To: NicholasBassam.Smaira@waterboards.ca.gov[NicholasBassam.Smaira@waterboards.ca.gov]
From: Dermer, Michele
Sent: Tue 3/22/2016 6:26:11 PM
Subject: FW: 3/25 Arroyo Grande AE discussion

From: Dermer, Michele
Sent: Tuesday, March 22, 2016 11:24 AM
To: 'Keeling, Matt@Waterboards' <Matt.Keeling@waterboards.ca.gov>; Katona, Aaron@Waterboards <Aaron.Katona@Waterboards.ca.gov>; Mckee, Michael E.@Waterboards <Michael.Mckee@Waterboards.ca.gov>
Cc: Borkovich, John@Waterboards <John.Borkovich@waterboards.ca.gov>; Robertson, John@Waterboards <John.Robertson@waterboards.ca.gov>; York, Christine@Waterboards <Christine.York@waterboards.ca.gov>; 'Wright, Ben@Waterboards' <Ben.Wright@waterboards.ca.gov>; Schlegel, Brandon@Waterboards <Brandon.Schlegel@Waterboards.ca.gov>; Gillman, Eric@Waterboards <Eric.Gillman@Waterboards.ca.gov>; Anna Weber <Anna.Weber@cadmusgroup.com>; Shari.Ring@cadmusgroup.com; McWhirter, Lisa <McWhirter.Lisa@epa.gov>; Engelman, Alexa <ENGELMAN.ALEXA@EPA.GOV>; Moffatt, Brett <Moffatt.Brett@epa.gov>; Albright, David <Albright.David@epa.gov>; 'Smaira,' <NicolasBassam@Waterboards.ca.gov>; Zinky, Janice@Waterboards <Janice.Zinky@waterboards.ca.gov>; 'Iverson, Jon@DOC' <Jon.Iverson@conservation.ca.gov>; Habel, Rob@DOC <Rob.Habel@conservation.ca.gov>; 'Salera, Jerry@DOC' <Jerry.Salera@conservation.ca.gov>; Walker, Alan@DOC <Alan.Walker@conservation.ca.gov>; 'Abel, Pat@DOC' <Pat.Abel@conservation.ca.gov>
Subject: RE: 3/25 Arroyo Grande AE discussion

Dear Matt, Aaron and Mike,

Thanks for your note Matt, and for introducing us to Aaron and Mike. I appreciate that they will be available for the meeting this Friday.

By the time you receive this message I am hopeful that John Borkovich and Christine York, and other State Board folks who were present for our "after meeting" on Thursday March 17, may have filled you in on the discussion we had with them regarding a "current source analysis." Our meeting Friday will focus on this topic.

Our understanding is that the Arroyo Grande aquifer exemption application is predicated on the concept of geologic and hydraulic isolation, i.e., the injected fluids will be contained in the proposed exempted area by a combination of geologic controls such as a fault barrier, stratigraphic and permeability conditions, and a synclinal structure, as well as by hydraulic and operational controls such as dewatering. In addition, we understand that isolation of fluids within the exempted area will be further assured by monitoring requirements, such as the installation of sentry monitoring wells. As such, the evaluation/analysis to demonstrate that the formation proposed for exemption does not serve as a current source of drinking water (required by 40 CFR Part 146.4(a)) needs further discussion.

Specifically, the Well Review provided in Appendix G of the application focuses on water supply wells, without distinguishing which wells are used for drinking water. It is important for us to understand the location of the drinking water wells in the vicinity of the proposed area to be exempted, both private and public drinking water supply wells. The current source analysis would consider whether any of these existing drinking water wells are drawing from the same formation as the proposed exempted formation, and whether over the wells' lifetime, if water from the exempted formation may be drawn into the cone of depression and used as drinking water, without consideration of operational/field controls.

It is our hope that the Water Board may be able to initiate this analysis prior to the meeting and present any new information to the participants on the call, also identifying any questions that may arise.

We look forward to the discussion Friday.

Please note I've copied this email to those that are invited to the meeting on Friday- please forward if you are aware of others that should be kept informed.

Sincerely,

Michele

Michele Dermer

Drinking Water Protection Section

EPA Region 9

(415) 972-3417

Dermer.michele@epa.gov

From: Keeling, Matt@Waterboards [mailto:Matt.Keeling@waterboards.ca.gov]
Sent: Monday, March 21, 2016 2:00 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>; Borkovich, John@Waterboards <John.Borkovich@waterboards.ca.gov>
Cc: Mckee, Michael E.@Waterboards <Michael.Mckee@Waterboards.ca.gov>; Katona, Aaron@Waterboards <Aaron.Katona@Waterboards.ca.gov>; Robertson, John@Waterboards <John.Robertson@waterboards.ca.gov>; York, Christine@Waterboards <Christine.York@waterboards.ca.gov>
Subject: 3/25 Arroyo Grande AE discussion

Hello Michele and John,

Aaron Katona and Mike McKee are going to be our technical leads for this discussion as John Robertson will be out on vacation and I will be out of the office for an unspecified time to attend to a family emergency.

It is my understanding that EPA will be preparing a list of issues/questions to frame this forthcoming discussion. Please provide them to both Aaron and Mike (copied on this email), in addition to John and myself for reference, prior to the meeting and include them in all other

meeting related correspondence. It would be much appreciated if we could have the comments in hand by COB tomorrow so that John will have a chance to review them with Aaron and Mike prior to the meeting. I have forwarded Aaron and Mike the appointment and copied them on this message.

Thank you.

Matthew Keeling, P.E.

Senior Water Resources Control Engineer

Groundwater Assessment and Protection (GAP) Program,

Active Oil Field Regulation Program & Land Disposal Unit

Central Coast Regional Water Quality Control Board

San Luis Obispo, CA

(805) 549-3685

Matt.keeling@waterboards.ca.gov