Petitioners' 1/13/14 Response to EPA's Request for Additional Information

Conversation Record

Date: January 13, 2014

Participants: Al Wehrmann, Tom Poy, Rita Bair and Bill Spaulding

Content:

Discussion included comments expressed in an email sent 1/2/14 to Al Wehrmann, Consultant, City of Champaign and Mahomet SSA Consortium. Conversation focused on watersheds outside the Mahomet SSA which recharge the Mahomet SSA. Exhibit 3-1 of the SSA guidance identifies several areas which may be discussed relative to SSA areas: the aquifer itself, aquifer service area, designated area, streamflow service area, and project review area. What is described in the Petition is the designated area, which is the surface area above the aquifer and its recharge areas in which the boundaries are contiguous with those of recharge areas. Mr. Wehrmann conceded that certain areas, consisting of the Sugar Creek and Salt Creek, and possibly the Kickapoo Creek and other areas could contribute recharge within the Mahomet Aquifer. The guidance defines those areas of these watersheds as streamflow source areas. The City of Champaign is willing to expand the Mahomet boundary to include these areas. EPA asked Al to confirm that the Mahomet did not receive recharge from the upper Mackinaw east of Mackinaw and the Sangamon south of Petersburg. Al will do this and identify any additional watershed areas that could contribute recharge flow to the Mahomet Aquifer.

Action items:

- Al will write up a summary of the conversation and distribute to the participants and his client
- Al will investigate possible other watersheds that might possibly be recharging the Mahomet Aquifer, and map their boundaries
- Al will send this information to EPA

Spaulding, William

From: Allen Wehrmann <[redacted]
Sent: Monday, January 13, 2014 5:06 PM
To: Spaulding, William
Subject: Re: Potential Mahomet Aquifer SSA Petition Boundary Modifications

Right. I don't plan on doing too much along those lines until we firmly agree on the boundary modifications. This especially applies to those 'sheds on the downstream end of the Sangamon River.

Al

Sent from my iPhone

On Jan 13, 2014, at 4:54 PM, "Spaulding, William" <spaulding.william@epa.gov> wrote:

> Al:
>
> Thanks for the summary of our call. I know that we talked about the need for recalculating population during the call but I don't think we came to any firm conclusion that this was absolutely necessary. So, please withhold from doing any population calculations until we get back to you on that.
>
> Bill
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> ---
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> **From:** Allen Wehrmann [mailto:[redacted]
> **Sent:** Monday, January 13, 2014 3:38 PM
> **To:** Dennis Schmidt; Dan Haddock
> **Cc:** Spaulding, William
> **Subject:** Potential Mahomet Aquifer SSA Petition Boundary Modifications
>
> Dennis and Dan,
>
> I talked with USEPA representatives (Bill Spaulding, Tom Poy, and Rita Bair) earlier this afternoon. We had a good discussion on potential boundary modifications, and as you might suspect, things are never as easy as they may first appear.
>
> I refer everyone to the attached PowerPoint slide, which has been modified from the one I sent out as an attachment last week. I believe we are fairly well agreed upon the points I raised in response to Bill Spaulding's prior comments regarding addition of those various Sangamon River sub-watersheds. USEPA seemed very amenable to adding those subwatersheds I had outlined in black as opposed to adding two or three in piecemeal fashion. We also agreed that the subwatershed of interest by Monticello and Allerton Park was already within the aquifer boundary and nothing new needed to be added in that area.
>
> However, this brought up the question of adding subwatershed areas along the downstream end of the Sangamon River, downstream of Springfield, principally in Cass and Menard Counties. I have outlined this area in bright red on the attached new slide version (there is also a small area outlined with a dashed red line that I am not sure about as to flow direction onto or off of the aquifer).

We (both USEPA and myself) want to look more closely at streamflow contribution to groundwater recharge in this area before making a decision here. My initial reaction is that several towns in this area (e.g., Virginia and Petersburg) extended pipelines to the Mahomet Aquifer because of a lack of groundwater in the vicinity of their towns and there is virtually no recharge contribution from streams, so no need to add these areas. But this needs to be examined and agreed upon before moving forward.

Once agreed upon which subwatersheds to include, we will need to recalculate the percentage of population served by the Mahomet Aquifer within the new Petition boundary. The total population served will not change, but because we will be adding towns within the Petition boundary (towns not served by the aquifer), the percentage will change. The only town of significance will be Bloomington, so I am sure the percentage served will still be well in excess of the 50% requirement for sole source designation. [Once we have agreed on the new boundary, we will need to determine which towns fall into the new boundary, and then get population and water use numbers for each town. GIS will likely help in this exercise!]

We are unsure as to whether new economic analyses are needed for these towns that might fall within the new boundary area. These towns do not use the Mahomet Aquifer, so my take on it is that it does not make sense to conduct an economic analysis on alternative water supply feasibility if they are not using the aquifer we are trying to protect. I think USEPA is generally agreeable with this, but wants some time to discuss and make a final determination.

Finally, this brings us to our question regarding a timeline on the public meeting process. As you can guess, there is no timeline - the process will have to create its own timeline. Once fully satisfied that the Petition is complete, USEPA will move forward. Bill apologized for the sporadic nature of his request for additional information, but such requests came about as reviews were made. Bill generally feels that the major points have been addressed but some tweaking on minor points, such as those discussed today, will need to be resolved. A time schedule will be driven by all the technical channels and parties involved, on our end as well as theirs.

I have copied Bill on this e-mail to make sure that I summarized our discussion correctly. Let me know if you have questions or comments.

Al
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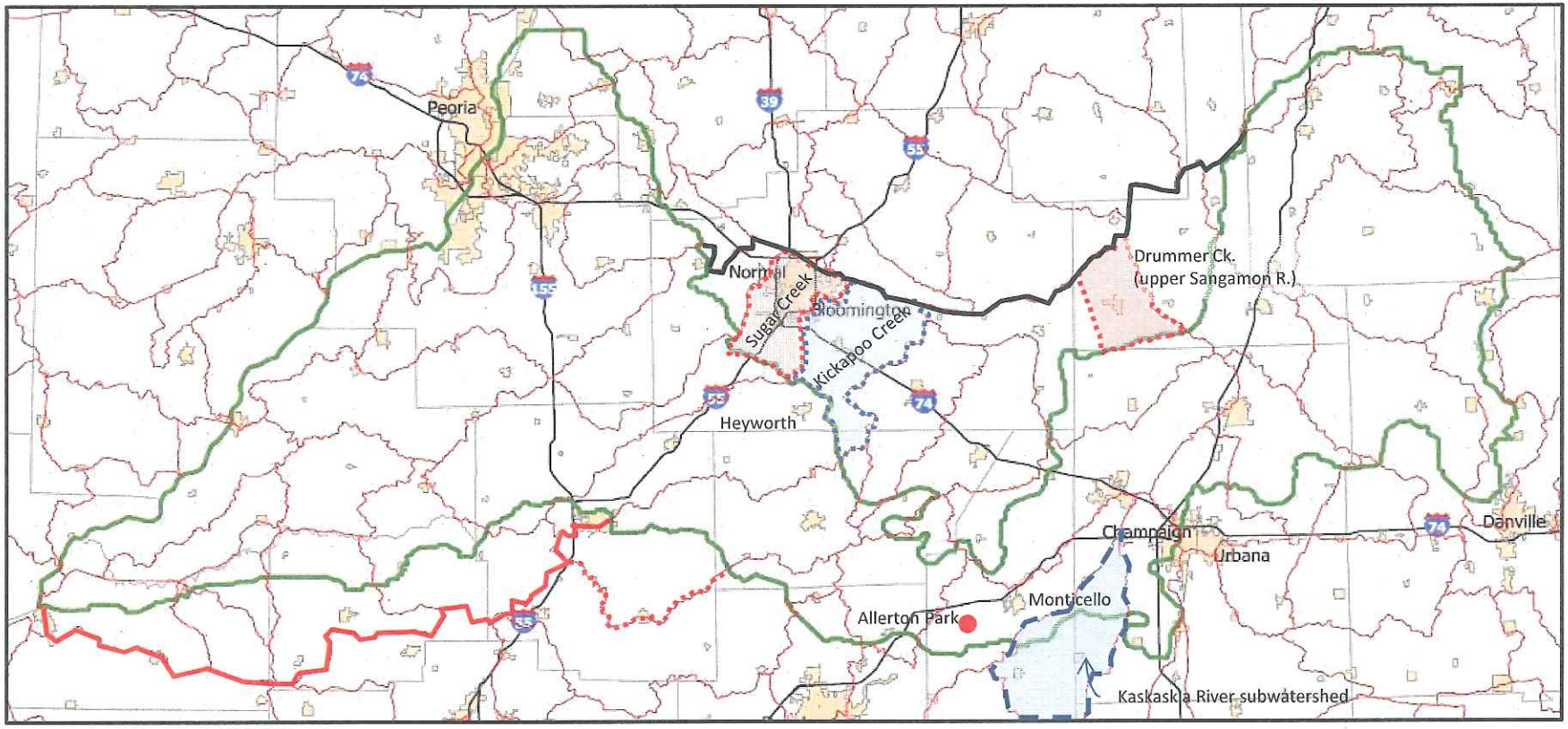
H. Allen Wehrmann, P.E.

Potential Mahomet Aquifer SSA Petition Boundary Modifications