

City of Santa Fe, New Mexico

memo

Date: November 20, 2015

To: Public Utilities Committee/Finance Committee/PARC

From: Eric Ulibarri, Water Division Engineer Associate EU

Via: Nick Schiavo, Public Utilities Department and Water Division Director NSA

RE: Closure of Dr. Richard Engle Tennis Courts at Hospital Water Tank

ITEM AND ISSUE:

The Water Division requests the closure of the Dr. Richard Engle Tennis Courts located on the Hospital Water Tank at 5 Calle Medico 87505.

BACKGROUND AND SUMMARY:

The Water Division has determined that the existing Hospital Water Tank located at 5 Calle Medico has reached the end of its useful life and is need of replacement. The City Council approved the contract for design of a new water tank at this location during the May 27, 2015 meeting. Design is underway and demolition/construction is anticipated in early 2016.

When the Hospital Tank and associated tennis courts were originally built in the 1980's, the Safe Drinking Water Act (SDWA) focused primarily on treatment as the means of providing safe drinking water at the customer tap. The 1996 SDWA amendment greatly enhanced the existing law by recognizing and incorporating factors such as source water assessment and protection as one of the most important components of safe drinking water supply. These approaches ensured the quality of drinking water protections from source to tap. As a result all public water supply systems (PWSSs) are now required to identify all possible sources of contaminants which could affect water supplies, determine how susceptible the PWSS is to these possible contaminant sources, and to take action to eliminate or mitigate these threats. The SDWA called for such mitigation through avoidance, treatment, or other remedial actions.

The Public Utilities Department has acknowledged past problems caused by the presence of tennis courts on the existing hospital tank in its design of the replacement tanks. These problems included leakage from the tennis courts into the tank and the subsequent introduction of contaminants, reoccurring vandalism, and the provision of a means for unsecured and unmonitored entry into the storage tank area by the public. As part of its Vulnerability Assessment and Source Water Protection activities, the City has consulted with the New Mexico Environment Department's Drinking Water Bureau (NMED-DWB) regarding the construction of the new hospital tank(s). This consultation resulted in the agreement that the only way to protect the new tanks from threats which could result from the presence of new tennis courts was through avoidance or elimination of the threat itself from structures that are intended solely for the safe storage of treated water prior to distribution.

It must also be noted that the Homeland Security and Bioterrorism Act of 2002 furthered the protective requirements of EPA's source water protection rules even more. The Act requires community drinking

water systems serving populations of 3500 persons, or more, to conduct assessments of their vulnerabilities to terrorist or other intentional malevolent acts and to defend against adversarial actions that threaten the provision of safe and reliable supply of drinking water. The Act assigns EPA, delegated states (such as NM) and water utilities new responsibility to enhance water security and to develop protective measures for potential threats. The City of Santa Fe has identified unauthorized entry and vandalism of water storage structures as a major vulnerability for its system. In response, it has entered into a \$400,000 per year contract with a private security firm to provide increased surveillance at water production, treatment and storage facilities. Regardless, the Hospital Tank has posed a constant problem with regard to unauthorized entry, vandalism, and tampering. The presence of tennis courts at this facility has only served to exacerbate these problems.

In conclusion, the Santa Fe Water System is required to take necessary actions to reduce potential sources of contamination of its water supplies, identify and address/eliminate vulnerabilities, and protect its water from intentional and adversarial actions. The City's Source of Supply Section has taken these actions in consultation with the NMED-DWB/EPA and has determined that the presence of tennis courts at the Hospital Tank poses an unnecessary and unjustifiable risk to the integrity of the City's drinking water supply. Therefore, the courts will not be reinstalled as part of the new Hospital Tank construction project. We request that the Dr. Richard Engle Tennis Court Park designation be removed.