

CSI - Ohio

The Common Sense Initiative

Business Impact Analysis

Agency Name: Ohio Environmental Protection Agency

Regulation/Package Title: No Change Underground Injection Control 2016

Rule Number(s): 3745-34-07, 3745-34-13, 3745-34-14, 3745-34-15, 3745-34-19, 3745-34-32, 3745-34-33, 3745-34-35, 3745-34-37, 3745-34-39, 3745-34-51, 3745-34-54, and 3745-34-59.

Date: 3/30/2016

Rule Type

New

5-Year Review

Amended

Rescinded

The Common Sense Initiative was established by Executive Order 2011-01K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Regulatory Intent

1. Please briefly describe the draft regulation in plain language.

Ohio EPA is proposing to file several rules in Chapter 3745-34 of the Ohio Administrative Code (OAC) with no changes. The rules in this package regulate the underground injection of various waste streams and establish the filing requirements:

- Prohibition of movement of fluid into underground injection.
- Class I permit applications, permit to drill applications and permit to operate applications.
- Emergency permits.

- Area of review of an injection well, field or project.
- Corrective actions.
- Criteria for establishing permitting priorities.
- Construction requirements for class I wells.
- Information to be considered by the director in authorizing class I wells.
- Minimum criteria for siting class I hazardous waste injection wells.
- Construction requirements for class I hazardous waste injection wells.
- Information about class I hazardous waste injection wells to be evaluated by the director.

2. Please list the Ohio statute authorizing the Agency to adopt this regulation.

Division (B) of section 6111.043 of the Revised Code authorizes Ohio EPA to adopt these regulations. It states “the director of environmental protection, in consultation with the director of natural resources, shall adopt rules... governing the injection of sewage, industrial waste, hazardous waste and other wastes into wells.”

3. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

Yes, these regulations enable Ohio EPA to determine compliance with the Safe Drinking Water Act (SDWA), as well as retain primary enforcement authority from the Federal Government. These rules are used by Ohio EPA to prevent contamination of underground sources of drinking water. The federal counterpart to these rules can be found in Title 40 of the Code of Federal Regulations (C.F.R.), Parts 144 (Underground Injection Control Program) and 146 (Underground Injection Control Program: Criteria and Standards).

4. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

The following are areas where Ohio EPA’s rules are more stringent:

- OAC rule 3745-34-07 exceeds its counterpart in that it protects surface waters of the state from adverse impacts due to recharge from ground water contaminated by injection activities.

- OAC rule 3745-34-37 is more stringent than its federal counterpart in that it requires well material to be corrosion resistant, and the compatibility of injected fluids with formation fluids to be determined or calculated for new class I wells. These requirements were added to Ohio's rule in result of material compatibility problems encountered with earlier wells constructed in Ohio.

5. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

The Ohio-specific public policy goals (as stated in Ohio Revised Code section 6111.043) are to establish a program for regulation of the injection of sewage, industrial waste, hazardous waste, and other wastes into wells in order to control pollution of the waters of the state, to prevent contamination of underground sources of drinking water, and to satisfy all requirements of the Safe Drinking Water Act (SDWA). These rules are required for Ohio to maintain SDWA primary enforcement authority. In addition, the rules aim to prevent the migration of contamination into underground sources of drinking water via underground injection and are, therefore, protective of human health.

6. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

The Agency will base success of all of the rules in this package on compliance rates within the underground injection control program. Compliance is determined through plan review, inventory records, anonymous complaints and inspections of facilities with underground injection control wells.

Development of the Regulation

7. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

Stakeholders include underground injection control owners and operators, consultants, environmental organizations, other state agencies and the general public. The only measure someone has to take to be notified of DDAGW's potential rule activity is to request to be added to our electronic or hard-copy mailing list. Stakeholders can also sign themselves up for this notification directly from Ohio EPA's website.

Stakeholders were first notified of DDAGW's plans to revise these rules on February 6, 2013 by electronic or regular mail in accordance with their preference.

8. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

Stakeholders did not provide any comments during early stakeholder outreach, held from February 6 – March 6, 2013. However, several comments were received during interested party review held from May 19 – June 20, 2014. Two meetings, phone calls and additional reviews of draft rule revisions by stakeholders were performed in order to address their concerns. DDAGW has addressed the comments and is proposing to adopt these rules with no changes based on stakeholder input.

9. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

Statutory authority for these rules is established in Chapter 6111 of the Revised Code. Ohio EPA promulgated these rules under OAC Chapter 3745-34. The federal counterparts are the foundation for these rules and include the latest revisions to the Federal Underground Injection Control Program Rules which are found in Title 40 of the C.F.R. Parts 144 and 146.

10. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

In order to retain primary enforcement authority, Ohio EPA is required to adopt the federal counterparts of rules. Therefore, Ohio EPA could not consider alternatives to rules in OAC Chapter 3745-34.

11. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.*

The rules in this package are performance-based and will demonstrate the overall effectiveness of properly constructed and maintained underground injection control wells at preventing the migration of contaminants into underground sources of drinking water.

12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

Ohio EPA has reviewed internal regulations and determined there are no duplications. As part of the review process, Ohio EPA deleted various duplications that were previously in place. However, at the request of stakeholders, several of the removed duplications were reinstated and the rules are either being adopted with no changes or minor revisions.

13. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

Ohio EPA implemented the regulations in 1984 including being granted primacy by US EPA. All inspections and regulatory monitoring of Class I, IV and V injection wells per these rules

is performed by four employees in the UIC unit in the Columbus Central Office of the Ohio EPA. The manager of the UIC unit ensures that employees are trained and knowledgeable about the rules and ensures consistency among the three non-managerial staff in applying the rules.

Adverse Impact to Business

14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

a. Identify the scope of the impacted business community;

The cost of compliance of all rules in this rules package would fall upon facilities with underground injection wells.

b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and

The rules necessitate time for compliance to satisfy record keeping requirements, maintaining the injection wells, calculating the area of review, and completing permit applications. Other monetary costs could include sampling, testing, and well maintenance. If corrective actions are necessary, the adverse impact would also include the time and money to complete the corrective actions and associated compliance schedule. Facilities wishing to install a class I well will need to ensure that the well includes the correct type of cement, the correct number of centralizers, and extends to the necessary depth.

c. Quantify the expected adverse impact from the regulation.

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.

There is no adverse impact associated with OAC Rules 3745-34-19, 3745-34-33, 3745-34-35, 3745-34-39 and 3745-34-59.

OAC Rule 3745-34-07:

A facility under corrective actions will need to prepare a compliance schedule and complete the corrective actions. The cost for completing the corrective actions will vary widely depending on the abatement option selected. For example, these actions may involve submitting permit applications which are covered in other rules of this chapter (e.g., rule 3745-34-12).

OAC Rule 3745-34-13:

I. Personnel Costs

a. Statement of Expertise

Time estimated for a water or wastewater treatment plant operator to complete this statement is 2 hours at an average rate of \$19.60* per hour. The cost of the statement of expertise is estimated to be \$39.20.

b. Report on Current Injection Activities

Time estimated for an applicant to complete this report is 2 hours at an average rate of \$19.60* per hour. The cost of completing the report is estimated to be \$39.20.

c. Area of Review of the Proposed Injection Well

Time estimated for an engineer to complete the area of review calculation is 8 hours at an average rate of \$110.62 per hour. The cost of the plan is estimated to be \$884.96.

d. Description of Wells Penetrating Injection Zone

Time estimated for an engineer to complete a report with a description of wells penetrating the injection zone is 64 hours at an average rate of \$110.62 per hour. The costs incurred for the report are estimated to be \$7,079.68.

e. Corrective Action Plan

Time estimated for an engineer to complete the corrective action plan is 8 hours at an average rate of \$110.62 per hour. The costs incurred for the report are estimated to be \$884.96.

f. Geologic Suitability of Area

Time estimated for an engineer to complete an evaluation of the area is 48 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$5,309.76.

h. Financial Assurance

Time estimated for an accountant to compile information establishing evidence of financial responsibility for operation and closure of the well is 16 hours at an average rate of \$29.66* per hour. The cost for this information is estimated to be \$474.56.

*Note: Hourly pays included below that are marked with an asterisk were based on the average hourly pay for that position in the “Occupational Outlook Handbook” 2012-2013 edition released by the Bureau of Labor and Statistics in the U.S. Department of Labor. The remaining hourly pays (e.g., geologist,

engineer) were based on pays included in the U.S. EPA document “Geologic Carbon Dioxide Sequestration Technology and Cost Analysis,” November 2010.

II. Operating/Indirect Central Service Costs

Operating/Indirect costs are calculated using the average cost at Ohio EPA (22.1% of direct costs). This cost should be similar to the average cost for private and governmental entities regulated by this rule. The total direct costs are calculated using the total of any personnel costs, new equipment or other capital costs, and any other costs (e.g., supplies/mailing).

Total direct costs: \$14,712.32
 Percent indirect costs of total direct costs: 22.1%
 Total operating/indirect costs incurred complying with this rule: \$3,251.42

III. Other Costs – Supplies/Mailing Costs

Several binders are needed to compile this information. The cost to purchase and mail these binders is estimated to be \$100.

IV. Total Costs for Complying with OAC Rule 3745-34-13:

a. Personnel Costs		
i. Statement of Expertise:		\$39.20
ii. Report on Current Injection Activities:		\$39.20
iii. Area of Review of the Proposed Injection Well:		\$884.96
iv. Description of Wells Penetrating Injection Zone:		\$7,079.68
v. Corrective Action Plan:		\$884.96
vi. Geologic Suitability of Area:		\$5,309.76
vii. Financial Assurance:		\$474.56
b. Operating/Indirect Central Service Costs		\$3,251.42
c. Other Costs		
i. Supplies/Mailing		\$100.00
	TOTAL:	\$18,063.74

OAC Rule 3745-34-14:

I. Personnel Costs

a. Design Specifications

Time estimated for an engineer to compile and design specifications for a class I well is 48 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$5,309.76.

b. Written Analysis of Corrosion Capability

Time estimated for an engineer to complete written analysis of corrosion capability is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

c. Well Schematics

Time estimated for a drafter to complete well schematic analysis is 4 hours at an average rate of \$23.02* per hour. The cost for completing this requirement is estimated to be \$92.08.

d. Proposed Stimulation Program Plan

Time estimated for an engineer to complete a proposed stimulation program plan is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

e. Plan for Core Sample Collection and Analysis

Time estimated for an engineer to complete a plan for core sample collection and analysis is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

f. Proposed Formation Testing

Time estimated for an engineer to complete proposed formation testing is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

g. Plans for Collecting Logs and Conducting Testing and Surveys

Time estimated for an engineer to complete a plan for collecting logs and conducting testing/surveys is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

h. Plans for Injectivity Testing

Time estimated for an engineer to complete an injectivity testing plan is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

i. Procedures, Forms, and Methods for Collecting Miscellaneous Information

Time estimated for an engineer to compile procedures, forms and methods for collecting miscellaneous information is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

j. Proposed Schedule for Logging and Testing

Time estimated for an engineer to complete a proposed schedule for logging and testing is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

*Note: Hourly pays included below that are marked with an asterisk were based on the average hourly pay for that position in the “Occupational Outlook Handbook” 2012-2013 edition released by the Bureau of Labor and Statistics in the U.S. Department of Labor. The remaining hourly pays (e.g., geologist, engineer) were based on pays included in the U.S. EPA document “Geologic Carbon Dioxide Sequestration Technology and Cost Analysis,” November 2010.

II. Operating/Indirect Central Service Costs

Operating/Indirect costs are calculated using the average cost at Ohio EPA (22.1% of direct costs). This cost should be similar to the average cost for private and governmental entities regulated by this rule. The total direct costs are calculated using the total of any personnel costs, new equipment or other capital costs, and any other costs (e.g., supplies/mailing).

Total direct costs: \$8,941.68
 Percent indirect costs of total direct costs: 22.1%
 Total operating/indirect costs incurred complying with this rule: \$1,976.11

III. Other Costs – Supplies/Mailing Costs

Several binders are needed to compile this information. The cost to purchase and mail these binders is estimated to be \$100.00.

IV. Total Costs for Complying with OAC Rule 3745-34-14:

a. Personnel Costs	
i. Design Specifications:	\$5,309.76
ii. Written Analysis of Corrosion Capability	\$442.48
iii. Well Schematics	\$92.08
iv. Proposed Stimulation Program Plan	\$442.48
v. Plan for Core Sample Collection and Analysis	\$442.48
vi. Proposed Formation Testing	\$442.48
vii. Plans for Collecting Logs and Conducting Testing and Surveys	\$442.48
viii. Plans for Injectivity Testing	\$442.48
ix. Procedures, Forms, and Methods for Collecting Miscellaneous Information	\$442.48
x. Proposed Schedule for Logging and Testing	\$442.48
b. Operating/Indirect Central Service Costs	\$1,976.11
c. Other Costs	
ii. Supplies/Mailing	\$100.00
	TOTAL: \$11,017.79

OAC Rule 3745-34-15:

I. Personnel Costs

a. Drilling and Completion Reports

Time estimated for an engineer to compile drilling and completion report information is 16 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$1,769.92.

b. Formation Testing Program Data

Time estimated for an engineer to compile formation testing program data is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

c. Report of Injectivity Testing Results

Time estimated for an engineer to complete an injectivity testing results report is 6 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$663.72.

d. Formation Pressure Information and Contamination Potential

Time estimated for an engineer to compile information on formation pressure and contamination potential is 16 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$1,769.92.

e. Report of Logs and Tests

Time estimated for an engineer to complete a report of logs and tests is 16 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$1,769.92.

f. Description of Injected Fluids

Time estimated for a geologist to compile injection fluid information is 8 hours at an average rate of \$107.23 per hour. The cost for completing this requirement is estimated to be \$857.84.

g. Plan for Passive Seismic Monitoring Program

Time estimated for a geologist to complete a plan for a passive seismic monitoring program is 8 hours at an average rate of \$107.23 per hour. The cost for completing this requirement is estimated to be \$857.84.

h. Proposed Injection Procedure

Time estimated for an engineer to complete a proposed injection procedure is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

i. Contingency Plans

Time estimated for an engineer to complete a contingency plan is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

j. Plan for Annual Review and Testing of Well

Time estimated for an engineer to complete a plan for annual review and testing of a well is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

k. Plan for Monitoring Lowermost USDW

Time estimated for a geologist to complete a monitoring lowermost USDW plan is 4 hours at an average rate of \$107.23 per hour. The cost for completing this requirement is estimated to be \$430.52.

l. Plan for Well Plugging and Abandonment

Time estimated for an engineer to complete a well plugging and abandonment plan is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

m. Plans and Maps for Meeting Testing Requirements

Time estimated for an engineer to complete plans and maps for meeting testing requirements is 8 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$884.96.

n. Procedures and Forms for Collecting and Submitting Required Information

Time estimated for an engineer to complete procedures and forms for collecting and submitting required information is 4 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$442.48.

II. Operating/Indirect Central Service Costs

Operating/Indirect costs are calculated using the average cost at Ohio EPA (22.1% of direct costs). This cost should be similar to the average cost for private and governmental entities regulated by this rule. The total direct costs are calculated using the total of any personnel costs, new equipment or other capital costs, and any other costs (e.g., supplies/ mailing).

Total direct costs: \$15,120.08

Percent indirect costs of total direct costs: 22.1%

Total operating/indirect costs incurred complying with this rule: \$3,341.54

III. Other Costs – Supplies/Mailing Costs

Several binders are needed to compile this information. The cost to purchase and mail these binders is estimated to be \$100.00.

IV. Total Costs for Complying with OAC Rule 3745-34-15:

a. Personnel Costs		
i. Drilling and Completion Reports		\$1,769.92
ii. Formation Testing Program Data		\$442.48
iii. Report of Injectivity Testing Results		\$663.72
iv. Formation Pressure Information and Contamination Potential		\$1,769.92
v. Reports of Logs and Tests		\$1,769.92
vi. Description of Injected Fluids		\$857.74
vii. Plan for Passive Seismic Monitoring Program		\$857.74
viii. Proposed Injection Procedure		\$442.48
ix. Contingency Plans		\$442.48
x. Plan for Annual Review and Testing of Well		\$442.48
xi. Plan for Monitoring Lowermost USDW		\$430.52
xii. Plan for Well Plugging and Abandonment		\$442.48
xiii. Plans and Maps for Meeting Testing Requirements		\$884.16
xiv. Procedures and Forms for Collecting and Submitting Required Information		\$442.48
b. Operating/Indirect Central Service Costs		\$3,341.54
c. Other Costs		
i. Supplies/Mailing		\$100.00
	TOTAL:	\$15,103.24

OAC Rule 3745-34-32:

I. Personnel Costs

Time estimated to calculate the area of review by an Engineer is 8 hours at an average rate of \$110.62 per hour. The cost for completing this requirement is estimated to be \$884.96.

II. Operating/Indirect Central Service Costs

Operating/Indirect costs are calculated using the average cost at Ohio EPA (22.1% of direct costs). This cost should be similar to the average cost for private and governmental entities regulated by this rule. The total direct costs are calculated using the total of any personnel costs, new equipment or other capital costs, and any other costs (e.g., supplies/ mailing).

Total direct costs: \$884.96
Percent indirect costs of total direct costs: 22.1%
Total operating/indirect costs incurred complying with this rule: \$195.58

III. Total Costs for Complying with OAC Rule 3745-34-32:

a. Personnel Costs	\$884.96
b. Operating/Indirect Central Service Costs	\$195.58
TOTAL:	\$1,080.54

OAC Rule 3745-34-37:

The cost of compliance is based on required construction materials, standards and the average depth of class I wells in Ohio is estimated to be \$1,097,382 to \$1,463,177 for one well.¹ This estimate is based on Agency staff expertise and information previously provided from a consultant to the industry.

¹ U.S. Department of Labor, Bureau of Labor Statistics Inflation Calculator used to account for inflation from 2005 – 2016.

OAC Rule 3745-34-51:

The facilities regulated by this rule are class I hazardous waste injection facilities which are almost exclusively large private enterprises. The one-time cost for these facilities to comply with this rule is the cost associated with the analyses and information a permit applicant is required to submit to the Director of Ohio EPA. Based on information provided by facilities in Ohio and their consultants, the agency estimates it costs an applicant with an existing site approximately \$31,516 to provide the director with the analyses required in this rule (analyses of structural and stratigraphic geology, hydrology, seismicity of the region, local geology and hydrology of the well site and a “determination that the geology of the area can be described confidently and that limits of waste fate and transport can be accurately predicted through the use of models”). The agency also estimates that an applicant with a new site will spend approximately \$252,125 providing the same information to the Director. Similarly, the agency estimates it will cost an applicant with an existing site approximately \$31,516 to submit sufficient information to demonstrate that the confining zone is sufficiently separate from the lowermost underground supply of drinking water (USDW), the piezometric surface of the fluid in the injection zone is less than the piezometric surface of the lowermost USDW, or that there is no USDW present. The agency also estimates it will cost an applicant with a new site approximately \$252,125 to submit the same information required. The total estimate for an applicant with an existing site is \$63,032 and an applicant with a new site is \$504,250 to comply with this rule.²

² U.S. Department of Labor, Bureau of Labor Statistics Inflation Calculator used to account for inflation from 2004 – 2016.

OAC Rule 3745-34-54:

The cost of compliance is based on all costs calculated from the U.S. EPA document, “Geologic Carbon dioxide Sequestration Technology and Cost Analysis,” June 2008. The costs incurred are for casing and cementing, and tubing and packer requirements. The total estimated cost of compliance with this rule is \$525,365.³

³ U.S. Department of Labor, Bureau of Labor Statistics Inflation Calculator used to account for inflation from 2008 – 2016.

15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The Agency considers the overall cost for complying with these regulations to be minor in comparison with ensuring that underground sources of drinking water are protected for public consumption.

Regulatory Flexibility

16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

No exemptions or alternative means of compliance for small businesses have been written into this rules package.

17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Ohio EPA does not assign fines and penalties for first-time offenders, and prefers to obtain compliance through outreach first and if needed, written notice of violations prior to any type of formal enforcement.

18. What resources are available to assist small businesses with compliance of the regulation?

The following resources are available:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is a non-regulatory program that provides information and resources to help small businesses comply with environmental regulations. OCAPP also helps customers identify and implement pollution prevention measures that can save money, increase business performance and benefit the environment. Services of the office include a

toll-free hotline, on-site compliance and pollution prevention assessments, workshops/training, plain-English publications library and assistance in completing permit application forms. Additional information is available at <http://www.epa.ohio.gov/ocapp>.

- Ohio EPA also has a permit assistance web page (http://www.epa.ohio.gov/dir/permit_assistance.aspx) that contains links to several items to help businesses navigate the permit process, including the Permit Wizard, Answer Place, Ohio EPA's Guide to Environmental Permitting and eBusiness Center.
- Ohio EPA maintains the Compliance Assistance Hotline 800-329-7518, weekdays from 8:00 a.m. to 5:00 p.m.
- US. EPA Small Business Gateway also has information on environmental regulations for small businesses available at <http://www.epa.gov/smallbusiness/> and a Small Business Ombudsman Hotline 800-368-5883.
- Facilities can turn to members of Ohio EPA's Division of Drinking and Ground Waters' Underground Injection Control (UIC) Unit for technical assistance. UIC contacts include Valerie Orr, Jess Stottsberry, and Lindsay Taliaferro. They can be reached by calling 614-644-2752. The UIC Unit also maintains a website which includes answers to many commonly asked questions (<http://epa.ohio.gov/ddagw/uic.aspx>).