

UIC Class I Permit Re-Application Guidelines
January 2001

Under the regulations which can be found at Title 40 of the Code of Federal Regulations (40 CFR) Section 144.36, UIC permits for Class I wells expire after a specified time. To continue operation of a Class I injection well, a new UIC permit must be obtained. These guidelines are designed to assist operators in generating a UIC Class I permit re-application.

The regulations at 40 CFR 146.14 and 146.70 both state that the Director may accept information already in the file provided it is current and accurate. Therefore, operators may reference maps, cross-sections, reports, etc. that are still accurate and current. The information required for a complete permit application is listed in the regulations under Parts 144 and 146, and is further detailed on the instructions for the Underground Injection Control Permit Application (US EPA Form 7520-6). All information required under the regulations must be submitted in the permit application unless referenced from a previous submittal. To be incorporated by reference, the operator must state that the information that was previously submitted has been reviewed and found to be accurate and current, and not merely state that the information has already been submitted. Clear reference to its location (for example, "appendix C of the permit application submitted June 6, 1994" is very important.

A copy of the UIC permit application checklist is attached. All items on this checklist must either be submitted or referenced in the permit re-application. The information listed below is information that we believe is most likely to need the most review or a new submittal:

1. A new Underground Injection Control Permit Application;
2. A review of the Area of Review, to include any new wells that penetrate the confining zone or new information about previously known or unknown wells, and any new water wells;
3. A review of the Waste Analysis Plan (WAP), including any updates on the sampling and monitoring requirements (see UIC Guidance #8, Preparing a Waste Analysis Plan at Class I Injection Well Facilities);
4. A current well schematic;
5. A current wellhead and annulus monitoring system schematic;
6. A current facility schematic and discussion explaining how wastes injected into the well are generated (see UIC Guidance #8, Part II(A));
7. An updated Plugging and Abandonment (P&A) Plan and cost estimate; if it meets current requirements, the plan may only require a current signature, not a revision. The cost estimate should be provided by an independent source; if the permit is for a hazardous injection well, the post-closure plan and cost estimate must also be updated.
8. Review of the most recent financial assurance mechanism, including amount and date of submittal;
9. Discussion of the most recent demonstrations of: Part I and II of mechanical integrity, ambient pressure monitoring, radioactive tracer survey and casing inspection log; and any interpretations based on the cumulative history of testing at the site;
10. Statement of the fracture gradient and how it was derived.

When you submit your re-application material, please address it to:

Lisa Perenchio, Chief,
Direct Implementation Section (WU-16J)
U.S. Environmental Protection Agency
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Should you have any questions, please contact the permit writer for your site.