

Proposed Revisions to Water Quality Rules and Regulations, Chapter 14, Financial Assurance; and Chapter 28, Standards for Issuing Permits for Commercial Oilfield Waste Disposal Facilities

Analysis of Comments Received by May 1, 2020



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Prepared by:
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Commenter:

Powder River Basin Resource Council

Comments and Responses

Powder River Basin Resource Council: “We are requesting that radionuclides, particularly Radium-226 and Radium-228, be added to the water analysis performed on samples taken during baseline and operational monitoring of COWDF facilities. We understand that some Wyoming COWDF operators do require radioactive monitoring, but this monitoring is not required across the board, thus large problems could be created. For example, a COWDF that does not monitor for radioactivity could receive more of it than those that do.”

Department Response: WDEQ/WQD considered the comment. WDEQ/WQD believes the request for Radium 226 and Radium 228 to be added to the analysis for samples during baseline monitoring is already in place. Chapter 28 Section 11(a)(iii) requires that all applications for a permit to construct include ambient groundwater quality information. Additionally, Chapter 28, Section 11(a)(iii)(B) requires applicants to sample and test their wells for the constituents listed in Water Quality Rules and Regulations Chapter 8, Table 1, which includes Radium 226 and Radium 228.

WDEQ/WQD uses the information required by Chapter 28, Section 11(a)(iii) to determine the operational parameter list and frequency. As provided for in Section 11(a)(iv)(B)(II) the analyte list and monitoring frequency are subject to revision as required by the Administrator. In other words, the Administrator may require operational sampling and analysis of Radium 226 and Radium 228 on a case by case basis in situations where facilities demonstrate levels of concern. The passages will remain as written.