

MEETING NUMBER: 4-19
DATE: December 10, 2019
TIME: 1:30 p.m. to 4:30 p.m.
LOCATION: Conservation Halton Office

MINUTES

SPC Attendees:

Bob Edmondson
Dan Banks
Dana Couture
Carla Coveart
Michael Kandravay
Judi Partridge
Glenn Powell
David Rodgers
Gavin Smuk

Absent with Regrets:

Bert Andrews Proxy held by Glenn Powell
Barb Veale, Liaison, Conservation Halton

Other Attendees:

Beth Forrest, Liaison, MECP
Tony Colaco, Liaison, Health
Scott Peck, Liaison, Hamilton Conservation Authority
Carmen Vega, City of Hamilton
Jen Croswell, Niagara Region
Jacek Strakowski, Conservation Halton
Florentina Perju, Conservation Halton
Diane Bloomfield, Conservation Halton
Tea Pesheva, MECP, via phone

1. Roll call and welcome – Bob Edmondson noted Glenn Powell held Bert Andrews proxy. Diane Bloomfield indicated Tea Pesheva, a new MECP Liaison was listening to the meeting via phone.
2. Disclosures of conflict of interest – None
3. Acceptance of agenda
HHSPC 19-09 Moved by Judi Partridge and seconded by Glenn Powell
That the agenda be accepted as distributed.
Carried
4. Approval of the Source Protection Committee meeting minutes dated September 17, 2019
HHSPC 19-10 Moved by Michael Kandravay and seconded by Gavin Smuk

That the minutes of the September 17, 2019 meeting of the Halton-Hamilton Source Protection Committee be approved as circulated.

Carried

5. Business Arising from the September 17, 2019 minutes
 - a. Bob Edmondson held a conference call with Crop Life – see item #9 below.
6. Presentations:
 - a. Carla Coveart presented her work on the environmental impacts from cross-connections – when sanitary flows mix with storm water
 - b. Florentina Perju presented the Protecting Our Drinking Water Sources story map – a communications product that summarizes the source protection program. It can be customized and made to cycle
7. Chairs' Update – Bob Edmondson – Bob provided an overview of the chairs' conference call held October 1, 2019 based on the attached meeting notes. As there are four calls per year, the next is scheduled for January 22, 2020.
 - a. There are now 17 chairs' appointed with Niagara and Sudbury appointments outstanding.
 - b. Regulations under the *Conservation Authorities Act* are being written and these will include the core mandate of the source protection program and a process for CAs to levy municipalities. Consultations are ongoing.
 - c. Bob and Diane provided a program overview presentation to the Hamilton Region Source Protection Authority and Bob spoke to an Earth and Environment first year class at McMaster University. He indicated that the students did know about the Walkerton tragedy.

Discussion: Judi Partridge suggested that there may be an opportunity to speak to Redeemer College's environmental program. They are in rural Ancaster and partner with Hamilton CA on water quality sampling, analysis and reporting.

Scott Peck indicated that all 36 CAs have met with MECP staff regarding their programs and the upcoming regulations. The province will be having a broader consultation.

Action: Scott Peck to provide contact details for Redeemer College to Bob Edmondson and Bob to follow-up regarding a possible presentation.

Action: Elizabeth Forrest to report back on the expected timing of the release of the proposed regulations under the CA Act.

8. MECP Liaison's Update – Elizabeth Forrest
 - a. Awaiting senior management decision on two outstanding chair appointments
 - b. The four Phase 2 Technical Rule engagement sessions are completed and comments are being received. All comments will be considered and following amendments, senior management approval will be sought to post the proposal on the Environmental Registry of Ontario.
 - c. Annual reporting starts February 1 and the ministry is preparing to release the databases
 - d. The first S.36 source protection plan update has been approved by the Minister. This is Mattagami's and there was no mention of the next review in the Minister's letter.
 - e. MECP approvals of plan updates are getting faster.
 - f. 2020/21 funding applications were received and discussions between MECP and CAs will start in January
 - g. The moratorium on water bottlers' permits is proposed to be extended to October 1, 2020 and is posted on the Environmental Registry of Ontario with a December 18 due date for comments.

9. Implementing Body Outreach – Bob Edmondson provided an overview of the following outreach sessions with assistance from Michael Kandravy:

- Canada Energy Regulator call – held September 25, 2019 – meeting notes attached
- Agrichemical Warehousing Standards Association call – held November 6, 2019 – meeting notes attached

Discussion: Scott Peck indicated that Enbridge Line 10 pipeline was abandoned through segmenting and cementing under creeks and roads. He also clarified that valve locations can be points of weakness where a pipe will break so valves should be placed only in strategic locations. Judi Partridge mentioned that adjacent to areas needing protection, such as the Beverly Swamp, is where it makes sense to have valves.

Diane Bloomfield asked Russel Hurst, AWSA, why Biedermann facility in Dundas was not certified. His response was somewhat confusing and Bob was asked to follow-up.

Action: Bob Edmondson to contact Russel Hurst to learn more about the Biedermann facility lack of certification under AWSA.

10. Section 36 Technical Work Update –

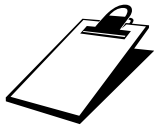
- a. Dan Banks provided an overview of the Campbellville well field ongoing and proposed work to reassess the water quality of the source water and the possible identification of an issue contributing area for chloride. The Region is constructing five additional monitoring wells—three bedrock and two overburden, to monitor water quality near the municipal wells. Since chloride and sodium concentrations are high and groundwater may taste salty, the Region has retained a consultant to assess treatment options for the water treatment plant. See his presentation for an overview.
- b. Jacek Strakowski provided an overview of the process followed to assess the delineation of the IPZ-2s in Halton Region and Hamilton. Scott Peck indicated that updated hydraulic models for the Hamilton region will be finalized in the next couple of months. Jacek suggested that use of the updated models may result in a slightly different delineation of the Woodward IPZ-2. See his presentation for an overview.

11. SPC Online Site overview – Diane Bloomfield updated members on new postings on the member site. Members were encouraged to use the site to stay informed and share information.

12. Other business:

- a. Halton Region will be discussing with Hamilton about a change in responsibility for Health Liaison to the SPC, thus this may be Tony Colaco's last meeting. Tony was thanked for his dedication.
- b. Next meeting is March 10, 2020 at Hamilton Conservation Authority Office.

13. Adjournment at 4:30 p.m.



MECP – Source Protection
Committee Chairs Meeting

MEETING NOTES

SPC CHAIRS TELECONFERENCE

MEETING:

October 1, 2019 9:00 A.M. to 11:00 00 A.M.

CHAIRS IN ATTENDANCE:

Wayne Belter, Max Christie, David Blaney, Ray Beauregard, Dean Edwardson, Tracey Cooke, Ken Graham, Doug Wright, Tom Fuerth, John Williamson, Bob Edmundson Alan Dale (for Wendy Wright-Cascaden), Adrin Willems, Bill Twaddle, Lucy Kloosterhuis, Lynn Dollin, Richard Bois, Jim Hunt

REGRETS

George Pirie

MINISTRY STAFF IN ATTENDANCE:

Susan Ecclestone, Pat Kinch, Saira Bozin-Ilisinovic, Wendy Lavender, Debbie Scanlon, Mary Wooding, Elizabeth Forrest, Olga Yudina, Nisha Choudry, Andy Gemza Neil Gervais, Jen Moulton, Angelune DesLauriers, Stacey Baker, Michael Halder, George Jacoub, Michelle Zehr

1. Welcome and Updates

- Susan Ecclestone welcomed the chairs and provided updates on the future of the program. Susan indicated that the program continues to be a priority for the Ministry, and the province continues to fund conservation authorities for their responsibilities as source protection authorities under the Clean Water Act.
- Susan reviewed the meeting objectives:
 - Welcome new and returning chairs.
 - Establish expectations for chairs and ministry.
 - Share provincial updates and seek feedback from the chairs.
 - Provide an overview of the source protection program for new chairs and an optional refresh for returning chairs.
- Susan reviewed the action items from the June 2019 meeting notes and noted that Pat Kinch and her team would be following up with chairs and project managers in regard to updated orientation materials for new committee members.

Chair appointments

- All previous chair appointments expired on August 19, 2019. Sixteen chairs have been appointed by the Minister and three committees were asked to identify an acting chair until the Minister appointments are made. The terms of the chairs range

from one to three years and the amount of days that chairs can dedicate to their work is 40. Susan mentioned that the Minister has sent a letter of gratitude to chairs that are not returning.

- Susan advised that quarterly meetings for Chairs will continue and will be utilizing distance tele-meeting options. The next meeting is planned for January.

Conservation Authorities Act

- The Ministry is planning discussion and engagement with municipalities, conservation authorities, Indigenous communities, and stakeholders on upcoming regulations related to core programs of Conservation Authorities under the Conservation Authorities Act.
- The Minister has made a commitment to review all of the relevant legislation and regulations that govern CAs with an eye to focusing their efforts on their core mandate. It is anticipated that this includes the Clean Water Act.
- CAs have recently been invited to meetings with the Minister's Office to discuss programs and services provided by conservation authorities.
- The Great Lakes and Inland Waters Branch is leading the work on the regulations. The Source Protection Programs Branch is a partner.
- The matter of how to address the lead CA approach under the Clean Water Act as it relates to levying municipalities that are outside of the scope of the lead CA (i.e., regional approach) will be addressed as part of the discussions about the regulations under the Conservation Authorities Act.

2020-21 funding

- The Source Protection Programs Branch has started to think ahead to the Ministry's next fiscal year. While approval for future funding is pending, discussions have begun on the eligibility criteria with the core group of conservation authorities (the Joint Advisory Committee). Major changes to eligible activities have not been proposed. The program is trying to find efficiencies in program costs and planning to move toward more electronic communications vs printing and reducing travel and hospitality.

2. Provincial Updates

a) Engagement on proposed amendments to the Director's Technical Rules.

- Wendy Lavender provided updates on the proposed amendments to the Director's Technical Rules. Engagement on Phase 2 of the amendments to the Director's Technical Rules is underway. The purpose is to get feedback and address implementation challenges. There are 4 engagement sessions planned in November with approximately 230 participants.

- The climate change assessment tool continues to be developed led by Conservation Ontario. The completion of the third pilot is underway. Through proposed amendments to the Director's Technical Rules, the use of the tool would be enabled, however it would not be mandatory. Conservation Ontario will continue to update the tool based on pilots and make that available to SPAs and municipalities to use.

b) Update on recent Minister's decisions and related matters.

- Debbie Scanlon and Neil Gervais provided updates on ministry decisions on s.34 amendments and s.36 orders. The Minister has 24 decisions pertaining these amendments and orders in 2019.

c) Update on recent developments related to the Aggregate Resources Act.

- Jen Moulton provided updates on the proposed changes to the Aggregate Resources Act and their relationship with source protection.

d) Annual Reporting – planned updates; promoting compliance.

- Neil Gervais provided updates on annual reporting including continuous improvements and key reminders including early engagement, sharing draft changes, etc. Guidance documents are being consolidated and updated and will be shared soon.

3. Expectations for Chairs and the Ministry

- Pat Kinch and Susan Ecclestone reviewed chairs' financial and ethical responsibilities. The expectation is that chairs will be submitting expenses and per diems bimonthly. Total days per annum are to be capped at 40. New chairs will be matched with returning chairs through a buddy system to support them in taking on their new responsibilities.

4. Source Protection Overview

- Pat Kinch, Mary Wooding, Olga Yudina and Beth Forrest provided an overview of the source protection program and the roles and responsibilities of chairs.

5. Next Steps

- The Ministry should consider participating in annual conferences, such as the Ontario's Building Officials.
- It was requested that minutes from the meeting be sent out within a week.
- SPPB agreed to do the following:
 - Once the new forum – Source Protection Community of Practice - is ready, set up a session on how to use it.

- Provide examples of cumulative hours and expense scenarios related to the chair's per diems and expenses.
- Set up a meeting to introduce the buddy system for new chairs.

Notes – Conference Call Meeting with Canada Energy Regulator (CER)

Date: September 25, 2019

Attendees: Marc-Andre Plouffe, Director Eastern Region, Canada Energy Regulator
Armand Ngonga, Pipeline Integrity Engineer, CER
Robert Edmondson, Chair of the Halton-Hamilton Source Protection Committee (SPC)
Michael Kandravy, SPC member representing industry
Diane Bloomfield, Manager, Source Water Protection, Halton-Hamilton Region

Meeting overview:

Diane provided an overview of Ontario's source water protection program and how it relates to liquid hydrocarbon pipelines. She then explained Halton-Hamilton Source Protection Plan policies L-1-S, L-2-S, and T-52-S. SPC members lead a discussion with CER through a series of questions.

What we learned:

- The Eastern Region Office of CER, located in Montreal, is always available to help us. Pipeline companies are required to answer stakeholder and the public's questions and address concerns raised.
- The oversight goal of the CER is to protect people and the environment and the replacement of the *National Energy Board Act* with the *Canadian Energy Regulator Act, 2019* did not change that. However, many changes were made to the regulator's role in assessments. All energy projects that are interprovincial and international are evaluated, not just pipelines. If a pipeline project is <75 km in length the CER would assess and regulate, however, the Minister has the ability to designate a project to be assessed (for example if there is lots of opposition). Larger projects are assessed by the CER, with their report being submitted to the Impact Assessment Agency of Canada (Agency) for consideration. The ultimate decision lies with Cabinet. CER has one commissioner on the Agency and CER supports the Agency. Having the Agency in place facilitates consistency in methodology for the assessment of all projects.
- Both the CER and Agency include the protection of drinking water sources in their assessments. They require the submission of an impact study from the proponent that outlines the risks of the project and they require a mitigation plan to reduce risks identified. Conditions of approval may be imposed based on their assessment of the documents provided and testimony given during hearings. During the assessment the proponent is also asked for a strong emergency management plan.
- The proponent provides rationale for the routing of the pipeline and the locations of shut-off valves. Testimony can be given before the Agency to request changes and the addition of locally strategic shut-off valves.
- The framework followed for assessments and regulation is CSA Z662-19 (Oil and gas pipeline systems). This Canadian Standard is reviewed every four years. The Standard sets minimum requirements using a risk based approach and the onus is on the proponent to bring solutions to challenges/risks identified regarding design, construction, and operation. Any new threat not

included in the Standard and any concern brought forward by a stakeholder must be addressed by the proponent. Companies are required to have emergency management plans on their websites.

- The requirements for integrity management programs are based on the risk assessment completed by the proponent, and for operating pipelines, an assessment by CER. Integrity management programs are designed to ensure the pipeline product stays in the pipe. They include the maintenance, inspection, leak detection and response for the lifecycle of the pipeline project. Damage prevention plans are also required that detail how leaks, ruptures and third party damage will be avoided. The frequency of inspections by CER is based on a risk matrix that includes the condition of the pipeline, the history of minor leaks, and the frequency of incidents such as pressure drops and releases. Older pipes with a history of minor leaks would be inspected more frequently. Oil spill response plans must plan for all possible risks including the contamination of drinking water. Exercises are conducted to test the response readiness.
- Setting a three-year inline and visual inspection recommendation in policy L-1-S a. may not be appropriate. The frequency of these inspections depends on factors such as the technology used, the history of releases, the age of the pipeline. If the pipeline was just constructed and pressure tested, then it could be 10 years before it is inspected. External corrosion is a risk for new pipelines and integrity digs are required to confirm the amount of corrosion loss and its rate. The terrain, moisture conditions and what pipe coatings were used all factor into the risk. Some old pipelines are in use where inline testing cannot be done because instruments won't fit. Other tests must be completed and these pipelines are deemed riskier.

Westover Express Pipeline Ltd. (Enbridge) Line 10 was recently replaced, while TNPI pipeline is aging. CER determines inspection requirements for each pipeline on a case by case basis.

- Incidents are reported daily on the CER website <https://www.cer-rec.gc.ca/sftnvrnmnt/index-eng.html>

And companies can be tracked on their Safety Performance Portal <https://www.cer-rec.gc.ca/sftnvrnmnt/sft/dshbrd/index-eng.html>

- The *Pipeline Safety Act, 2015*, regulates when release incidents occur and pipelines are abandoned. If a product release occurs, the company is financially responsible for the clean up of the material and to return the environment to the state it was in before the incident. They must ensure all pipelines are safe prior to starting them up again. Safety Orders can be issued by CER when a company does not respect the conditions imposed by the CER. This could include operating at only 80% pressure and fines.

Pipelines are frequently abandoned in place if they aren't compromising the safety of people. Typically, the surface overlying the pipe has regenerated with vegetation, etc. and more damage would be done to the environment by requiring the pipe's removal. Pipelines are cleaned, filled with concrete if they cross a river or road, and are segmented so they are not a conduit. Funds are set aside by the company each year for the eventual abandonment of the pipelines.

Notes – Conference Call Meeting with Agrichemical Warehousing Standards Association (AWSA)

Date: November 6, 2019

Attendees: Russel Hurst, Executive Director, AWSA
Robert Edmondson, Chair of the Halton-Hamilton Source Protection Committee (SPC)
Michael Kandravy, SPC member representing industry
Gavin Smuk, SPC member representing agriculture
Diane Bloomfield, Manager, Source Water Protection, Halton-Hamilton Region

Meeting overview:

Diane provided an overview of Ontario's source water protection program, the handling and storage pesticide threat, and explained Halton-Hamilton Source Protection Plan policy T-29-S d. She then provided an overview of AWSA with clarity provided by Russel Hurst and asked for clarity on some points noted in the AWSA's June 11, 2019 letter received. SPC members led a discussion with Russel Hurst through a series of questions and Bob Edmondson followed with specific requests regarding the protection of drinking water sources.

What we know about AWSA:

AWSA is managed by warehouse operators, manufacturers, distributors and governments working together. Their mission is continuous improvement through the establishment of national standards to improve environmental protection, working conditions and business risk. There are about 1,400 certified facilities across Canada. Third-party audits are completed every two years by specially trained and certified auditors. Standard enforcement is through the issuance and withdrawal of warehouse certificates - "no certification/no ship". The standards incorporate the National Fire Code, National Building Code and Canadian Electrical Code but more rigorous provincial or municipal codes, bylaws, regulations or legislation supersede the standards. Audits are for compliance with the national standards since provinces take a while to adopt new standards issued. Some municipalities do exceed the national standards.

Standards are written for:

- Fire
- Spills (minor or major)
- Flood
- Explosion
- Personal injury
- Occupational health
- Personnel training
- Mechanical equipment safety
- Shipping and receiving design safety
- Adequate lighting
- Sources of ignition for flammable liquids

AWSA has partnered with

- Fertilizer Safety & Security Council to provide auditing services of their Ammonia Code of Practice

- Fertilizer Canada to provide auditing services of their
 - Ammonium Nitrate Code of Practice
 - Calcium Ammonium Nitrate Security Code of Practice
 - 4R Nutrient Stewardship Certification Program – voluntary program for sustainable farming

What we learned:

- The AWSA comprises 13 agrichemical retailers, registers, and government representatives. The activities of the AWSA are funded by the registrants through a levy. CropLife Canada appointed Russel Hurst as Executive Director of the AWSA. He works for CropLife. The Association also has on contract, a manager and support staff. Russel was involved in an education program when the source protection program started so he is very familiar with our program.
- Facilities for commercial agricultural or industrial pesticide products need to comply with the AWSA standards. Also included are storage facilities of custom applicators, i.e. ground or aerial crop sprayers. The standards do not apply to storage facilities that only contain domestic pesticides or animal health pesticides. The facilities are classed as F1 or F2 depending on the nature and quantities of the material stored. F1 signifies a high hazard due to the storage of sufficient quantities of highly combustible and flammable or explosive materials. F2 signifies a medium hazard. F1 facilities require a sprinkler system (provided there is adequate water pressure) and F2 facilities do not.
- When a new facility or a renovation is proposed to be built on sand or fractured rock, where shallow groundwater exists, or close to a stream it would not be granted. Local building permits would likely not be granted as well but if a municipality said yes, AWSA would say no. There are a few grandfathered sites but they still have to comply with all other requirements and no expansions are granted.
- There is a minimum 10 cm curb for the certified warehouse area but the facility must also have 110% containment for bulk storage. Large facilities typically have everything under one roof while small facilities may have bulk raw materials stored separately. About 25% of facilities have bulk storage (for example 5,000 gal tank) in addition to pre-packaged materials. Bulk storage must have capture of leaks with no drainage away from the tank. Russel was not aware of any outside bulk storage in Ontario. There is some outside storage in western Canada, but this storage is not used in winter. Heating the facility would be cost prohibitive.
- The biggest issue historically with certified warehouses has been fire. Too much fire water turns an on-site issue with product and fire water contained, into an off-site issue that could impact the environment and increase safety risk. The best control method for pesticide fire is to let it burn very hot.
- Emergency response plans are required for each facility. If there are regulated products, fertilizer products, on-site then Natural Resources Canada regulations require this. If the products are non-regulated pesticides then the standards require that the plan be shared with first responders, and an organizational chart included. This chart specifies the roles and responsibilities of staff and third-parties in case of an emergency and requires that they hold themselves accountable. The facilities also required emergency monitoring and 24-hour fire detection.

- Risk assessments are completed every two years by the facility management. They primarily are concerned with on-site risks but that depends on where they are located and if there are environmentally sensitive areas nearby. They must document and manage all risks in the emergency response plan, including where water would flow on the ground.
- Facilities range in size and inventory. Small facilities are typically <1,000 ft² and the largest are >10,000 ft². Small facilities may be all packaged goods for distribution to retailers. The inventory is kept low between mid-July to December when pesticides are not used. It starts to increase in January and is maximized mid-April to June. The inherent risk is not associated with the volume stored. The risk of fire impacts increases with the warehouse size.

There have been six incidents since 1995 and fire water has been the issue. To help address this issue it is required that facility owners meet with local first responders to discuss products stored and the warehouse floor plan. In some cases, the cause of the fire has been electrical faults and this knowledge has resulted in new protocols for certification. Contained spilled product and fire water are removed by certified hazardous waste haulers.

- Mixing and loading of pesticides can result in spills. If the material is contained on-site it is not reportable. If there are off-site impacts, it is reportable. Mixing and loading are carried out on concrete pads with dykes to contain spills.
- Bulk tanks are inspected every five years by a third-party and visually by the facility auditors every two years.
- Pesticides arrive at the warehouse facilities in various ways:
 - 1/3 prepackaged - 20 L pails or 205 L drums by semi-trucks
 - 1/3 on totes – 400 to 1,000 L in bladders (rigid plastic with metal cage) or blow moulded (hard plastic) on semi-trucks and to a lesser extent by rail
 - 1/3 as true bulk materials – 5,000 to 10,000 L come from U.S.A. via tanker truck or rail

There are a couple small formulation plants in Ontario. Only a small amount of transport by rail is used. Tillsonburg facility uses some rail.

- AWSA certifies and contracts auditors that audit facilities every two years. The auditors have long term industry knowledge, are trained annually on all codes, have quarterly webinars, and must pass exams with 80% on code updates. There are 32 auditors across Canada and five auditors in Ontario. 5% of the audits are randomly checked unannounced in June to ensure compliance with standards and that the products are stored appropriately in the warehouse during the busy season. Non-compliance consequences start with a warning, then a second event results in a \$5,000 fine, a third event a \$10,000 fine, and with a fourth event the facility is de-certified for two years. Russel mentioned that in Western Canada there are a few sites with issues around environmental health and safety.

What we asked for:

- We discussed the inclusion of specific aspects of the protection of drinking water in the national protocols. Russel indicated that protocols must be consulted on, while audit notes do not. The audit notes, located under each protocol, provide some guidance on implementation and auditing of the protocol. We discussed that some of what we're asking for may be included in these notes. Russel reminded that the protocols are applied nationally and so wording may be tweaked. He will bring our requests to the AWSA Board meeting on December 3. He suggested that the changes may be to audit awareness rather than protocol changes. This could be through an industry bulletin. He will provide an update on actions taken.
- The standards reference a 50 m buffer between new storage buildings and zoned residential property lot lines, hospitals, schools, shopping centres, restaurants, processing facilities for feed or food (not storage) and other buildings with high occupancy. We asked if water wells could be added to the list to make facility owners more aware of the need to protect drinking water.
- A protocol requires that management document the normal groundwater level and the soil type at the warehouse site but does not require that this information be considered during the risk assessment. Should there be standards for the risk assessment content and if so, we suggested that defining pathways and local drinking water sources and protection areas when defining receptors be included.
- Since a protocol requires that management conduct a risk assessment every two years, we suggested that the audit notes could specifically include the risk to drinking water to raise awareness.
- The standards require that emergency phone numbers be prominently displayed. We requested that for facilities where the risk to drinking water has been identified, that the municipal water operators be called in addition to the Spills Action Centre. Russel indicated that the intent was fine but he'd have to determine the best way to advance it. It may be best to send out a briefing document to the auditors and agrichemical retail operators.
- A protocol states that buildings constructed on flood plain land have written authorization from local authorities and it was requested that this be expanded to include wellhead protection areas and intake protection zones.