ATTACHMENT III

UIC CLASS V INVENTORY AND ASSESSMENT

Final Report

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10. Conclusion

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10.3 Summary of desirable state program changes

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Appendix: Class V Well Assessment Methodology (QA/QC Project Plan)

Field procedures

Laboratory procedures (if sampling)

Problems encountered

(5) The Office of General Counsel (OGC) has clarified that a primacy State has the right to prepare a work program and a grant application for its entire formula allotment, even though the Region may have issued a lesser amount in its planning target.

(6) During the last 3 months of any fiscal year, a State's grant shall be prorated according to the number of days remaining in the fiscal year after primacy is assumed. OGC believes that a state which assumes primacy near the end of a fiscal year could not possibly use a full allotment and therefore, we should discourage the states from even considering such a request.

Finally, we will continue to work with you and the States to refine our current grant allocation formula. This will include the composition of the formula, the amount and distribution of base allotments, the allocation factors and weightings. We will also look into the issue of how to divide the grant funds among two State agencies in those States where two agencies split the primacy responsibility for UIC programs under Sections 1422 and 1425 of the SDWA.

This guidance will become effective as of the date of this memorandum. If you have any comments on or questions about the guidance, please give me a call, or call Dr. Jentai Yang of the Underground Injection Control Branch, on 382-5542.

Attachment