

February 27, 2014

Mr. Joe Brown  
Environmental Individual  
XYZ Company  
123 Highway  
Nowhere, TX 12345

Dear Mr. Brown:

As a result of decreasing staff levels and an ongoing workload backlog, the Region is continuing to explore efforts to improve the quality of submitted petitions and reissuances to expedite the review process of Class I No Migration Petitions. To this end, EPA Region 6 has compiled a table establishing a crosswalk based on the February 2007 EPA Region 6 UIC Land Ban Petition Application Guideline and the regulations at 40 CFR parts 146 and 148. The crosswalk table focuses on the 25 elements of the guideline. Some of the requested information is redundant with the requirements in 40 CFR Part 146 Subpart G, but is required by Part 148 or is used by EPA Region 6 to verify no migration of waste from the injection zone. The crosswalk table and the February 2007 EPA Region 6 UIC Land Ban Petition Application Guideline can be found at the following website:

<http://www.epa.gov/region6/water/swp/uic/landban.htm>

Region 6 is requesting your cooperation in using this table to facilitate the common goal of timely processing of No Migration Petition related applications. The table is set up for applicants to annotate each of the 25 elements with information showing specifically where each element is addressed in the application. Since each No Migration demonstration is site specific, additional information not included in this table may be required. However, the table includes core information normally used in no migration demonstrations. In addition to serving as a review tool for the Region, the table should be used by applicants as an aid to improve the QA/QC of the application and ensure the application is ready for EPA review.

The crosswalk table will be the first item reviewed by the Region for any submission. If all the requested information on the table is not submitted, the review will cease and the operator will be notified. The review will not continue until the missing information is supplied. In addition to the crosswalk table, Region 6 is also requesting that the application text, tables and small scale figures (ones easily viewable on a computer monitor) be provided in a searchable electronic format. These two requested items should enable a more efficient review by EPA. If you have any questions, please contact Brian Graves at (214) 665-7193. Thank you for your consideration in this matter.

Sincerely yours,

Philip Dellinger  
Chief  
Ground Water/UIC Section