



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OIL & GAS MANAGEMENT PROGRAM

DEP USE ONLY	
Auth #	APS #
Site #	Facility #
Client #	Sub-fac #

Request for Approval of Alternative Waste Management Practices

Please read instructions before completing this form.

PROJECT IDENTIFICATION				
Well Operator		DEP ID	Well Permit(s) or Registration No.(s)	
Address			Well Farm Name	
City	State	Zip Code	Well No.(s)	
Phone No.	Fax No.	County	Municipality	
Consultant (If any)	Phone No.	Project Name	Permit Issue Date	
Email		Spud Date	ESCGP #	
Latitude (decimal degrees) N °			Longitude (decimal degrees) W °	
<p>Note: All submittals must include the following information:</p> <ol style="list-style-type: none"> 1) USGS Topo map at 1" = 2,000' showing the location of the proposed alternative waste management practice 2) Full size set of plan design drawings showing proposed facility dimensions and location relative to existing facilities (Recommend using approved or pending ESCGP drawings with a scale of 1" = 200' or smaller) 3) A brief detailed project narrative describing the proposed project 				
REQUEST FOR APPROVAL OF ALTERNATIVE WASTE MANAGEMENT PRACTICES				
Check the appropriate box and complete the applicable section of the form.				
<input type="checkbox"/> For temporary storage, complete Section A. Temporary Storage				
<input type="checkbox"/> For disposal of drill cuttings or residual waste, complete Section B. Alternate Waste Disposal Practices				
<input type="checkbox"/> For processing, complete Section C. Residual Waste Processing				
<p>Note: For processing wastewater generated from oil or gas wells, the approval request is limited to wastewater that is either (1) processed at the well site where it was generated, or (2) processed at the well site where it will all be beneficially used to complete a well.</p>				
A. Temporary Storage				
<p>1) If a variance is requested from the requirement that the bottom of the pit be at least 20 inches above the seasonal high groundwater table for a pit that exists only during dry times of the year and is located above groundwater, fill in the dates the pit will be used in the space provided below. See 25 Pa. Code § 78.56(a)(10).</p> <p>Variance requested; planned dates to be used, from _____ to _____</p>				

- 2) If approval of an alternative practice for temporary storage is being requested, describe the type of waste and the temporary storage method. Include information, which will demonstrate that the proposed alternative practices will provide equivalent or superior protection to the practices identified in 25 Pa. Code § 78.56, 78a.56. Provide the dates an approved above ground temporary storage structure will be used in the space provided below.

Planned dates to be used, from _____ to _____

B. Alternative Waste Disposal Practices

Complete this section if requesting approval of an alternative practice to dispose of drill cuttings or residual wastes at the well site. Describe the proposed alternative practice the type of waste material being processed, including any additives to be used as part of the alternative practice. Provide the Material Safety Data Sheets (MSDS) for the additives used. Include information that will demonstrate the proposed practice will provide protection equivalent or superior to the practices identified in 25 Pa. Code §§ 78.61-63. If requesting to use solidifiers prior to disposal of drill cuttings or residual waste in a pit under 78.62(c), include a chemical analysis of a representative sample of the waste to demonstrate compliance with 25 Pa. Code § 78.62(b). Identify any waste stream that is created from the alternative waste disposal practice and describe how this waste material will be processed and/or disposed.

C. Residual Waste Processing

Check the appropriate box or boxes that best describe the planned processing practices.

- Processing wastewater generated at the well site
- Processing wastewater to be beneficially used to complete a well at the well site
- Processing drill cuttings
- Onsite liner processing (handling, washing, or shredding)
- Other onsite processing

- 1) Provide a narrative description and schematic for each activity checked above in Section C. a). Include type of treatment; desired outcome; facility design; and methodology, including a schematic of the treatment train. Use additional pages if necessary.
- 2) If using a company/contractor for the processing facility, include the contractor's name, address, contact person, and contact information.
- 3) For processing wastewater, approval requests are limited to wastewater processing (1) at the well site where it was generated, and/or (2) at the well site where it will be beneficially used to complete a well. If approval is granted, the operator shall maintain the following records for inspection by the Department of Environmental Protection (DEP) (1) the types and amounts of waste processed, (2) the specific locations where the processed waste was generated, (3) the specific locations where the processed waste was beneficially used to complete a well, and (4) the amount beneficially used to complete a well at each well location. If wastewater processing generates any additional waste (liquid or solid), records must also be maintained documenting the method and location of handling, storage, processing, and disposal site of such additional waste.
- 4) For processing drill cuttings, approval requests are limited to processing drill cuttings at the well site where they were generated. If approval is granted, the operator must maintain the following records: (1) the types and amounts of waste processed; (2) the specific location where the processed waste was generated; (3) the specific locations where it is used, if applicable; and (4) the permit number and Latitude/Longitude of the disposal location.. Such records shall be provided to the Department upon request.
- 5) For processing well pad liners (ie. handling, washing and shredding) approval requests are limited to activities at the well site where the well pad liner was installed. Describe the process for handling, washing and shredding such liners.

6) If using additives to treat (e.g. biocides, odor control) or process (i.e. for beneficial reuse) the contents of impoundments, pits, tanks, and/or series of tanks provide a description of the type of waste and the additive(s) used. Attach MSDS for the additives used. Pursuant to § 78.56(a)(4)(i) the liner shall be maintained so that the physical and chemical characteristics of the liner are not adversely affected by the waste and the liner is resistant to physical, chemical, and other failure during installation and use.

PPC Verification

Note: An operator must revise its Preparedness, Prevention and Contingency (PPC) Plan to implement changes to the practices identified in the plan. See § 78.55(c). To the extent an operator's PPC Plan does not address the practices approved by the form, the operator must update its PPC Plan to reflect any changes to the plan required to implement the approved practices.

For any alternate waste practice outlined above, provide documentation showing revisions to operator's site specific PPC Plan. The revised PPC Plan shall be provided to the Department upon request.

Has the site specific PPC Plan been revised to reflect any changes resulting from the alternative waste management practices? YES NO

Signature of Applicant

Signature Well Operator:

Print or Type Well Operator's Name and Title:

Date

DEP USE ONLY

Approved

Denied

Conditions: YES, see below or attached.

Date

DEP

NO

Representative:

Conditions:

Instructions

Use Form 8800-PM-OG0071A to request approval of alternative waste management practices under 25 Pa.Code §§ 78.56, 78a.56, 78.61, 78a.61, 78.62, 78a.62, 78.63, and 78a.63 and submit it with all of the necessary documentation. Label each attachment with the applicant's name and the information item to which it refers. The applicant should be the well operator or owner only. If a contractor is used for these activities, the applicant/operator should list the contractor's name, address, contact person and contact information in the space provided with approval request.

Type of Request for Approval of Alternative Waste Management Practices

Two types of Alternative Waste Management Practice approval requests are available:

1) Initial request of an Alternative Waste Management Practice (Form 8800-PM-OG0071A)

- Submit a completed Form 8800-PM-OG0071A to request approval for an Initial Request of Approval of Alternative Waste Management Practices

2) Previously Approved Alternative Waste Management Practices (Form 8800-PM-OG0071B)

- This may be utilized when a waste management practice has been previously approved and used at a different well site without resubmitting the same information submitted for the initial approval on Form 8800-PM-OG0071A, as long as the previously approved alternative management practice will be used in the same manner on the new site as it was on the old site.

Project Identification

Provide the requested information that identifies the owner and project site where alternative waste management practices will be provided.

Request For Approval of Alternative Waste Management Practices

Check the box or boxes corresponding to the alternative waste management practice(s) to be employed.

A. Temporary Storage

Operators shall contain regulated substances and wastes from the drilling, altering, completing, recompleting, servicing and plugging of a well (i.e. brines, drill cuttings, drilling muds, oil, stimulation fluids, well treatment and servicing fluids, plugging, and drilling fluids other than gases) in a pit, tank, or series of pits and tanks in accordance with the requirements in § 78.56(a). Use this form to request to use practices other than those specified in § 78.56(a) that provide equivalent or superior protection.

Operators seeking to utilize non-rigid and/or modular aboveground temporary containment structures need to demonstrate that they are structurally sound and reasonably protected from unauthorized acts of third parties pursuant to § 78.56(a)(3). Use this form to make that demonstration.

Submittal Requirements

- 1) *Provide additional narrative and supporting information; such as liner information, chemical concentrations, MSDS sheets, etc. that are relative to your proposed project plan.*
- 2) *Provide a schematic or diagram showing movement of fluids to the drill pad from storage and from the drill pad to the storage facility during planned activity.*
- 3) *Provide quality assurance and quality control (QA/QC) for the structure installation, including an installation plan that describes required installation activities and identifies critical phases, processes and techniques.*
- 4) *Include an engineer certified stability analysis for installation of temporary storage systems on fill areas or where height exceeds the diameter or width to be used to ensure the integrity of the structure at the proposed site.*
- 5) *Demonstrate that secondary containment is in compliance with the following:*
 - a. *Equal to 110 percent of the volume of the largest primary containment unit*

- b. *Synthetic flexible liner when proposed has coefficient of permeability of no greater than 1×10^{-10} cm/sec*
 - c. *Liner thickness of at least 30 mils*
 - d. *Demonstrate liner compatibility with the impounded materials*
- 6) *Provide information relative to any engineering controls when used for the structure including:*
- a. *Alarms/sensors/controls for monitoring freeboard level*
 - b. *Leak detection system/sensor*
 - c. *Proposed inlet and outlet check valves, air gaps at facility connection piping*
- 7) *Identify all volumes in cubic feet or gallons.*

B. Alternative Waste Disposal

Residual wastes, including drill cuttings generated from an oil or gas well may be disposed of on the well site from which the wastes were produced as per the requirements in §§ 78.61, 78.62 and 78.63. Only residual waste, including drill cuttings, that meet the requirements of § 78.62(b) may be disposed of on the well site. Prior to disposing such waste on the well site, a chemical analysis of a representative sample of the waste be performed to demonstrate compliance with this section. Trash, land clearing waste, or other waste that was not generated by drilling or production of an oil or gas well may not be disposed of on the well site.

An operator may request approval for the following alternative practices for the disposal of residual waste: (1) use solidifiers, dusting (limited to drill cuttings above the casing seat), unlined pits, attenuation, or other alternative practices for the disposal of uncontaminated drill cuttings, § 78.61(d); (2) use of solidifiers prior to disposal in a pit, § 78.62(c); and (3) disposal of residual waste by land application in an alternate manner from that required by § 78.63 and § 78.63(c). If requesting approval for “dusting”, the drill cuttings shall only be from above the casing seat. If requesting approval to use solidifiers prior to disposal of drill cuttings or residual waste in a pit, use this form to make such a request and include a chemical analysis of a representative sample of the waste to demonstrate compliance with § 78.63(b). Submit chemical analyses of the waste prior to adding solidifiers and after adding solidifiers.

To obtain approval for these alternative practices to dispose of residual waste, operators must demonstrate that the requested practice provides equivalent or superior protection to the requirements in Chapter 78.

Please note that any liner must be designed, constructed, and maintained so that the physical and chemical characteristics of the liner are not adversely affected by the waste. The liner is also required to be resistant to physical, chemical, and other failure during transportation, handling, installation, and use. See § 78.62(a)(11).

Submittal Requirements

- 1) *“Request for Approval of Alternative Waste Management Practices,” form 5500-PM-OG0071 (OG71)*
- 2) *Project narrative describing the proposed alternative disposal plan*
- 3) *A USGS topographic location map at 1” = 2,000’*
- 4) *Latitude and longitude location or GPS coordinates of the disposal site*
- 5) *Results of the chemical analysis of a representative sample that meets § 78.62(b)*
- 6) *When solidifiers are proposed, submit chemical analysis after adding solidifiers*
- 7) *Demonstrate that the requested practice provides equivalent or superior protection to the requirements of Chapter 78*

C. Residual Waste Treatment/Processing

An operator may request approval to process residual waste on the well site. For processing wastewater generated from oil or gas wells, the approval request is limited to wastewater that is either (1) processed at the well site where it was generated, or (2) processed at the well site where it will all be beneficially used to complete a well. Approval is not required for the following activities: (1) mixing fluids with freshwater; (2) aerating fluids; and (3) filtering solids from

fluids. If approval is granted, the operator must maintain records that include the types and amounts of waste processed and make such records available for inspection upon request to a representative of the Department.

Any approval to process drill cuttings generated from oil or gas wells is limited to drilling cuttings processed at the well site where they were generated.

An operator may request approval to add any substance, including chemicals, to a pit or tank on the well site to treat its contents for beneficial use. Pits must be constructed with a synthetic flexible liner designed, constructed, and maintained so that the physical and chemical characteristics of the liner are not adversely affected by the waste and that the liner is resistant to physical, chemical, and other failure during transportation, handling, installation, and use. See § 78.56(a)(4)(i). Operators must demonstrate that treatment chemicals used are compatible with the liner. Operators treating residual waste in tanks must demonstrate adequate containment.

An operator may request to shred well pad liners at the well site. Approvals are limited to activities on the well site where the well pad liner was installed. Requests must describe the process for handling, washing, and shredding such liners and demonstrate that these activities provide adequate environmental protections.

Submittal Requirements

- 1) *"Request for Approval of Alternative Waste Management Practices" form 5500-PM-OG071(OG71)*
- 2) *Project narrative describing the proposed Residual Treatment/Processing*
- 3) *A USGS topographic location map at 1" = 2,000'*
- 4) *Latitude and longitude location or GPS coordinates of the disposal site*
- 5) *When synthetic flexible liners are used in the treatment process, demonstrate that the physical and chemical characteristics of the liner are not adversely affected by the waste or the process*
- 6) *Identify the waste stream, it's volume, handling and disposal plan*

Note: *An operator must revise its Preparedness, Prevention and Contingency (PPC) Plan to implement changes to the practices identified in the plan. See § 78.55(c). To the extent an operator's PPC Plan does not address the practices approved by the form, the operator must update its PPC Plan to reflect any changes to the plan required to implement the approved practices.*

Submit application to the District Oil and Gas Operations at the appropriate DEP district office:

PA DEP
District Oil & Gas Operations
Northwest District Office
230 Chestnut Street
Meadville, PA 16335-3481
Phone: 814-332-6860
Fax: 814-332-6120

PA DEP
District Oil & Gas Operations
Southwest District Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745
Phone: 412-442-4000
Fax: 412-442-4328

PA DEP
District Oil & Gas Operations
Eastern District Office
208 West Third Street
Williamsport, PA 17701-6448
Phone: 570-327-3636
Fax: 570-327-3420