



Sanitary Survey Corrective Action Plan (CAP)

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

PWSS Name	Springer Water System
PWSS ID	NM3526604
Sanitary Survey Date:	09/28/2023
Date report issued:	10/24/2023

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

Deficiency Code	Description	Choose one and fill in date:	
		Date Deficiency was addressed	Expected date of completion
005G	Lack of water loss assessment or water audit		2-1-25
001V	Insufficient Operations and Maintenance Plan		
001W	Insufficient Emergency Response Plan		
001U	Lack of essential spare parts		
004P	Chemical dosage records are insufficient to ensure proper operation of the treatment plant		
SW26	Chlorine meter calibration checks not performed as required by the regulations		
SW26	Inadequate turbidity calibration records kept		
SW05	Lack of, or improper containment of liquid chemicals	6-7-24	
001Q	Failure to ensure that the clearwell hatch prevents the entry of contaminants.	6-7-24	
001B	Failure to ensure that the clearwell is free of any unprotected opening.	6-7-24	
006M	Failure to have the clearwell professionally inspected. Facility 003	6-7-24	
SW15	Inadequate process control		
SW20	Unmarked raw water sample tap		
SW33	Inadequate CT measurements	6-7-24	
SW13	Improper treatment of drinking water, including not meeting proper inactivation of pathogens		
SW20	Inadequate sample locations for finished water turbidity and chlorine residual		
003X	No water level indicator or inoperable water level indicator for storage facility	6-7-24	

	Facility (Storage Tank #1) 26604004	6-7-24
001Q	Storage facility hatch is not locked (Storage Tank #1) 26604004	6-7-24
001Q	Storage facility hatch is not locked (Storage Tank #2) 26604005	6-7-24
Comments:	<i>These corrections were confirmed on a meeting held with NMED on 6-7-24 with our compliance officer. See Attachment</i>	

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

Jacob Kruse at jacob.kruse@env.nm.gov

Corrective Action Plan submitted by:

Signature *Craig Eppler* Printed Name *Craig Eppler* Date *10-4-24*

Springer WS—2023 Sanitary Survey

Significant Deficiencies

• SD #1 005G—Water Audit

- Option #1: work with NM Rural Water
- Option #2: Shawn states she has forms for documenting water loss. Complete water loss audits based on available data and submit to NMED for review.
- Noted that meter for treated water leaving the plant is not operational at this time.

• SD #2 001V—Lack of Operations and Maintenance (O&M) Plan

- Can work with NMED-Sustainable Water Infrastructure Group. Fill out Technical Assistance Request form (separate attachment).
- Template provided (separate attachment).
- Key points to include in O&M Plan:
 - define organizational structure
 - detailed description of system and treatment
 - describe standard operations/maintenance/sampling procedures
 - flocculation maintenance
 - clarifier flushing/backwash and maintenance
 - filter evaluation and maintenance
 - chemical addition
 - jar testing
 - daily documentation requirements and format
 - all other routine procedures, some described below to address other deficiencies
 - internal forms and how to use them
 - procedures for compiling MORs
 - include all process control procedures
 - flocculation evaluation
 - clarification evaluation
 - filter optimization
 - disinfection monitoring and optimization
 - TOC removal optimization
 - include all calibration check procedures and routine calibrations
 - turbidimeters
 - in-line chlorine meter
 - chemical pumps
 - specifications for new installations/repairs
 - identify chemical/equipment suppliers and contractors.

• SD #3 001W—Insufficient Emergency Response Plan

- Can work with NMED-Sustainable Water Infrastructure Group. Fill out Technical Assistance Request form (separate attachment).
- Template provided (separate attachment).
- Key points:

- identify threats to system and responses including routine and non-routine emergencies
 - identify contact personnel within and outside system in event of emergencies
 - formalize an emergency communication protocol
 - Boil water advisory & public notice templates
 - Inventory of critical equipment
 - Identify critical or vulnerable customers
- **SD #4 001U—Lack of Essential Spare Parts**
 - Photos have been submitted, but do not specifically address need for spare parts for chemical pumps, or replacements for the old Hach turbidimeters.
 - Staff should provide an inventory of spare parts.
 - Identify supplies that need to be purchased for budget purposes including but not limited to:
 - Chemical addition pumps
 - Turbidimeters (Current Hach 1720D models are no longer supported by the manufacturer)
 - Motors & seals for pumps, flocculator, etc.
- **SD #5 004P—Calibrate and check all chemical addition pumps**
 - Staff need to document chemical dosage levels
- **SD #6 SW26—Chlorine meter calibration checks**
 - Staff need to check that meters are working properly
 - Calibration checks at least every 5 days (put in O&M Plan)
 - Look into hiring technicians from Hach to perform calibration on quarterly or annual basis
 - Include procedures in O&M Plan
- **SD #7 SW26—Inadequate turbidity calibration records**
 - Staff need to check that meters are working properly
 - Look into hiring technicians from Hach to perform calibration on quarterly or annual basis
 - Include procedures in O&M Plan
- **SD #8 SW05—Install secondary containment**
 - Emailed staff on 5/23/2024 to provide some extra guidance, stated that proper supplies to correct this deficiency will be ordered. Will check back in for documentation once secondary containment has been installed.
- **SD #9 001Q—Clearwell contamination**
 - Photos submitted showing lock on clearwell hatch, area around clearwell hatch cleaned, absorbent pad applied in case of accidental spill.
- **SD #10 001B—Clearwell unprotected openings**
 - Photo submitted showing new cap and caulking at clearwell chlorine entry point.
- **SD #11 006M—Clearwell inspection**
 - Quote and invoice from Midco Diving submitted for inspection and cleaning of all tanks including clearwell, scheduled for July 2024. In email from 5-23-2024, staff state the inspections have already been completed. Staff will be sending over the inspection reports.

• SD #12 SW15—Inadequate Process Control

- a. include in O&M Plan how to check accuracy of flow meters
- b. include in O&M Plan how to check accuracy of meter flow
- c. provide documentation that turbidity of clarified water is being monitored
- d. include in O&M Plan how to evaluate clarifiers and when/how to clean
- e. document that jar testing is being conducted by Springer staff
- f. provide scans of operator logbook to demonstrate that proper documentation is being done
- g. include in O&M Plan how you evaluate filter media
- h. this has been corrected
- i. work with engineering partner to address these issues and provide timeline
- j. work with engineering partner to address these issues and provide timeline

• SD #13 SW20—Raw water sample tap

- Photo documentation submitted of proper label on raw water sample tap.

• SD #14 SW33—Inadequate CT measurements

- Work with engineering partner to address these issues and provide timeline for completion

• SD #15 SW13—Improper treatment of drinking water, not meeting proper inactivation of pathogens

- Work with engineering partner to address these issues and provide timeline

• SD #16 SW20—Inadequate sampling location for finished water turbidity and Cl₂ residual

- Ideally would be measured where water enters the clearwell. Currently is measured where water leaves the clearwell.
- Work with engineering partner to see if sampling location can be changed.

• SD #17 003X—Storage Tank #1 level indicator

- Photo documentation submitted of repaired level indicator

• SD #18 001Q—Storage tank hatch locks

- CAP states locks were placed on hatches as needed, but no photo documentation. Staff state the Midco inspections have been completed, so when reports are received this deficiency may be addressed.