

## **Laguna County Sanitation District (LCSD)**

### **Class I Non-Hazardous Waste Injection Well Permit No. R9-UIC-CA1-FY20-3R**

#### **Description of Changes to the Draft Permit**

Pursuant to Title 40 Code of Federal Regulations (C.F.R.), 40 C.F.R. § 124.17(a)(1), the United States Environmental Protection Agency, Region IX (EPA), hereby identifies which provisions of the draft Permit have been changed in the final Permit decision and the reasons for those changes. The only change to the draft Permit is specified in Item 1.

1. EPA revised the requirement in Part II.D.2.b.iii for a casing evaluation log every five (5) years to requiring a casing evaluation log only when the tubing and packer is removed for a repair. The basis for the change is explained below in the Response to Comments.

#### **Summary of Significant Public Comments and EPA Response to Comments**

Pursuant to 40 C.F.R. § 124.17(a)(2), EPA hereby summarizes and responds to comments raised during the public comment period, which was open from October 9, 2021 through November 10, 2021, in regard to the above-referenced draft Permit. EPA received only one comment from Marty Wilder, Utilities Manager of the Laguna County Sanitation District.

**Comment:** On Page 14, Section 2, b, iii: there is a requirement for a casing evaluation log to be conducted every 5 years. Running a casing inspection log requires LCSD to remove the tubing and packer from the well. LCSD is requesting that this requirement be changed to require the running of a casing inspection log anytime the tubing and packer is removed from the well for well repairs. The cost and potential well damage that can be experienced when unsetting and removing the tubing and packer is not worth the benefit that a casing inspection log will provide. With the well under constant pressure and monitoring on the space between the tubing and casing, along with the pressure test required every 5 years, any potential casing issues will be identified before there is a risk of contamination. Therefore, we request that the 5-year testing requirement for the casing inspection log be changed as indicated.

**EPA Response:** Based on the construction of Union Sugar No.13 and information provided by the commentor, EPA finds that requiring a casing evaluation log every five (5) years could potentially cause damage to the well when removing and setting the tubing and packer. Accordingly, EPA is removing the requirement for a casing evaluation to be conducted every five (5) years and requiring instead that the Permittee conduct a casing evaluation each time the tubing and packer is removed for a repair and as otherwise required by the Permit.