

From: tsaranchuk [<mailto:tsaranchuk@cox.net>]
Sent: Monday, May 20, 2019 12:54 AM
To: Hutton, Ronda <Ronda.Hutton@ks.gov>
Subject: ASR Comments

Even though I do not live in the area of the ASR project, I have come up with the following items and observations for consideration. I believe that the items would resolve issues by concerned citizens after listening to the various discussions about the ASR permit modification. The outcome of this permit modification could influence future development of systems in the future.

1. From what I have heard, my opinion is the bottom limit should not be changed.
2. If AMCs are allowed it would only be if the aquifer was full or being recharged at the maximum rate all of the wells could handle. These requirements would have to be made part of the system permit. This would require instrumentation and controls to maintain the recharge conditions required. Additionally, the aquifer level and recharge rates of the wells would have to be reported, monthly not annually, to allow monitoring of compliance with the permit requirements.
3. The issue of aquifer maintenance credits (AMC) is a good idea. I realize that there would probably have to be a revision of law to make them possible. I believe this review is underway in Topeka.
4. I believe that there is a difference between passive recharge and the use of surface water to be substituted for pumping water from the aquifer for use. The water has to be processed to drinking water standards for AMC and ASR credits.
5. If anyone gets an ASR, or equivalent, system using surface water built and permitted they should be able to get ASR credits for the water injected into the aquifer and AMC credits for the treated surface water used for a permitted purpose, i.e. irrigation, watering livestock, domestic use, etc. Unfortunately, the system would probably be beyond what an individual could afford.
6. In all cases above a minimum stream level, or other water source, would have to be determined and maintained. This would help protect the environment of the stream, or other water source.