



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OCT 11 2012

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-082

Alan White
Lapwai School District # 341
P.O. Box 247
Lapwai, Idaho 83540

Re: Conditional Approval of Closure Plan for Motor Vehicle Waste Disposal Wells at the Lapwai School District Bus Transportation and Maintenance Facility, Lapwai, Idaho
(UIC ID#ID204L5-12-90215)

Dear Mr. White:

On August 30, 2012, the Underground Injection Control (UIC) program at the U.S. Environmental Protection Agency (EPA), Region 10, notified Lapwai School District that motor vehicle waste disposal wells at the school district's Bus Transportation and Maintenance facility in Lapwai, Idaho, must be closed. On September 24, 2012, the EPA received Lapwai School District's plan to permanently close one well and assess all of the motor vehicle waste disposal wells to determine if contamination has resulted from the injection activities. The UIC program also received clarifying information from you by telephone on October 3, 2012.

Closure of the motor vehicle waste disposal wells is conducted under 40 C.F.R. §§ 144.82, 144.89, and 146.10(c). Pursuant to the EPA's authorities under 40 C.F.R. §§ 144 and 146, the EPA has reviewed and conditionally approves your plan with three conditions described in detail below.

Summary of Closure Plan

Equipment Bay Drywell

A floor drain in the equipment bay of the Bus Transportation and Maintenance shop, where the school district has performed both bus and equipment maintenance, is connected to a drywell. A shop sink also discharges to the drywell. The drywell is located below the parking lot on the east side of the building.

During October 2012, the school district will end the discharge of fluids to the drywell by re-routing the floor drain and the shop sink to the community sewer system.

The drywell will be uncovered. A soil sample will be collected approximately 3-4 feet below the center of the drywell to determine if contamination resulted from the injection activities. The

sample will be analyzed in a laboratory and the results will be provided to the EPA. The results will be used to determine if additional work will be required to address contamination.

Bus Wash Pad

An open drain on the bus wash pad where bus engines have been cleaned discharges to a drywell.

The school district will assess the bus wash pad drywell to determine if contamination has resulted from the injection activities. A soil sample will be collected approximately 3-4 feet below the center of the drywell. It will be analyzed in a laboratory and the results will be provided to the EPA. The results will be used to determine if additional work will be required to address contamination.

The school district will work to determine if the drain on the bus wash pad has an open bottom or other openings that allow fluids to discharge below the ground surface. If the school district determines that the drain covers a fully enclosed basin, the school district will provide this information to the EPA. If the drain is found to have openings that allow fluids to discharge underground, the school district will sample the soil that receives the bus wash fluid and the analytical results will be used to determine if additional work will be required to address contamination.

Conditions of Approval

Pursuant to the EPA's authority under 40 C.F.R. § 144.89(a)(1), the closure plan is approved with the following conditions:

If the school district determines that the drain on the wash pad has openings that allow fluids to discharge underground, please ensure that the soil is sampled at a location that would be most likely to reveal contamination caused by the underground disposal activities (i.e., if the drain covers an open bottom drywell, the sample should be collected beneath the drywell, but if the openings are on the sides of the drywell, collect the sample along the side of the drywell near an opening through which the fluid would have discharged).

Lapwai School District has committed to sample soil beneath the drywells and the soil that received fluids from the wash pad drain if it is found to have openings that allow fluids to discharge underground. The sampling will be done to determine whether contamination has resulted from the injection of fluids. Please ensure that the soil samples are analyzed for volatile organic compounds by EPA Method 8260, semivolatile organic compounds by EPA Method 8270, and the metals arsenic, cadmium, chromium, and lead. There are a number of different laboratory methods available for the metals analyses, so when you contact the laboratory you should request a state or EPA approved method. Please also ask the laboratory to provide assurances to you that it is accredited for all of the methods they will use to analyze your soil sample, including the method selected for the metals analyses and Methods 8260 and 8270.

If contamination is observed during the sampling events, you must notify the EPA. Even if signs of contamination are not observed, you should complete the sampling as planned. Upon receipt

of the laboratory data, please submit a report to the EPA that contains the following: the date the samples were collected, a description of how the soil samples were collected (*e.g.*, they were collected with clean spoons following digging with a shovel or a hand auger), a description of where the soil sample was collected (depth and location in relation to the center point or side of the well), a hand-drawn sketch of the soil sample locations in relation to the wells, and the complete set of laboratory data. The report should be submitted to the following address:

U. S. Environmental Protection Agency, Region 10
Ground Water Unit (c/o Jennifer Parker)
1200 Sixth Avenue, Suite 900, OCE-082
Seattle, Washington 98101

If contamination is detected at levels of concern, the EPA will work with you to determine appropriate next steps to address the contamination. Please be aware that additional work may be required, including removal of contaminated materials.

Pursuant to the conditions described above, the plan for the closure of one well and assessment of all motor vehicle waste disposal wells at Lapwai School District's Bus Transportation and Maintenance facility is approved. If you have any questions, please contact Jennifer Parker of my staff at (206) 553-1900.

Sincerely,



Peter Contreras, Manager
Ground Water Unit