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State of New Mexico
ENVIRONMENT DEPARTMENT

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RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

2/18/2016

Becky McLaughlin
Lee/Hammond Water Treatment Plant Co-Op, NM3500624
5649 Us Highway 64
Farmington, NM 87401

**RE: Notice of Violation—Treatment Technique
Control of Disinfection ByProduct Precursors, Total Organic Carbon**

Dear Ms McLaughlin:

This letter serves as Notice of Violation that the Lee/Hammond Water Treatment Plant Co-Op water system failed to meet the minimum Total Organic Carbon (TOC) removal level(s) as required in 20.7.10.100 NMAC [incorporating 40 CFR Section 141.135(b)(2)] during the first, second, third, and fourth quarters shown below by having at least one month in that quarter with a TOC running annual average removal ratio below 1.00.

Month	RAA Removal Ratio
January 2015	0.66
February 2015	0.68
March 2015	0.68
April 2015	0.66
May 2015	0.83
June 2015	0.86
July 2015	0.83
August 2015	0.82
September 2015	0.83
October 2015	0.84
November 2015	0.85
December 2015	0.85

Based on the failure to meet the treatment technique (TT) requirements for TOC removal, the New Mexico Environment Department Drinking Water Bureau (DWB) requires the Lee/Hammond Water Treatment Plant Co-Op water system to notify customers of the TT violation(s) as stated in 20.7.10.100 NMAC (incorporating 40 CFR Section 141.203). The notice must be provided to all customers and others who drink the water as soon as practical but no later than 30 days of receipt of this letter and must

remain in place as long as the violation or situation persists. The public notice must be provided by one or more methods reasonably calculated to reach all persons served by the water system, i.e., appropriate broadcast media (such as radio and television), posting of the notice in conspicuous locations throughout the area served by the water system OR hand delivery of the notice to persons served by the water system.

Pursuant to 20.7.10.100 NMAC [incorporating 40 CFR Section 141.31(d)] the Lee/Hammond Water Treatment Plant Co-Op water system 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. A representative copy of each type of notice distributed, published, posted or made available to the persons served by the system must be included with the certification form.

Failure to comply with the public notice requirements will result in an additional violation (failure to notify the public and the state) being issued without notice to the Lee/Hammond Water Treatment Plant Co-Op water system. 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 Order(s) with possible penalties assessed against the Lee/Hammond Water Treatment Plant Co-Op water system.

Continued violation(s) of the TT requirements for TOC removal as defined in the New Mexico Drinking Water Regulations, 20.7.10.100 NMAC [incorporating 40 CFR Section 141.135(b)(2)] will result in escalated enforcement action(s) including issuance of Administrative Order(s) with possible penalties assessed against the Lee/Hammond Water Treatment Plant Co-Op water system.

Please return a copy of the posted notice and the enclosed Public Notice Certification Form to:

Joseph C. Savage
NMED-DWB
811 E First Street, Suite D
Alamogordo, NM 88310

Or send by e-mail to: joe.savage@state.nm.us.

If you have any questions or need assistance, please call 575-437-7115 or e-mail joe.savage@state.nm.us.

Respectfully,



Joseph C. Savage
Surface Water Rule Administrator
Drinking Water Bureau
Water Protection Division

Enclosures: Public Notice Template
 Public Notice Certification Form

Cc: District Manager (electronic)
 Albuquerque Area Office file
 Electronic central file

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Treatment Technique Requirements
Total Organic Carbon Removal Levels Not Met By Lee/Hammond
Water Treatment Plant Co-Op

We were notified in February 2016 that our plant classification was changed in 2015 which initiated a violation in our 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.

We monitor monthly for Total Organic Carbon (TOC) removal and maintain a running annual average (RAA) of the results. During the **first, second, third, and fourth quarters of 2015** the RAA for TOC removal was less than required.

What does this mean?

This is not an emergency. If it had been you would have been notified immediately.

Total organic carbon (TOC) has no health effects. However, TOC provides a medium for the formation of disinfection by-products. These by-products include trihalomethanes (THMs) and haloacetic acids (HAAs). Drinking water containing these by-products in excess of the Maximum Contaminant Level (MCL) may lead to adverse health effects, liver or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

Tests taken during this time period **did not** indicate the presence of disinfection byproducts in excess of their MCLs.

What should I do?

You do not need to use an alternative (e.g., bottled) water supply. However, if you have specific health concerns, please contact your health care professional.

What is being done? [Describe corrective action.]

We are in the process of making changes to our treatment chemical dosing to rectify this issue. We anticipate resolving the issue in the next 30 days. However, our plant will remain out of compliance and in violation until our running average of removal ratio is back above a 1.0 for an entire quarter. This could take up to 9 months; however, we expect that our monthly results will be above the compliance level on our sample date in April and will remain that way in the future.

For more information, please contact:

Aaron Lee or Nick Ashcroft

Lee/Hammond Water Treatment Plant Co-Op, NM3500624
5649 Us Highway 64,
Farmington, NM 87401

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#: NM3500624 **Water System Name:** Lee/Hammond Water Treatment Plant Co-Op

Violation or Situation Date: First, second, third & fourth quarters; months January through December 2015

Individual Contaminant or Contaminant Group: Total Organic Carbon - Failure To Meet Removal Requirement

Violation or Situation Type: Treatment Technique

Violation or Situation Public Notification Tier: Tier 2

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: _____ |

Note: Non-community water systems that serve a school, preschool or daycare must also hand deliver the notice to a parent or legal guardian of each child. For more information reference EPA's Public Notification Handbook at: <http://www.epa.gov/safewater/publicnotification/compliancehelp.html>

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: _____