

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
290 Broadway, 24<sup>th</sup> Floor  
New York, New York 10007-1866

**NOTICE OF MAJOR PERMIT MODIFICATION, FORMULATION OF DRAFT  
MODIFIED UIC PERMIT AND  
NOTICE OF PUBLIC COMMENT PERIOD OF DRAFT MODIFIED PERMIT**

Public Notice No.

Application No. **20NY01705002**

Date: 10/16/2020

Prasinos Storage I LLC, 720 Rusk Street #227, Houston, TX 77002 has applied to the U.S. Environmental Protection Agency (“EPA”) under the provisions of the Safe Drinking Water Act, 42 U.S.C. 300f et. seq (the Act), for a major modification of its Underground Injection Control (UIC) permit authorizing the injection of fluids into its Class VG experimental technology well, Romahn #1 located at 42.429312<sup>0</sup> north latitude and -75.632774<sup>0</sup> west longitude, Town of Oxford, New York 13830. The existing permit sets injection fluid limitations during water cycling operations to no injection of any hazardous substances, as defined by 40 C.F.R. Part 261 nor any other fluid, other than freshwater supplied by the Village of Greene Public Water Supply, and flowback water produced from the well. By permit application received August 26, 2020, Prasinos requested the addition of injection fluid additives.

To support this request, Prasinos provided a list of additives with safety data sheets. Following review of the list and the proposed concentrations, EPA has prepared a draft modified permit. The draft modified permit specifies conditions for the operation, monitoring, reporting and plugging and abandonment of the injection wells. Permit conditions in the draft modified permit are identical to those found in the prior permit except as follows:

Part II Section B.2 Injection Fluid has been modified as follows:

The Permittee shall not inject any hazardous substances, as defined by 40 C.F.R. Part 261 nor any other fluid, other than freshwater supplied by the Village of Greene Public Water Supply, and flowback water produced from the well, and the following additives in the given percentages are permitted to be added to the injection fluid:

CRUMBLES (bentonite clay), 0.1%  
NEW GEL NT (bentonite clay), 0.1%  
NEWHPA (water thickener), 0.1%

NaCl (sodium salt), 0.2%  
KCl (potassium salt), 0.2%  
Soil Moist (water absorption granules), 1%  
Guar Gum (water thickener), 0.1%  
Calcium Chloride (calcium salt), 0.2%

In addition, the following additives, in the given percentages, may be added to water placed in on-site storage tanks for the purpose of maintaining tank water quality:

Power Powder (calcium hypochlorite), 0.1%  
Aluminum Sulfate (water purifier), 0.2%

Part II Section C.2 Monitoring Requirements has been modified as follows:

A grab sample of the injected fluid shall be collected and analyzed for the parameters listed below on a monthly basis or whenever the injected fluid is changed, such as the addition of additives:

- pH
- Total Dissolved Solids (mg/L)
- Chloride (mg/L)
- Sodium (mg/L)
- Barium (mg/L)
- Bromide (mg/L)
- Gross alpha/beta (pCi/L)
- Potassium, Total (mg/L)
- Calcium, Total (mg/L)

This notice is being given to inform the public that EPA has prepared the draft modified permit, and to solicit public comment. Pursuant to 40 C.F.R §124.5(c)(2) only the proposed modifications listed above are open for public review and comment. The draft modified permit contains standards, prohibitions and other conditions necessary to carry out the provisions of the Act. Should there be significant interest displayed by written public comment, a Presiding Officer shall conduct a public hearing on the above-identified draft modified permit. The purpose of this public hearing will be to receive comments from interested parties and the public on the draft modified permit prepared by EPA. Notification of the Hearing will be published in advance so that all interested parties may participate. Once all public comments are submitted and a public hearing, if necessary, is held, the Director of the Water Division of EPA Region II will make a final decision on whether or not to issue the modified permit and if issued the applicant will be required to comply with all conditions of the modified permit.

Comments must be submitted electronically within 30 days of the date of this notice (i.e. by no later than 11/16/2020) to [Region2\\_UIC@epa.gov](mailto:Region2_UIC@epa.gov).

All information submitted by the applicant is available as part of the administrative record, subject to provisions of law restricting the public disclosure of confidential information. Please contact [Region2\\_UIC@epa.gov](mailto:Region2_UIC@epa.gov) if you would like to request electronic versions of the permit documents.

Copies of documents comprising the administrative record can be obtained by submitting a Freedom of Information Act (FOIA) request online at <https://foiaonline.regulations.gov/foia/action/public/home> or by mailing a request to:

Freedom of Information Officer  
U.S. EPA Region 2  
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