



Jackson, Hylton <hylton.jackson@dnr.iowa.gov>

FW: UIC Notification (Site in Maurice Iowa)

1 message

Eric Smith <ESmith@ramboll.com>

Tue, Sep 6, 2022 at 9:51 AM

To: Hylton Jackson <hylton.jackson@dnr.iowa.gov>

Hylton

Please see email below from the UIC Program (EPA Region 7) regarding approval of our UIC notification regarding injection of PetroFix at the Vogel Paint and Wax Co. site in Maurice. Please let me know if you have any questions regarding the August 15th Design Plan Addendum where we detailed the injection plan along the downgradient south property boundary. We are tentatively scheduled to start the injection work on September 27th pending concurrence/approval from EPA/IDNR.

Eric Smith, PG, CHG

Principal

D +1 (949) 7983603

M +1 (949) 9395261

esmith@ramboll.com

From: Meissner, Benjamin <Meissner.Benjamin@epa.gov>**Sent:** Wednesday, August 31, 2022 11:21 AM**To:** Eric Smith <ESmith@ramboll.com>**Cc:** Zurbuchen, Brian <Zurbuchen.Brian@epa.gov>; Campbell, Brent <campbell.brent@epa.gov>**Subject:** RE: UIC Notification (Site in Maurice Iowa)

Eric Smith, PG, CHG

Principal Consultant

Ramboll

[5 Park Place](#)[Suite 500](#)[Irvine, CA 92614](#)

Mr. Smith:

We have reviewed the information that you have provided regarding Ramboll's proposed use of PetroFix™ reduce offsite migration of groundwater contamination due to a release of BTEX at the Vogel Paint and Wax Company Site (EPA I.D.:

IAD980630487, IDNR I.D.: 339), located on Grant Avenue between 490th and 500th Street, Maurice, IA. The emplacement of these materials into the subsurface as described in the CERCLA approved remediation plan is regulated by the Environmental Protection Agency's Underground Injection Control (UIC) Program. The Region 7 UIC Program requires that authorization be obtained prior to commencing injection activities in Iowa and Tribal Lands in Region 7 to ensure the protection of underground sources of drinking water. Aquifer remediation injection wells fall within the Class V injection well category and can operate as either rule authorized, or under conditions of a permit. The decision to require a permit is based on the following criteria: whether the injectate could cause a violation of the Primary Drinking Water Regulations under 40 CFR § 141 or otherwise adversely affect the health of humans; the duration of the project; frequency of injection; and the volume of fluids to be injected. However, since the proposed injection activities are occurring as part of a CERCLA approved remediation plan, permitting from the Region 7 UIC Program is not required but approval by rule authorization from the program is still required under the permitting equivalency process.

Based on the information that has been provided, the injection/emplacement of PetroFix™ to reduce offsite migration of groundwater contamination 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 7 UIC Program has determined that the fifty-six (56) injection points which you are proposing to use to emplace ~22,800 gallons of PetroFix™ amended fluid at the site will be allowed to operate as Rule Authorized under 40 CFR § 144.24. If surfacing occurs during the emplacement of remediation materials into the interval designated in the proposed work plan, injection into the well(s) is to be halted and adjustments made to the injection rates at all remaining injection wells to prevent additional surfacing from occurring. Any materials which have surfaced (either during the well installation or emplacement of remediation materials) will need to be contained and not allowed to migrate off-site. These injections/emplacements will be covered under the existing EPA UIC facility ID number of **IAS167260001**. Also, please note that the Region 7 UIC Program has only approved the one treatment event described above at this time.

By the authorities granted under 40 CFR Section 144.27, we are also requesting that the results of all groundwater monitoring and copies of any reports and notifications required by the EPA Region 7 CERCLA program be submitted in electronic format to the following email address: R7_UIC_Program@epa.gov

All required reporting or other correspondence should reference the EPA I.D., EPA UIC facility ID number, site name, address, and IDNR facility or registration number. The authorization by rule for this operation automatically terminates for any failure to comply with the above requirements or if the Agency learns of or suspects that the operations have adversely impacted an underground source of drinking water or otherwise adversely affected the health of humans.

While the Region 7 UIC Program has approved this injection activity, this does not preclude the need to coordinate with the IDNR as per the permitting equivalency process to ensure that they would also approve the proposed treatment methodology.

While a UIC permit was not required for this project, the Region 7 UIC Program needs to be made aware of any additional projects your firm will be conducting in Iowa or Tribal Lands in Region 7 involving injection wells at least 30 days before commencing operations 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 is considered to be an unauthorized injection and is subject to up to \$10,000 per day per violation in penalties.

Please contact me in the signature block below or Brent Campbell (email: Campbell.brent@epa.gov or phone: 913-551-7889) if you should have any questions on this decision and its requirements or any other UIC related issues.

Thanks,

Ben Meissner

EPA Region 7: Water Division

Groundwater & Drinking Water Branch

Phone (913) 551-7992

Fax: (913) 551-9992

From: Eric Smith <ESmith@ramboll.com>
Sent: Wednesday, August 24, 2022 4:10 PM
To: Meissner, Benjamin <Meissner.Benjamin@epa.gov>
Cc: R7_UIC_Program <R7_UIC_Program@epa.gov>; 'Hildebrandt, Kurt' <Hildebrandt.Kurt@epa.gov>; Zurbuchen, Brian <Zurbuchen.Brian@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>; 'Curtis.Baker@diamondvogel.com' <Curtis.Baker@diamondvogel.com>
Subject: RE: UIC Notification (Site in Maurice Iowa)

Ben

The version I sent you earlier today is a protected (locked) PDF document per Ramboll protocols regarding document management. Attached is an unprotected version with my electronic signature removed from the letter, if you needed version to apply a barcode for saving into the EPA database.

Eric Smith, PG, CHG

Principal

D +1 (949) 7983603

M +1 (949) 9395261

esmith@ramboll.com

From: Eric Smith
Sent: Wednesday, August 24, 2022 11:28 AM
To: 'Meissner, Benjamin' <Meissner.Benjamin@epa.gov>
Cc: 'r7_uic_program@epa.gov' <r7_uic_program@epa.gov>; 'Hildebrandt, Kurt' <Hildebrandt.Kurt@epa.gov>; Zurbuchen, Brian <zurbuchen.brian@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>; Curtis.Baker@diamondvogel.com
Subject: UIC Notification (Site in Maurice Iowa)

Ben

Please see attached UIC notification document for the Vogel Superfund Site in Maurice Iowa. We received approval from you in the summer of 2019 for a UIC notification we submitted at that time for injection of EOx and PlumeStop as part of a pilot bioremediation effort we had conducted at that time at the site under the supervision of EPA and IDNR. We are now injection another product PetroFix to create a further barrier along the downgradient property line to eliminate any migration of chemicals of concern off the property. We tentatively have the work scheduled in the later part of September into early October pending agency approvals.

Please contact me if you have any questions about the attached.

Eric Smith, PG, CHG

Principal

1692739 - Irvine

D +1 (949) 7983603

M +1 (949) 9395261

esmith@ramboll.com

Ramboll

[5 Park Plaza](#)

Suite 500

Irvine, CA 92614

USA

<https://ramboll.com>