From: Williams, Jonathan
To: Douglas.Tanner@deq.idaho.gov; Brian.Ragan@idwr.idaho.gov
Cc: Scott.Miller@deq.idaho.gov; Wayne.Crowther@deq.idaho.gov; Zavala, Bernie; McDonnell, Kimberlee
Subject: RE: FMC possible ground water injection
Date: Tuesday, January 05, 2016 12:24:45 PM

Doug, Scott, Brian, and Wayne:

My review of the intermediate groundwater remedy Remedial Design Report, Section 5.4.2, suggests that FMC has not presented much of a rationale for further consideration of this (different from the preliminary RD) option they're considering for treated groundwater disposal.

Let's discuss this on the bi-weekly call this coming Thursday, and then see if discussing the Idaho UIC program injection well permit substantive requirements is warranted.

Jonathan Williams, LHG
Remedial Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900, ECL-122
Seattle, WA 98101

Telephone: (206) 553-1369
E-mail: williams.jonathan@epa.gov

-----Original Message-----
From: Douglas.Tanner@deq.idaho.gov [mailto:Douglas.Tanner@deq.idaho.gov]
Sent: Tuesday, December 29, 2015 12:24 PM
To: Brian.Ragan@idwr.idaho.gov
Cc: Scott.Miller@deq.idaho.gov; Wayne.Crowther@deq.idaho.gov; Williams, Jonathan <Williams.Jonathan@epa.gov>
Subject: RE: FMC possible ground water injection

Excellent! I will attempt to get a call set up shortly. dt

-----Original Message-----
From: Ragan, Brian [mailto:Brian.Ragan@idwr.idaho.gov]
Sent: Tuesday, December 29, 2015 12:55 PM
To: Douglas Tanner
Cc: Scott Miller; Wayne Crowther; Williams.Jonathan@epa.gov
Subject: RE: FMC possible ground water injection

Doug,

Thanks for the opportunity to provide input early in this process.

1. Yes, I am the correct contact until further notice.
2. I'm available for a call 99% of the time. Pretty much any date you suggest I can be available.
3. I would consider this a Class V (aquifer remediation injection well) because the injectate will have been treated to a higher quality than the produced, untreated ground water.
4. Our depth cutoff between "shallow" and "deep" is 18-feet. If the well(s) is greater than 18-ft total depth, it is considered a DEEP injection well and will be processed as such.
5. Let's discuss the injectate requirements quality during our conference call.

Brian Ragan
IDWR Water Compliance Bureau

(208) 287-4934

-----Original Message-----
From: Douglas.Tanner@deq.idaho.gov [mailto:Douglas.Tanner@deq.idaho.gov]
Sent: Tuesday, December 29, 2015 12:28 PM
To: Ragan, Brian
Cc: Scott.Miller@deq.idaho.gov; Wayne.Crowther@deq.idaho.gov; Williams.Jonathan@epa.gov
Subject: FW: FMC possible ground water injection

Hey Brian,

A quick heads up that FMC as part of their CERCLA remedy MAY want to do "shallow" ground water injection. I have attached a brief write up from FMC's 60% Groundwater design document where they briefly talk about the option of infiltrating or injecting extracted ground water that they will treat to remove arsenic and phosphorus.

First, are you the correct contact?

Second, I have a few questions on IDWR's regs, and likely you or whoever the correct contact is have a few for me. As such, even though it is not certain that injection will be chosen I would like to have a call to discuss the initial set of questions and garner as much insight as we jointly can do just in case. We likely will not know until May or June what the final decision is, so the call does not have to be real soon but I was thinking mid-January would be a good time. If you agree, please let me know some available dates and I will set it up.

So I don't forget, (you do not need to answer these now), would this be a class IV or class Vaa?
85' below ground surface would be considered shallow by IDWR? Any guidance on how to determine if shallow or deep injection is needed?
How clean does the injected water have to be?

Thanks for your help. Dt

Douglas M. Tanner
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-----Original Message-----
From: ricoh@deq.idaho.gov [mailto:ricoh@deq.idaho.gov]
Sent: Tuesday, December 29, 2015 7:44 AM
To: Douglas Tanner
Subject: Message from "RNP0026738B96F1"

This E-mail was sent from "RNP0026738B96F1" (MP C4503).

Scan Date: 12.29.2015 09:44:18 (-0500)
Queries to: ricoh@deq.idaho.gov