

Elizabeth Ignoffo

From: Dodson, James <James.Dodson@dep.state.fl.us>
Sent: Tuesday, October 02, 2018 10:29 AM
To: david@mcnabbhydroconsult.com
Cc: Rhodes, David; Elizabeth Ignoffo; John Paul Castro; Allen Perez; Franz, Andrew E; Haberfeld, Joe; Woods, Tracy; Velazquez, Alfredo
Subject: Approval: MIT Test Plan Key West IW-2 (WACS 93574)
Attachments: Key West MIT Plan_Final.pdf

Facility Name: City of Key West, Richard A. Heyman Environmental Protection Facility (WRF)
Permit No.: 327710-002-UO/5W
WACS ID # 93574
County: Monroe

RE: Mechanical Integrity Testing Plan Injection Well IW-2

Mr. McNabb:

The Department acknowledges the receipt of the mechanical integrity testing (MIT) plan for the above referenced injection well received September 28, 2018. The testing plan is approved after the following changes. Please note the following, some of which appears in the permit as a specific condition (item 1):

1. Pursuant to Rule 62-528.430(2)(b)2.a., F.A.C., the final report for the demonstration of mechanical integrity for the injection wells shall be submitted to the Department's Tallahassee office for review and approval within three months of the completion date for mechanical integrity testing. In addition, a copy of the cover letter for the MIT results shall be sent to the U.S. Environmental Protection Agency, Region 4, UIC program, 61 Forsyth St. SW, Atlanta, GA 30303-8909, or R4gwuic@epa.gov. The final MIT report shall be prepared by a registered/certified Professional Engineer and/or Professional Geologist (as appropriate), and it shall address all tests noted in permit 0280170-004-UO/11 specific condition I.B.2. (including procedures followed, results, and interpretations), and shall include a tabular presentation/graphical evaluation of monitoring well data over the previous 5-year period. [62-528.440(5)(b)]
2. If the logging tool is to be moved upwards in the event of detection of tracer by the upper detector, the tool should not be moved prior to the time period required for the tracer to travel from the middle detector to the lower detector (theoretically 2 minutes for a 5 foot/minute flow rate). It is important to see if tracer is also reaching the lower detector.

In lieu of submitting a hard copy of the final MIT report it may be sent via electronic mail in Adobe™ (.pdf) format to the following e-mail address: james.dodson@dep.state.fl.us

If you have any questions please contact me.

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