Guidance for Underground Injection Control (UIC) Class V Well Closures in EPA Region 10 (AK, ID, OR, WA)

EPA requires that closures of all Class V injection wells are conducted in a manner that protects underground sources of drinking water and complies with all applicable laws and regulations related to removal of materials from the well and adjacent to the well. 40 CFR §§ 144.12(a) and 144.82. Closures of motor vehicle waste disposal wells and large-capacity cesspools are conducted under additional regulations, including required notification to EPA a minimum of 30 days before the planned closure activity. 40 CFR § 144.88 and 144.89. EPA recommends that you submit closure plans for EPA review as early as possible before the proposed start date of the closure activities.

As a general matter, EPA is likely to approve a closure plan if it contains the following information. The information listed below is neither an exclusive nor exhaustive set of requirements. Closure plans are evaluated on a case-by-case basis and may necessitate additional information or requirements to receive EPA approval. Furthermore, the following list of information is not required in all circumstances to obtain EPA approval, nor does the list obviate a regulated entity from satisfying any other applicable statutory or regulatory requirements under the Safe Drinking Water Act. Rather, the listed information is intended to provide the regulated community guidance about what EPA may look for when evaluating a Class V well closure plan. (Please note that for sanitary systems where a connection to the sewer is not possible, EPA is likely to approve continued use of the sanitary system for disposal of sanitary waste only if sampling confirms that chemical contamination is cleaned out and you provide evidence that the non-sanitary waste discharge has permanently ended.):

A. A schematic diagram displaying the injection well system that identifies all drains, piping, processing units such as oil/water separators or septic tanks, and final discharge mechanisms such as drywells, leachfields, log cribs, or open underground pipe. (The diagram can be drawn by hand or computer.)

B. A description of all fluids which enter, or have entered, the Class V well.

C. A statement indicating that the connections between all drains of concern and the injection well (cesspool, drywell, open pipe or leachfield) will be, or have been, verified.

D. A description of plug emplacements (if applicable).

E. A statement indicating that all contaminated liquids, sludge, and soil will be removed from in and around the Class V injection well until visibly clean soil is reached, or structural integrity of the excavation or buildings or other significant structures near the excavation, may be compromised.

F. A description of on-site storage while awaiting proper disposal, of liquids, sludge, soil, and other materials removed from the Class V well system.

G. A statement indicating that all wastes will be characterized for disposal purposes, in accordance with Federal, State, and local regulations.
H. A plan to collect an end-point sample from the cleaned out Class V well, below the point of discharge. The end-point sample should be analyzed according to well use and injectate constituents. A statement should be included indicating what analytical methods will be used. Recommended EPA methods are included below.

- For large capacity cesspool wells (20 or more people per day), which receive only sanitary waste, an end-point sample and analysis typically is not required.

- For motor vehicle waste disposal wells, the end-point sample should be analyzed for volatile organic compounds (EPA Method 8260), semi-volatile organic compounds (EPA Method 8270), and arsenic, cadmium, chromium, and lead by a total metals analysis.

- For industrial discharge wells, the end-point sample should be analyzed for contaminants present in the injectate (analyses may include testing for volatile organic compounds by EPA Method 8260; semi-volatile organic compounds by EPA Method 8270, metals, herbicides, pesticides, or other parameters).

I. An assurance that all backfill material is clean.

J. A statement indicating that a final report outlining the closure procedures, including all sampling results and waste disposal manifests will be submitted to:

U. S. Environmental Protection Agency, Region 10
Ground Water Unit
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101