

March 17, 1998
Program Letter

Installation of Corrosion Protection Anode Drill holes

The increase in the number of corrosion protection (CP) applications and installations has brought to light the fact that CP installers are failing to apply for all required permits prior to the installation of a system. *A Conditional Approval from ERS does not replace any other state or local applications and/or permits that must be applied for and received prior to system installation.*

The following is a listing of some of the permits and approvals that may have to be acquired prior to the installation of a CP system.

- The Department of Commerce *requires* that a preinstallation plan review be conducted and Conditionally Approved. All reviews of CP systems are required to be submitted to ERS in Madison. *The exceptions are systems to be installed in areas covered by a full service LPO. Those applications shall be submitted to the respective full service LPO.*
- In many municipalities an electrical permit must be applied for, and on site during system installation. System installations must comply with all respective sections of the State Electrical Code ILHR 16 and NFPA70.
- Some municipalities require that a building permit be obtained prior to the system installation.
- The Department of Natural Resources requires permits for any anode drillholes greater than ten feet deep. The DNR requirement for anode Drillhole approval is found in NR812.

“NR.812.07 Definitions. *The following terms are defined as follows:*

(33) “Drillhole” *Means an excavation, opening or driven point well deeper than it is wide that extends more than 10 feet below the ground surface.”*

“NR 812.09 Department approvals.

(2) Approval application and submission. *The property owner or lessee shall obtain a written approval from the department. When an application is submitted by someone other than the owner of the subject property, the owner or authorized agent shall sign the application. Application information, outlines or forms may be obtained from the department. Applications shall provide information regarding the owner's and operator's name, address and firm name, if applicable, and any other information requested by the department. The department may request, but is not limited to descriptions or sketches of well construction, geology, pump installation, plumbing, possible contamination sources, property boundary, water use and, water sample results, depending on the type of application.”*

“NR 812.26 Well and drillhole abandonment.

(1) Purpose. *The permanent abandonment of unused or contaminated wells or drillholes and noncomplying water systems is an important step in the protection of the local groundwater quality. Wells, especially those with structural defects, may act as conduits for the vertical movement of contamination from or near the ground surface to the groundwater or from one aquifer to another.”*

ERS will continue to review CP applications. Applications that are received without an approved Anode Drillhole application and drawings will be reviewed and if approved include the condition that a DNR Anode Drillhole approval must be in place prior to system installation.

“NOTE: The Wisconsin Department of Natural Resources *requires prior approval* for the installation of (a) cathodic protection drillhole(s), per Wis. Stats. Chapter 281 and Ch. NR 812, Wis. Adm. Code. The Drillhole approval is required to be maintained on the construction site premises and available for inspection. Copies of the **Anode Drillhole Approval Application** may be obtained by calling (608)-266-0821. Questions regarding DNR Drillhole installation and approval requirements should be directed to : DNR Bureau of Drinking Water and Groundwater, P.O. Box 7921, Madison, WI. 53707.”

The Department of Natural Resources has requested that ERS forward them a copy of all conditional approval letters for CP system installations.

The DNR has advised us that the Drillhole Location Information section of the application must at a minimum include : county, township, street or grid address and post office. *Please note:* The location information is to indicate the *actual site location, not the mailing address*. This information is similar to the project information requested on the ERS-9 Installation Application.

The Drillhole profile drawings submitted to the DNR to delineate construction criteria per NR812 will also be acceptable to ERS plan review as part of the ERS submittal package.

During a CP installation it may be determined that additional anodes are required. ERS requires that a revision be submitted with new site drawings that show the location of the additional anode drillholes and calculations reflecting the change in site configuration and current requirements. The DNR also requires that information be provided regarding changes to the number and/or Drillhole construction.

Corrosion Protection contractors and installers should contact the Department of Natural Resources, Bureau of Drinking Water and Groundwater, P.O. Box 7921, Madison, WI 53707 with any questions regarding the DNR installation and approval requirements for anode drillholes.

During onsite inspections of Impressed Corrosion protection system installations the LPO may enquire if the corrosion protection system installer has the Drillhole approval onsite. The DNR drillhole approval is outside the scope of ILHR 10, it will be at the discretion of the LPO to notify DNR if a Drillhole approval is not available for inspection.