Appendix E

Ministry of Environment Letters Approving Variances to Technical Rules

File, WMWP 2.4.15

Ministry of the Environment

Source Protection Programs Branch

8th Floor
2 St. Clair Ave. West
Toronto ON M4V 1L5

Ministère de l'Environnement

Direction des programmes de protection des sources

8e étage
2, avenue St. Clair Ouest
Toronto (Ontario) M4V 1L5

Ontario

FEB 4 '10 AM 11:41

Log: ENV1174IT-2010-29

☐ GM ☐ Water Mgmt.
☐ Communications ☐ Land Mgmt.
☐ Foundation ☐ _____

January 27, 1010

Mr. Mark Neufeld
Chair, Niagara Peninsula Source Protection Committee
740 Ridge Road North
Ridgeway ON L0S 1N0

Dear Mr. Neufeld:

I am responding to the December 4, 2009 e-mail sent by Jayme Campbell requesting to use an alternate method under Rule 15.1 of the Director's Technical Rules (Rules) for the completion of the assessment report under the *Clean Water Act* (CWA) for the Niagara Peninsula source protection area.

As set out in your correspondence, your proposal is to use an alternative grid centroid within which you calculated the impervious surface area per 1 km^2 using a node centred on the centroid of the individual IPZs, instead of "with a node of the grid centred on the centroid of the source protection area" as required by Rule 17. In our opinion, the use of this proposed alternative grid centroid will not impact the implementation of the Rule, other than to centre the calculations on the areas of particular interest. Therefore, this approach is equivalent to the method currently required through sub-Rule 16(11) and Rule 17.

In accordance with my authority under Rule 15.1, I hereby provide Director's approval for the use of this alternate method for the Niagara Peninsula source protection area.

Your rationale for the use of an alternative grid and how it is being applied must be included in your assessment report.

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We thank you for your efforts in completing the technical studies in support of the assessment report under the CWA. If you have any questions or require additional information, please contact our office.

Sincerely,

Ian Smith, Director
Source Protection Programs Branch
Ministry of the Environment

cc: Brian Wright, Project Manager, Niagara Peninsula Conservation Authority
Jayme D. Campbell, Source Protection Hydrogeologist
Heather Malcolmson, Manager, Source Protection Planning
Keith Willson, Manager, Source Protection Approvals
Maeve McHugh, Liaison Officer, Source Protection Implementation

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Direction des programmes de protection des sources

8e étage
2, avenue St. Clair Ouest
Toronto (Ontario) M4V 1L5

Ontario

Log: ENV1174IT-2010-110

APR29 '10 PM12:55

☐ GM ☐ Water Mgmt.

☐ Communications ☐ Land Mgmt.

☐ Foundation ☐ _____

April 26, 2010

Mr. Mark Neufeld
Chair, Niagara Peninsula Source Protection Committee
740 Ridge Road North
Ridgeway ON L0S 1N0

Dear Mr. Neufeld:

I am responding to the April 15, 2010 memo sent by Jayme Campbell requesting approval to use an alternate method under Rule 15.1 of the Director's Technical Rules (Rules) for the completion of the assessment report under the *Clean Water Act* (CWA) for the Niagara Peninsula source protection area.

As set out in the memo, the proposal is to use an alternate method for the identification of drinking water threat conditions (Rule 126). The proposed alternative method would compare the results of sediment analyses to soil criteria, rather than to sediment criteria, which was the method recently used for the Human Health and Ecological Risk Assessment (Goss Gilroy Inc. and intrinsic, 2009) for the Lake Gibson reservoir. This reservoir is part of the DeCew water treatment plant intake protection zone.

As set out in the Lake Gibson risk assessment, soil standards were used to determine if the contamination could pose a risk to human health. Given the results of that report, we agree that determining whether this is a condition under the CWA should also be based on the soil standards.

In accordance with my authority under Rule 15.1, I hereby provide Director's approval for the use of this alternate method for the assessment of whether the sediment in Lake Gibson is a condition at the Decew intake in the Niagara Peninsula source protection area.

Your rationale for the use of this alternative method and how it is being applied must be included in your assessment report.

.../2

We thank you for your efforts in completing the technical studies in support of the assessment report under the CWA. If you have any questions or require additional information, please contact our office.

Sincerely,

Ian Smith, Director
Source Protection Programs Branch
Ministry of the Environment

cc: Brian Wright, Project Manager, Niagara Peninsula Conservation Authority
Jayme D. Campbell, Source Protection Hydrogeologist
Heather Malcolmson, Manager, Source Protection Planning
Keith Willson, Manager, Source Protection Approvals
Maeve McHugh, Liaison Officer, Source Protection Implementation

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Ministère de l'Environnement

Direction des programmes de protection des sources

8e étage
2, avenue St. Clair Ouest
Toronto (Ontario) M4V 1L5

Ontario

Log: ENV1174IT-2010-124

☐ GM ☐ Water Mgmt.
☐ Communications ☐ Land Mgmt.
☐ Foundation ☐ _____

May 6, 2010

MAY13 '10 PM 3:59

Mr. Mark Neufeld
Chair, Niagara Peninsula Source Protection Committee
740 Ridge Road North
Ridgeway ON L0S 1N0

Dear Mr. Neufeld:

I am writing to you regarding the classification for the Niagara Falls and DeCew intakes under Rule 55.1 of the Director's Technical Rules (the Rules) for the completion of the assessment report under the Clean Water Act (CWA) for the Niagara Peninsula source protection area.

Variation from Rule 55.1 – Classification of Intakes

The Director has the authority under Rule 55.1 to notify a Source Protection Committee of the classification of an intake. Based on Rule 55, the Niagara Falls and DeCew intakes are classified as Type C and Type D intakes respectively. Though this letter, I am providing notice that both intakes are to be classified as Type B (connecting channels) intakes.

The Niagara Falls intake is located in the channel of the Welland River which makes it a Type C intake according to Rule 55.0. The intake is located at the mouth of Welland River where it receives 100% of the Niagara River flow, under normal conditions. The flow conditions at the intake are very similar to the Niagara River flow conditions and therefore the intake is best classified as a Type B intake.

With respect to the DeCew intake, there is a lack of certainty as to whether or not this system is in a connecting channel, and therefore, the system could be classified as a Type B or a Type D system depending on local interpretation. The Conservation Authority staff have been working with the understanding that it is a Type B intake. It is apparent that given the lack of certainty, that there is a need to confirm the classification of this intake. Based on various conversations between staff from the Source Protection Programs Branch (SPPB) and

...2

Conservation Authority staff, as well as a meeting held on January 29th 2010 with SPPB staff it was determined that there would be little difference in the practical outcome regarding whether the DeCew intake was classified as a Type B or a Type D intake with respect to the delineation and scoring of the IPZ-1 and IPZ-2. There is considerable difference in the delineation of the IPZ-3 and the Type B IPZ-3 delineation is more appropriate for this intake. As such I am formalizing it as a Type B intake.

In accordance with my authority under Rule 55.1, I hereby classify both the Niagara Falls and the DeCew intakes as Type B intakes.

This letter notifying you of the classification of the intakes must be included in your assessment report.

We thank you for your efforts in completing the technical studies in support of the assessment report under the CWA. If you have any questions or require additional information, please contact our office.

Sincerely,

Ian Smith, Director
Source Protection Programs Branch
Ministry of the Environment

cc: Brian Wright, Project Manager, Niagara Peninsula Conservation Authority
Jayme D. Campbell, Source Protection Hydrogeologist
Heather Malcolmson, Manager, Source Protection Planning
Keith Willson, Manager, Source Protection Approvals
Maeve McHugh, Liaison Officer, Source Protection Implementation

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2 St. Clair Ave. West
Toronto ON M4V 1L5

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8e étage
2, avenue St. Clair Ouest
Toronto (Ontario) M4V 1L5

Ontario

Log: ENV1174IT-2010-162

June 21, 2010

Mr. Mark Neufeld
Chair, Niagara Peninsula Source Protection Committee
740 Ridge Road North
Ridgeway ON L0S 1N0

Dear Mr. Neufeld:

I am responding to the June 3, 2010 memo sent by Jayme Campbell requesting approval to use an alternate method under Rule 15.1 of the Director's Technical Rules (Rules) for the completion of the assessment report under the *Clean Water Act* (CWA) for the Niagara Peninsula source protection area.

As set out in the memo, the proposal is to use an alternate method for the identification of drinking water threat conditions (Rule 126). This proposed alternative method is to compare the results of the sediment analyses with soil criteria, rather than with sediment criteria as stipulated in Rule 126. The memo requests approval to use this alternative method for the Niagara Falls, Fort Erie/Rosehill, Grimsby, Welland and Port Colborne water treatment plant intakes. This alternative method has already been approved for the DeCew water treatment plant intake protection zones.

The rationale for this alternative method is to be consistent with the approach at the DeCew water treatment plant. The original need for this alternative method was first indicated by staff from the MOE Niagara District office. They supported the conclusions of a Human Health and Ecological Risk Assessment (Goss Gilroy Inc. and Intrinsic, 2009) recently completed for the Lake Gibson reservoir (part of the DeCew water treatment plant system) which compared sediment data to soil criteria for its analysis.

As set out in the Lake Gibson risk assessment, soil standards were used to determine if the contamination could pose a risk to human health. Given the results of that report, we agree that determining whether this is a condition under the CWA should also be based on the soil standards.

In accordance with my authority under Rule 15.1, I hereby provide Director's approval for the use of this alternate method for the assessment of the Niagara Falls, Fort Erie/Rosehill, Grimsby, Welland and Port Colborne water treatment plant intakes in the Niagara Peninsula source protection area.

Your rationale for the use of this alternative method and how it is being applied must be included in your assessment report. .../2

We thank you for your efforts in completing the technical studies in support of the assessment report under the CWA. If you have any questions or require additional information, please contact our office.

Sincerely,

for Ian Smith, Director
Source Protection Programs Branch
Ministry of the Environment

cc: Brian Wright, Project Manager, Niagara Peninsula Conservation Authority
Jayme D. Campbell, Source Protection Hydrogeologist
Heather Malcolmson, Manager, Source Protection Planning
Keith Willson, Manager, Source Protection Approvals
Maeve McHugh, Liaison Officer, Source Protection Implementation

Ministry of the Environment
Source Protection Programs Branch
14th Floor
40 St. Clair Ave. West
Toronto ON M4V 1M2

Ministère de l'Environnement
Direction des programmes de protection des sources
14e étage
40, avenue St. Clair Ouest
Toronto (Ontario) M4V 1M2

Ontario

ENV1174IT-2011-38

May 16, 2011

Mr. Brian Wright
Source Protection Coordinator
Niagara Peninsula Source Protection Area
250 Thorold Road West, 3rd Floor
Welland, Ontario, L3C 3W2

Dear Mr. Wright:

We are in receipt of your letter requesting the Director's opinion regarding a hazard rating for the transportation of specified substances under the technical rules.

In accordance with my authority under Rules 119, 120, or 121, I am of the opinion that the hazard rating is greater than 4. Based on this, Table 1 provides information on the activity, circumstance and areas where the activity is a significant, moderate or low drinking water threat related to your proposed request as per the attached table. The transportation of materials as set out in Table 1 has been approved as local threats in the Niagara Peninsula Source Protection Area.

I recognise that the approval of this local threat does not align with timelines set for the submission of your amended/updated assessment report. Therefore, the local threat is approved for consideration in future updated assessment reports only. Your rationale for the inclusion of this local threat along with a copy of this letter must be included in the updated assessment report when submitted.

Sincerely,

Ian Smith, Director
Source Protection Programs Branch
Ministry of the Environment

cc: Keith Willson, Manager, Source Protection Approvals
Heather Malcolmson, Manager, Source Protection Planning
Melanie Ward, Team Lead, Source Protection Approvals
Wesley Wright, Provincial Liaison Officer.

Table 1:
ACTIVITY, CIRCUMSTANCE, AND AREAS WHERE THE ACTIVITY IS SIGNIFICANT, MODERATE OR LOW DWT

1) Transportation Of Organic Solvents

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Carbon Tetrachloride. 2. Carbon Tetrachloride is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Carbon Tetrachloride to surface water.	---	10	9 – 6.4
1. The transportation of Chloroform. 2. Chloroform is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Chloroform to surface water.	---	10	9 - 7
1. The transportation of Methylene Chloride (dichloromethane). 2. Methylene Chloride (dichloromethane) is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Methylene Chloride (dichloromethane) to surface water.	---	---	10 - 7
1. The transportation of Pentachlorophenol. 2. Pentachlorophenol is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Pentachlorophenol to surface water.	---	10	9 - 7
1. The transportation of Carbon Tetrachloride. 2. Carbon Tetrachloride is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Carbon Tetrachloride to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Chloroform. 2. Chloroform is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Chloroform to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Methylene Chloride (dichloromethane). 2. Methylene Chloride (dichloromethane) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Methylene Chloride (dichloromethane) to surface water.	---	10	9 – 6.3

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Pentachlorophenol. 2. Pentachlorophenol is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Pentachlorophenol to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Carbon Tetrachloride. 2. Carbon Tetrachloride is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Carbon Tetrachloride to surface water.	10	9 - 8	7.2 – 5.4
1. The transportation of Chloroform. 2. Chloroform is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Chloroform to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Methylene Chloride (dichloromethane). 2. Methylene Chloride (dichloromethane) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Methylene Chloride (dichloromethane) to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Pentachlorophenol. 2. Pentachlorophenol is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Pentachlorophenol to surface water.	---	10 - 8	7.2 – 5.4

2) TRANSPORTATION OF DNAPLs

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Dioxane-1,4. 2. Dioxane-1,4 is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Dioxane-1,4 to surface water.	---	---	10 - 7
1. The transportation of Polycyclic Aromatic Hydrocarbons (PAHs). 2. PAHs are transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PAHs to surface water.	---	10	9 – 6.3
1. The transportation of Tetrachloroethylene (PCE). 2. PCE is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PCE to surface water.	---	10	9 - 7
1. The transportation of Trichloroethylene (TCE). 2. TCE is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of TCE to surface water.	---	10	9 - 7
1. The transportation of Vinyl chloride. 2. Vinyl chloride is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Vinyl chloride to surface water.	---	10	9 - 7
1. The transportation of Dioxane-1,4. 2. Dioxane-1,4 is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Dioxane-1,4 to surface water.	---	10	9 – 6.3
1. The transportation of Polycyclic Aromatic Hydrocarbons (PAHs). 2. PAHs are transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PAHs to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Tetrachloroethylene (PCE). 2. PCE is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PCE to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Trichloroethylene (TCE). 2. TCE is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of TCE to surface water.	---	10 - 9	8.1 - 6

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Vinyl chloride. 2. Vinyl chloride is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Vinyl chloride to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Dioxane-1,4. 2. Dioxane-1,4 is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Dioxane-1,4 to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Polycyclic Aromatic Hydrocarbons (PAHs). 2. PAHs are transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PAHs to surface water.	10	9 - 8	7.2 - 5
1. The transportation of Tetrachloroethylene (PCE). 2. PCE is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PCE to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Trichloroethylene (TCE). 2. TCE is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of TCE to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Vinyl chloride. 2. Vinyl chloride is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Vinyl chloride to surface water.	---	10 - 8	7.2 – 5.4

3) TRANSPORTATION OF FUELS

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Petroleum hydrocarbons (PH) F1 (C6-10). 2. PH F1 (C6-10) is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PH F1 (C6-10) to surface water.	---	---	10 - 8
1. The transportation of Petroleum hydrocarbons (PH) F2 (>C10-16). 2. PH F2(>C10-16) are transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PH F2(>C10-16) to surface water.	---	---	10 - 7
1. The transportation of Petroleum hydrocarbons (PH) F3 (>C16-34). 2. PH F3 (>C16-34) is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PH F3 (>C16-34) to surface water.	---	10	9 - 7
1. The transportation of Petroleum hydrocarbons (PH) F4 (>C34-50). 2. PH F4(>C34-50) is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of PH F4(>C34-50) to surface water.	---	---	10 - 7
1. The transportation of BTEX compounds. 2. BTEX compounds is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of BTEX compounds to surface water.	---	10	9 - 7
1. The transportation of Petroleum hydrocarbons (PH) F1 (C6-10). 2. PH F1 (C6-10) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PH F1 (C6-10) to surface water.	---	10	9 – 6.4
1. The transportation of Petroleum hydrocarbons (PH) F2 (>C10-16). 2. PH F2 (>C10-16) are transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PH F2 (>C10-16) to surface water.	---	10	9 – 6.3
1. The transportation of Petroleum hydrocarbons (PH) F3 (>C16-34). 2. PH F3 (>C16-34) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PH F3 (>C16-34) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Petroleum hydrocarbons (PH) F4 (>C34-50). 2. PH F4 (>C34-50) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of PH F4 (>C34-50) to surface water.	---	10	9 – 6.3

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of BTEX compounds. 2. BTEX compounds is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of BTEX compounds to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Petroleum hydrocarbons (PH) F1 (C6-10). 2. PH F1 (C6-10) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PH F1 (C6-10) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Petroleum hydrocarbons (PH) F2 (>C10-16). 2. PH F2 (>C10-16) are transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PH F2 (>C10-16) to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Petroleum hydrocarbons (PH) F3 (>C16-34). 2. PH F3 (>C16-34) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PH F3 (>C16-34) to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Petroleum hydrocarbons (PH) F4 (>C34-50). 2. PH F4 (>C34-50) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of PH F4 (>C34-50) to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of BTEX compounds. 2. BTEX compounds is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of BTEX compounds to surface water.	---	10 - 8	7.2 – 5.4

4) TRANSPORTATION OF PESTICIDES / HERBICIDES

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Atrazine. 2. Atrazine is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Atrazine to surface water.	---	10	9 - 7
1. The transportation of Diacamba. 2. Diacamba are transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Diacamba to surface water.	---	10	9 - 7
1. The transportation of D-2,4 (Dichlorophenoxyacetic Acid). 2. D-2,4 is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of D-2,4 to surface water.	---	10	9 - 7
1. The transportation of Dichloropropene-1,3. 2. Dichloropropene-1,3 is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Dichloropropene-1,3 to surface water.	---	---	10 - 7
1. The transportation of Glyphosphate. 2. Glyphosphate is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Glyphosphate to surface water.	---	---	10 - 8
1. The transportation of MCPA. 2. MCPA is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of MCPA to surface water.	---	10 - 9	8.1 - 6
1. The transportation of MCPB. 2. MCPB is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of MCPB to surface water.	---	10	9 - 7
1. The transportation of Mecoprop. 2. Mecoprop is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Mecoprop to surface water.	---	10	9 – 6.3
1. The transportation of Metalaxyl. 2. Metalaxyl is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Metalaxyl to surface water.	---	---	10 - 7
1. The transportation of Metolachlor or s-Metolachlor. 2. Metolachlor or s-Metolachlor is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Metolachlor or s-Metolachlor to surface water.	---	---	10 - 8
1. The transportation of Pendimethalin. 2. Pendimethalin is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Pendimethalin to surface water.	---	10	9 - 7

Activity	Vulnerability Score to produce a Significant DWT IPZ-1,2,3	Vulnerability Score to produce a Moderate DWT IPZ-1,2,3	Vulnerability Score to produce a Low DWT IPZ-1,2,3
1. The transportation of 2,4,5-Trichlorophenoxyacetic acid. 2. 2,4,5-Trichlorophenoxyacetic acid compounds is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of 2,4,5-Trichlorophenoxyacetic acid compounds to surface water.	---	10	9 - 7
1. The transportation of Atrazine. 2. Atrazine is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Atrazine to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Diacamba. 2. Diacamba are transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Diacamba to surface water.	---	10 - 9	8.1 - 6
1. The transportation of D-2,4 (Dichlorophenoxyacetic Acid). 2. D-2,4 is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of D-2,4 to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Dichloropropene-1,3. 2. Dichloropropene-1,3 is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Dichloropropene-1,3 to surface water.	---	10	9 – 6.3
1. The transportation of Glyphosphate compounds. 2. Glyphosphate compounds is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Glyphosphate compounds to surface water.	---	10	9 – 6.4
1. The transportation of MCPA. 2. MCPA is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of MCPA to surface water.	---	10 – 8	7.2 – 5.4
1. The transportation of MCPB. 2. MCPB is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of MCPB to surface water.	---	10 - 9	8.1 - 6

Activity	Vulnerability Score to produce a Significant DWT IPZ-1,2,3	Vulnerability Score to produce a Moderate DWT IPZ-1,2,3	Vulnerability Score to produce a Low DWT IPZ-1,2,3
1. The transportation of Mecoprop. 2. Mecoprop is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Mecoprop to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Metalaxyl. 2. Metalaxyl is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Metalaxyl to surface water.	---	10	9 – 6.3
1. The transportation of Metolachlor or s-Metolachlor. 2. Metolachlor or s-Metolachlor is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Metolachlor or s-Metolachlor to surface water.	---	10	9 - 7
1. The transportation of Pendimethalin. 2. Pendimethalin is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Pendimethalin to surface water.	---	10 - 9	8.1 - 6
1. The transportation of 2,4,5-Trichlorophenoxyacetic acid. 2. 2,4,5-Trichlorophenoxyacetic acid is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of 2,4,5-Trichlorophenoxyacetic acid to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Atrazine. 2. Atrazine is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Atrazine to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Diacamba. 2. Diacamba are transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Diacamba to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of D-2,4 (Dichlorophenoxyacetic Acid). 2. D-2,4 is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of D-2,4 to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Dichloropropene-1,3. 2. Dichloropropene-1,3 is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Dichloropropene-1,3 to surface water.	---	10 – 8.1	8 – 5.6

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Glyphosphate compounds. 2. Glyphosphate compounds is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Glyphosphate compounds to surface water.	---	10 - 9	8.1 - 6
1. The transportation of MCPA. 2. MCPA is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of MCPA to surface water.	10	9 – 7.2	7 – 4.9
1. The transportation of MCPB. 2. MCPB is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of MCPB to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Mecoprop. 2. Mecoprop is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Mecoprop to surface water.	10	9 - 8	7.2 - 5
1. The transportation of Metalaxyl. 2. Metalaxyl is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Metalaxyl to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Metolachlor or s-Metolachlor. 2. Metolachlor or s-Metolachlor is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Metolachlor or s-Metolachlor to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Pendimethalin. 2. Pendimethalin is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Pendimethalin to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of 2,4,5-Trichlorophenoxyacetic acid. 2. 2,4,5-Trichlorophenoxyacetic acid is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of 2,4,5-Trichlorophenoxyacetic acid to surface water.	---	10 - 8	7.2 – 5.4

5) TRANSPORTATION OF OTHER CHEMICALS

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Arsenic. 2. Arsenic is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Arsenic to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Barium. 2. Barium are transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Barium to surface water.	---	10	9 - 7
1. The transportation of Cadmium. 2. Cadmium is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Cadmium to surface water.	---	10	9 – 6.3
1. The transportation of Chloride. 2. Chloride is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Chloride to surface water.	---	---	10 - 7
1. The transportation of Chromium VI. 2. Chromium VI is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Chromium VI to surface water.	---	10	9 – 6.3
1. The transportation of Copper. 2. Copper is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Copper to surface water.	---	---	10 - 7
1. The transportation of Cyanide. 2. Cyanide is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Cyanide to surface water.	---	10	9 – 6.4
1. The transportation of Lead. 2. Lead is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Lead to surface water.	---	10	9 – 6.3
1. The transportation of Mercury. 2. Mercury is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Mercury to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10	9 - 7
1. The transportation of Selenium. 2. Selenium is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Selenium to surface water.	---	10	9 - 7

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Silver. 2. Silver is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Silver to surface water.	---	10	9 - 7
1. The transportation of Sodium. 2. Sodium is transported in a quantity of 25-250 L or 25-250 kg. 3. A spill may result in the release of Sodium to surface water.	---	---	10 - 7
1. The transportation of Arsenic. 2. Arsenic is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Arsenic to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Barium. 2. Barium are transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Barium to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Cadmium. 2. Cadmium is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Cadmium to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Chloride. 2. Chloride is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Chloride to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Chromium VI compounds. 2. Chromium VI compounds is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Chromium VI compounds to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Copper. 2. Copper is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Copper to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Cyanide. 2. Cyanide is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Cyanide to surface water.	---	10 - 9	8.1 - 6

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Lead. 2. Lead is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Lead to surface water.	---	10 – 8.1	8 – 5.6
1. The transportation of Mercury. 2. Mercury is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Mercury to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Selenium. 2. Selenium is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Selenium to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Silver. 2. Silver is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Silver to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Sodium. 2. Sodium is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Sodium to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Arsenic. 2. Arsenic is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Arsenic to surface water.	10	9 – 7.2	7 – 4.9
1. The transportation of Barium. 2. Barium are transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Barium to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Cadmium. 2. Cadmium is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Cadmium to surface water.	10	9 - 8	7.2 - 5

Activity	Vulnerability Score to produce a Significant DWT IPZ-1,2,3	Vulnerability Score to produce a Moderate DWT IPZ-1,2,3	Vulnerability Score to produce a Low DWT IPZ-1,2,3
1. The transportation of Chloride. 2. Chloride is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Chloride to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Chromium VI compounds. 2. Chromium VI compounds is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Chromium VI compounds to surface water.	10	9 - 8	7.2 - 5
1. The transportation of Copper. 2. Copper is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Copper to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Cyanide. 2. Cyanide is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Cyanide to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Lead. 2. Lead is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Lead to surface water.	10	9 - 8	7.2 - 5
1. The transportation of Mercury. 2. Mercury is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Mercury to surface water.	10	9 – 7.2	7 – 4.9
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Selenium. 2. Selenium is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Selenium to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Silver. 2. Silver is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Silver to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Sodium. 2. Sodium is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Sodium to surface water.	---	10 - 8	7.2 – 5.4

6) TRANSPORTATION OF AGRICULTURAL SOURCE MATERIAL

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10	9 - 7
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Phosphorus to surface water.	---	---	10 - 7
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 8	7.2 – 5.4

7) TRANSPORTATION OF NON-AGRICULTURAL SOURCE MATERIAL – SEWAGE BIOSOLIDS

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10	9 - 7
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Phosphorus to surface water.	---	---	10 - 7
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 8	7.2 – 5.4

8) TRANSPORTATION OF NON-AGRICULTURAL SOURCE MATERIAL – PULP AND PAPER WASTE

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10	9 - 7
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of 25-250 L or 25-250 kg 3. A spill may result in the release of Phosphorus to surface water.	---	---	10 - 7
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 9	8.1 - 6
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 250 but not more than 2500 L or greater than 250 but not more than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 9	8.1 – 6.3
1. The transportation of Nitrogen (Nitrate). 2. Nitrogen (Nitrate) is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Nitrogen (Nitrate) to surface water.	---	10 - 8	7.2 – 5.4
1. The transportation of Phosphorus. 2. Phosphorus is transported in a quantity of greater than 2500 L or greater than 2500 kg. 3. A spill may result in the release of Phosphorus to surface water.	---	10 - 8	7.2 – 5.4

PATHOGENS

9) TRANSPORTATION OF AGRICULTURAL SOURCE MATERIAL (ASM)

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of ASM. 2. ASM is transported in any quantity. 3. A spill of the ASM may result in the presence of pathogens in surface water.	10-9	8.1-7	6.4-4.5

10) TRANSPORTATION OF NON-AGRICULTURAL SOURCE MATERIAL – SEWAGE BIOSOLIDS

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of NASM – sewage biosolids. 2. NASM – sewage biosolids is transported in any quantity. 3. A spill of the NASM – sewage biosolids may result in the presence of pathogens in surface water.	10-9	8.1-7	6.4-4.5

11) TRANSPORTATION OF NON-AGRICULTURAL SOURCE MATERIAL – PULP AND PAPER WASTE

Activity	Vulnerability Score to produce a Significant DWT	Vulnerability Score to produce a Moderate DWT	Vulnerability Score to produce a Low DWT
	IPZ-1,2,3	IPZ-1,2,3	IPZ-1,2,3
1. The transportation of NASM – pulp and paper waste. 2. NASM – pulp and paper waste is transported in any quantity. 3. A spill of the NASM – pulp and paper waste may result in the presence of pathogens in surface water.	---	10	9-7