

Town of Springer

NM

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September 27, 2024

Pamela Jones, Hearing Clerk
New Mexico Environment Department
1190 Saint Francis Drive
PO Box 5469
Santa Fe, New Mexico 87502
Pamela.Jones@env.nm.gov

Re: Answer and Request for Hearing regarding Administrative Compliance Order, No. 2024-ACOP-02, Springer Water System, PWS# NM3526604

Dear Hearing Clerk:

The Town of Springer is submitting this response to the Administrative Compliance Order (ACO) No. 2024-ACOP-02 on behalf of the Town of Springer, NM, and hereby requests a hearing.

Status of addressing disinfection byproduct exceedances

In the ACO, NMED notes that Springer has been out of compliance under notice of violation for exceeding the total tri-halomethane (TTHM) concentration limits at the regulatory sample points since the fourth quarter of 2019. Since that period of time, we have completed the following actions in attempts to reduce the presence of trihalomethanes in our distribution system.

- Began receiving technical assistance from a technical assistance provider from the New Mexico Rural Water Association. We have been maintaining regular contact with a NMRWA circuit rider and receive periodic visits for support
- We have performed significant maintenance at the plant including:
 - Removal of significant debris buildup in treatment filters
 - Removal of significant debris buildup in clear well
- We retained the assistance of a professional engineering firm, Daniel B. Stephens & Associates (DBS&A) through the New Mexico Environmental Department's (NMED) Drinking Water Bureau (DWB). This assistance is funded through a Water Infrastructure Improvements for the Nation Act (WIIN),

The scope of work for DBS&A includes the following tasks:

- Bench testing of our water to evaluate and recommend measures to reduce the potential for disinfection byproduct (DBP). This was completed and the report was submitted to NMED on May 30, 2024 (Attachment 1).



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- Full water treatment plant evaluation and preparation of a preliminary engineering report (PER) to assess the treatment plant and identify solutions to improve organic removal and reduce DBP formation potential. The draft PER is in progress will be submitted to the Town October 22, 2024.
- Design of treatment plant improvements.

Compliance Schedule

The PER is scheduled to be finalized in December 2024 after which design will commence. Final design is scheduled for April 2025.

After the design is complete, we will need to obtain funding and construct improvements. We are diligently working with DBS&A and the Southwest Environmental Finance Center to identify sources of funding. Once funding is obtained, we expect construction of the improvements to take 6 months. Based on the timeline to complete final design, if construction funding is obtained by April 2025, the Town could award a contract in June 2025, and construction would be complete in December of 2025.

We expect the quarterly TTHM concentrations to drop significantly as soon as the improvements are complete. However, since compliance is based on the locational running annual average, it may take 2 to 3 quarters before our LRAA drops below the MCL at both sampling locations. Thus, during the hearing, we will be requesting a modification of the compliance date to be October 31, 2026.

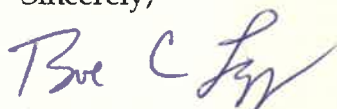
Sanitary Survey

In addition to notices of violation regarding TTHM exceedances in the system, the ACO noted that there were unaddressed significant deficiencies that were noted in a Sanitary Survey report issued October 2023. We have addressed some of the action items listed in the report, and plan to address the remaining items according to the Corrective Action Plan (Attachment 2).

Closing

The Town of Springer is actively engaged in addressing deficiencies in the Town's water treatment plant. The Town would like to request a hearing regarding the ACO and work cooperatively to create a feasible schedule for compliance that the Town intends to follow.

Sincerely,



Boe Lopez
Mayor

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Attachment or Enclosure

cc: Maria Medina, NMED
Christal Weatherly, NMED
Craig Eppler, Town of Springer
Jennifer Hill, DBS&A
Chase Stearnes, DBS&A
Dr. Kerry Howe, Howe Water Science