

DOWNSTREAM Session 10.

(0:30)

Translating General IEE Conditions Into Specific Mitigation Actions: Key Principles

Objective

Understand by example basic principles and approaches for translating general IEE conditions into specific mitigation actions.

Format

Presentation and discussion

Summary

IEE conditions are often written very generally. For example, an IEE might specify that “wells shall be sited to minimize the possibility of contamination.” (Or even more generally: wells shall be sited and constructed consistent with good practices.”)

Implementing this IEE condition (which begins with developing an EMMP) requires that it be translated into specific mitigation actions.

In this case, the project would need to develop or adopt a set of specifications for well location that can then be referenced in the EMMP.

For example, the project might adopt the following, based on the *Small Scale Guidelines*:

The following MINIMUM distances from potential sources of contamination will be observed for well siting:

- 150 ft (45.7 m) from a preparation area or storage area of spray materials, commercial fertilizers, or chemicals that may cause contamination of the soil or groundwater.
- 100 ft. (30.5 m) from a below-grade manure storage area.
- 75 ft (22.9 m) from cesspools, leaching pits, and dry wells.
- 50 ft (15.2 m) from a buried sewer, septic tank, subsurface disposal field, grave animal or poultry yard or building, privy, or other contaminants that may drain into the soil.
- The distance between a septic tank leach field and a down-gradient well should be greater than 100 ft (30.5 m) if the soil is coarser than fine sand and the groundwater flow rate is greater than 0.03 ft/day (0.01 m/day).²

The EMMP could then list the concrete mitigation action as “compliance with project well siting criteria,” and attach those criteria as an Annex.

In this session, we will work through a set of actual examples of “general IEE conditions” and discuss as a group how to translate them into specific mitigation actions.

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² Source: Driscoll, Groundwater and Wells, Second Edition, as cited in the *Small Scale Guidelines*.