



BUILDING A BETTER WORLD

CON 12-15
Doc #31115

July 24, 2015

Mr. Kurt F. Hildebrandt
Environmental Scientist
Drinking Water and Groundwater
Management Branch (WWPD/DWGM/UIC)
United States Environmental Protection
Agency (USEPA), Region VII
11201 Renner Blvd.
Lenexa, KS 66219

MWH #10507524.0104

RE: Underground Injection - Rule Authorization Request
Morse Rubber, LLC Facility
Keokuk, Iowa

Dear Mr. Hildebrandt:

MWH has been retained by Morse Rubber, LLC (Morse Rubber) to provide environmental assistance at the Morse Rubber facility located at 3588 Main Street in Keokuk, Iowa (site). On behalf of Morse Rubber, MWH has prepared this letter to notify you of proposed remedial action injections at the Morse Rubber facility and request a Rule authorization letter. The purpose of the injections is to enhance reductive dechlorination of chlorinated ethenes in groundwater by emplacement of Regenesis bioremediation products 3-D Microemulsion[®] (3DMe[®]) and Bio-Dechlor INCOLUM[®] Plus (BDI Plus[®]) in the subsurface. The number, location, volume, content, and rationale of the proposed injections are described in the Remedial Action Work Plan submitted to you and the Iowa Department of Natural Resources (IDNR) on July 15, 2015. The IDNR Contaminated Sites Section is providing regulatory oversight of the remedial activities at the site.

USEPA regulates underground injections in the state of Iowa through the Underground Injection Control (UIC) program and, based on our previous conversations, addition of the proposed bioremediation products to the subsurface would be considered a Class V Injection Well and could be completed under a Rule Authorization.

Proposed Schedule and Future Reporting

The proposed work is tentatively scheduled for late August or early September 2015, pending IDNR and USEPA approval. Annual reports will be prepared and submitted to the IDNR. Copies of all IDNR-required reports and notifications will be provided to UIC at the time of submittal to the IDNR.

11153 Aurora Avenue
Des Moines, IA 50322-7904

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Shallow Injection Well Registration/Information Verification Record

The completed Shallow Injection Well Registration/Information Verification Record for the site is provided in Attachment A. The 47 proposed injection points are to be completed with a similar design and procedures; therefore, a single Registration/Information Verification Record is provided

MWH requests a Rule Authorization letter be issued following UIC review of this submittal. If you have any questions or require additional information, feel free to contact me at 515-251-1053.

Sincerely,



Karin H. Wilhelm, PMP
Project Manager

/khw:vas

Attachments

cc: Patrick Boyd, Morse Rubber
Matt Culp, IDNR

ATTACHMENT A

**EPA-REGION 7 SHALLOW INJECTION WELL
REGISTRATION/INFORMATION VERIFICATION RECORD**

FACILITY INFORMATION (Complete a separate form for each Facility that has an Injection Well)

Facility Name: Morse Rubber, LLC
Facility Contact: Patrick Boyd Title: President
Address: 3588 Main Street
City: Keokuk State: Iowa Zip: 52632
County: Lee Phone: 319-524-0311
Number of Employee's (full and part time): _____
EPA Identification Number(s): 110000415480, IAD075838490
IDNR Identification Number(s): 311217959

FACILITY OWNER INFORMATION (If different than Facility Information)

Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Phone: _____

INJECTION WELL INFORMATION (Complete this section for each Injection Well at Facility)

Well Type: CESSPOOL DRAINAGE WELL DRY WELL HEAT PUMP RETURN FLOW WELL
SEPTIC SYSTEM (tank size in gallons: _____)
OTHER (please describe: Temporary Injection Points)
Well Status: PROPOSED ACTIVE ABANDONED PLUGGED
Approximate Date Installed: August 2015 If Plugged or Abandoned, When? _____
Well Location: Township: 65N Range: 05W Section: 14 1/4 Section: SW
Latitude: 40.42325 Longitude: -91.4123
Depth of Well (In Feet): 35 Injection Formation: Glacial Till
Nature of Injected Fluid(s): Regenesis bioremediation products 3-D Microemulsion® (3DMe®)
and Bio-Dechlor INCOLUM® Plus (BDI Plus®)

Has any chemical analysis been done on the injectate? YES NO (if yes please attach copies of the results)

FACILITY WATER SUPPLY

Municipal / Public / Rural: YES NO Private: YES NO (if yes, answer the following questions)
Is the water supply well at the facility used for human consumption: YES NO
Is the well protected with a backflow prevention device: YES NO

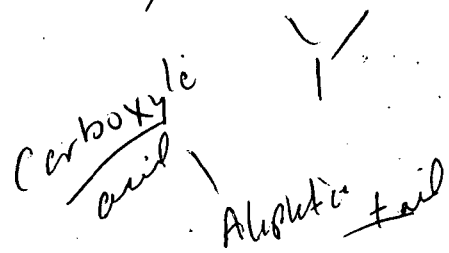
Signature: _____ Date: _____
Owner Operator

fermentation - bacterial

corn starch based

o Lactic acid, polyactate esters

o Free Fatty Acids Fatty Acid esters
corn based



work plan