

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
TECHNICAL PEER REVIEW DOCUMENT**

<i>This Section to be Completed by Issue Initiator</i>	
TITLE OR ISSUE	
<p>30 TAC §305.72 Underground Injection Control (UIC) Permit Modifications at the Request of the Permittee contains the following language: (b), (4) , “Change quantities or types of fluids injected which are within the capacity of the facility as permitted and in the judgment of the executive director, would not interfere with the operation of the facility or its ability to meet conditions described in the permit and would not change its classification;”</p> <p>A guidance document clarifying “types” of fluids injected is the issue.</p>	
DOCUMENT INITIATED BY (Name/Office/Phone Number)	DATE
Ken Anthony, Amoco Corporation, Environmental & Safety Coordinator	11/12/97
ISSUE DESCRIPTION	
Seek a clearer definition of “types” of fluids injected.	
WHO'S AFFECTED?	
All Class 1 UIC well operators.	
<i>This Section to be Completed by Peer Review Team</i>	
FACTORS CONSIDERED	
The intent of the agency in adopting this rule was to allow the minor modification process to be used by owner/operators of Class 1 Injection Wells to affect minor changes in permits. Failure to adopt a policy position on the interpretation of the rule may prevent the Agency from granting a minor modification when one is warranted or it may allow a minor modification without the appropriate level of public notice and participation.	
FINDING(S) AND RECOMMENDATION(S)	
30 TAC §305.72 (b), (4), is interpreted to mean that “types” of fluids injected must be generated on site, at a captured facility or from other facilities owned or effectively controlled by the same person and be compatible with existing waste streams, the injection zone formation, and materials of construction of the class 1 well. In addition, the “types” of fluids to be added to or deleted from an existing permit shall not change (by definition) the classification of the well (i.e. Class 1,2,3,4, & 5), nor change the type of waste disposal authorization from non-hazardous to hazardous or the character of the operation from non-commercial to commercial. For a change from non-commercial on site to non-commercial off site, the permittee must provide information on the means by which the permittee will convey waste to the off site location. Based on this information the executive director may, in it’s discretion, grant the request as a minor modification.	
COMMENTS	

REVIEW COMPLETED BY	NAMES	INITIALS	DATE
___ Technical Review Group	Ben Knape, URW	_____	_____
	Charles Greene, URW	_____	_____
___ Section Technical Panel	Hong Guo, URW	_____	_____
	Tina Amberboy, Legal	_____	_____
___ Division Senior Technical Committee	Ken Anthony, Amoco	_____	_____
	Bobby Atkins, BASF	_____	_____
___ Chief Engineer/Senior Technical Council	Aron Athavaley, Region 12	_____	_____
	Mark Cheesman, Merichem	_____	_____
	Steve Fotiades, DuPont	_____	_____
	James Clark, DuPont	_____	_____
		_____	_____
		_____	_____
___ Management Review	Alice Hamilton Rogers, URW	_____	_____
		_____	_____
		_____	_____
		_____	_____
		_____	_____

Send copies to:

- Chief Engineer
 Case File
 Case Coordinator
 Central Records
 OP&RD
 Issue Initiator
 Other: ED, Deputy Directors, Deputy Directors