

----- Original Message -----

Subject:DNR Wellhead Protection Plans and pesticides

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From:Maria Powell (MEJO) <mariapowell@mejo.us>

To:Madeline Gotkowitz <mbgotkow@wisc.edu>, "Heikkinen, Tom"
<THeikkinen@madisonwater.org>

CC:Anita Weier <AnitaWeier@netscape.net>, Satya Rhodes-Conway
<satya.vadia@gmail.com>, cmg@healthylawnteam.org,
jeffrey.helmuth@wisconsin.gov, "Sargent, Melissa forward"
<melissa4dane@gmail.com>, Gary Werner <nattrails@aol.com>, Jon Becker
<Jonbecker@aol.com>, Caryl Terrell <carylterrell@charter.net>, "Cnare, Lauren"
<district3@cityofmadison.com>, "Demorett, Joe" <jdemorett@madisonwater.org>,
Larry Nelson <ldnelson@chorus.net>, sue ellingsen
<district13@cityofmadison.com>, "Voegeli, Doug"
<DVoegeli@publichealthmdc.com>, "Grande, Joseph"
<JGrande@madisonwater.org>, "jimpowell@mejo.us" <jimpowell@mejo.us>, john
hendrick <j7hendrick@aol.com>

Mr. Heikkinen and Ms. Gotkowitz:

We are writing in regard to your letter of Sept. 25 to Gary Werner regarding wellhead protection and pesticide use on Lake View Hill County Park (see attached). Thanks for copying us on this communication. To be very clear, we are not responding for Mr. Werner, or C.R.A.N.E.S. We are writing only on behalf of the Midwest Environmental Justice Organization.

We are trying to understand how DNR's Wellhead Protection Plans (WHPP) are used by local water utilities and others to protect groundwater from pesticide contamination. In that light, we have some further questions related to statements in your letter:

1. Approximately 120-200 gallons of various pesticides (mostly chlorinated organics and glyphosate compounds) were applied in Lake View Hill County Park since 2010, or about 80 gallons a year using the average (not all applications have been recorded). Some applications were on steep slopes, near storm drains and abandoned wellheads, and some were unauthorized and/or illegal. The WU Technical Advisory Committee concluded that these applications "do not create increased risk of groundwater contamination" because they were "small and controlled" and outside the "greater of the 5-year time of travel capture zone" for wells 7 and 13.

-If Lake View Hill County Park *was* unequivocally in the 5 year capture zone for Well 7 or 13 according to the WU's analysis, would the WU conclude that these pesticide applications could create increased risk of groundwater contamination?

-If 10 entities (parks, golf courses, etc) in the Well 7 or 13 wellhead protection zones each used 80 gallons of pesticides per year, amounting to a total of 800 gallons per year (4000 gallons over five years, 40,000 gallons over 50 years, 80,000 gallons over 100 years), would the WU think these applications (additively) could create increased risk of groundwater contamination?

2. Is there a threshold of concern for pesticide amounts used within wellhead protection zones, and if so, what is it? Who determines this, and on what basis? Can you cite a WHPP where pesticides are considered a potential contaminant?

3. If there is a threshold, and entities exceed it, what actions are taken, if any? Who is responsible for taking these actions?

4. If there are no thresholds for pesticide amounts used within wellhead protection zones, and/or no actions are taken if entities exceed these thresholds, then how do Wellhead Protection Plans protect groundwater/drinking water from pesticide contamination?

We have copied the DNR contact person listed for the Wellhead Protection Plans (Jeffrey Helmuth), members of the City of Madison's pesticide policy committee, and previous recipients of communications on this issue, so they can weigh in on these questions as well.

Thanks in advance for addressing these questions.

Maria Powell, PhD
Jim Powell, Community Organizer
Midwest Environmental Justice Organization
Madison, WI 53704