. Significant Deficiency Code: 002J- Materials in contact with potable water are not NSF approved.

Regulatory Citation: 20.7.10.400.K

Significant Deficiency Description:

- a) Industrial Park Arsenic Treatment Plant (012)-Chemicals stored in the arsenic treatment building are not ANSI/NSF approved for use in drinking water.
- b) Santa Teresa Community Arsenic Treatment Plant (049)-Chemicals stored in the arsenic treatment building are not ANSI/NSF approved for use in drinking water.

Photo Documentation:

a)



Required Corrective Action: No later than February 28, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that all chemicals that are not ANSI/NSF approved have been stored in an alternate location.

12. Significant Deficiency Code: 001K-Inadequate construction at the well

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description:

- a) Well #2 (002)-Electrical conduit is not connected with a secure seal.
- b) Well #2 (002) An air relief valve was removed, and a closed valve was used to plug the pipe. This valve should be capped.

Photo Documentation:

a)



b)



Required Corrective Action: No later than February 28, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the electrical conduit is adequately sealed and that the closed valve is adequately capped.

13. Significant Deficiency Code: 006E-Inoperable water level indicator

Regulatory Citation: 40 CFR 141.63(d)(3)

Significant Deficiency Description:

- a) Large Tank (048) pressure gauge used to monitor tank levels was inoperable.
- b) Airport Tank (020) level indicator was inoperable.

Photo Documentation:



Required Corrective Action: No later than March 31, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the level indicators have been repaired.

14. Significant Deficiency Code: 004B-Insufficient Emergency Response Plan

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: On the day of the Sanitary Survey, the Camino Real Regional Utility Authority did not provide an adequate emergency response plan for review.

Required Corrective Action: No later than March 31, 2024, Camino Real Regional Utility Authority must submit a copy of an adequate emergency response plan that is specific to their water system. The plan must outline how emergencies are addressed and how customer complaints are processed and tracked.

15. Significant Deficiency Code: 004C-Insufficient Operations and Maintenance (O&M) Plan

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: On the day of the Sanitary Survey, the Camino Real Regional Utility Authority provided an incomplete O&M for review. O&M plan did not have maintenance requirements for the new treatment plant and was not specific for any of the treatment plants. No O&M logs were maintained that are specific to calibration of probes, calibration of meters, pH detected pre or post treatment or general maintenance of the system. The operations staff had no formal procedure for backwashing arsenic treatment units.

Required Corrective Action: No later than March 31, 2024, Camino Real Regional Utility Authority must submit a copy of an adequate operations & maintenance plan that is specific to their water system. Camino Real Regional Utility Authority must also provide documentation that all operations staff have read and understood the Plan.

16. Significant Deficiency Code: 005P-Lack of treatment plants lack alarms or automatic shutdown.

Regulatory Citation: 20.7.10.100 NMAC incorporating 40 CFR 141.403

Significant Deficiency Description: Camino Real Regional Utility Authority water system does have alarms to notify staff when any additive, pH, or chlorine residual becomes out of acceptable range.

Required Corrective Action: Camino Real Regional Utility Authority water system must monitor all arsenic treatment plant units at least every 8 hours of water treatment and record monitoring parameters and documentation including but not limited to:

- a. pH at all monitoring locations
- b. water temperature
- c. chemical additive settings
- d. chlorine residual before and after treatment
- e. any process control conducted at the time

Once alarms are set to alert operations staff remotely and record in SCADA or by other automatic means, all monitoring and recording procedures and frequency must be detailed in the O&M Plan.

The 8-hour monitoring is required as soon as arsenic treatment plants resume production up until the automatic alarm system is in place and routinely tested to ensure operators are able to receive alarms remotely on their cell phones and also displayed on the SCADA. No later than March 31, 2024, Camino Real Regional Utility Authority must install treatment plant alarms and automatic shutdown.

17. Significant Deficiency Code: 001U-Inadequate replacement equipment for critical processes.

Regulatory Citation: 20.7.10.400E NMAC

Significant Deficiency Description: Camino Real Regional Utility Authority water system does not have spare parts for chemical addition pumps, in-line pH probes, backup chlorine meter, and other key components.

Required Corrective Action: No later than March 31, 2024, Camino Real Regional Utility Authority must have spare parts on hand for all essential components. Spare parts include, but are not limited to:

- a. pH probes
- b. Chemical injector units

- c. Chemical addition pump spare parts
- d. Backup chlorine meter
- e. Chemical feeder pumps

18. Significant Deficiency Code: 006J-No flushing program

Regulatory Citation: 40 CFR 141.63(d)(3)

Significant Deficiency Description: The Camino Real Regional Utility Authority has fire suppression boosting stations that have the potential to contaminate the distribution system if allowed to stagnate.

Required Corrective Action: No later than March 31, 2024, Camino Real Regional Utility Authority must have a written flushing program that details routine flushing of the fire suppression booster piping and associated equipment. The flushing program should also include distribution and documentation of valving to identify the origin of water in all portions of distribution. The program must be included in the regular operation & maintenance plan.

19. Significant Deficiency Code: 005G No water loss assessment or water audit

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: The CRRUA water system was unable to provide documentation on water loss.

Required Corrective Action: No later than April 30, 2024, Camino Real Regional Utility Authority must calculate water loss on a routine basis and/or conduct a water audit. The Camino Real Regional Utility Authority must submit documentation acceptable to DWB within 120 days to verify that this deficiency has been corrected.

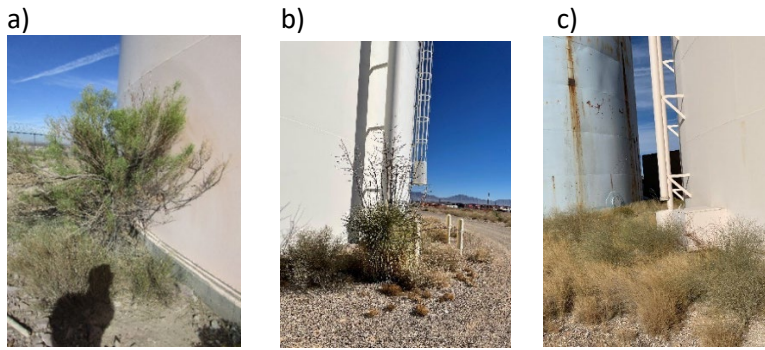
20. Significant Deficiency Code: 001E-Poor housekeeping

Regulatory Citation: 20.7.10.400. B

Significant Deficiency Description:

- a) Anapra Tank (041) – brush and vegetation growing around storage tank.
- b) Large Tank (048)- brush and vegetation growing around storage tank.
- c) Airport Tank (020)- brush and vegetation growing around storage tank.

Photo Documentation:



Required Corrective Action: Excess vegetation around storage tanks and treatment plants is a fire hazard. No later than April 30, 2024, Camino Real Regional Utility Authority must provide photos as documented proof that the areas are adequately maintained.

21. Significant Deficiency Code: 001N-Storage facility has a leak.

Regulatory Citation: 20.7.10.400 D

Significant Deficiency Description:

a) Airport Tank (020) valve was leaking.

Photo Documentation:



Required Corrective Action: No later than April 30, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that the leaking valve has been repaired.

22. Significant Deficiency Code: 005C-Administraton is unfamiliar with New Mexico Drinking Water Regulations.

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: On the day of the Sanitary Survey, the Camino Real Regional Utility Authority staff was not familiar with regulation requirements regarding notification and reporting.

Required Corrective Action: No later than April 30, 2024, Camino Real Regional Utility Authority administration staff must arrange and attend detailed training on drinking water regulations.

23. Significant Deficiency Code: 004K-Inadequate splash pad

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description:

a) Tierra Madre Tank (035)-No splash pad has led to major erosion at the overflow.

Photo documentation:



Required Corrective Action: No later than May 31, 2024, Camino Real Regional Utility Authority must submit a photograph or other documentation acceptable to DWB, indicating that an adequate splash pad has been installed at the overflow to minimize soil erosion at this site.

24. Significant Deficiency Code: 006M-Lack of storage tank inspection

Regulatory Citation: 40 CFR 141.63(e)(3)

Significant Deficiency Description:

- a) No professional inspection of Border Tank (006)
- b) No professional inspection of Small Tank (014)
- c) No professional inspection of Large Tank (048)
- d) No professional inspection of Airport Tank (020)
- e) No professional inspection of Santa Teresa Community Tank (050)
- f) No professional inspection of Tierra Madre Tank (041)
- g) No professional inspection of Meadow Vista Tank (040)
- h) No professional inspection of Anapra Tank (035)

Required Corrective Action: The inspection reports for the Border Tank (006), Meadow Vista Tank (040) and Anapra Tank (035) are past due. An inspection report for these tanks is due immediately. No later than December 15, 2024, Camino Real Regional Utility Authority must have the Small Tank, Large Tank, Airport Tank, Tierra Madre Tank and the Santa Teresa Community Tank professionally inspected.

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 Camino Real Regional Utility Authority water system during the survey.

1. **Note:** The Camino Real Regional Utility Authority monitors chlorine residuals with a single handheld meter.

Recommended Action: In addition to correcting the deficiency by having a second handheld or benchtop meter on site, the Camino Real Regional Utility Authority should install in-line chlorine meters at all Arsenic facilities. These meters should record data at least every 15 minutes and send the data to the SCADA system. The SCADA should also be set with alarms for chlorine residuals out of set range.

2. **Note:** The Camino Real Regional Utility Authority has unacceptable monitoring at the Arsenic treatment plants and was able to provide no documentation of any monitoring.

Recommended Action: The Camino Real Regional Utility Authority should consider routinely monitoring the following at all applicable Arsenic treatment plants and was able to provide no documentation of any monitoring.

- Water flow
- pH at all locations currently set up
- Temperature of raw and finished water
- Add pH measurement for raw water at all locations and between all chemical additions
- Total Dissolved Solid measurement of raw and finished water
- Chemical dosing for all additives
- Chlorine residual of water entering the plant and in finished water leaving the plant
- Chlorine residual of water leaving major storage tanks
- In-house Arsenic analysis of raw and finished water
- Filter pressures at least once per day

These parameters should be manually recorded and stored in the SCADA for efficient review. Before linking to SCADA, it is recommended to record manually on forms created for the purpose with time, date, location, and operator initials. Once linked to SCADA, decide which should have alarms associated with them for remote alert to operators. Recommended are:

- Finished water pH
- Chlorine residual before and after Arsenic treatment
- Chemical dose

3. **Note:** The Camino Real Regional Utility Authority uses two Arsenic treatment technologies with very different operational requirements.

Recommended Action: The Camino Real Regional Utility Authority should consider arranging with the manufacturers or contractors a thorough retraining of all operations staff at least annually, and for all new operations staff before they become responsible for the plants.

4. **Note:** The Camino Real Regional Utility Authority has very lax and unsafe gas chlorine safety measures in place.

Recommended Action: The Camino Real Regional Utility Authority should strongly consider arranging a consultation with NM OSHA for training and SOP writing. The CRRUA water system should bring all gas chlorine facilities up to all applicable codes and regulations to avoid violations and penalties from other agencies outside DWB. At a minimum, the gaseous chlorination building should be constructed with the following:

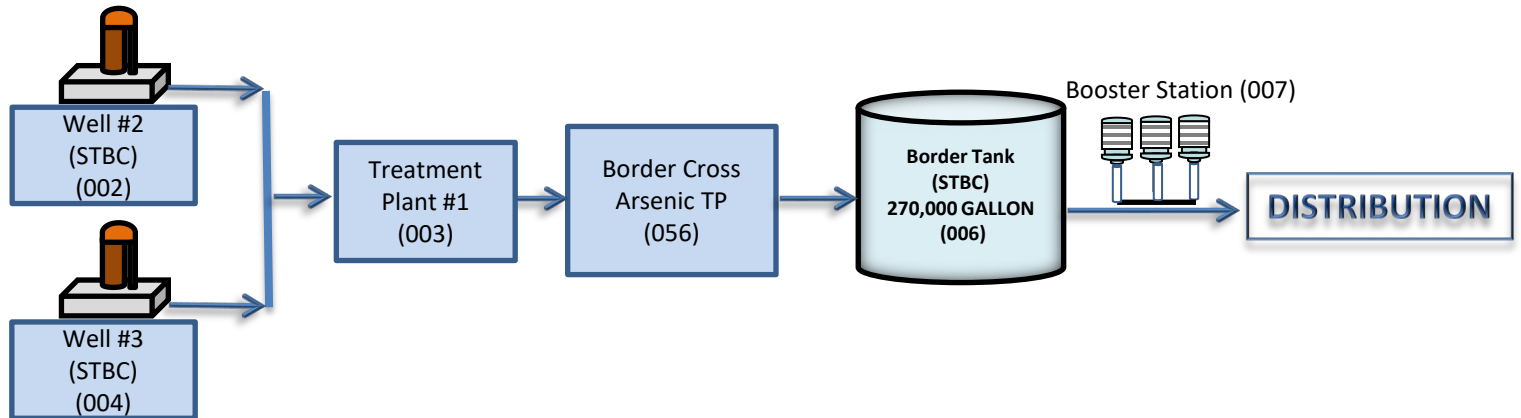
- Push bar door on treatment building
- Ventilation system within the building
- Outside ventilation switch
- Alarm lighting
- Gas alarm detection system



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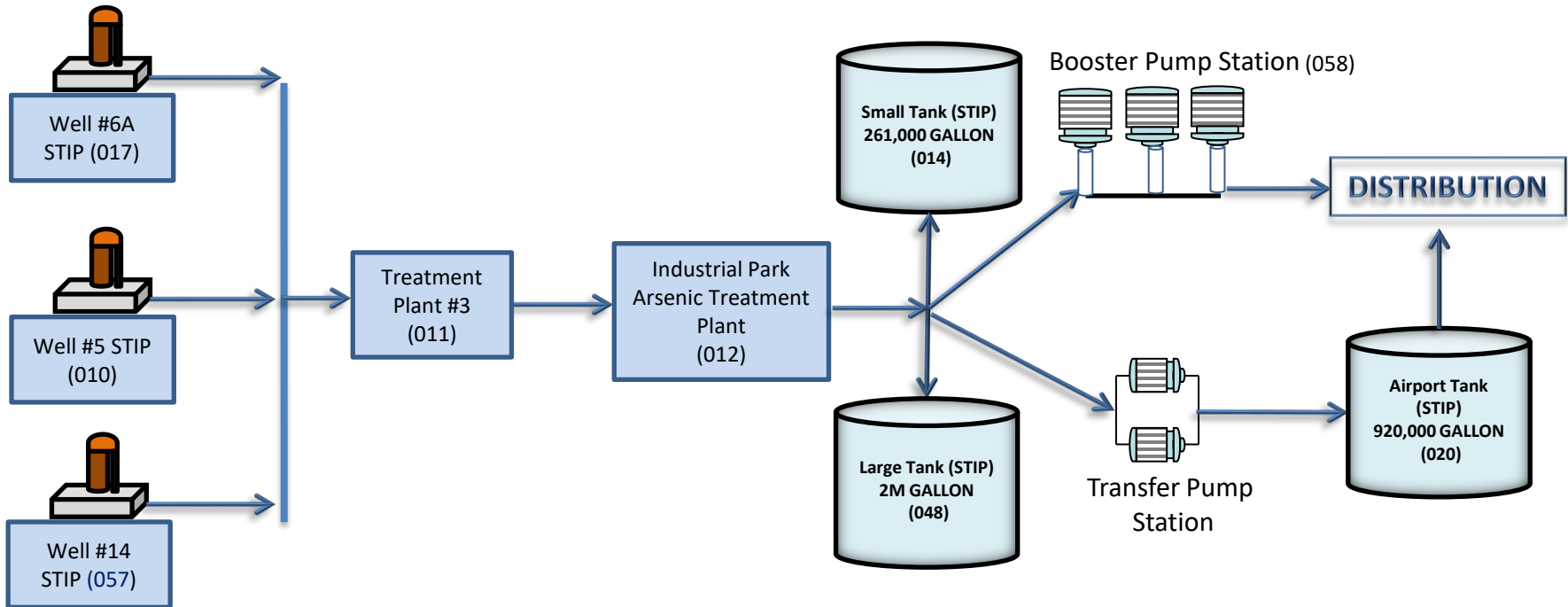


Santa Teresa Border Area



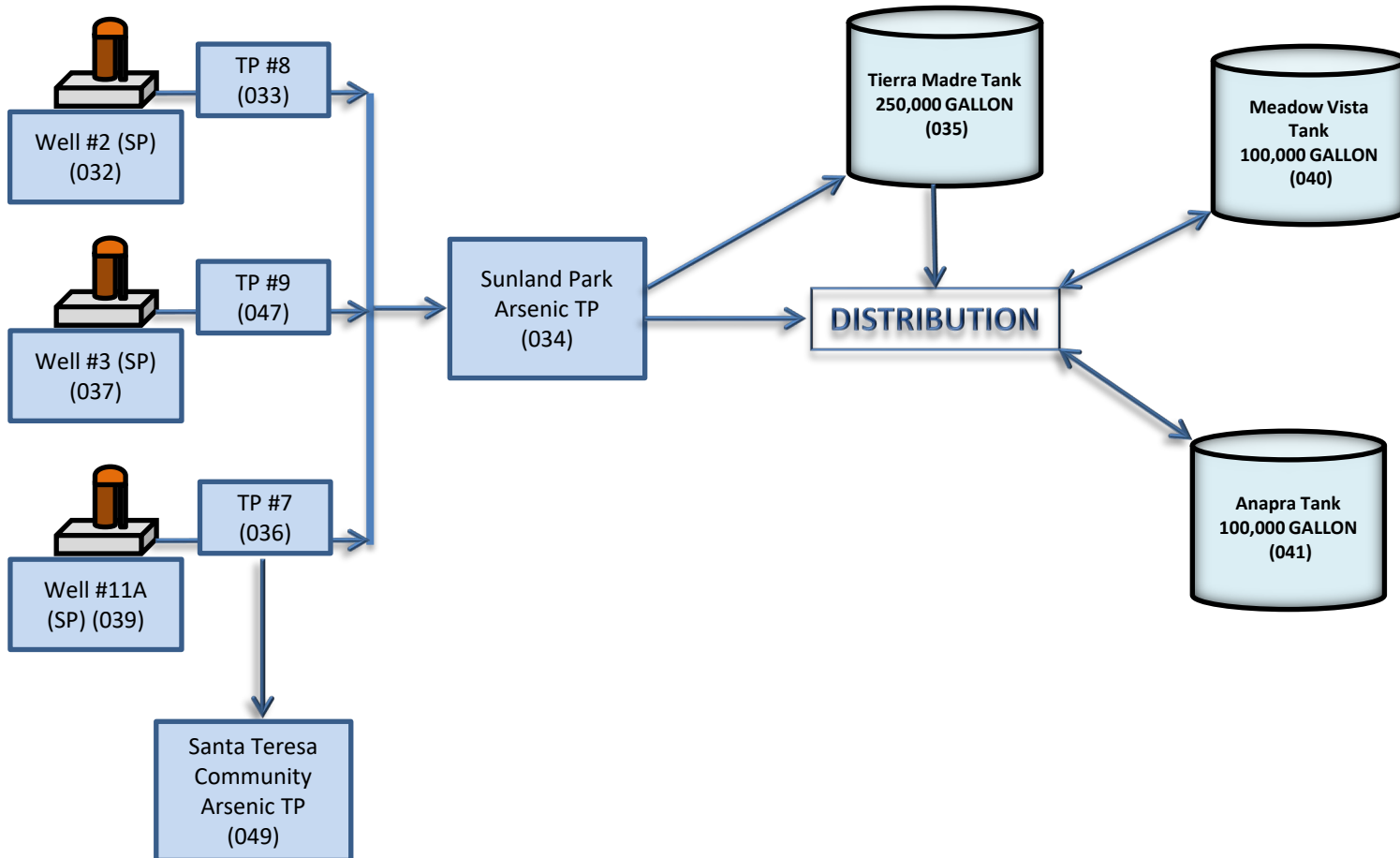


Industrial Park Area





Sunland Park Area

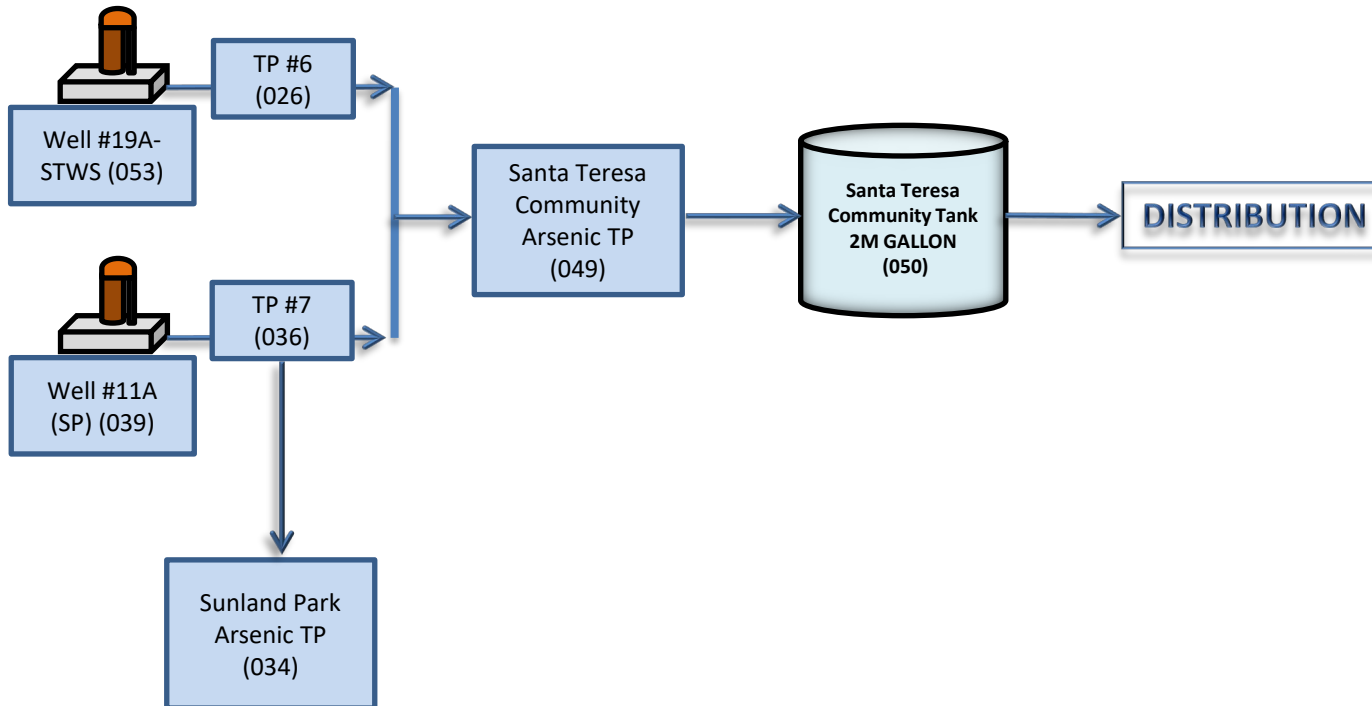




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Camino Real Regional Utility Authority
NM3502507



Santa Teresa Area





Sanitary Survey Corrective Action Plan

PWSS Name	Camino Real Regional Utility Authority
PWSS ID	NM3502507
Sanitary Survey Date:	December 6, 2023
Date report was issued:	December 12, 2023

Deficiency Listing with due dates

Deficiency Code	Description	Required date of completion
005O	Operators staff unfamiliar or lacks understanding of treatment method or process control.	12/22/2023
006C	Interruptions in treatment process	12/31/2023
005K	Inadequate process control monitoring and record keeping.	12/31/2023
004P	Chemical dosage records are insufficient to ensure proper operation of treatment.	12/31/2023
001I	Inadequate site security at treatment facilities	1/31/2024
001S	Inadequate site security at storage tank access hatch	1/31/2024
001S	Inadequate site security at storage tank fencing	3/31/2024
001Q	Storage Facility not protected against contamination.	1/31/2024
001L	Inadequate sanitary seal at the well	1/31/2024
004Y	Inadequate construction at pump unit	1/31/2024
004W	Inadequate construction at treatment plant	2/28/2024
002J	Materials in contact with potable water are not NSF approved.	2/28/2024
001K	Inadequate construction at the well	2/28/2024
006E	Inoperable water level indicator	3/31/2024
004B	Insufficient Emergency Response Plan	3/31/2024
004C	Insufficient Operations and Maintenance (O&M) Plan	3/31/2024
005P	Treatment plants lack alarms or automatic shutdown.	3/31/2024
001U	Inadequate replacement equipment for critical processes.	3/31/2024

