

**From:** [Hildebrandt, Kurt](#)  
**To:** "Elyn Potter"  
**Cc:** "Reutlinger, Danny"; "Robert Rohlf's"; [Matt.Peramaki@lbgmn.com](mailto:Matt.Peramaki@lbgmn.com); [Cook, Dan \[DNR\]](#); [Anderson, Michael \[DNR\]](#); [Mindrup, Mary](#); [Meissner, Benjamin](#)  
**Subject:** RE: Proposed In-Situ Remediation Injection System - Former Williams Petroleum South Sioux City Site (Sioux City, Iowa) IDNR ILRP Site ID #140  
**Date:** Tuesday, August 25, 2015 11:23:37 AM

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Elyn Potter, RG  
Leggette, Brashears & Graham, Inc.  
405 19th Avenue, Suite A2  
North Kansas City, Missouri 64116

Ms. Potter:

We have reviewed the information that you have provided regarding Leggette, Brashears & Graham, Inc's proposed supplemental injection of gypsum along with BOS 200® and bacteria concentrate In-Situ Remediation materials in the vicinity of MW-7 at the former Williams Petroleum South Sioux City Site (Iowa Land Recycling Program Site ID No.140) located at 3701 S. Lewis Boulevard in Sioux City, Iowa. Based on the information that has been provided, the injection/emplacement of gypsum along with BOS200® and bacteria to encourage remediation via biodegradation at the site should not result in an adverse impact to any underground sources of drinking water or otherwise adversely affect the health of humans. Therefore, the Region approves your request for a targeted supplemental injection of remedial materials at the site.

The thirteen injection points which you are proposing to use to emplace up to ~2,250 pounds of gypsum along with ~1,650 pounds of BOS 200® and ~5 gallons of bacteria at the site will be allowed to operate as Rule Authorized under 40 CFR § 144.24 without the need for permitting. These wells will be covered under the original Environmental Protection Agency - Region 7 UIC facility ID number of IAS193260002. Note that the region has only approved this one additional treatment event at this time and you will need to submit information on any further proposed bioremediation treatments at the site at least 30 days before commencing operation so that a determination can be made if rule authorization is still appropriate. All other conditions that were outlined in our original approval correspondence remain in effect.

Please contact me if you should have any questions on this decision and its requirements or any other UIC related issues.

Sincerely,  
Kurt Hildebrandt

**Kurt F. Hildebrandt**  
US Environmental Protection Agency - Region 7  
Water, Wetlands & Pesticides Division  
11201 Renner Boulevard  
Lenexa, Kansas 66219

Voice: **913-551-7413**  
FAX: **913-551-9413**

-----Original Message-----

From: Elyn Potter [<mailto:epotter@lbgkcmo.com>]  
Sent: Monday, August 24, 2015 4:52 PM  
To: Hildebrandt, Kurt  
Cc: 'Reutlinger, Danny'; 'Robert Rohlf's'; [Matt.Peramaki@lbgmn.com](mailto:Matt.Peramaki@lbgmn.com); 'Cook, Dan [DNR]'; 'Anderson, Michael [DNR]'  
Subject: RE: Williams S. Sioux City BOS 200 Injection Work Plan

Mr. Hildebrandt,

Monitoring efforts following the injection of BOS 200® at the South Sioux City Site (Region 7 UIC facility ID number IAS193260002) indicate that additional injection near monitoring well MW-7 would be beneficial. At the time of the injection event completed in early 2015, some of the BOS 200® was observed to surface near this well, and LNAPL has been observed to accumulate in this well during subsequent fluid level monitoring events.

Therefore, on behalf of Williams, LBG is requesting authorization to complete an additional, targeted injection event near monitoring well MW-7.

Additional product will be emplaced in thirteen (13) injection borings. The additional injection will emplace:

- 1,650 pounds of BOS 200®
- 2,250 pounds of gypsum
- 5 gallons of Bacteria Concentrate
- <2,000 gallons water

Work is tentatively scheduled to proceed the week of September 21, and is anticipated to take two days to complete. We look forward to your written response, noting whether this work can proceed under authorization by rule.

Thank you,  
Elyn Potter

-----Original Message-----

From: Hildebrandt, Kurt [<mailto:Hildebrandt.Kurt@epa.gov>]

Sent: Thursday, December 18, 2014 9:51 AM

To: 'Elyn Potter'

Cc: Reutlinger, Danny; Robert Rohlf; [Matt.Peramaki@lbgmn.com](mailto:Matt.Peramaki@lbgmn.com); Cook, Dan [DNR]; Anderson, Michael [DNR]

Subject: RE: Williams S. Sioux City BOS 200 Injection Work Plan

Elyn Potter, RG  
Leggette, Brashears & Graham, Inc.  
405 19th Avenue, Suite A2  
North Kansas City, Missouri 64116

Ms. Potter:

We have reviewed the information that you have provided regarding Leggette, Brashears & Graham, Inc's proposed use of BOS 200® In-Situ Remediation materials and Trap and Treat® Bacteria Concentrate for the remediation of groundwater contamination due to a release of petroleum hydrocarbons at the former Williams Petroleum South Sioux City Site (Iowa Land Recycling Program Site ID No.140) located at 3701 S. Lewis Boulevard in Sioux City, Iowa. The emplacement of this material into the subsurface that has been proposed in your remediation plan is regulated by the Underground Injection Control (UIC) Program as a Class V injection well. Injection wells in this classification are allowed to operate either as Rule Authorized, or under conditions of a permit. The decision to permit these operations is based on the following criteria: whether the injectate could cause a violation of the Primary Drinking Water Regulations under 40 CFR § 124 or otherwise adversely affect the health of humans; the duration of the project; frequency of

injection; and the volume of fluids to be injected. To ensure the protection of underground sources of drinking water, the region typically requires permits to be obtained for all aquifer remediation related injection wells by the authorities granted the Administrator under 40 CFR § 144.25(a)(3).

Based on the information that has been provided, the injection/emplacement of BOS 200® In-Situ Remediation materials amended with Trap and Treat® Bacteria Concentrate to encourage remediation at the site should not result in an adverse impact to any underground sources of drinking water or otherwise adversely affect the health of humans. Therefore, the region has determined that the ~96 wells which you are proposing to use to emplace ~7,000 gallons of BOS 200® amended fluids over a period of approximately two weeks will be allowed to operate as Rule Authorized under 40 CFR § 144.24 without the need for permitting. These wells will be covered under an Environmental Protection Agency - Region 7 UIC facility ID number of IAS193260002. Please note that the region will need to be made aware of any subsequent injection at this site beyond the series which you have proposed at least 30 days before commencing operation so that a determination can be made if rule authorization is still appropriate.

By the authorities granted under 40 CFR § 144.27, we are also requesting that the results of all groundwater monitoring and copies of any reports and notifications required by the Iowa Department of Natural Resources (IDNR) be submitted as the project progresses to the Director at the following address:

U.S. Environmental Protection Agency - Region 7  
Attention: Kurt F. Hildebrandt  
Water, Wetlands and Pesticide Division  
11201 Renner Boulevard  
Lenexa, KS 66219

All correspondence should reference the UIC facility ID number, site name, address, and IDNR registration number. The authorization by rule automatically terminates for any failure to comply with the above requirements.

Though the region has determined that this activity will not require an EPA issued UIC permit, this does not preclude the need to obtain a state issued operating permit. The Water Quality Bureau of the Iowa Department of Natural Resources (IDNR) handles the state approval of injection activities and may require you to obtain an operating permit. Therefore, the proposed facility MAY NOT go into operation until you have received either an operating permit or other form of approval from IDNR.

While a UIC permit was not required for this project, the region needs to be made aware of any additional remediation projects which your firm will be conducting in Iowa which involve the use of injection wells at least 30 days before commencing operation so that a determination can be made if permitting is necessary. Any injection of materials into the subsurface in Iowa that is done without prior approval from EPA - Region 7 is considered to be an unauthorized injection and is subject to up to \$10,000 per day per violation in penalties.

Please contact me if you should have any questions on this decision and its requirements or any other UIC related issues.

Sincerely,  
Kurt Hildebrandt

Kurt Hildebrandt  
Environmental Protection Agency  
Region 7  
Water, Wetlands and Pesticide Division  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: 913-551-7413

Fax: 913-551-9413

-----Original Message-----

From: Elyn Potter [<mailto:epotter@lbgkcmo.com>]

Sent: Wednesday, November 12, 2014 10:40 AM

To: Hildebrandt, Kurt

Cc: Reutlinger, Danny; Robert Rohlf; [Matt.Peramaki@lbgmn.com](mailto:Matt.Peramaki@lbgmn.com)

Subject: Williams S. Sioux City BOS 200 Injection Work Plan

Mr. Hildebrandt,

Please find attached a cover letter and work plan for injection of BOS 200(R) at the Williams S. Sioux City site. The BOS 200(R) injection is intended to address the residual free product periodically observed to accumulate in the remaining wells, to meet the Iowa Department of Natural Resources requirements for product removal. A copy of this work plan is also being submitted to Mr. Dan Cook, the IDNR project manager for this site. On behalf of Williams, LBG is requesting the UIC program grant authorization by rule to inject at the Site. Feel free to contact me with any questions or comments.

Thank you,  
Elyn Potter

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Elyn Potter, RG

Leggette, Brashears & Graham, Inc.

405 19th Avenue, Suite A2, North Kansas City, Missouri 64116

Office: (816) 421-7766 x 103 Cell: (816) 304-1963 Fax: (816)421-8444

[lbgweb.com](http://lbgweb.com)