

Municipality/Organization: Town of Hatfield

EPA NPDES Permit Number: MA 04-1010

MassDEP Transmittal Number: W-036303

Annual Report Number
& Reporting Period: No. 14: May 1, 2016 – April 30, 2017

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Phil Genovese **Title:** DPW Director

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Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Phil Genovese

Printed Name: PHIL GENOVESE

Title: DPW DIRECTOR

Date: 3/13/18

Part II. Self-Assessment

The Town of Hatfield, Massachusetts has continued implementation of its Phase II Program. Hatfield continued public education efforts by providing a flyer for residents at the Town Hall. The Town also encourages participation in the Source to Sea program to clean up the Connecticut River banks.

Stormwater outfall and structure mapping is approximately 95% complete within the Urbanized Area (UA). Mapping has progressed slowly in recent years, as locating remaining outfalls generally requires significant brush clearing or excavating buried outfalls. As additional outfalls and structures are located, they are added to the map. To date, no evidence of illicit discharges has been found. An Illicit Discharge Program was also developed during past years and incorporated into the Hatfield Department of Public Works (DPW) Rules and Regulations. Should any complaints regarding illicit discharge or stormwater complaints be received, the appropriate Town department follows up on the complaint and takes measures to address the problem if required.

The Hatfield Zoning Board adopted a Stormwater Management Zoning Bylaw during previous years to reflect current EPA Rules and Regulations, and require typical Best Management Practices (BMPs) be employed during project design and construction. At a minimum, erosion and sediment controls are required during construction for all projects greater than 1 acre in size, and post-development runoff rates must be maintained at pre-development levels for up to the 10-year storm. Bylaws also require site plan review and several onsite inspections throughout the construction process. Enforcement of rules and bylaws continues by the appropriate Town department as necessary.

Finally, good housekeeping techniques such as catch basin cleaning and street sweeping are performed as required, beginning in high priority areas such as commercial areas and areas prone to sediment accumulation, and progressing through lower priority areas.

In accordance with the NPDES Phase II Stormwater requirements, the following topics were evaluated for the completion of the Annual Report:

1. Compliance with the Phase II Permit Conditions
2. Appropriateness of the Selected BMPs
3. Progress Towards Achieving the Program's Measurable Goals
4. Results of Any Information that has been Collected and Analyzed
5. Activities for the Next Reporting Cycle
6. Changes in Identified BMPs or Measurable Goals

The Town has determined that our municipality is in compliance with all permit conditions.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
1A Revised	Educational displays	DPW / James Reidy DPW	Poster / town hall Display Educational Pamphlet Provided at Town Hall	A stormwater brochure was made available at the Town Hall as outlined under BMP 1D.	Continue to provide educational material to the public. Review opportunities for additional brochures and flyers in conjunction with BMP 1D.
1B Revised	Community Website & Hotline	DPW / James Reidy DPW	Number of calls Stormwater information posted on the Town website	Contact information for Town departments and boards is posted on the Town website, as well as information on stormwater-related activities such as HHW collection days as noted under BMP 1E.	Continue to post contact information on the Town website and advertise stormwater-related public participation events.
1C Revised	Local Cable Access	DPW / James Reidy DPW	Informational bulletins Meet with other organizations on stormwater related items	The DPW meets with the Board of Selectmen, Planning Board, Conservation Commission and other Town boards and departments on stormwater as necessary. Selectmen meetings are televised on the local cable access channel.	Continue to broadcast Town meetings on the local cable access channel.
1D Revised	Informational Pamphlets	DPW / James Reidy DPW	Mailing to households Provide informational flyers to residents	An educational stormwater brochure was made available at the Town Hall. The brochure covers hazardous waste, fertilizer usage, illicit discharge information, pet waste disposal, and general stormwater facts applicable to homeowners. As development in Hatfield is almost all residential, other audiences were not targeted.	Continue to make informational pamphlets available to the public at the Town Hall as outlined in BMP 1A. Review opportunities to provide additional public information and perform a mass mailing as budget allows.
1E Revised	Hazardous Waste Collection Day	DPW / James Reidy DPW	Participation by residents Participate in at least 1 HHW collection day per year	Hatfield contracted with Northampton to allow its residents to participate in the HHW Collection Day held on May 21, 2016. Informational handouts and applications were made available at the event.	Hatfield will participate in Northampton's HHW Collection Days on May 20, 2017 and October 14, 2017. This event was recently expanded to twice per year. Continue to make informational handouts and applications available to the public.

1a. Additions.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
1F	Healthy Lawns and Landscapes	DPW / James Reidy	1 Workshop per year	Due to budgetary constraints and minimal participation, the Healthy Lawns and Landscapes workshops have not been held in recent years.	Offer educational workshops to the public pending available budget, manpower, and interest.
Revised		DPW			

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
2A	Adopt-A-Stream	DPW James Reidy	Scout troops involvement	Worked with Connecticut River Watershed Council and local nonprofit volunteer groups to participate in the September 23 and 24, 2016. Source to Sea riverbank cleanup program to remove trash and debris from various locations along the Connecticut River banks.	Continue to plan cleanup efforts along the Connecticut River banks with local Cub Scouts, currently scheduled for September 22 and 23, 2017.
Revised	Source to Sea Riverbank Cleanup	DPW	Participate in at least 1 event per year		
2B	Community Hotline	DPW James Reidy	Number of calls	Contact information for each Town department and board is posted on the Town website and periodically posted on the local cable access channel. Calls received from the public are handled as outlined in BMPs 3F and 4E.	Continue to provide contact information on the cable channel and Town website.
Revised		DPW	Contact information posted on Cable TV and website		

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
3A	Mapping of Outfalls	DPW / B Lehmann / W Young	50% 2003, 75% 2004, 100% 2005	Approximately 95% of the Town's urbanized area outfalls and drainage system has been mapped to date. No additional structures were mapped during Permit Year 14.	Continue to gather information on the Town's drainage system and update the map with any newly installed or located structures as required.
Revised	Mapping Stormwater Outfalls	DPW	Map all known UA outfalls by Year 5		
3B	Develop Illicit Discharge Program	DPW / W Young	Draft year 3, vote year 4, implementation year 5	Continued enforcement of the Illicit Discharge Program, developed during previous years with the Pioneer Valley Planning Commission. Any suspected illicit discharges are investigated by the DPW, Board of Health and/or other appropriate Town department. To date, no illicit discharges have been located.	Continue enforcement of the Illicit Discharge Program. Continue monitoring for illicit discharges as part of routine DPW operations. Follow up on any suspected illicit discharges, and remove any located.
Revised		DPW	IDDE program implemented by year 5		
3C	Non-Stormwater Ordinance	DPW / Health Department / Building Department	Vote year 3, implementation years 4 and 5	A bylaw was adopted during previous years as part of the zoning bylaws that prohibits non-stormwater discharges into the MS4, surface waters and groundwater.	Continue enforcement of the bylaw prohibiting illicit discharges to the MS4 and other waters.
Revised	Non-Stormwater Bylaw		New bylaw by year 5		
3D	Illegal Dumping	DPW / Health and Building Department	Decrease in items by year 5	The Town DPW, Police, and Board of Health have worked together to identify illegal dumping activities and fine those responsible as feasible. DPW has picked up the illegally dumped trash and signs have been posted in problem dumping areas.	Continue efforts to identify illegal dumping activities and fine those responsible.
Revised		DPW, Police, Board of Health	Address all illegal dumping complaints		
3E	Recreational Wastewater	DPW	No illegal dumping	Hatfield residents are allowed to dump their Recreational Vehicle wastewater, free of charge, at the Town's Wastewater Treatment Facility.	Continue to assure that Hatfield residents are able to use the Town's Wastewater Treatment Facility for disposal of RV wastewater.
Revised			No illegal dumping of RV wastewater		

3a. Additions.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
3F	Establish a Procedure for Receipt of Public Complaints	DPW	Receive and follow-up on public complaints	Calls to the DPW regarding suspected illicit discharges are investigated by DPW personnel. Contact information is provided on the Town website. Appropriate follow-up actions are taken, including contacting other Town departments such as the Board of Health if required. No calls were received during Permit Year 14.	Continue to follow-up on any calls or complaints received.
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
4A	Construction Runoff Ordinance	Planning Board / Corey Bardwell / DPW	Town By-Law Adopted May 2003	The Town adopted a "Stormwater Management" bylaw as part of the zoning bylaws on May 13, 2008, as well as several other provisions of the zoning bylaws that govern erosion controls. In part, bylaws require projects disturbing greater than 1 acre to provide erosion control devices during construction to prevent erosion of the project area and sedimentation of the MS4 and/or surface waterbodies.	Continue to enforce the "Stormwater Management" bylaw requirements, as well as other zoning bylaws governing erosion protection.
Revised	Construction Stormwater Control Bylaw	Planning Board	Stormwater Management bylaw adopted by year 5		
4B	Plan Review	Planning Board / Corey Bardwell / DPW	Specifications	The "Stormwater Management" bylaw requires projects with more than 1 acre of land disturbance submit a stormwater management plan to the Planning Board for review and approval. The Planning Board and Conservation Commission then conduct a review to ensure the design is acceptable.	Continue to perform site plan review as outlined in the "Stormwater Management" bylaw.
Revised		Planning Board / Conservation Commission	Conduct site plan reviews as required		

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
4C	Inspection/ Reporting	DPW / Health & Building Department	Annual report filed	The "Stormwater Management" bylaw requires several on-site inspections be performed. Inspections include an initial inspection prior to plan approval and an erosion control inspection to ensure erosion control practices are in place and functioning. The Zoning Board, DPW, Board of Health, or other applicable Town department conduct inspections as required.	Continue to perform onsite inspections as outlined in the "Stormwater Management" bylaw.
Revised	Perform On-Site Inspections	DPW, Planning Board, Conservation Commission, Zoning Board	Inspect all construction sites as required		
4D	Building Permit Requirement	Planning Board / Building Department	Site visits of property	Project plans are reviewed as outlined in BMPs 4B and 5B, while site visits are conducted as outlined in BMPs 4C and 5E.	Continue conducting plan reviews and site inspections.
Revised					

4a. Additions.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
4E	Establish a Procedure for Receipt of Public Complaints	DPW	Receive and follow-up on public complaints	Any calls or complaints concerning flooding, erosion control, or the MS4 system are forwarded to the DPW for investigation personnel. Contact information is provided on the Town website. Appropriate follow-up actions are taken, including contacting other Town departments such as the Zoning Board and Conservation Commission if required.	The DPW will continue to receive and follow-up on any calls or complaints received. Document and tract any actions taken.
Revised					

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
5A	Post Construction Runoff Ordinance	Master Planning Committee / Planning Board	Town By-Law	The Town adopted a "Stormwater Management" bylaw as part of the zoning bylaws on May 13, 2008. In part, the bylaw requires projects disturbing more than one acre to maintain post development peak discharges for up to the 10-year storm at pre-development rates. The bylaw also outlines several best management practices such as infiltration and groundwater recharge.	Continue to enforce the "Stormwater Management" bylaw requirements.
Revised	Post Construction Stormwater Control Bylaw	Zoning Board	Stormwater Management bylaw adopted by year 5		
5B	Construction Site Plan Review	Planning Board / Conservation Commission	Ordinance adopted May 2003	The "Stormwater Management" bylaw requires that projects disturbing more than one acre submit a stormwater management plan to the Planning Board for review and approval. The Planning Board and Conservation Commission then conduct a review to ensure the project design is acceptable.	Continue to perform site plan review as outlined in the "Stormwater Management" bylaw.
Revised	Plan Review		Conduct site plan reviews		
5C	Stormwater System Maintenance Plan	DPW / James Reidy	By-Law adopted 4th year	Prior to issuing a construction permit, the Planning Board requires that an inspection and maintenance agreement be prepared. This agreement requires that the system be adequately maintained and repaired as needed, and that a maintenance schedule be developed.	Continue to require inspection and maintenance agreements to be prepared and followed as required under the "Stormwater Management" bylaw.
Revised		DPW	Require an inspection and maintenance agreement		
5D	Training of Town Officials	DPW / Master Planning Committee	Annual event	Applicable Town department staff has been made familiar with the "Stormwater Management" bylaw, in particular, the Zoning Board, Planning Board, Conservation Commission, and Department of Public Works. Training is typically given to those individuals responsible for implementing and enforcing the bylaw.	Update applicable staff on bylaw changes should any be made.
Revised	Training for Town Staff on New Bylaw		Town staff training provided		

5a. Additions.

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
5E	Perform On-Site Inspections	DPW, Planning Board, Conservation Commission, Zoning Board	New By-Law to be adopted in Year 5.	The "Stormwater Management" bylaw requires that several on-site inspections be performed. Inspections include a construction inspection to ensure proper construction and a final inspection to ensure that the system is functioning properly. The Zoning Board or other applicable Town department will conduct the above inspections as needed.	Continue to perform onsite inspections as outlined in the "Stormwater Management" bylaw.
Revised			Inspect all construction sites as required		

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
6A	Municipal Maintenance Activity Program	DPW / James Reidy	Monitor compliance and revise policies	In-house DPW meetings were held to discuss the Municipal Maintenance Activity Program as part of routine operations. DPW staff and additional Town departments coordinate as necessary.	Continue to hold periodic meetings and make progress on the Municipal Maintenance Activity Program.
Revised		DPW			
6B	Training of All Municipal Employees	DPW / Selectmen	Annual training session 1-5	DPW employees received informal annual stormwater training as part of their training procedures during routine operations. In part, training included pollution prevention techniques, stormwater system cleaning procedures, how to spot illicit discharges, etc.	Continue the current DPW employee training program.
Revised			Conduct annual training		

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
6C	Stormwater Pollution Prevention Plan / MSGP	DPW	(none listed)	A SWPPP has been completed for the Transfer Station & Highway Garage. SWPPP procedures were followed during facility operations.	Continue to enforce the SWPPP and update the document as needed. Conduct employee training for pollution prevention and good housekeeping.
Revised			SWPPP for Transfer Station & Highway Garage in Year 1		
6D	Catch Basin Cleaning Program	DPW	33% of town each year	Catch basins within the urbanized area were cleaned during the Spring of 2016 by an outside cleaning service, with the high priority downtown area cleaned first and more frequently.	Continue the current catch basin cleaning program. Clean high priority basins more frequently as needed.
Revised			Clean at least 33% of Town catch basins each year		
6E	Street Cleaning Procedures	DPW / Hwy / Bill Young	Internal audit	Streets within the urbanized area were swept during early May of 2016 at the conclusion of winter sanding operations, with the high priority downtown area swept first and more frequently.	Continue the current street sweeping program. Clean high priority streets more frequently as needed.
Revised	Street Sweeping and Cleaning	DPW	Sweep streets each year		

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<if applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Next Permit Term
7A	TMDL for Receiving Waters	DPW / Master Planning Committee	Testing	To date, the only water quality assessment relevant to Hatfield is the Connecticut River Watershed 2003 Water Quality Assessment Report. The report does not outline any specific requirements to Hatfield. The next steps for developing a water quality strategy are pending the reissuance of the Phase II Permit.	Review the pending Phase II Permit and develop an implementation strategy to meet applicable TMDLs goals as necessary.
Revised	Evaluate TMDL Studies & Status of Town BMPs to Address Impaired Waters	DPW	Summary of pollution prevention efforts, future needs, and responsible parties.		

7b. WLA Assessment

The MassDEP 2014 303(d) Integrated List of Waters lists two waterbodies within Hatfield: the Mill River (MA34-24), listed as a Category 2 (Attaining Some Uses; other Uses Not Assessed), and the Mountain Street Reservoir (MA34056), listed as a Category 3 (No Uses Assessed). Neither waterbody is listed as requiring a TMDL.

The Connecticut River (MA34-04) is listed as a Category 5 waterbody and provides the following status for designated uses:

- Aesthetics: fully supporting
- Fish Consumption: not supporting (E.coli, PCB), source unknown
- Fish, other Aquatic Life and Wildlife: fully supporting
- Primary Contact Recreation: fully supporting
- Secondary Contact Recreation: fully supporting

Once a TMDL is developed for this segment of the Connecticut River or any other applicable waterbodies, Section 7 of the annual report will be updated to reflect changes associated with each TMDL. Water quality concerns associated with 303d waters are also addressed through the implementation of BMPs under the six minimum measures for Phase II.

The approach for addressing impaired waters will be updated based on the new permit. Additionally, it is expected that the new permit will required measures to be taken in order to address the Long Island Sound nitrogen TMDL.

Part IV. Summary of Information Collected and Analyzed

Hatfield has completed a map of approximately 95% of all outfalls located within the Urbanized Area. No illicit discharges have been located to date.

Part V. Program Outputs & Accomplishments

Programmatic

Stormwater management position created/ staffed	(y/n)	N
Annual program budget/ expenditures	(\$)	
Total program expenditures since beginning of permit coverage	(\$)	
Funding mechanism(s) (General Fund, Enterprise, Utility, etc.)		

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	
Stormwater management committee established	(y/n)	N
Stream teams established or supported	(# or y/n)	Y
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	Y
Shoreline cleaned since beginning of permit coverage	(mi.)	
Household Hazardous Waste Collection Days		
▪ Days sponsored	(#)	2
▪ Community participation	(# or %)	
▪ Material collected	(tons or gal)	
School curricula implemented	(y/n)	N

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with “X”)				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control				X
▪ Post-Development Stormwater Management				X
Accompanying Regulation Status (indicate with “X”)				
▪ Illicit Discharge Detection & Elimination				X
▪ Erosion & Sediment Control				X
▪ Post-Development Stormwater Management				X

Mapping and Illicit Discharges

Outfall mapping complete	(%)	95%
Estimated or actual number of outfalls	(#)	
System-Wide mapping complete	(%)	95%

Mapping method(s)		
▪ Paper/Mylar	(%)	95%
▪ CADD	(%)	
▪ GIS	(%)	
Outfalls inspected/screened	(# or %)	
Illicit discharges identified	(#)	
Illicit connections removed	(#) (est. gpd)	
% of population on sewer	(%)	
% of population on septic systems	(%)	

Construction

Number of construction starts (>1-acre)	(#)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	100%
Site inspections completed	(# or %)	100%
Tickets/Stop work orders issued	(# or %)	0
Fines collected	(# and \$)	0
Complaints/concerns received from public	(#)	0

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	100%
Site inspections completed	(# or %)	100%
BMP maintenance required through covenants, escrow, deed restriction, etc.	(y/n)	N
Low-impact development (LID) practices permitted and encouraged	(y/n)	Y

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	1/yr
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	1/yr
Total number of structures cleaned	(#)	
Storm drain cleaned	(LF or mi.)	
Qty. of cleanings /debris removed from storm sewer infrastructure	(lbs. or tons)	Unknown

Disposal or use of cleanings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)	(location)	
Cost of cleanings disposal	(\$)	
Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	1/yr
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	1/yr
Qty. of sand/debris collected by sweeping	(lbs. or tons)	Unknown
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	
Cost of sweepings disposal	(\$)	
Vacuum street sweepers purchased/leased	(#)	1
Vacuum street sweepers specified in contracts	(y/n)	Y
Reduction in application on public land of: (“N/A” = never used; “100%” = elimination)		
▪ Fertilizers	(lbs. or %)	N/A
▪ Herbicides	(lbs. or %)	N/A
▪ Pesticides	(lbs. or %)	N/A
Anti-/De-Icing products and ratios	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl % Sand	25% 0 0 0 0 0 75%
Pre-wetting techniques utilized	(y/n)	N
Manual control spreaders used	(y/n)	Y
Automatic or Zero-velocity spreaders used	(y/n)	N
Estimated net reduction in typical year salt application	(lbs. or %)	25%
Salt pile(s) covered in storage shed(s)	(y/n)	N
Storage shed(s) in design or under construction	(y/n)	Y

Water Supply Protection

Stormwater outfalls to public water supplies eliminated or relocated	(# or y/n)	N
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	(# or y/n)	N
▪ Treatment units induce infiltration within 500-feet of a wellhead protection area	(# or y/n)	N