

STATE OF WISCONSIN

Department of Safety and Professional Services 4822 Madison Yards Way Madison WI 53705

Governor Tony Evers

Web: http://dsps.wi.gov

Email: DSPSSBPowtsTech@Wi.gov

Secretary Dan Hereth

Phone: 608-266-2112

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Hydrograph Suspension Update

Hydrograph County SPIA's-

As of April 1st, 2024, the Hydrograph Procedure may not be used as an alternate method to the standard soil test. This means no new evaluations using the Hydrograph Procedure. Those sites previously utilizing the Hydrograph Procedure and already approved by the county, will continue to be valid for the purposes of designing POWTS and obtaining sanitary permits. The recent suspension of the Hydrograph Procedure in Adams, Juneau, Portage, Waushara, and Wood Counties has generated a certain level of concern and confusion. The DSPS POWTS Program would like to use this opportunity to list and detail the options that may be considered for POWTS system elevations on new and replacement sites in affected counties. Listed below are options in lieu of the former hydrograph procedure SPS 385.60(4).

- 1. SPS 385.60 (2) Interpretive Determination Reports. These reports are comprehensive soil/data reports that are site specific. Besides the requirements listed, the department uses any and all data provided to make its determination on the site's limiting features.
- 2. SPS 385.60(3) Soil Saturation Determinations. This procedure is typically more time consuming and not utilized as much as when it was first codified. It does, however, offer an effective alternative to the Hydrograph procedure.
- 3. SPS 385.60 (5) Artificially controlled Navigable Waters. Like the other options, sandy soil will be required for consideration. This is an excellent option and is not time-consuming. Note: Distance from the controlled flow navigable water is critical to consider and the control must be a recognized management entity.
- 4. Standard Soil Evaluation Report SPS 385.20 SPS 385.40. Prepare a Soil Report using the code. This will likely result in an At-Grade or Mound type system in areas they would have otherwise gained that separation using the previous "Suspended" Hydrograph Procedure. Note: Soil Color Pattern Exemptions as described in SPS 385.30 (3) (1) will not be accepted unless proper data and evidence is provided. This could lead to further failing systems if there is no evidence to suggest or prove soil color pattern exemptions. Utilizing an exemption as a "work around" will not be an acceptable practice.

Moving forward, Department staff will continue to work with the State Geologist and other experts to better understand ground water flooding. Cooperation and collaboration from county agents is critical as their soil evaluation data, permitting information, and input aids in the future decision-making process. We want to develop standards to re-instate the Hydrograph Procedure that address well construction of proposed Hydrograph Wells, consistent hydrograph methods and data collection, extrapolation distance from those wells, department review of county data to utilize a well, and maps detailing where the process should or should not be used in a particular county.

The DSPS POWTS Program understands that this suspension is not always going to lead to an equivalent plan as compared to the "former" Hydrograph Procedure. Our goal in this situation is to protect the public's health. Continuation of the Hydrograph Procedure as previously prescribed could lead to health issues on certain sites. Building back a Hydrograph Procedure that accurately predicts groundwater levels will greatly reduce the likelihood of serious health risks.

Sincerely,

Travis Wagner

Wastewater Specialist Division of Industry Services WI Department of Safety and Professional Services 608-598-0715

Matt Janzen

Wastewater Specialist Division of Industry Services WI Department of Safety and Professional Services 715-340-0407