

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
Underground Injection Control

FACT SHEET

(pursuant to NAC 445A.874)

Permittee Name: **Short Term Remediation - General Permit**
Permit Number: **GU07RS**
Permit Action: **UIC Permit Renewal**

A. Permit Objective

The Nevada Division of Environmental Protection (NDEP) Underground Injection Control (UIC) Program proposes to renew the Short Term Remediation General Permit, GU07RS. This general permit establishes water injection limitations, prohibitions and management practices for two separate discharge categories. This permit authorizes the injection of chemical compounds and water that has been treated in conjunction with a Corrective Action (CA) site overseen by the NDEP Bureau of Corrective Actions (BCA) or other CA agency and sets the appropriate requirements to prevent the degradation of groundwater. This Short Term General Permit will be issued to qualifying CA projects lasting six months or less.

B. Timeline

2007: GU07RS was originally issued in June 2007 and only authorized the injection of chemical compounds into groundwater.

2012: NDEP is proposing to include a second category in this general permit: water which has been treated and then injected into the subsurface.

2017: There have been minor changes to the permit, mostly to the standard language required in all permits or reorganization of certain sections of the permit. Significant changes were not made to 1) sampling and monitoring requirements; 2) reporting requirements.

2025: Changes have been made to discharge category 1 to include additional remediation agents that BCA uses for aquifer remediation (**see section D**). There have been several formatting changes to standardize UIC permits including a new cover page, one designated section for monitoring and reporting requirements, an updated noncompliance and spill reporting section as well as other minor changes in the standard language required in all permits. Tables were included as an attachment to organize well data. Site/facility maps and copies of chemical authorizations will now be included as attachments. Monitoring will now be required for category 1 discharges. No significant changes were made to reporting requirements.

C. Application Requirements

Before being included in this general permit, an applicant must submit a Workplan to BCA or other CA agency. Once the CA agency has approved the Workplan, the applicant

may request inclusion in the general permit by submitting a Notice of Intent (NOI). Upon review of the Workplan and NOI, NDEP will make the decision to approve the NOI, require additional information, or require the applicant to obtain an individual UNEV permit.

D. Discharge Categories

Monitoring requirements and report guidelines are established for the following two (2) categories:

Category 1 - Chemical compound injection: Permitted activities include the injection of the following compounds:

- $\leq 20\%$ hydrogen peroxide solution (by relative/estimated mass of limiting reagent) per injection well/combined total
- Oxygen without O₂ infuser
- Hydrogen-releasing compound
- Activated carbon
- Carbon sources
- Ozone
- Surfactant
- Nutrient solution
- Nutrient solution with microbial culture(s)
- Sulfate, Persulfate, or Polysulfide
- Potassium and Sodium permanganate
- Reducing Agents
- Oxidizing Agents

Category 2 - "Pump and Treat": Permitted activities include the injection of water which has been treated (in conjunction with a remediation project overseen by the BCA or other CA agency) to meet groundwater quality criteria. Once generated, the contaminated groundwater may be treated by the following remediation mechanisms: physical, chemical, thermal, biological and other similar techniques. Other water generated as part of the facility's CA project (including purge water, decontamination water, and Investigation Derived Waste (IDW) water) may also be authorized under this permit. These additional waters shall be produced from an on-site activity, treated to meet groundwater quality criteria, and receive Division approval.

F. Permit Requirements and Rationale

NDEP has determined that the injection categories included in this general permit can be effectively regulated under a general permit rather than individual permits. This permit requires submittal of an NOI, Workplan, appropriate fees for both discharge categories. Semi-annual reports are additionally required for submittal of Category 2 sites. Permit requirements and limitations ensure the approved injection activity is carried out in a manner which minimizes water pollution and protects public health and the environment.

G. Proposed Determination

The Division has made the tentative determination to modify and renew the proposed

permit for a period of five (5) years.

H. Procedures for Public Comment:

Pursuant to NAC 445A.890.5 through NAC 445A.877, public notice of Underground Injection Control permit applications and proposed drafts is being posted on the NDEP website, and mailed to any interested persons on our mailing list, to (1) solicit written comments or objections to determinations of the Director regarding the application or permit and (2) provide the opportunity for a public hearing, if the Director determines that there is a significant level of interest from the applicant, any affected state, any affected interstate agency, the regional administrator, or any interested agency, person, or group of persons. A hearing request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted. Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted to accordance with NAC 445A.238 and the final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Any person wishing to submit comments or request a hearing must do so by email/mail, which must be sent/postmarked or hand delivered within thirty (30) days to:

Department of Conservation & Natural Resources
Nevada Division of Environmental Protection
Bureau of Water Pollution Control | Permits Branch
Attn: Underground Injection Control Permit Writer
901 S. Stewart Street, Suite 4001
Carson City, NV 89701

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