

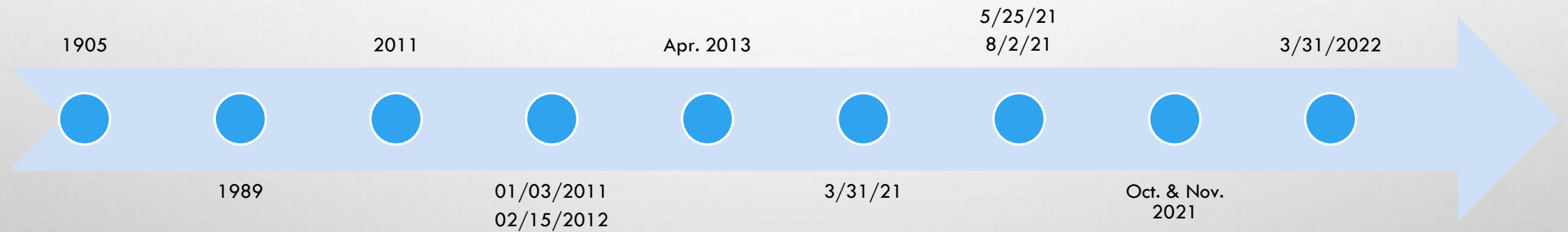
The background of the slide is a light gray gradient with several realistic water droplets and bubbles of various sizes scattered across it. The droplets have highlights and shadows, giving them a three-dimensional appearance.

NYS WATER RESOURCES PROTECTION ACT & WATER WITHDRAWAL PERMITTING, REPORTING AND REGISTRATION

EMPIRE STATE WATER WELL DRILLER'S ASSOCIATION
2022 ANNUAL MEETING

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A BRIEF HISTORY



WHO NEEDS A PERMIT?

NON-AGRICULTURAL FACILITY

- ANY USER OF GROUND OR SURFACE WATER WITH THE CAPACITY TO WITHDRAW MORE THAN 100,000 GALLONS PER DAY.

AGRICULTURAL FACILITY

- ANY AGRICULTURAL FACILITY THAT WITHDRAWALS IN EXCESS OF THE THRESHOLD CAPACITY.
- THRESHOLD CAPACITY = AVG. 100,000 GALLONS PER DAY, OR 3 MILLION GALLONS IN ANY CONSECUTIVE 30-DAY PERIOD.

EXEMPTIONS

1. IF YOUR AVERAGE DAILY WITHDRAWAL RATE IS BELOW 100,000 GALLONS PER DAY OR LESS THAN 3,000,000 GALLONS IN ANY 30-DAY PERIOD.
2. IF YOU REGISTERED YOUR WATER-USE PRIOR TO 2/15/2012 AND YOU HAVE NOT INCREASED YOUR CAPACITY OR ADDED ANY ADDITIONAL SOURCES AND HAVE COMPLETED YOUR YEARLY REPORTING REQUIREMENT.
3. IF YOU PURCHASE WATER THROUGH A PERMITTED FACILITY OR FALL UNDER THE JURISDICTION OF A REGIONAL COMMISSION. PERMIT CONDITIONS MAY VARY BASED ON COMMISSION.

SOME DEFINITIONS

- WATER RESOURCE LAW ([ECL ARTICLE 15, TITLE 15](#)) (LEAVES DEC WEBSITE) DEFINES "AGRICULTURAL PURPOSES" AS: "FARMING FOR CROPS, PLANTS, VINES, TREES, AND THE KEEPING, GRAZING OR FEEDING OF LIVESTOCK FOR SALE OF LIVESTOCK OR LIVESTOCK PRODUCTS, AND THE ON-FARM PROCESSING OF CROPS, LIVESTOCK, AND LIVESTOCK PRODUCTS."
- NOTE THAT MULTIPLE PROXIMATE PARCELS OF LAND UNDER THE OWNERSHIP OR CONTROL OF THE SAME BUSINESS ENTITY OR LEGALLY RESPONSIBLE PARTY ARE GENERALLY CONSIDERED TO BE ONE AGRICULTURAL FACILITY.
- FARMS WITH MULTIPLE LOCATIONS/PARCELS WILL BE CONSIDERED TO BE A SINGLE FACILITY IF CONTIGUOUS OR PROXIMATE PROPERTIES USED FOR AGRICULTURAL PURPOSES ARE OWNED OR OPERATED BY THE SAME BUSINESS ENTITY OR LEGALLY RESPONSIBLE PARTY.

BASIC PROCESS

1. FORECAST WATER NEEDS AND PLAN WELL IN ADVANCE. NYS DEC'S POSITION IS THAT NO NEW WATER SOURCE CAN BE USED UNTIL PERMITTED. PERMITTED FACILITIES NEED A PERMIT MODIFICATION TO INCREASE CAPACITY OR ADD ADDITIONAL SOURCES.
2. CONTACT YOUR REGIONAL DEC OFFICE TO SCHEDULE A PRE-APPLICATION CONSULTATION AT YOUR FARM.
3. CONTRACT AN ENGINEER LICENSED IN NYS WHO WILL BE ABLE TO COMPLETE AND CERTIFY THE REPORTS FOR DEC.
4. CONTRACT A WELL DRILLER (IF SOURCE IS A WELL)
5. WORK WITH ENGINEER, WELL DRILLER, DEC AND ANY NECESSARY THIRD PARTY TO PLAN THE 72 HOUR PUMP TEST, STEP DRAW DOWN TEST, SEQR, SHPO AND JOINT PERMIT APPLICATIONS FOR STREAMBANK DISTURBANCE.
6. INSTALL THE WELL, NECESSARY MONITORING WELLS AND OTHER APPURTENANCES.
7. COMPLETE THE PUMP TEST.
8. COMPILE STUDIES AND REPORTS INTO APPLICATION PACKAGE AND SUBMIT WATER WITHDRAWAL PERMIT APPLICATION.
9. AWAIT DEC'S DECISION.
10. BEGIN USE OF THE SYSTEM.

RENEWALS

- PERMITS ARE VALID FOR A MAXIMUM OF 10 YEARS.
 - SIMILAR TO THE INITIAL APPLICATION EXCEPT FOR THE PUMP TEST.
- THE FACILITY WILL NEED TO JUSTIFY ITS WATER-USE AND DOCUMENT ALL THE WATER SAVING TECHNOLOGY AND IMPROVEMENT

MODIFICATIONS

PERMIT MODIFICATIONS - CHANGES REQUIRING A PERMIT MODIFICATION INCLUDE, BUT ARE NOT LIMITED TO, CHANGES IN PUMP CAPACITIES, INSTALLATION OF NEW PUMPS, ENLARGEMENT OF CONDUITS, INCREASED RESERVOIR STORAGE, INSTALLATION OF NEW SOURCES OF WITHDRAWAL, CHANGE IN DIAMETER OF AN EXISTING WELL.

- MODIFICATIONS REQUIRE THE SUBMISSION OF AN AMENDED ENGINEER'S REPORT AND THE CERTIFICATION OF THE NEW APPURTENANCES.

TRANSFERAL

- A PERMIT MODIFICATION MUST BE OBTAINED FROM THE DEPARTMENT PRIOR TO ANY TRANSFER OR CHANGE OF OWNERSHIP OF A WATER WITHDRAWAL SYSTEM, AND THE SYSTEM SHALL NOT BE OPERATED UNTIL A PERMIT IS SECURED.

THE TOUGH QUESTIONS

15-1503 ¶12 IN MAKING ITS DECISION TO GRANT OR DENY A PERMIT OR TO GRANT A PERMIT WITH CONDITIONS, THE DEPARTMENT SHALL DETERMINE WHETHER:

A. THE PROPOSED WATER WITHDRAWAL TAKES PROPER CONSIDERATION OF OTHER SOURCES OF SUPPLY THAT ARE OR MAY BECOME AVAILABLE;

B. THE QUANTITY OF SUPPLY WILL BE ADEQUATE FOR THE PROPOSED USE;

C. THE PROJECT IS JUST AND EQUITABLE TO ALL AFFECTED MUNICIPALITIES AND THEIR INHABITANTS WITH REGARD TO THEIR PRESENT AND FUTURE NEEDS FOR SOURCES OF POTABLE WATER SUPPLY;

D. THE NEED FOR ALL OR PART OF THE PROPOSED WATER WITHDRAWAL CANNOT BE REASONABLY AVOIDED THROUGH THE EFFICIENT USE AND CONSERVATION OF EXISTING WATER SUPPLIES;

E. THE PROPOSED WATER WITHDRAWAL IS LIMITED TO QUANTITIES THAT ARE CONSIDERED REASONABLE FOR THE PURPOSES FOR WHICH THE WATER USE IS PROPOSED;

F. THE PROPOSED WATER WITHDRAWAL WILL BE IMPLEMENTED IN A MANNER TO ENSURE IT WILL RESULT IN NO SIGNIFICANT INDIVIDUAL OR CUMULATIVE ADVERSE IMPACTS ON THE QUANTITY OR QUALITY OF THE WATER SOURCE AND WATER DEPENDENT NATURAL RESOURCES;

G. THE PROPOSED WATER WITHDRAWAL WILL BE IMPLEMENTED IN A MANNER THAT INCORPORATES ENVIRONMENTALLY SOUND AND ECONOMICALLY FEASIBLE WATER CONSERVATION MEASURES; AND

H. THE PROPOSED WATER WITHDRAWAL WILL BE IMPLEMENTED IN A MANNER THAT IS CONSISTENT WITH APPLICABLE MUNICIPAL, STATE AND FEDERAL LAWS AS WELL AS REGIONAL INTERSTATE AND INTERNATIONAL AGREEMENTS

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**ITEMS OF CONCERN & OBSTACLES FOR
IMPLEMENTATION & COMPLIANCE:**

HOW WILL WATER BE SHARED BETWEEN USERS AND ULTIMATELY WHAT USE SHALL TAKE PRIORITY

- 15-105 DECLARED POLICY
 - ¶18. IN ADDITION TO OTHER RECOGNIZED PUBLIC BENEFICIAL USES AND CONTROL OF WATER AS PROVIDED BY THIS ARTICLE 15 OR BY ANY OTHER STATUTE, THE REGULATED ACQUISITION, STORAGE, DIVERSION AND USE OF WATER FOR THE SUPPLEMENTAL IRRIGATION OF AGRICULTURAL LANDS WITHIN THE STATE IS A PUBLIC PURPOSE AND USE, IN THE INTERESTS OF THE HEALTH, SAFETY AND WELFARE OF THE PEOPLE OF THE STATE AND FOR THEIR INTEREST.
 - ¶15. THE ACQUISITION, STORAGE, DIVERSION AND USE OF WATER FOR DOMESTIC AND MUNICIPAL PURPOSES SHALL HAVE PRIORITY OVER ALL OTHER PURPOSES;
 - RE-READ #2F ABOVE.

FARM WILL NEED TO DEVELOP A WATER USE CONSERVATION PLAN

- ECL 15-1503 ITEM 1F
 - A DESCRIPTION OF THE APPLICANT'S PROPOSED NEAR TERM AND LONG RANGE WATER CONSERVATION PROGRAM THAT INCORPORATES ENVIRONMENTALLY SOUND AND ECONOMICALLY FEASIBLE WATER CONSERVATION MEASURES, INCLUDING IMPLEMENTATION AND ENFORCEMENT PROCEDURES, EFFECTIVENESS TO DATE AND ANY PLANNED MODIFICATIONS FOR THE FUTURE.
- 15-105 DECLARED POLICY
 - ¶7" REQUIRE THE USE OF ALL KNOWN AVAILABLE AND REASONABLE METHODS TO PREVENT AND CONTROL POLLUTION, WASTAGE AND UNREASONABLE DISTURBANCE AND DEFILEMENT OF THE WATERS OF THE STATE"

PERMITS CAN BE DENIED, GRANTED OR GRANTED WITH CONDITIONS

- (A) ANY WATER USE AUTHORIZED BY A WATER WITHDRAWAL PERMIT SHALL BE SUBJECT TO SUCH REQUIREMENTS FOR MONITORING THE INTAKE, WATERS OF THE STATE OR OTHER SOURCE AS MAY BE REQUIRED BY THE DEPARTMENT TO DETERMINE COMPLIANCE WITH PERMIT LIMITATIONS AND WATER QUALITY STANDARDS THAT ARE OR MAY BE AFFECTED BY THE WATER WITHDRAWAL. THESE REQUIREMENTS INCLUDE THE INSTALLATION, USE, AND MAINTENANCE OF MONITORING EQUIPMENT OR METHODS, AND IF IMPOSED SHALL BE INCLUDED AS PROVISIONS OF THE WATER WITHDRAWAL PERMIT.
- (B) ALL WATER WITHDRAWAL SOURCES SHALL BE EQUIPPED WITH TOTALIZING FLOW METERS, WHICH SHALL BE PROPERLY CALIBRATED WITHIN THE YEAR PRIOR TO PERMIT APPLICATION AND AT LEAST ONCE EVERY FIVE YEARS THEREAFTER. IF THE WATER WITHDRAWAL IS USED SOLELY FOR THE PURPOSE OF FIRE PROTECTION OR IF THE DEPARTMENT DETERMINES THAT THE INSTALLATION OF A TOTALIZING FLOW METER IS IMPRACTICAL OR UNNECESSARY, THE PERMITTEE MAY ESTIMATE WATER WITHDRAWAL QUANTITIES USING AN ACCURATE METHOD APPROVED BY THE DEPARTMENT.

PERMITS CAN BE DENIED, GRANTED OR GRANTED WITH CONDITIONS

- (D) EACH PARAMETER REQUIRED TO BE MONITORED PURSUANT TO THIS SUBPART SHALL BE MONITORED AT INTERVALS TO BE DETERMINED BY THE DEPARTMENT AS SUFFICIENTLY FREQUENT TO YIELD DATA THAT CHARACTERIZES THE NATURE OF THE MONITORED FLOW OR WATER LEVELS. VARIABLE WATER WITHDRAWAL RATES MAY REQUIRE MONITORING AT MORE FREQUENT INTERVALS THAN RELATIVELY CONSTANT WITHDRAWAL RATES.
- (F) ANY GROUNDWATER WELL INSTALLED AFTER APRIL 1, 2013 SHALL BE EQUIPPED WITH APPARATUS FOR MEASURING AND RECORDING WATER LEVELS AND THE APPARATUS SHALL BE PROPERLY CALIBRATED AT LEAST ONCE EVERY FIVE YEARS THEREAFTER. ANY SURFACE WATER IMPOUNDMENT INSTALLED AFTER APRIL 1, 2013 SHALL BE EQUIPPED WITH APPARATUS TO MEASURE WATER LEVELS AND CORRESPONDING STORAGE VOLUMES.

INSPECTION

- DEC MAY REQUIRE ON SITE VISITS AS PART OF THE APPLICATION AND AS A PERMIT HOLDER HAS THE RIGHT TO INSPECT ANY PART OF THE WATER WITHDRAWAL SYSTEM.
 - **WATER WITHDRAWAL SYSTEM** - MEANS ANY FACILITY, WORKS, EQUIPMENT OR INFRASTRUCTURE OPERATED OR MAINTAINED FOR THE PROVISION OR WITHDRAWAL OF WATER INCLUDING, BUT NOT LIMITED TO, COLLECTION, PUMPING, TREATMENT, TRANSPORTATION, TRANSMISSION, STORAGE, AND DISTRIBUTION FACILITIES AND WORKS.
- FACILITY MEANS ANY OR ALL OF THE PHYSICAL COMPONENTS OF A WATER WITHDRAWAL SYSTEM.

THE PUMP TEST

- THE 72 HOUR PUMP TEST:
 - AN EXTREMELY RIGOROUS TEST WITH EXACTING REQUIREMENT. SOME OF THESE REQUIREMENTS COULD BE WAIVED OR EXEMPTED AT DEC'S DESECRATION.
 - A STEP DOWN TEST MAYBE REQUIRED BEFORE THE 72 HOUR TEST.
 - UNLIKELY TO BE PREFORMED DURING WINTER OR SPRING DUE TO GROUND WATER RECHARGE.
 - WELL MUST BE INACTIVE FOR 24 HOUR BEFORE THE TEST.
 - WELL CAN ONLY BE USED FOR THE TEST DURING THE 72 HOUR PUMPING TEST.
 - WEATHER EVENTS MAY REQUIRE THE RESTART OR RESCHEDULE OF TEST.
 - INTENSIVE MEASUREMENTS OF WATER ELEVATIONS AT THE WELLS AND MONITORING WELLS.
 - UP TO 3 MONITORING WELLS MAY NEED TO BE INSTALLED.
 - ELEVATIONS OF SURFACE WATER SOURCES WITHIN 1000 FEET OF THE WELL WILL NEED TO BE MONITORED USING STAFF GAUGES, WEIRS, NESTING WELLS THROUGHOUT THE TEST.
 - IF THERE ARE FAILURES (PUMPING, RECORDING, POWER) THEN TEST MAY NEED TO BE REPEATED.

SURFACE WATER WITHDRAWAL

- NEED TO MEASURE ALL UPSTREAM WATER WITHDRAWALS
- NEED TO CALCULATE THE PASS BY VOLUME
- THE PROCEDURE IS DESCRIBED IN A 60 PAGE DOCUMENT AND DEC WILL BE RESPONSIBLE FOR ITS COMPLETION.

FINICAL BURDEN TO FARM

- EXPECTED COSTS OF COMPLIANCE FOR WELLS
 - COST OF APPLICATION AND PERMIT - \$0
 - ENGINEERING COSTS – \$20,000.00+
 - 72 HOUR PUMP TEST COSTS – \$25,000.00+
 - WELL DRILLING COST – STARTING AT \$20,000.00
 - MONITORING WELLS & DECOMMISSIONING – MIN. 7,500 EA. X 3
 - SURFACE WATER MONITORING COSTS – SITE SPECIFIC
 - SHPO PHASE 1 & 2 IF NECESSARY. - \$1,800 – \$12,500.00 IF NEEDED
- REOCCURRING COSTS – PERMIT NEEDS RENEWAL EVERY 10 YEARS & PERMIT MODIFICATIONS.
- A CONDITION OF THE PERMIT WILL LIKELY INCLUDE THE CLOSURE OF FAILING OR UNUSED WELLS.

FOR THE WELL DRILLERS

- WELL DRILLERS ARE CERTIFIED BY DEC AND NYS REQUIRES THE CERTIFICATION LIKE A BUSINESS LICENSE. DRILLERS ARE OBLIGATED UNDER THE LAW TO:
 - SUBMIT A REPORT BEFORE DRILLING A WELL.
 - SUBMIT A REPORT AFTER THE WELL IS DRILLED.
 - SUBMIT A REPORT TO CLOSE A WELL.
 - AND ANOTHER REPORT WHEN THE WELL IS CLOSED.

ECL 15-1501

- THE DEPARTMENT SHALL PROMULGATE REGULATIONS TO IMPLEMENT A PERMITTING PROGRAM FOR WATER WITHDRAWALS EQUAL TO OR GREATER THAN THE THRESHOLD VOLUME CONSISTENT WITH THE REQUIREMENTS OF THIS SECTION WHICH SHALL ESTABLISH: (A) MINIMUM STANDARDS FOR OPERATION AND NEW CONSTRUCTION OF WATER WITHDRAWAL SYSTEMS; (B) MONITORING, REPORTING AND RECORDKEEPING REQUIREMENTS; AND (C) PROTECTIONS FOR PRESENT AND FUTURE NEEDS FOR SOURCES OF POTABLE WATER SUPPLY. SUCH REGULATIONS MAY ESTABLISH QUANTITATIVE STANDARDS THAT MAINTAIN STREAM FLOWS PROTECTIVE OF AQUATIC LIFE, CONSISTENT WITH THE POLICY OBJECTIVES OF THIS ARTICLE AND ANY OTHER CONDITIONS, LIMITATIONS AND RESTRICTIONS THAT THE DEPARTMENT, IN CONSULTATION WITH THE DEPARTMENT OF HEALTH, DETERMINES ARE NECESSARY TO PROTECT THE ENVIRONMENT AND THE PUBLIC HEALTH, SAFETY AND WELFARE AND TO ENSURE THE PROPER MANAGEMENT OF THE WATERS OF THE STATE. THE REGULATIONS MAY ESTABLISH EXEMPTIONS FROM PERMITTING REQUIREMENTS IN ADDITION TO THOSE EXEMPTIONS SPECIFIED IN THIS SECTION.

THE EQUITABILITY PROBLEM

- MOST OF THE QUESTIONS THAT WERE ASKED DURING THE Q&A SESSIONS WERE NOT ANSWERED AND DESCRIBED AS A SITE SPECIFIC QUESTIONS THAT WILL BE DECIDED ON A CASE BY CASE BASIS.
- THE BROAD USE OF ENFORCEMENT DISCRETION WILL LEAD TO A DISPARITY BETWEEN REGIONS
- ONLY INCLUDING “LARGE” WATER USERS WILL LIKELY RESULT IN HARM TO SMALL USERS AND THE EVENTUAL INCLUSION OF ADDITIONAL USERS OR THE REDUCTION OF THE THRESHOLD.
- THE PERMIT DOES NOT GRANT A RIGHT TO WATER USE.
 - *NYS WATER RIGHTS – BASED ON RIPARIAN RIGHTS WHICH PROVIDES FOR THE REASONABLE USE OF WATER RESOURCES BY ALL INDIVIDUALS, NO USER HAS THE RIGHT TO A USE THAT WOULD LIMIT ANOTHER USER’S ABILITY TO SHARE IN THE RESOURCE.*

ADDITIONAL CONCERNS

- PERMITS WILL REQUIRE PUBLIC NOTIFICATION & COMMENT PERIODS, ALSO PERMIT INFORMATION IS SUBJECT TO FREEDOM OF INFORMATION REQUESTS.
- NYS IS SUFFERING FROM A LACK OF AGRICULTURAL ENGINEERING SERVICES
- THE LENGTH OF TIME THIS PROCESS WILL REQUIRE TO DEVELOP NEW WATER SOURCES
 - THE LENGTH OF TIME IT COULD TAKE TO TRANSFER A PERMIT.
 - POTENTIALLY EMERGENCY SOURCES COULD BE ADDED TO THE PERMIT IN ADVANCE.
- NYS DEC RESOURCES DEVOTED TO THE PROGRAM
 - PROVIDE EFFICIENT, EDUCATION, TRAINING AND ENFORCEMENT ACROSS THE STATE.
- NYS DEC CURRENT INTERPRETATION AND USE OF ENFORCEMENT DISCRETION IS LIKELY TO CHANGE OVER TIME CREATING THE POSSIBILITY AND FUTURE UNCERTAINTY THAT THIS REGULATION COULD BECOME FAR MORE RIDGED AND BURDENSOME.

IN SUMMARY

IN MY OPINION, THE CURRENT REGULATION SEEMS TO STAND IN STARK CONTRAST TO THE DESCRIPTION AND GENERAL LACK OF INFORMATION GIVEN TO THE INDUSTRY IN 2011, WHICH IS HIGHLIGHTED BY THE EX-GOVERNORS COMMENTS "THIS LAW WILL ENHANCE THE STATE'S ABILITY TO MANAGE ITS WATER TO PROMOTE ECONOMIC GROWTH AND ADDRESS DROUGHTS WHILE PROTECTING THE ENVIRONMENT" AND DESCRIBED IT AS "A BALANCED PROGRAM THAT MANAGES SIGNIFICANT WATER WITHDRAWALS ACROSS THE STATE AND PROTECTS NEW YORK'S FARMERS AND BUSINESSES FROM UNDUE REGULATORY BURDENS." (CUOMO, 2011.)

THE IMPLEMENTATION OF THIS LAW AND PERMIT WILL CAUSE SIGNIFICANT HARM TO THE NYS AGRICULTURAL INDUSTRY IN THE FORM OF DIRECT & INDIRECT EXPENSES, REGULATORY BURDEN, REDUCTION OF GROWTH, AND FAILURE TO PROTECT OUR WATER RESOURCES.

A QUICK SIDE NOTE

- NYS DEC ASKED ME TO SHARE WITH YOU SECTION 5-B.7 SEPRABILITY FROM THE STANDARDS FOR WATER WELL. (https://www.health.ny.gov/regulations/nycrr/title_10/part_5/appendix_5b.htm#b7)

Table 1 Required Minimum Separation Distances to Protect Water Wells From Contamination

Contaminant Source	Distance (Feet) ¹
Chemical storage sites not protected from the elements (e.g., salt and sand/salt storage) ²	300
Landfill waste disposal area, or hazardous or radiological waste disposal area ²	300
Land surface application or subsurface injection of effluent or digested sludge from a Municipal or public wastewater treatment facility	200
Land surface application or subsurface injection of septage waste	200
Land surface spreading or subsurface injection of liquid or solid manure ³	200
Storage Areas for Manure piles ⁴	200
Barneyard, silo, barn gutters and animal pens ^{5, 6}	100
Cesspools (i.e. pits with no septic tank pretreatment)	200
Wastewater treatment absorption systems located in coarse gravel or in the Direct path of drainage to a well	200
Fertilizer and/or pesticide mixing and/or clean up areas	150
Seepage pit (following septic tank) ⁵	150
Underground single walled chemical or petroleum storage vessels	150
Absorption field or bed ⁵	100
Contained chemical storage sites protected from the elements (e.g. salt and sand/salt storage within covered structures) ⁷	100
Septic system components (non-watertight) ⁵	100
Intermittent sand filter without a watertight liner ⁵	100
Sanitary Privy pit ⁵	100
Surface wastewater recharge absorption system constructed to discharge storm water from parking lots, roadways or driveways ⁵	100
Cemeteries	100
Sanitary privy with a watertight vault	50
Septic tank, aerobic unit, watertight effluent line to distribution box	50
Sanitary sewer or combined sewer	50
Surface water recharge absorption system with no automotive-related Wastes (e.g., clear-water basin, clear-water dry well)	50
Stream, lake, watercourse, drainage ditch, or wetland	25
All known sources of contamination otherwise not shown above	100

QUESTIONS

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