



Pre-Sanitary Survey Record Review:

Please provide the following documents to your compliance officer prior to your scheduled sanitary survey

Certified Operator Information

- ☐ Copies of certification card(s) for the Certified Operator(s) of your water system
- ☐ Operator contract (*if system is operated by contract operator*)

Sampling Plans

Current and updated sampling plans for the following:

- ☐ The Revised Total Coliform Rule;
- ☐ The Lead and Copper Rule (*if applicable by regulation*);
- ☐ The Disinfection Byproduct Rules (*if applicable by regulation*);
- ☐ Collection of Asbestos samples (*if applicable by regulation*);
- ☐ Collection of SOC, VOC, IOC, radionuclide, nitrate, samples (*if applicable by regulation*)

Water System Maps

At a minimum your maps should have the following:

- ☐ Locations of all system sources
- ☐ Locations of pipelines, valves, & blow-offs
- ☐ Pressure zone boundaries (if system has multiple pressure zones)
- ☐ Locations of interconnections to other systems
- ☐ All water system facilities such as, water treatment plants, water storage tanks, pumping stations, disinfection units.

**Systems may use one map to show all major features, or several maps that can be overlaid to give a complete picture of the distribution system. Maps should be updated regularly to document changes or additions to the system.*

Operations & Maintenance Plan

At a minimum, the operations & maintenance plan should contain the following:

- ☐ Define your organizational structure
- ☐ Formalize general and detailed description of system components and treatment units
- ☐ Schedule standard operating, maintenance and sampling procedures (SOPs, SMPs and SSPs)
- ☐ Define specifications for new installations and repairs
- ☐ Identify chemical, appurtenance and equipment suppliers and contractors

Emergency Response Plan (community water systems only)

At a minimum, the emergency response plan should contain the following:

- ☐ Identified likely threats to their system and assigned the appropriate severity level and response to each type of event
- ☐ Routine operating emergencies such as:
 - ☐ line breaks, pump malfunctions, acute MCL exceedances, power outages
- ☐ Non-routine emergencies such as:
 - ☐ chemical spills, drought, wind/ice storms, fire, floods, earthquakes or other natural occurrences, intentional acts of sabotage
- ☐ Identified appropriate contact personnel within and outside the system in the event of an emergency
- ☐ Formalized emergency event communication protocol
- ☐ Boil water advisory notification templates
- ☐ Public Notification template forms and protocol
- ☐ Established emergency plans, actions and procedures
- ☐ Inventoried and assessed critical equipment
- ☐ Identified critical or vulnerable customers

Additional Documents

- ☐ Copy of the NMED DWB approval for representative sampling under the groundwater rule *(if applicable)*
- ☐ Copy of the NMED DWB approval for 4 log filtration/inactivation under the groundwater rule *(if applicable)*.
- ☐ Disinfectant residual measurements at the point of compliance for 4 log filtration/inactivation for the last year *(if applicable)*
- ☐ Monitoring results for the following:
 - Total coliform samples
 - All chemical samples
 - Disinfectant residuals *(if applicable)*
 - Monthly Operating Reports *(if applicable)*
- ☐ Most recent three years of correspondence with the NMED DWB
- ☐ Copy of Public Notice posted



Sanitary Surveys:

Preparing for an inspection of your public water system

What is a Sanitary Survey?

A sanitary survey is an inspection of the water system facilities, operations, and records to assess and identify conditions that may present a sanitary or public health risk.

A sanitary survey is an on-site review of the eight elements of a sanitary survey including: water source, facilities, equipment, operation, and maintenance of a public water system for the purpose of evaluating the adequacy of the facilities for producing and distributing safe drinking water.

A Compliance Officer from the New Mexico Environment Department's Drinking Water Bureau (NMED DWB) will conduct your sanitary survey. They will contact you when it's due and arrange a date for the survey.

Sanitary Survey Frequency

Routine sanitary surveys are required by the for all public water systems (PWS) every three to five years.

- ☐ Community Water Systems (CWS) - Every Three Years
- ☐ Non-Transient, Non-Community Water Systems (NTNC) - Every Five Years
- ☐ Transient, Non-Community Water Systems (NC) - Every Five Years

The New Mexico Environment Department's Drinking Water Bureau (NMED DWB) has the authority to conduct more frequent sanitary surveys based on water quality concerns or to follow up on previous sanitary surveys. In addition, the NMED DWB may conduct sanitary surveys without advance notice.

How do I prepare for the survey?

Prior to the survey, you will be contacted by the Compliance Officer to arrange a time and date for the inspection. We want your sanitary survey to be successful. This guidance will help you prepare and avoid significant deficiencies. You should:

- ☐ **Set aside time for the Compliance Officer.** Plan on having someone knowledgeable of the water system take the Compliance Officer through the system and the files. It is possible that one person will be more qualified to walk the Compliance Officer through the physical system and someone else will have more knowledge of the monitoring, compliance and data aspects.
- ☐ **Be prepared to access all parts of the system.** This includes accessing each source; all tanks, all treatment facilities, and any pump stations and pressure reducing stations. Make sure you have keys available to all locked facilities, including gated areas, and ladder extensions and safety equipment if needed to access tanks.
- ☐ **Have records on hand.** This includes well logs, monitoring records, RTCR monitoring plan, Stage 1 or Stage 2 Disinfection Byproducts monitoring plan (if applicable), and Lead & Copper Monitoring Plan (if Applicable), past sanitary survey reports, and as-built drawings.

Who should attend your sanitary survey?

1. Certified System Operator(s)
2. Administrative Contacts
3. Owners or Water System Decision makers.

Please prepare for questions about general operations, management, security, and specific technical questions.

How long will the sanitary survey take?

Sanitary Surveys can take several hours to several days to complete, depending on the complexity of the water system being inspected.

Ensuring that you are prepared for the sanitary survey will help to make the inspection process proceed quickly and efficiently.

- ☐ **Have questions prepared for the Compliance Officer.** This is an excellent opportunity to address any questions you may have regarding monitoring, reporting results, compliance, public notification requirements, etc.

Before the sanitary survey

- ☐ **Inventory all structures, man-made materials, and land use within 100 feet of any water source.** Identify all microbial and chemical contaminant threats. Prepare a plan to eliminate or mitigate them. Discuss your plan and provide a copy to the Compliance Officer during the survey.
- ☐ **Inspect your water source facilities.** Verify the integrity of seals and screens used to keep contaminants out of the well casing or spring box.
- ☐ **Inspect your Storage Tank Facilities.** Verify the roof hatch, vent, and roof structure are weatherproof. Verify the integrity of the screens installed over the vent and overflow outlet.
- ☐ Be prepared to provide current photographs of the parts of your water system the Compliance Officer may not be able to access. For example, photograph the storage tank roof that must be climbed. Photographs should verify all storage tank roof vents, hatches, overflows, drains and openings where the level gauge wire enters each tank are sealed or properly screened to keep contaminants out.
- ☐ Your storage tank overflow pipe outlet should terminate 12-18 inches above the ground surface and appropriately screened or covered with a hinged flap valve.
- ☐ A raw source water sample tap must be on each source.
- ☐ Each well house, pump station, and storage tank should be secure from unauthorized access.
- ☐ Animals should not be able enter your buildings.
- ☐ The outlet pipe for any pump control valve or vacuum relief valve should have an approved air gap and screen.
- ☐ Water treatment chemicals should be NSF-approved for use in potable water. Any hard-piped water supply into the chemical solution tank should be built with an air gap or equipped with an approved reduced pressure backflow assembly.

Significant Deficiencies

Significant deficiencies include, but are not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage, or distribution system that the State determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers

To protect public health, significant deficiencies require corrective action.

During and after your sanitary survey

- ☐ Water system personnel meet with the Compliance Officer to discuss records and provide a tour of the water system facilities, pump house, treatment unit, storage, booster pumps, distribution system, and so on.
- ☐ After the survey, the Compliance Officer sends you a completed survey letter and report of findings. Be sure to read the report carefully. It describes any deficiencies found during the inspection and the associated corrective action you must take.
- ☐ You must address significant deficiencies and significant findings by the assigned due date. Please review any observations and recommendations noted in the survey report.
- ☐ You must provide appropriate compliance documentation as outlined in the survey report when you complete the necessary corrections. If unable to make the corrections by the due date, you must submit a corrective action plan with a timeline indicating when items will be corrected. Any proposed corrective action plans must be approved by us. We track any significant deficiencies and significant findings assigned a due date until you correct them.

Items to Have Available

- Water testing equipment (e.g., chlorine analyzer)
- Personal Protective equipment (e.g., gloves, boots, eye, head, and ear protection)
- Paper and pencil or pen for notes
- Camera

Other Items to Consider (for your comfort):

- Clothing for Adverse Weather
- Water
- Sunglasses/Sunscreen
- Phone
- Insect Repellent

- ☐ Keep a copy of the survey results and all other survey-related follow-up documentation and correspondence (including your own) for your records.
- ☐ Don't wait for the next sanitary survey: Make self-inspections of source and storage tank vents, covers, seals, and screens part of your routine operations and maintenance program.

Record Keeping and Retention Periods

All Public Water Systems	
Bacteriological Analysis	5 Years
Chemical Analysis	10 Years
Actions to correct significant deficiencies or violations	3 years
Sanitary Survey reports and subsequent correspondence	10 years
Sampling Plans	Indefinitely or until these documents have been updated to new versions
Significant correspondence with NMED DWB (e.g. engineering applications & subsequent correspondence, engineering approval/denial letters, etc.)	Indefinitely
Public Notice Information	3 Years after issuance of the Public Notice

Community Water Systems	
Emergency Response Plans, Operations & Maintenance Plans	Indefinitely or until these documents have been updated to new versions
Lead & Copper Records	12 Years
Disinfectant/disinfection by-products Records	Up to 10 Years
Consumer confidence reports (CWS only)	3 Years

Subpart H Water Systems (Surface Water or Ground Water Under the Direct Influence of Surface Water)	
Turbidity Results	5 Years
Disinfection Profile/benchmark	Indefinitely
Long Term 2 Surface Water Treatment Rule Information	10 Years

***When in doubt about record retention for your public water system's records, it is best to keep a copy.**

Correcting Significant Deficiencies

Public Water System deficiencies that are critical enough to warrant designation as "significant deficiencies" must be corrected within required timeframes. The resolution may include immediate corrective action or may require an NMED DWB approved compliance schedule – depending on the nature of the problem.

Failure to correct significant deficiencies is an enforceable violation.

Any changes to the system including construction, alteration, or extensions must meet engineering plan and specification review requirements *before* they occur. Information on engineering plan and specification requirements can be located at <https://www.env.nm.gov/dwb/watersystemmodificationdesignconstruction.htm>