

Frequently Asked Questions About UIC Class V Wells

Q: What's an injection well?

A: Injection wells are defined broadly to include: boreholes, sumps, [drywells](#), cesspools, septic systems, and storm water drains, drainfields, and other subsurface drainage and disposal devices used to put fluids into the ground. These range from deep, highly technical wells to shallow on-site septic systems. There are five categories or "classes" of injection wells based on function, construction, and operating features.

Q: What are Class V wells?

A: Any injection wells which do not fit into Classes I through IV are, by default, Class V injection wells. As explained in EPA's 1987 Report to Congress, there are dozens of different types of Class V injection wells. These wells are usually shallow and simply constructed devices (such as septic systems and drywells). The potential for Class V injection wells to pollute ground water varies widely, depending on things like the amount and kinds of fluid going into the well, the construction of the system, kinds of soil and other underground materials, depth to ground water, etc. Some types of Class V wells are generally banned ([large capacity cesspools](#) and [motor vehicle waste disposal wells](#)), while most others are authorized by rule or permit.

Q: What are the most common types of Class V injection wells in Region 5?

A: Sanitary wastewater disposal wells (multi-family and large commercial septic systems) and stormwater runoff and other drainage wells are by far the most common. Less common but still significant numbers of Class V wells are used to dispose of commercial or industrial wastewater, motor vehicle service related fluids, and in some areas, agricultural drainage.

Q: How big a threat to ground water quality do those sorts of shallow injection wells really pose?

A: The degree of risk to ground water varies from quite high to very low, depending upon things like the geologic setting, well construction and operation, volume and quality of waste fluids, likelihood of accidental spills, etc. For example, state and local governments permit the installation of approved large septic systems that adequately treat and dispose of sanitary waste fluids underground. However, a floor drain or shop sink in a business that would periodically drain small amounts of commercial or industrial fluids through a septic system could slowly spread contaminants underground and lead to ground water pollution. An accidental, one-time spill into a drain could also cause contamination. Business owners and operators need to consider their liability in these kinds of situations and ensure that their underground discharges do not cause ground water contamination which could be costly to clean-up.

Q: Why does EPA regulate injection wells instead of my state or local government?

A: Many state and local agencies do regulate different types of injection wells under their own authorities. To run the federal UIC program, state [primacy](#) agencies must have regulations at least as stringent as the federal ones, and they may be more restrictive. Some states have chosen not to officially run the UIC program and therefore the federal EPA runs the UIC program in those states.

Q: Which States in Region 5 have UIC program primacy for Class V wells, and which ones depend upon EPA to implement the Class V program?

A: Currently, Illinois, Ohio, and Wisconsin have obtained full UIC Class V well program primacy. EPA has the responsibility to directly implement the UIC Class V well program in Indiana, Michigan, Minnesota, and on [Indian Lands](#).

Q: How do I know if I have a Class V well?

A: If you have any wastewater or other fluids that eventually discharge underground through a pipe, septic system, catchbasin, drywell, or other related mechanism, you probably have a Class V well. If all of your drainage and wastewater goes into a city sewer system, you probably don't have a Class V well.

Not all septic systems are Class V wells. The EPA brochure titled [When is a Septic System Regulated as a Class V Well?](#) (PDF file, 4 pp, 1 Mb) can help you determine if your septic system is a Class V well.

Q: What if I'm still not sure if I have a Class well?

A: We request that people that could have a possible Class V well fill out an [UNDERGROUND DISCHARGE SYSTEM \(CLASS V\) INVENTORY SHEET](#) and send it in to EPA for review. In most situations, we can determine if you have a Class V well based on our review of the information on the inventory form.

Q: What do I have to do if I have a Class V well? Do I need to get a permit?

A: The owner or operator of a Class V well is required at a minimum to do at least two things, 1) provide EPA with some basic inventory information about their well, and 2) do not endanger any [underground source of drinking water](#).

To provide the required inventory information, the owner or operator can send EPA a completed [UNDERGROUND DISCHARGE SYSTEM \(CLASS V\) INVENTORY SHEET](#). The instructions for completing the form include the address to mail the form back to EPA. For most situations, this is all you will have to do (if the information provided is complete). In rare situations, if we need additional information, or if you would need to do anything else (like submit a permit application or close your Class V well), we will get back to you. As mentioned above, you are still not allowed to contaminate an underground source of drinking water, so take measures to prevent any discharges of fluids that could cause contamination.

Q: What do I have to do if I have a remediation project?

A: Remediation projects that utilize injection wells as part of the site cleanup activity are also regulated by the UIC program. At a minimum, all injection well owners/operators need to provide inventory information about the wells to the UIC program. This can be provided on our [example inventory sheet](#). In addition to the information requested in the inventory sheet, please attach a brief description of the contamination being addressed and include a map of the areal extent of the contamination. This can be from previously prepared reports for other programs or agencies that are overseeing the cleanup activities.

Because these cleanups are intended to benefit the environment and are already overseen by other federal and/or state programs, the UIC program does not wish to unnecessarily delay remediation activities. In most all situations, the above information is sufficient to allow the UIC program to "[rule-authorize](#)" these types of injection wells (they do not require a permit). If you would like to receive a letter or e-mail response back from EPA that the wells are authorized by rule, please include a cover letter with your inventory submittal requesting a response. After the injection activity has been completed, you need to notify the UIC program briefly describing when the wells have been plugged and how they were plugged.

Q: Why was I sent a Class V inventory sheet/form?

A: The EPA Region 5 UIC Program is conducting an inventory of all buildings and facilities including businesses and government facilities that might dispose of fluid wastes into the ground through Class V wells. We are using several sources of publicly available information to create mailing lists of facilities in unsewered areas (which are most likely to have Class V wells). In some cases, our field inspectors have visited the facility and no inventory information was provided by the owner/operator. This request for information is part of an effort to assist Class V well owner/operators to comply with their responsibility to submit inventory information to EPA. This is also a ground water protection effort since many areas of Region 5 have ground water that is close to the surface and is vulnerable to contamination from disposing of certain fluids through septic systems, drywells, french drains, or similar disposal systems. EPA believes that by notifying Class V well owners and operators of the requirement to submit Class V well inventory information, the owners and operators of these systems will be more likely to follow [best management practices](#) at their facilities which will lead to better protection of underground sources of drinking from contamination.

Q: Who receives Inventory Forms? Am I the only one?

A: All buildings and facilities, including businesses and government facilities that potentially dispose of fluid wastes into the ground in the states of Indiana, Michigan, Minnesota, and on [Indian lands](#) in Region 5, are asked to fill out an inventory form. The UIC programs in Illinois, Ohio and Wisconsin are run by their respective state programs, which also conduct inventory surveys to identify Class V wells. Since providing the inventory information to the UIC Director is required for all Class V wells, and most business and facility owners and operators are not aware of this requirement, EPA has chosen to assist the regulated entities by informing them of the requirement and providing them with a form to fill-out and return.

Q: Why do I need to fill it out?

A: All owners or operators of Class V wells (or shallow waste disposal systems) are required to provide basic "inventory information" to the UIC Director according to Title 40 of the [Code of Federal Regulations](#) (40 CFR) Sections [EXIT disclaimer](#) 144.26 and 144.83. The EPA Region 5 office has provided the inventory form, [UNDERGROUND DISCHARGE SYSTEM \(CLASS V\) INVENTORY SHEET](#), to assist you with this requirement. If the form is properly filled-out and returned to the address listed at the bottom of the instructions, this inventory requirement has been met.

Q: This form does not apply to me, since I don't have any underground discharges at my business. Do I still have to fill it out and mail it back?

A: If you are sure that this form is not applicable to you (for example, all your wastewater discharges to a municipal sewer system or onto the surface of the ground), you are not required to respond. We would appreciate your returning the form, stating the reason that this does not apply to you, so that we can remove your business from our list. But, if you are not sure where the wastewater at your facility goes, you should still fill it out to the best of your knowledge and send it to the address listed at the bottom of the instructions.

Q: What if I only lease this facility/space?

A: The operator of the business is still responsible for submitting the inventory information for the facility. If you are uncertain about any of the required information, contact the owner of the facility.

Q: What if the form was mailed to my place of residence instead of my business?

A: If your business is conducted at another location other than your residence, provide the information for that alternate site.

Q: What if I work out of my home?

A: If you work out of your home, are not on a municipal sewer, and you generate waste fluids from your business that discharge underground such as through floor drains or a septic system, you are likely operating a Class V well or a shallow waste disposal system. You should fill out the form and send it to EPA.

Q: What if I have more than one facility?

A: If you have more than one location, copy the form and fill out the required information for each individual facility and return all forms to the EPA.

Q: What if the sanitary waste (bathroom) goes to the public sewer system, but the floor drains in the garage or maintenance/shop area not connected to the sewer? A: You must provide inventory information for the wastewater discharges from the garage or maintenance/shop area. Fill out the required information for the facility and return the form to the EPA.

Q: I have a floor drain, but I never use it.

A: If you have a floor drain that is connected to a drywell, septic system or any other kind of drainage system that could discharge underground, it still is a Class V well. Just because the system currently doesn't receive fluids does not exempt you from having to provide inventory information.

Q: What if all the floor drains go into a holding tank?

A: If you have no other underground discharges at your facility, and all the waste goes to a holding tank with no underground outlet that is periodically pumped out by a licensed waste hauler, you do not have a Class V well. A septic tank, a grease separator, or a oil separator is not a holding tank. A holding tank must not have a overflow or other holes or pipes that could discharge underground.

Q: Who do I send the form to?

A: Lisa Perenchio (WU-16J), EPA Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590.

Q: I was told that I need to close my Class V well or get a permit. What does each mean?

A: The regulations require that certain Class V wells must either be closed or operate by a permit if they remain open. This is necessary so that fluids that could enter the ground through the disposal system not contaminate underground sources of drinking water.

The simplest choice is to close the Class V well, since it permanently stops possible contaminants from entering the ground, even from accidental leaks or spills. How you close your Class V well is up to you so long as its approved by EPA, and details will depend on your facility construction and operation. Closure could be as simple as permanently plugging a floor drain. It could even involve connecting to a [holding tank](#) or a municipal sewer. EPA Region 5 has prepared [guidelines](#) on how to close Class V wells.

Getting a permit is different. It starts with proving that the waste fluids in your Class V well meet [National Primary Drinking Water Standards](#) and other health based standards, and submitting a complete [Class V permit application](#) to EPA. If the application is approved and a permit is issued, the permittee must meet all permit requirements. The permit requirements will include management practices to minimize the chance of contaminants entering the wastewater. A permit will also include a schedule for sampling and reporting the chemical composition of wastewater fluids and sludge. Whether samples are collected and analyzed monthly or quarterly will depend on site-specific conditions. If any samples do not meet drinking water standards, the well must be closed or additional treatment equipment might be required. If any permit conditions are not met, enforcement action including penalties can result.

Q: Where do I collect samples from my Class V well?

A: To get an EPA permit, the regulations require that fluids released underground by a motor vehicle waste disposal well must meet [National Primary Drinking Water Standards](#) and other health based standards at the last accessible sampling point before waste fluids are released into the underground environment. This opening would be where you collect the fluid and sludge samples for analysis. For example, for a septic system that might be at the distribution box. If the distribution box is not accessible it could be the septic tank. For a drywell it could be within the drywell itself.