



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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261154

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

SR-6J

February 23, 1998

John Roberts, Senior Project Manager  
ERM-North Central, Inc.  
611 E. Wisconsin Ave., Suite 560  
Milwaukee, Wisconsin 53202

Re: Midco WDW-1

Dear Mr. Roberts:

The United States Environmental Protection Agency (EPA), in consultation with the Indiana Department of Environmental Quality, has reviewed the Five-Year Underground Injection Well Re-Application, Midco WDW-1 (Five-Year Re-Application). This document was submitted pursuant to the requirement in Section 12.2 of the EPA approved Underground Injection Well Application Package (UIWAP), which requires submittal of an amended UIWAP updating information in the previously approved UIWAP between 52 and 54 months of approval.

EPA reviewers found no technical deficiencies in the Five-Year Re-Application. However, EPA reviewers found that a number of revisions need to be made. Therefore, pursuant to 14.c of the Consent Order, EPA is requiring that the following corrections be made and the document resubmitted to EPA, within 30 calendar days of your receipt of this letter. In addition, EPA would appreciate it if you list the revisions to Sections 12 and 13 of the UIWAP in your cover letter.

1. In general the section numbers in the Five-Year Re-Application reflect the sections being revised in the approved UIWAP. This is not the case for the following sections of the Five-Year Re-Application: 7, 8, 10 and 11. In order to make it clear which sections are being revised, the MRC must revise the Five-Year Re-Application so that the section numbers correspond to the sections of the UIWAP that are being revised.

2. Section 12.2 of the UIWAP shall be revised to provide for submittal of future amended UIWAPs within 90 months from approval of the previous amended UIWAP.

3. The following reporting requirement shall be added to Section 13.4 of the UIWAP: It shall be made clear that the advanced written notice requirement applies to any change in the casing or cementing of the well.

4. The following operational requirements included in Section 13.9 of the UIWAP shall be transferred to Section 13.10:

- At no time shall injection occur into a formation which is or is above the lowermost formation containing, within one quarter mile of the well bore, an underground source of drinking water.

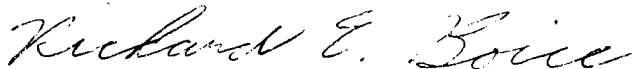
The Settling Defendants shall inject only through tubing with a packer set within the long-string casing at a point within or below the B-cap shale.

The Settling Defendants shall maintain the female coupling and valve on the wellhead for use for independent injection pressure readings.

5. In item 5 of Section 13.11 of the UIWAP, the reporting procedures included in subsections a) b) and c) shall be removed, since they are not being required.

If you have any questions or concerns feel free to call me at (312) 886-4740 or David Werbach at (312) 886-4242.

Sincerely yours,



Richard E. Boice  
Remedial Project Manager

cc: M. Travers, de-maximis  
Robert Schaibel, IDEM  
Roy Ball, ERM  
Bruce White, Karaganis & White  
Attorney General, State of Indiana  
Harvey M. Sheldon, McDermott, Will & Emery  
Arthur Schulcz, ENVIRONMENTAL COUNSEL  
Jeff Fort, Sonnenshein, Nath, and Rosenthal

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Remedial Project Manager

cc: M. Travers, de-maximis  
Robert Schaibel, IDEM  
Roy Ball, ERM  
Bruce White, Karaganis & White  
Attorney General, State of Indiana  
Harvey M. Sheldon, McDermott, Will & Emery  
Arthur Schulcz, ENVIRONMENTAL COUNSEL  
Jeff Fort, Sonnenshein, Nath, and Rosenthal

bcc: M. Berman, CS-3T  
A. Tenenbaum, DOJ

## LIST OF ADDRESSEES

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NW 2/20/98

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- Attach this form to the front of the mailpiece, or on the back if space does not permit.
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- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1.  Addressee's Address
2.  Restricted Delivery

Consult postmaster for fee.

**3. Article Addressed to:**

John Roberts, SPM  
EPM-North Central, Inc.  
611 E. Wisconsin Ave, Ste 560  
Milwaukee, WI 53202

**4a. Article Number**

P 371 896 450

**4b. Service Type**

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**7. Date of Delivery**

FEB 25 1998

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77 W Jackson Blvd

Chicago, IL 60604

