

SUBSTANTIVE POLICY STATEMENT

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ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY Inter-Office Memorandum

TO: Technical Engineering Unit, Review Staff
FROM: Bill Shafer, Manager
Technical Engineering Unit, DWS, WQD
DATE: April 25, 1994 *WMS*
RE: Well Seal Requirements

Recently there was a question regarding well seal requirements for an existing well where it was proposed that the well serve as a new source for a drinking water system. At the current time both ADEQ and DWR require a 20 foot deep grout seal.

Question: If a well with a 10 foot deep grout seal is proposed as a drinking water source, does the seal have to be upgraded to the current 20 foot standard?

1. No: if the well was constructed prior to March 5, 1984; the well has a 10 foot grout seal as required as of that date, there is no major well or pump work required to place the well into service as a drinking water source, and there are no site conditions (such as a fault or other soil discontinuity) that would compromise the integrity of the well. If all these conditions are met, a 10 foot deep grout seal can be accepted with a condition on the approval to construct or approval of construction that the well seal will be required to be extended to 20 feet deep whenever there is a major renovation of the well or pump. (Note: *Discussions with DWR indicate that they have determined that they are unable to enforce the 20 foot seal requirement prior to the formal effective date of that requirement, which was March 5, 1984. They require that the grouting be upgraded whenever there is a major renovation of the either the well or the pump. In addition ADEQ's standard was 10 feet until the change in the DWR standard. It should also be noted that there may be other unusual conditions where it might not be necessary to enforce the current well seal depth requirement. An example is the exclusion granted to the Holbrook Seventh-day Adventist Indian School, PWS #09-046 where there was no well seal, but there was a large concrete slab and structure around the well. However, the exclusion requires the addition of the grout seal whenever the pump is repaired or replaced.*)
2. Yes: if the well was constructed on or after March 5, 1984.
3. Yes: if the location of the well is such that either surface or sub surface conditions would place the well in jeopardy. In such cases it might be necessary to require the well seal to be greater in depth than the current 20 foot minimum.

cc: Ed Swanson
Jim Maston

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