



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

November 18, 2025

Steven Keller  
Dayco Incorporated  
401 S. Old Woodward Avenue, Suite 308  
Birmingham, MI 48009

**RE: Draft Discharge Permit Renewal, DP-1928, Former Gulton Industries Site**

Dear Steven Keller:

The New Mexico Environment Department (NMED) hereby provides notice to you of the proposed approval of Ground Water Discharge Permit Renewal, DP-1928, (copy enclosed), pursuant to Subsection H of 20.6.2.3108 NMAC. NMED will publish notice of the availability of the draft Discharge Permit in the near future for public review and comment and will forward a copy of that notice to you.

Prior to making a final ruling on the proposed Discharge Permit, NMED will allow 30 days from the date the public notice is published in the newspaper for any interested party, including the Discharge Permit applicant, i.e., yourself, to submit written comments and/or a request a public hearing. A hearing request shall set forth the reasons why a hearing is requested. NMED will hold a hearing in response to a timely hearing request if the NMED Secretary determines there is substantial public interest in the proposed Discharge Permit.

Please review the enclosed draft Discharge Permit carefully. Please be aware that this Discharge Permit may contain conditions that require the permittee to implement operational, monitoring or closure actions by a specified deadline.

Please submit written comments or a request for hearing to my attention at the address below, via email to [melanie.sandoval2@env.nm.gov](mailto:melanie.sandoval2@env.nm.gov) or to [pps.general@env.nm.gov](mailto:pps.general@env.nm.gov), or directly into the NMED Public Comment Portal at <https://nmed.commentinput.com/comment/search>. If NMED does not receive written comments or a request for hearing during the public comment period, the draft Discharge Permit will become final.

Thank you for your cooperation during the review process. Feel free to contact me with any questions at (505) 660-7892.

Sincerely,

Melanie Sandoval, Industrial Waste Team Lead

Encl: Draft Discharge Permit Renewal, DP-1928



**NEW MEXICO ENVIRONMENT DEPARTMENT GROUND  
WATER QUALITY BUREAU**

**UNDERGROUND INJECTION CONTROL**

**GENERAL DISCHARGE PERMIT**



**Certified Mail- Return Receipt Requested**

**Facility Name:** FORMER GULTON INDUSTRIES SITE GWQ-97-003

**Facility Location:** 14800 Central Ave SE Albuquerque, NMs  
26, T10N, R4E  
Bernalillo

**Legally Responsible Party:** Dayco Incorporated  
401 S Old Woodward Ave. Suite 308  
Birmingham, Mi 48009  
(248) 404-6558

**Remediation Oversight Agency Contact:** NMED GROUNDWATER QUALITY BUREAU  
MS. KATE HERRELL  
(505) 948-0534  
STAGE 2 VOLUNTARY ABATEMENT PROGRAM  
20NMAC 6.2.D

**Remediation or Injection Plan Identification:** STAGE 2 ABATMENT PLAN FORMER GULTON  
INDUSTRIES SITE GWQ-97-003

**Permitting Action:** RENEWAL: UIC DP-1928

**PPS Contact** MS. MELANIE SANDOVAL  
  
(505) 660 7892

**EFFECTIVE DATE:** TERM ENDS:

---

**Justin D. Ball**  
**Chief, Ground Water Quality Bureau**

Version updated December 5, 2018

[Subsection H of 20.6.2.3109 NMAC, NMSA 1978, § 74-6-5.]

FORMER GULTON INDUSTRIES SITE, DP-UIC-1928

EFFECTIVE DATE: \_\_\_\_\_

## I. UIC GENERAL DISCHARGE PERMIT

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) issues this Underground Injection Control General Discharge Permit (UIC Permit) for the subsurface emplacement of additive fluids through a Class V UIC injection well for the purpose of facilitating vadose zone or groundwater remediation. The GWQB issues this UIC Permit to Dayco Incorporated (Permittee) pursuant to the New Mexico Water Quality Act (WQA), NMSA 1978 §§74-6-1 through 74-6-17, and the New Mexico Water Quality Control Commission (WQCC) Ground and Surface Water Protection Regulations, 20.6.2 NMAC.

In issuing this UIC Permit, the GWQB has determined that the requirements of Subsection C of 20.6.2.3109 NMAC have been met. The activities authorized by this UIC Permit are principally governed by 2025 STAGE 2 ABATEMENT WORK PLAN (Injection Plan), under the authority of 2025 STAGE 2 VOLUNTARY 20NMAC 6.2.D], with oversight by the NMED GROUNDWATER QUALITY BUREAU. Compliance with this UIC Permit requires compliance with the terms, requirements, and conditions of the Injection Plan. The term of this UIC Permit shall be no longer than five years from the effective date of this UIC Permit.

The injection activities, the location of the injection site, the type of injection and quantities of additives being used are briefly described as follows:

### **Injection Activities (summary: including injection well type, number of wells, and injection frequency)**

Copy of the Injection Plan Attached (required):

Summary of Injection Plan: To promote additional dechlorination of CVOCs in the immediate vicinity of wells MW-12, MW-13, MW-18, and MW-26S, groundwater treatment with HRC-3DME® material will be performed at DAY-1 and DAY-2 every six months for a period for up to 3 years. To maintain the conditions that have successfully provided dechlorination of CVOCs near the source area (the former circuit board shop), HRC-3DME® will be placed into wells INJ-1, INJ-2 and INJ-3 on an annual basis. The volume and schedule for injection of HRC-3DME® at each well is summarized in Table 3 of the attached abatement plan (and here in the application) along with the groundwater monitoring frequency. Injection treatments at DAY-1 and DAY-2 will be performed under pressure using a Geoprobe GS-1000 grout pump. The HRC-3DME® material will be warmed to between 95- and 110-degrees Fahrenheit to decrease viscosity to promote injectability using a warm water bath. At the completion of the HRC-3DME® injection, some warm water (5 to 10 gallons) will be pumped into each well to chase the HRC-3DME® from the casing and eliminate any viscous material from the well boring that may inhibit the next treatment.

HRC-3DME® will be pumped into the unconsolidated portion of the aquifer (DAY-1) and the fractured granite zone of the aquifer (DAY-2) through the screened portion of each well. Well DAY-1 is

approximately 25 feet deep, has 5-feet of 2-inch ID wire wrapped stainless screen (approximately 5501 feet to 5496 feet MSL) attached to threaded 2-inch ID galvanized riser pipe. Well DAY-2 is approximately 80 feet deep, with 15-feet of 2-inch ID wire wrapped stainless screen (approximately 5542 feet to 5557 feet MSL) attached to threaded 2-inch ID galvanized riser pipe. These wells will be fitted with pressure rated quick connection fittings to facilitate pressurized delivery of HRC-3DME® through the screened interval into the aquifer.

**Injection Site Information**

Depth to most shallow groundwater (required): 5 ft  
 Existing concentration of total dissolved solids (TDS)in groundwater (required):1200mg/L  
 Location (required): 14800 Central Ave SE, Albuquerque, NM  
 County (required): Bernalillo  
 Latitude: 35 degrees 3 min. 45sec N  
 Longitude: 106 degrees 29 min. 10 sec W  
 Map Showing Area of Injection Sites Attached (required)

**Additives Being Used (including volumes, manufacturer, and mixing ratios)**

Frequency of Groundwater Treatment and Amount of HRC-3DME® per Well

Well	Frequency of treatment	Duration of treatment	Volume/mass each treatment
DAY-1	Every 6 Months	3-years	160 pounds
DAY-2	Every 6 Months	3-years	160 pounds
INJ-1	6 Months	3-years	40 pounds
INJ-2	Annually	3-years	40 pounds
INJ-3	Annually	3-years	40 pounds

**Anticipated Precipitation, Dissolution, Adsorption, and Desorption Products**

HRC-3D-Microemulsion (HRC-3DME®) is comprised of a patented molecular structure containing oleic acids (i.e., oil component) and lactates/polylactates, which are molecularly bound to one another. The HRC-3DME® molecule contains both a soluble (hydrophilic) and insoluble (lipophilic) region. These two regions of the molecule are designed to be balanced in size and relative strength. The balanced hydrophilic/lipophilic regions of HRC-3DME® result in an electron donor with physical properties allowing it to initially adsorb to the aquifer material in the area of application, then slowly redistribute via very small HRC-3DME® “bundles” called micelles. These HRC-3DME® micelles spontaneously form within sections of the aquifer where concentrations of HRC-3DME® reach several hundred parts per million. The micelles’ small size and mobility allow it to move with groundwater flow through the aquifer matrix, passing easily through the pore throats in between soil grains resulting in the further redistribution of HRC-3DME® within the aquifer. This allows for advective distribution of the oleic acids which are otherwise insoluble and unable to distribute in this manner, allowing for increased persistence of the lactate/polylactates component due to their initial attachment to the oleic acids. The specialized chemistry of HRC-3DME® results in a staged release of electron donors: free lactate (immediate); polylactate esters (mid-range) and free fatty acids & fatty acid esters (long-term).

Material longevity of three years or greater has been seen at most sites as determined from biogeochemical analyses

A brief initial depression of pH of 1 to 2 standard units in the immediate proximity (15 to 20-foot radius) of the injection well is possible during HRC-3DME® during treatment at the Site. However, over time, the pH rebounds to pre-injection conditions. The rate of return to equilibrium is a function of the consumption by bacteria and the buffering capacity of the subsurface. Further, TDS may also increase in the immediate area of the injection. The consumption of HRC-3DME® by bacteria in an aerobic setting can produce fatty acids which can result in ketones such as 2-butanone and acetone. These ketones are both readily volatilized or consumed by bacteria in an aerobic environment. Both acetone and 2-butanone have been produced at the treatment area and are considered positive signs of HRC-3DME® activity.

### **Public Notice Posting Locations**

2 inch by 3 inch Newspaper Ad required for Renewal applications.

**Newspaper:** Albuquerque Journal

3 inch by 4 inch Newspaper Ad required for New, Modification, and Renewal/Modification applications.

**Newspaper:**

2 feet by 3 feet sign posted for 30 days in a location conspicuous to the public at or near the facility required for New, Modification, and Renewal/Modification applications.

**Sign Location:** Fence for the parking lot of Route 66 Open space

8.5 inch by 11 inch or larger posted off-site location conspicuous to the public (e.g. public library). Required for New, Modification, and Renewal/Modification applications.

**Flyer Location:** Smiths grocery at Tramway and Central

This UIC Permit consists of the complete and accurate completion of this UIC Permit form as determined by the GWQB.

Issuance of this UIC Permit does not relieve the Permittee of the responsibility to comply with the WQA, WQCC Regulations, and any other applicable federal, state and/or local laws and regulations, such as zoning requirements and nuisance ordinances.

**Signatures**

Signature must be that of the person listed as the legally responsible party on this application.

*I, the applicant, attest under penalty of law to the truth of the information and supporting documentation contained in this application for an Underground Injection Control General Discharge Permit.*

**Applicant's Signature**

Signature:	<u>Steven Keller</u>	Date:	<u>April 4, 2025</u>
Printed Name:	<u>Steven Keller</u>	Title:	<u>Director</u>

Applicant Note that Submissions Must Include:

- 1- One electronic copy of the application delivered to the GWQB via email or other format
- 2- Two hardcopies of the application delivered to: Ground Water Quality Bureau  
Harold Runnels Building  
1190 Saint Francis Drive  
P.O. Box 5469  
Santa Fe, NM 87502-5469
- 3- Payment by check or electronic transfer of one application fee of \$100.00

**II. FINDINGS**

In issuing this UIC Permit, GWQB finds:

1. The Permittee is injecting fluids so that such injections will move directly or indirectly into groundwater within the meaning of Section 20.6.2.3104 NMAC.
2. The Permittee is injecting fluids so that such fluids will move into groundwater of the State of New Mexico which has an existing concentration of 10,000 mg/L or less of TDS within the meaning of Subsection A of 20.6.2.3101 NMAC.
3. The Permittee is using a Class V UIC well as described in 20.6.2.5002(B)(5)(d)(ii) NMAC for in situ groundwater remediation by injecting a fluid that facilitates vadose zone or groundwater remediation.
4. The Permittee is injecting fluids into groundwater in order to achieve the remediation goals identified in the Injection Plan.

**III. AUTHORIZATION TO DISCHARGE**

The Permittee is authorized to inject chemical additives into groundwater in accordance with this UIC Permit and the Injection Plan under the oversight of NMED GROUNDWATER QUALITY BUREAU.

[20.6.2.3104 NMAC, Subsection C of 20.6.2.3106 NMAC, Subsection C of 20.6.2.3109 NMAC]

**IV. CONDITIONS**

The conditions of this UIC Permit shall be complied with by the Permittee and are enforceable by GWQB.

1. The Permittee shall perform remediation activities in accordance with the Injection Plan and shall notify GWQB of any changes prior to making them.

[20.6.2.3107 NMAC]

2. The Permittee shall monitor the injection activities and their effects on groundwater quality as required by the Injection Plan and shall provide GWQB with electronic copies of the required reporting and any pertinent documentation of activities at the site.

[20.6.2.3107.A NMAC, 20.6.2.3109.A NMAC]

EFFECTIVE DATE:

3. If the GWQB or the Permittee identifies any failure of the Injection Plan or this UIC Permit to comply with 20.6.2 NMAC not specifically noted herein, GWQB may require the Permittee to submit a corrective action plan and a schedule for completion of corrective actions to address the failure.

Additionally, the GWQB may require the Permittee to submit a proposed modification to the Injection Plan, this UIC Permit, or both.

[20.6.2.3107.A NMAC, 20.6.2.3109.E NMAC]

4. ADDITIONAL MONITORING REQUIREMENTS – (Note: The 2025 Stage 2 Abatement plan has semi-annual groundwater monitoring an annual reporting to the NMED GROUNDWATER QUALITY BUREAU. A copy of this plan is attached.
5. TERMINATION – Within 30 days of completion of activities authorized by this UIC Permit the Permittee shall submit a closure report and a request to terminate the UIC Permit to the GWQB for its approval. The closure report shall identify how the injection well(s) was (were) closed in accordance with the Injection Plan. The Permittee shall provide NMED GROUNDWATER QUALITY BUREAU with a copy of this closure report.

[20.6.2.5005 NMAC, 19.27.4 NMAC]

6. INSPECTION and ENTRY – The Permittee shall allow a representative of the NMED to inspect the facility and its operations subject to this UIC Permit and the WQCC regulations. The GWQB representative may, upon presentation of proper credentials, enter at reasonable times upon or through any premises in which a water contaminant source is located or in which are located any records required to be maintained by regulations of the federal government or the WQCC. The Permittee shall allow the GWQB representative to have access to, and reproduce for their use, any copy of the records, and to perform assessments, sampling or monitoring during an inspection for the purpose of evaluating compliance with this UIC Permit and the WQCC regulations.

Nothing in this UIC Permit shall be construed as limiting in any way the inspection and entry authority of GWQB under the WQA, the WQCC Regulations, or any other local, state, or federal regulations.

[20.6.2.3107.D NMAC, NMSA 1978, §§ 74-6-9.B and 74-6-9.E]

7. MODIFICATIONS and/or AMENDMENTS – In the event the Permittee proposes a change to the injection plan that would result in a change in the volume injected; the location of the injections; or the concentration of the additives being injected by the facility, the Permittee shall notify GWQB prior to implementing such changes. The Permittee shall obtain approval (which may require modification of this UIC Permit) by GWQB prior to implementing such changes.

[20.6.2.3107.C NMAC, 20.6.2.3109.E and G NMAC]

8. COMPLIANCE with OTHER LAWS – Nothing in this UIC Permit shall be construed in any way as relieving the Permittee of the obligation to comply with all applicable federal, state, and local laws, regulations, permits, or orders.

[NMSA 1978, § 74-6-5.L]

9. PERMIT FEES – Payment of permit fees is due at the time of UIC Permit approval. Permit fees shall be paid in a single payment remitted to GWQB no later than 30 days after the UIC Permit effective date.

Permit fees are associated with issuance of this UIC Permit. Nothing in this UIC Permit shall be construed as relieving the Permittee of the obligation to pay all permit fees assessed by GWQB. A Permittee that ceases injecting or does not commence injecting during the term of the UIC Permit shall pay all permit fees assessed by GWQB. An approved UIC Permit shall be suspended or terminated if the facility fails to remit a payment by its due date.

[20.6.2.3114.F NMAC, NMSA 1978, § 74-6-5.K]