



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

September 3, 2014

The Honorable Walter Nelson
Mayor, City of Gooding
308 5th Avenue West
Gooding, Idaho 83330-1205

RECEIVED
SEP 04 2014
DEPT OF WATER RESOURCES
SOUTHERN REGION

Re: **City of Gooding Little Wood River Groundwater Recharge Proposal Review**, Gooding County

Dear Mayor Nelson:

Please be aware that Chuck Brockway, with Brockway Engineering has submitted the above referenced draft ground water recharge proposal to this office for our use, review and comment.

We have reviewed the proposal and we have the following comments.

- License Sealing of Ground Water Recharge Monitoring Proposal. Technical Comment. It was determined from our review of the submittal that the proposal was not license sealed by the project engineer prior to submittal. Resultantly, we respectfully request that Chuck Brockway include his seal on the amended proposal prior to submittal.
- Unavailable Reference Documents. General Comment. It was determined from our review that documents referenced in the narrative have not been incorporated as indicated. Please review the following instances and amend the proposal as needed.
 - A. Background Water Quality: "*Ground Water Section*". Page Five. It was determined from our review of the narrative that the last bullet item contained in the listing suggests all six existing wells were previously tested for Volatile Organic Chemicals (VOC's), however only the monitoring results for source 05S-15E-35DBD3 is included. With this in mind, please incorporate the additional five source monitoring results into the appendix for present and future reference. We also recommend that consideration be made toward adding one or two VOC parameter indicators in the semi-annual monitoring schedule or a brief discussion be included suggesting why VOC monitoring may not be a necessary parameter to monitor.
 - B. Background Water Quality: "*Ground Water Section*". Page Five. It was determined from our review that the last sentence contained in the second to last paragraph indicates the city of Gooding Consumer Confidence Report is incorporated into the proposal however isn't. Please check and amend the proposal as needed.
 - C. Background Water Quality: "*Surface Water Section*". Page Five. It was determined from our review of the fourth sentence contained in the first paragraph that surface water quality data should be available in Appendix X, but isn't. Please check and amend the document as needed.

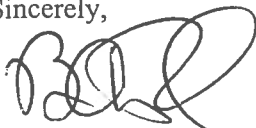
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- D. Proposed Dedicated Monitoring Wells Section. Page Seven. It was determined from our review of the last sentence contained in this part that a typical ground water monitoring well rendering is attached, but isn't. Please check and amend the document as needed.
- Under Water Quality Monitoring Section. Page Seven. General Comment. After reviewing the proposed water quality parameter listing, we respectfully request that the following water quality parameters be included: conductivity, Cryptosporidium and Giardia. Please also clarify in the narrative why the presented Synthetic Organic Chemical (SOC) parameters were selected? The DEQ recharge guidance, which has been enclosed for your convenience suggests on page seventeen that individuals proposing to recharge surface water to ground water consult with the Idaho Department of Agriculture to determine which types of pesticides are used in the recharge area. Resultantly, we recommend that the proposed monitoring plan parameters be based on those consultations.
 - Figure One – "*City of Gooding Groundwater Monitoring Plan*". Page Eleven. General Comment. After reviewing the rendering, it appears that proposing a triangle monitoring orientation may produce more accurate and representative groundwater water quality, flow capacity and velocity data. Resultantly, is it possible to position the up gradient monitoring well (MW-1), a half mile to the west north west of the current location or is the proposed configuration based on land ownership, availability or right to access considerations? Please clarify.
 - Proposed Monitoring Schedule. General Comment. Be aware at this time that DEQ may ask the city of Gooding to include additional water quality parameters in the future based on adjacent land use, contamination events, water quality monitoring history and localized ground water conditions.

Please submit two final amended copies of the report to this office for our use, review and acceptance at the city of Gooding's earliest convenience.

If you have any questions, do not hesitate to contact this office at 736-2190.

Sincerely,



Brian A. Reed, PE
Technical Engineer I

BAR:gl

Enclosure: DEQ Recharge Guidance: Narrative without Appendices

cc: Chuck Brockway, Ph.D, PE, Brockway Engineering, Twin Falls w/o enc.
Todd Bunn, City of Gooding w/o enc.
Rob Lanford, USDA-RD, Twin Falls w/o enc.
Alan Merrit, PE, IDWR, Twin Falls w/o enc.
Oksana Roth, E.I, Keller & Associates, Pocatello w/o enc.

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ec: Irene Nautch, DEQ-Twin Falls Regional Office w/ enc.
David Anderson, DEQ-Twin Falls Regional Office w/ enc.
Toni Mitchell, DEQ-State Office w/ enc.
MaryAnna Peavey, DEQ-State Office w/ enc.
Ester Ceja, DEQ-State Office w/ enc.