Nevada Division of Environmental Protection			
Bureau of Water Pollution Control - Underground Injection Control Program	m		
901 S. Stewart St Ste 4001 Carson City Nevada 89701			
Ph: 775-687-9418 Fx: 775-687-4684			

Notice of Intent (NOI) – Form U210

UIC General Permits for Groundwater Remediation (Long- and Short-Term)

Attach to Completed UIC Permit Application Form	n U200New application (Long-Term >6 mo.) - \$1,500New application (Short-Term <=6 mo.) - \$300Annual fee for Long-Term General Permit - \$900Plan Review fee for Modification - \$200 each
Facility/Site Name:	
NDEP BCA Facility ID: Case Officer:	
Petroleum Fund ID:	District Health Dept. UST ID:
Mark one or the other you are applying for: Long-Term (more than six months)	Mark if New or Modification Submission:
□ Short-Term (six months or less)	□ Modification
For Short-term projects, indicate the month/year injection will begin:	If you are seeking a minor modification (e.g. adding 1 injection well), review the items below and supply information that will cover the basics for the minor change, for the example - a new map w/location of well, well data.

To apply for inclusion under the UIC General Permit – Remediation, mark the category that applies to the type of injection planned. If Category 1, also mark all substances to be used.

CATEGORY 1 – Injection of one or more of the following substances:

- Low-percentage solution of hydrogen peroxide (H₂O₂). Injection shall not exceed 350 gallons/well per month;
- □ Potassium and sodium permanganate;
- □ Ozone;
- \Box Polysulfide;
- □ Nutrients: nitrate, ammonia, phosphate, vitamins;
- Carbon Sources/Electron Donors: including but not limited to acetate, lactate, glucose, and complex sugars (e.g. molasses or corn syrup, other food process byproducts (e.g. yeast), complex organic material (e.g. wood chips));
- \Box Oxygen infusers;
- \Box Chemical oxidation compounds;
- □ Surfactants; and/or
- □ Hydrogen releasing compounds

CATEGORY 2 –

Injection of water that has been treated for remediation purposes to meet groundwater quality criteria.

An applicant shall submit the following information:

Provide the number of planned injection wells (as stated on U200 form):	
---	--

Provide names/IDs for all injection wells:

Nevada UIC Notice of Intent (NOI) - Form U210

- 1. **Facility/Site Map:** Attach a scaled map of the property(ies) on which the injection is proposed and the surrounding properties. The map should include but not be limited to the following:
 - a) All injection wells (include open excavation and injection gallery);
 - b) All major structures (i.e. buildings, streets, etc.) and property lines;
 - c) All underground utilities and tank(s) within 100 feet of any on-site or off-site injection well(s);
 - d) All wells (e.g. drinking, monitoring, dewatering) and surface bodies of water on property;
 - e) Location of all sensitive receptors within 3,000 feet of the site (including wetlands; aquifer recharge zones; well fields where groundwater is extracted for municipal or other beneficial use);
 - f) Groundwater contours (amsl) and groundwater flow direction.
- **2.** A copy of the 1) most recent, approved workplan and 2) the Letter of Concurrence by the Bureau of Corrective Actions (BCA) or District Health Department Case Officer.
- **3.** For Long-term project requests only: Collect background water samples from the farthest up-gradient well and down-gradient well for the following water quality parameters field parameters: pH, ORP, conductivity, dissolved oxygen; lab parameters: sulfate, nitrate, total iron.
- 4. Current plume map (scaled) of contaminants of concern (COC) including those that exceed the Federal Drinking Water Standards and/or State Action Levels. All current occurrences of plume migration off the property must be thoroughly documented.
- 5. Depth to groundwater (range):
- 6. Depth of injection well(s), open excavation, and/or injection gallery:
- - □ Water table level within injection well screen
 - Water table level above well screen
 - □ Water table level below well screen (not allowed by NDEP)

- □ Water table level within monitoring well screen
- ☐ Water table level above well screen
- □ Water table level below well screen (not suitable for monitoring)

- 9. Document Light Non-Aqueous Phase Liquid (LNAPL or "free product") or Dense Non-Aqueous Phase Liquid (DNAPL) within the last 3 months at the site. Injection is prohibited in these wells.
- **10.** Injection well construction plans and drawings that include: surface and subsurface construction details (size of the hole, type of casing, type and grade of cement), process/treatment systems, additive ports, valves and gauges, and pumps. Show how wellheads will be secured to prevent: 1) leakage of surface water or other contaminants, and 2) tampering by unauthorized persons.
- **11.** Drilling logs for injection and monitoring wells (if wells already drilled). For site excavations, please show all 3 dimensions (depth, width, length) of each excavation, and locate them on the map under #1.
- **12.** Attach a scaled cross section showing well depth, screen interval, and water table (correlated at each well) for the injection and monitoring wells.

Nevada UIC Notice of Intent (NOI) - Form U210

13. Attach Affidavit of Intent to Abandon Well from the Division of Water Resources (DWR).

14. Briefly describe:

- **a**) the business at the remediation site
- **b**) the cause and nature of the contamination
- c) all permits issued by the Bureau of Water Pollution Control.
- **15.** For technologies using chemicals with the potential for strong exothermic reactions, including hydrogen peroxide over 12%, provide the following:
 - a) Details on what precautions and monitoring will be taken to ensure in-situ chemicals reactions do not cause adverse impacts to water quality and property (e.g. surface asphalt, underground storage tanks, etc.), and cause migration of chemical and groundwater into underground utilities and/or to the surface.
 - b) Discuss the corrosive issues that could arise from certain chemicals and/or chemical reactions with underground objects subject to corrosion such as metal piping, storage tanks, etc.
 - c) Discuss baseline concentrations of constituents in the aquifer that can act as catalyst (e.g. iron) with hydrogen peroxide and similar chemicals.
 - d) All injection wells will need to be tested for hydraulic parameters with clean water to show the wells can reasonably accept the proposed injected volumes, and information provided with this NOI.

Please note that if the above information is insufficient, the bureau may require plans to be reviewed, modified and stamped by a Nevada registered Professional Engineer.

Nevada UIC Notice of Intent (NOI) – Form U210

Notice of Intent Instructions:

The following are notes to assist with completing the NOI and the attachments to the application. Please address all sections. Complete the *UIC Permit Application – Form U200* with Owner/Operator information and signature. **Attach the NOI to Form U200**.

Enter Facility/Site Name, NDEP BCA Facility ID, Case Officer, Petroleum Fund ID (if applicable), District Health Department UST ID (if applicable). Mark with an "X" if the project is Long-Term (more than six months) or Short-Term (six months or less).

Mark with an "X" next to all of the injection substances. The 350 gallons/well per month limit may be waived depending on the injection activities.

1. Facility/Site Map: Attach a <u>scaled map</u> of the property(ies) on which the injection is proposed **and** the surrounding properties. The map should include all injection wells, extraction well (if applicable), all major structures and property lines, all water wells and surface bodies of water, location of sensitive receptors within 3,000 feet of the site (including wetlands; aquifer recharge zones; well fields where groundwater is extracted for municipal or other beneficial use), dewatering wells, groundwater contours (amsl), groundwater flow direction, and the legal property boundaries. Identify the location of remediation wells on adjacent properties. A map of the one-mile radius pursuant to UIC regulations will not be required for these general permits.

2. Submit a copy of the approved Workplan. The workplan must include details of routine monitoring and sampling associated with injection activities. Attach the Letter of Concurrence for the Injection Workplan from the Bureau of Corrective Actions Case Officer or the District Health Department Case Officer. Applications without the Letter of Concurrence cannot be processed. NDEP strongly suggests that injection occur only in *injection wells* and not in *monitoring wells* due to the potential for dilution of groundwater samples. If injection must occur in *monitoring wells*, the Workplan should include specifications that sampling of the monitoring wells will occur no sooner than 30 days after injection.

3. Collect background sample from one up-gradient and one down-gradient monitoring well. Sampling for metals shall be collected unfiltered and reported as total metals. If there is a turbidity issue, the well should be further developed and evaluated. If the well water cannot be cleared up, the sample may be filtered only with a **one (1) micron filter** and all actions documented and reported.

4. Attach a current plume map (<u>scaled</u>) of the Contaminants of Concern (COC) that exceed the Federal and State Drinking Water Standards and/or State Action Levels. The map must show the most recent data for the plume. Additional historic plume maps may also be submitted if they provide further information. All current occurrences of plume migration off the property must be thoroughly documented.

- 5. Enter the range of depth to groundwater (below ground surface bgs).
- 6. Enter the range of the depth of the injection wells, open excavation, and/or injection gallery.
- 7. A. Enter the screened intervals of each injection well. Note if groundwater is within, above, or below the screened interval. NDEP does not allow injection where groundwater is below the screened interval.

B. Enter the screened intervals of each monitoring well. Note if groundwater is within, above, or below the well screen. NDEP typically does not allow using monitoring wells if groundwater is above the well screen. Obviously, if groundwater is below the well screen, the well is not suitable for monitoring.

8. Enter the volume of injectate in gallons and enter the frequency of injection. The maximum amount of injection allowed is 350 gallons per well per month. If the project is an open excavation or injection gallery, up to 1,000 gallons hydrogen peroxide (H_2O_2) can be injected per month. If the volume is greater than these limitations, please apply for a UIC UNEV permit. Enter the average and maximum injection rate in gallons.

Nevada UIC Notice of Intent (NOI) - Form U210

Enter the average and maximum injection pressure. If the maximum pressure exceeds 30 psi, apply for a UIC UNEV permit. Note that surfacing of injectate and/or groundwater is prohibited by the permit.

9. Document all observances of Light Non-Aqueous Phase Liquid (LNAPL or "free product") or Dense Non-Aqueous Phase Liquid (DNAPL) within the last three months at the site. Injection is prohibited in these wells.

10. Submit well construction plans and drawings that include surface and subsurface construction details (size of the hole, type of casing, type and grade of cement), process/treatment systems, additive ports, valves and gauges, and pumps). Show how wellheads will be secured to prevent: 1) leakage of surface water or other contaminants, and 2) tampering by unauthorized persons.

11. Submit drilling logs for injection and monitoring wells, if already drilled.

12. Attach a sample scaled cross section showing well depth, screen interval, and water table (correlated at each well) for the injection and monitoring wells.

13. A plugging and abandonment plan must be submitted by attaching the *Affidavit of Intent to Abandon Well* from the Division of Water Resources.

14. Briefly describe the business at the remediation site, the cause and nature of the contamination. In addition, list all other permits issued by the Bureau of Water Pollution Control.