

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 155 Seattle, WA 98101

WATER DIVISION

Reply to: 19-H16

Sent via email: <u>mgreer@greertank.com</u>

Mr. Mark Greer GREERLEASECO II P.O. Box 71193 Fairbanks, Alaska 99707

Re: Conditional Closure Approval and Reclassification for One Class V Motor Vehicle Waste

Disposal Well at Greer Tank & Welding, Inc., 3140 Lakeview Drive, Fairbanks, Alaska

UIC ID No. AK090P5-30-13980

Dear Mr. Greer:

The Underground Injection Control (UIC) Program at the U.S. Environmental Protection Agency (EPA), Region 10, has reviewed the "Underground Injection Control Class V Well Investigation & Closure Work Report" dated June 29, 2022. The report was prepared on your behalf by Nortech regarding the closure of one class V injection well at Greer Tank & Welding, Inc., 3140 Lakeview Drive, Fairbanks, Alaska.

Closures of Motor Vehicle Waste Disposal Wells (MVWDWs) are to be conducted under 40 CFR §§ 144.82, 144.89 and 146.10(c). The information provided to the EPA about the closure of the MVWDW at Greer Tank & Welding, Inc. is summarized as follows:

On September 14, 2021, both sumps and associated piping to a "T" that connects the drains to the septic tank were cleaned out using a 108°F high pressure wash. In doing so, the welded covers that sealed the drain outlets since 2012/2012 were removed. Each sump was verified to be two feet square and three feet deep and drain lines confirmed to be six inches in diameter. The floor drain sumps and the first 5-7 feet of drain lines were then filled with concrete and finished to floor grade. In addition, the current septic tank was pumped and disinfected. In November 2021, the lift station antecedent of the leach field was also pumped.

As previously noted in the closure plan, the current septic system tank was installed in 2020 and the leach field was reconstructed in 2015 after being installed in 1995 when the leach pit was abandoned. The current tank and leach field receive sanitary wastes from bathrooms and drains in the office portion of the building.

One soil boring (SB1) was be taken in the former leach pit and two (SB2 and SB3) just downgradient from the existing leach field. The samples were be analyzed for volatile organic compounds (VOCs) by EPA Method SW8260C; semi-volatile organic compounds (SVOCs) by EPA Method SW8270; RCRA metals (arsenic, cadmium, chromium, and lead) by EPA Method

6020; Gasoline Range Organics (GRO) (AK Method AK101), Diesel Range Organics (DRO) (AK Method AK102), Residual Range Organics (RRO) (AK Method AK103). ADEC's Method 2 Migration to Groundwater soil cleanup levels were exceeded in SB1 for PCE, benzo(a)anthracene, benzo(a)pyrene, and arsenic. Nortech reported that the detected arsenic level was within the naturally occurring (background) concentration of arsenic in your geographic area. Concentrations of GRO, DRO, TCE, trichlorofluoromethane, and several PAH analytes were detected below ADEC cleanup levels. For SB2 and SB3, only arsenic was detected above ADEC's Method 2 migration to Groundwater soil cleanup levels and as noted above within background concentrations.

Approximately 300 gallons of oily water from the floor drains and water from flushing the floor drain piping, along with the sludge was disposed by US Ecology.

The EPA has reviewed the information provided regarding UIC Class V closure activities at Greer Tank and Welding, Inc. and pursuant to EPA's authorities under 40 CFR §§ 144 and 146, the EPA conditionally approves the closure of the MVWDW as it discharged to the leach pit with the condition that Greer Tank and Welding, Inc. continue to work with the ADEC to address the contamination that remains in the soil in the area of the former MVWDW. Pursuant to 40 C.F.R. § 144.89(b), EPA approves the reclassification of the current leach field at your facility to a large capacity septic system injection well for disposal of sanitary wastes received from the bathrooms and drains in the office portion of the building. The UIC program file for this facility has been updated to show that one class V injection well has been permanently closed at this site and reclassified as a large capacity septic system.

Greer Tank and Welding, Inc. is responsible for meeting all applicable UIC requirements under the Safe Drinking Water Act. Please note that this approval does not impact Greer Tank and Welding, Inc.'s obligation to comply with other federal, state or local laws, or the EPA's authority to take future enforcement actions. If additional information becomes available indicating that the injection well closure activities at this facility were inadequate, Greer Tank and Welding, Inc. is required to provide this information to the EPA, and further actions may be required.

If you have any questions, please contact Derek Schruhl of my staff at (206) 553-1146.

Sincerely,

Karen Burgess, Chief Ground Water and Drinking Water Section

cc: Ms. Susan Vogt Nortech

> Mr. Jim Fish ADEC Contaminated Sites Program