APPENDIX A TAC Survey Results

California Drywell Guidance

TAC Member Survey Results Summary

Presented By

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TAC Member Overview



- TAC member agencies/companies:
 - State Water Resources Control Board
 - Regional Water Quality Control Board(s)
 - Office of Environmental Health Hazard Assessment
 - National Water Research Institute
 - Sacramento State Office of Water Programs
 - Torrent Resources
 - City of Los Angeles
 - California Department of Water Resources
 - University of California, Davis
 - Orange County Water District



Drywell Experience

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Please rate your level of experience with drywells according to the following categories



Interest

None



Drywell Experience



Some experience

Interest

None

Extensive experience

Please rate your level of experience with drywells according to the following categories

Over 50% of responses show the following experience

- Siting and planning
- Stormwater quality monitoring
- Groundwater quality monitoring
- Water quality modeling
- Permitting



Drywell Experience

Please rate your level of experience with drywells according to the following categories



Some experience

Interest

None

Extensive experience

Over 50% of responses show the following interest

- Design (pre-treatment)
- Design (civil/wells)
- Construction



Existing Drywell Guidance Recommendations

What existing drywell guidance would you recommend following or building off of as a starting point for this project (multiple responses shown in parenthesis)?

- Portland UIC (2)
- Oregon UIC (4)
- American River Basin SWRP (3)
- Orange County (3)
- City of Chandler, AZ, Dept. of Environmental Quality (2)
- US EPA guidance on UIC
- Washington State Department of Ecology (3)
- Nevada Department of Environmental Protection
- NCHRP Report 802, Groundwater Quality Appendix
- CA DWR Well Design
- Torrent Resources Drywell Design Standards



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Strengths and Weaknesses of Existing Guidance

What are the primary strengths and weaknesses of the guidance identified?

• Strengths

- Flexible, protective of groundwater, and follow common sense
- Straightforward and well presented
- Matrix to determine pretreatment needs based on input water quality and vadose zone treatment capacity

Weakness

- Lacking guidance following risk-based WQ impacts
- Lack of consideration of the volume drywells can manage (i.e., can handle small but not large storms)
- Lacking tools/models to simulate fate/transport of variety of pollutants (including organics)
- Lack of science-based data to categorize subsurface treatment potential
- Lack of monitoring guidelines/requirements
- Arbitrary standards for characterizing the vadose zone
- Lack of construction/monitoring guidance to prevent plugging, bio-fouling, and settling of lower sand/gravel material during initial rainfall



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Highest Priority Critical Data/Information Gaps

What critical data/information gaps exist and need to be filled in order for CA to establish statewide drywell guidance?

- Decision Framework/Guidance for Drywell Implementation
 and GW Protection
 - Decision process for when modeling is required and when site-specific monitoring/modeling is <u>not</u> required
 - Drywell site eligibility based on land use and WQ risk
 - Fate and transport modeling guidance for GW protection (suggestion: modify US EPA funded GIFMod for drywells)
 - Guidance to determine vadose zone treatment potential
 - Site-specific soil evaluation requirements
 - Proper use of drywells in consideration with other BMPs



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Highest Priority Critical Data/Information Gaps

What critical data/information gaps exist and need to be filled in order for CA to establish statewide drywell guidance?

• Monitoring/Modeling Studies

- Long term groundwater monitoring to assess impact from various drywell designs at different locations throughout the State
- Consider how the water table will fluctuate in smaller/perched aquifers
- Explore emerging contaminants including antibiotic resistant genes (ARGs)
- Regulatory
 - Clarify how DWR views dry wells in reference to the State Water Well Standards (Bulletins 74-81 & 74-90) to reduce overlay and treat drywells as a stormwater BMP
 - Harmonize dry well standards with the Industrial General Permit
 - Acceptance of drywells by the regulatory agencies as an appropriate means of storm water infiltration



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Pollutants of Concern Risk

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What are the relative risks of the following pollutants of concern?



Pollutants of Concern Risk

What are the relative risks of the following pollutants of concern?

Comments



Antibiotic resistant bacteria and genes

Risk dependent on availability of organic soils/amendments in order to absorb organics

Water soluble contaminants and NAPLs are the major risks to groundwater



High risk

Medium risk

Low risk

Highest POC Risk

- Nutrients
- Metals
- PFOS/PFOA
- Pesticides
- Spills



What are the most important elements for CA's drywell guidance to evaluate and address?

• Siting based on:

- Underlying GW quality
- GW separation (especially for agricultural runoff contributing nitrates)
- Distance from drinking wells
- Setbacks from contaminated sites
- Consideration of contamination plumes and GW contamination
- Consideration of stormwater sources and GWQ standards to determine contamination risk



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What are the most important elements for CA's drywell guidance to evaluate and address?

- Design
 - Guidance
 - Based on depth to GW, soil type, and GW fluctuation
 - Include suggested sizing calculations/assumptions
 - Recommendations to minimize clogging
 - Recommendations to determine drywell/pretreatment size to maintain treatment standards
 - Consider "time to clogging" based on pretreatment, source area, and factor of safety



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What are the most important elements for CA's drywell guidance to evaluate and address?

• Design Cont.

- Testing
 - Evaluate percolation test results for soil types in CA
 - Recommend capacity testing of completed drywells
- Standards and design components
 - Develop pretreatment standards/design guidance
 - Develop standard details and specs
 - Recommend/Require shutoff mechanisms



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What are the most important elements for CA's drywell guidance to evaluate and address?

Installation

- General consensus = lower priority
- Include in-situ full-scale testing to determine if reduction in total # of wells is appropriate
- Control the materials used
- Drilling method should allow strata continuous sampling (coring) and detection of GW (aquifer or perched/seasonal)
- Provide guidance on preventing sidewalls from invading drywell after construction



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What are the most important elements for CA's drywell guidance to evaluate and address?

- O&M
 - Routine inspection frequency/type
 - Procedures to minimize clogging
 - Periodic rehabilitation recommendations
 - Efficiency of pretreatment system
 - Consider O&M in system setup/design to allow for drywell modification, simplicity, and low cost maintenance
 - Address bio-fouling and sediment trap cleanout



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What are the most important elements for CA's drywell guidance to evaluate and address?

Monitoring

- Include priority pollutants
- Consider which bacterial indicators are appropriate and whether ARG/ARB are identified separately
- Monitor groundwater elevation (monitoring wells)
- Consider that extensive monitoring may make drywells unattractive to designers; could apply similar standard to all infiltration devices
- Include sufficient # of wells up/downgradient to capture GW quality
- Recommendations should include selecting monitoring levels/locations accounting for changes in GW flow direction/elevation



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Pretreatment Criteria

With respect to pretreatment criteria, would you prefer to see:

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