

## PWSAP Webinar Series: Groundwater Renewal Process

### Part 1 - Groundwater Project Renewals: A Two-Step Process

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## Webinar Overview

- Part 1 -Groundwater Project Renewals: A Two-Step Process
  - January 28, 2021
- Part 2 – Groundwater Project Renewals: Operational Monitoring and Operational Testing
  - February 25, 2021
- Part 3 – Groundwater Project Renewals: Water Level Monitoring
  - March 25, 2021

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## Why Are We Doing This?

- Continuation and expansion of PWSAP workshops
- Self-funded program to provide technical assistance, mostly for renewals
- First PWSAP offering since COVID struck
- ~ 200 participants today – There must be a need!

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## New Fact Sheets



- One per webinar topic
- Available on our website
- Copy included with your invite
- Check our website for the latest version, as we expect these to change and be updated

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## Renewals

### BACKGROUND

Commission regulations establish project approval terms, including expiration dates and renewal application due dates. Projects are required to submit information and data for Commission review to demonstrate the continued sustainability of the withdrawal and to evaluate ongoing or potential impacts to other users and the environment. By regulation, renewal applications need to be submitted to the Commission at least six (6) months prior to the expiration date of the approval. However, because the renewal of an approval is a two-step process,

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## Purpose of Renewals

- Standards and site conditions may have changed since the original approval
  - Approvals must meet current 18 CFR §806.23
- Evaluate for three things:
  1. Sustainability
  2. Impacts to other users
  3. Impacts to the environment
- Older approvals may not have addressed these items

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## Two-Step Process

### TWO-STEP PROCESS

- 1 Approved Aquifer Testing Plan or Waiver
- 2 Renewal Application

For most projects, submitting a renewal application is a two-step process involving a Plan or Waiver (Step 1), followed by a groundwater withdrawal application (Step 2). However, some projects may have already satisfied Step 1 and can proceed directly to Step 2. The Commission has been reviewing and approving aquifer testing plans for many years, and some projects undergoing the renewal process may have already satisfied the requirements to complete a Commission approved test. For those projects, submission of a Plan or Waiver is not required and those projects may begin with Step 2. Projects should begin to assemble the data available early to help

*(continued on next page)*

- Step 1: Aquifer testing plan (ATP) or aquifer testing plan waiver (Waiver)
- Step 2: Groundwater withdrawal application
- Steps 1 and 2 are per source, even for wellfields

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## Step 1

- A groundwater withdrawal application must contain an evaluation of the requested withdrawal at the requested rate
  - Sustainability
  - Impacts to other users
  - Impact to the environment
- Requirements of 18 CFR §806.12 (Aquifer Testing)

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## Step 1 (Cont.)

- Most projects will need an aquifer testing plan (ATP) or aquifer testing plan waiver (Waiver)
- Bulk of hydrogeologic evaluation is completed during this step with a waiver
- Aquifer testing, only if needed

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### Step 1 (Cont.)

- Project renewals can meet the aquifer testing requirement by meeting one of the following:
  - Previous testing under a Commission reviewed and approved Aquifer Test Plan
  - Submittal, Commission approval and implementation of an Aquifer Test Plan
  - Submittal and Commission approval of an Aquifer Test Plan Waiver request

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### Step 1 Previous Testing

- Demonstrate that aquifer testing has been completed with a Plan previously reviewed and approved by the Commission and the results of testing were provided with the original or prior application
- Generally, aquifer tests have been approved since 2001 (Look at your approval – It may tell you if an approved test was done)
- 2007 – Significant change in SRBC aquifer testing guidance

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### Step 1 Met, but Missing Data

- May still require some data to confirm the results of the original testing
- Data supporting the requested rate is needed (806.23 still applies!)
- Supplement with operational testing?

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## Step 1 Waivers

- More than 90% of waivers submitted since 2012 have been approved
- Those not approved have been extremely deficient
- Waivers that are nearly acceptable can be given additional time to fill in data gaps

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## Waiver Overview

- Paper water – the quantity only exists on the piece of paper, as the supply is not reliable
- What can the well produce?
  - How do you know?
- Prior approval may be unrealistic, or exactly right
- Next webinar will cover operational testing and monitoring in more detail

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## Step 1 – Aquifer Test Plan

- May be required if:
  - Historical testing was not completed, was incomplete, or does not provide the necessary data to evaluate the withdrawal
  - Usable operational data has not been collected
  - There is not sufficient time to collect useable operational monitoring data to support renewal at the requested rate
- Aquifer Test Plan Guidance can be found at: <https://www.srbc.net/regulatory/policies-guidance/docs/aquifer-testing-guidance-policy-2007-01.pdf>

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## Step 2 - Application

- Completion and submittal of the Renewal Application
  - Six-month deadline
  - With the current on-line application system, much of the information contained in the aquifer test plan/aquifer test waiver will be automatically inserted into the application.
  - Information for the renewal application may be covered in a future webinar series

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## Preferred Order

- Completion of an Aquifer Test Plan/Waiver Request
- Aquifer Test Plan approval (if doing a test)
- Conduct any necessary testing
- Waiver approval (if doing a waiver)
- Submittal of the Groundwater Withdrawal Application
  - At least six months before the approval expiration

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## Timing

- Renewal reminders sent out five years before an approval expires
- A good time to assess what data exists and what additional data may be needed (identify data gaps)
- A pre-application meeting is recommended
- Six-Month APPLICATION submittal deadline
- Can “release” an application

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## Resources

- **Renewal Guidance:**  
<https://www.srbc.net/regulatory/policies-guidance/docs/guidelines-expiring-approvals-policy-2016-03.pdf>
- **Aquifer Test Plan Guidance:**  
<https://www.srbc.net/regulatory/policies-guidance/docs/aquifer-testing-guidance-policy-2007-01.pdf>
- **Aquifer Testing Plan and Waiver Request Instructions (online submittals):**  
<https://www.srbc.net/regulatory/application-process/docs/aquifer-testing-plan-online-application-instructions.pdf>
- **Fact Sheets:** <https://www.srbc.net/our-work/fact-sheets/>

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## Additional Resources

### General Project Review Questions

- **Todd Eaby,** [teaby@srbc.net](mailto:teaby@srbc.net)

### Groundwater Projects

- **Mike Appleby** [mappleby@srbc.net](mailto:mappleby@srbc.net)
- **Bill Miller** [wmiller@srbc.net](mailto:wmiller@srbc.net)

### PWSAP

- **Scott McFeaters** [smceaters@srbc.net](mailto:smceaters@srbc.net)
- **Dave Haklar** [dhaklar@srbc.net](mailto:dhaklar@srbc.net)
- **Mike Appleby** [mappleby@srbc.net](mailto:mappleby@srbc.net)

#### Other important references:

- Water Level Monitoring Fact Sheet
- Operational Monitoring and Operational Testing Fact Sheet
- Online Application Instructions
- Online Waiver/Plan Templates
- Online Application Functional Template
- Aquifer Test Guidance

#### Questions & Additional Information

If you have any questions or would like to request a free pre-application consultation, please contact the Commission's Manager of Project Review at 717-238-0423.

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## Up Next

- **Part 2 – Groundwater Project Renewals: Operational Monitoring and Operational Testing**
  - *Thursday, February 25th, 2021 (1-2 pm)*
- **Part 3 – Groundwater Project Renewals: Water Level Monitoring**
  - *Thursday, March 25th, 2021 (1-2 pm)*
- **Next Series – Aquifer Testing Plan Waivers?**
  - *April 2021?*
  - *We are seeking input on future webinar topics*

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## Summary

- Groundwater project renewal is a two step process
  - Collect and evaluate hydrogeological information in support of the requested withdrawal rate.
  - Prepare and submit the groundwater withdrawal application **six months** prior to expiration
- Use existing information to the fullest extent possible
- Start early and coordinate with Commission staff – starting with a pre-application meeting

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