



## Environmental GEO-Technologies, LLC

October 24, 2014

Mr. Allan Batka  
United States Environmental Protection Agency  
Region 5 (WU-16J)  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: EGT Annual Report

Dear Mr. Batka:

Environmental Geo-Technologies, LLC ("EGT") hereby timely submits its Annual Report in conformance with the requirements of its two EPA UIC permits [#s MI-163-1W-C010 & MI-163-1W-C011], Section II.D.2] (the "permits") and in accordance with Item 1 of your email of Friday, October 03, 2014, 4:38 pm (see Attachment A).

EGT is providing all of the attached information in the same sequence as required by Section II.D.2 of the aforementioned permits.

- A. Results of the injection fluid analyses specified in Part III(A) and (E) of the permits, and the approved Waste Analysis Plan ("WAP") as recorded in the file for the permits have already been submitted to EPA as part of each EGT Monthly Report (ten monthly reports dated 12.20.13, 01.31.14, 02.24.14, 03.31.14, 04.30.14, 05.30.14, 06.30.14, 07.31.14, 08.29.14 & 09.30.14). In reporting fluid analyses, the permittee (i.e. EGT) shall identify the waste components of the waste stream by their common name, chemical name, structure and concentration, or as approved by the Director. EGT recognized the voluminous nature of this WAP documentation submission even prior to commencing injection and chose to provide such detail on an on-going monthly basis, in part, to be as currently transparent as possible. Rather than "killing trees" by providing redundant information, EGT has referenced this already publicly available information here. EGT hereby affirms that it has met the requirements of Part I(E)(10) ['samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity'], Part II(B)(2) ['no substances other than those identified in Part III(E) of this permit shall be injected'], and Part II(C)(3) ['the permittee (i.e. EGT) shall comply with the approved Waste Analysis Plan...'].
- B. The pressure fall-off testing shall be completed by November 21, 2014 in accordance with Item 2 of your email of Friday, October 03, 2014, 4:38 pm.
- C. Results of the calibration of measuring equipment as required in Part II(C) (7) of the permits are provided in Attachment B.
- D. Documentation demonstrating the annual continuing operator training required in Part II (B) (5) of the permits for 2013 is provided in Attachment C. The annual training for 2014 is not due until 12.31.14, it is already scheduled (as usual) for November, and, once completed, certificates validating that training will be forwarded to you yet this year.

- E. The Compliance audit report required in Part II (C) (8) of the permits will be completed by November 21, 2014 and submitted to EPA no later than 60 days later, i.e., by January 19, 2015 in accordance with Item 3 of your email of Friday, October 03, 2014, 4:38pm.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

We trust that you find this report satisfactory. However, if you have any questions or comments, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Powals", written in a cursive style.

Richard J. Powals, P.E.  
Chief Operating Officer

cc: J. Frost (EGT), T. Athans (HH)

att.

rjp102414/EGTEPAAnnualReport-102414

# ATTACHMENT A

**John Frost**

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**From:** Batka, Allan <batka.allan@epa.gov>  
**Sent:** Friday, October 03, 2014 4:38 PM  
**To:** Tom Athans  
**Cc:** vugrinovichr@michigan.gov; 'Sofocles Papas'; 'Rick Powals'; jfrost@envgeotech.com  
**Subject:** RE: Compliance Dates

Tom,

Yes, the due dates outlined in your message is accurate.

Allan Batka

---

**From:** Tom Athans [mailto:tathans@heliconholdings.com]  
**Sent:** Friday, October 03, 2014 11:49 AM  
**To:** Batka, Allan  
**Cc:** vugrinovichr@michigan.gov; 'Sofocles Papas'; 'Rick Powals'; jfrost@envgeotech.com  
**Subject:** Compliance Dates

Allan,

This is to confirm our earlier discussion regarding compliance due dates.

1. The Annual Report is due October 26, 2014.
  - a. Per EGT's UIC Permit, an Annual Report is due every twelve months starting from the effective date of the permit. Since EGT did not have Authorization to Inject until November 12, 2013, EPA internally determined that an annual report was not required until 2014. Therefore, it is due on the permit effective date in 2014.
2. The Fall Off Test is due November 21, 2014.
  - a. EPA interprets the twelve month requirement to be from the date of first injection, which was November 21, 2013.
  - b. The Fall Off Test is required to be included in the Annual Report. However, because the compliance dates do not match, EPA will accept a notation in the Annual Report indicating that it will be completed by the required compliance date.
3. The Annual Audit is to be completed by November 21, 2014 and submitted to EPA no later than 60 days later.
  - a. The Audit is also required to be in the Annual Report. Again, because the compliance dates do not match, EPA will accept a notation in the Annual Report indicating that it will be completed by the required compliance date.

Please confirm that the above is an accurate reflection of our discussion this morning. As always, EGT wishes to be vigorous in its compliance with all agency requirements and we appreciate this clarification.

Regards,

Tom Athans  
Vice President  
Helicon Holdings  
28470 Citrin Drive  
Romulus, Michigan 48174

(734) 946-1000 Office  
(734) 946-1002 Fax

## ATTACHMENT B

# Environmental Geo-Technologies

Romulus, Michigan

## Injection Well Metering

### Meter Certifications

MAK-1414

MAK: Michael Lancina  
[MAKcontrolsLLC@gmail.com](mailto:MAKcontrolsLLC@gmail.com)  
(734) 770-8785

EGT: John Frost  
[jfrost@envgeotech.com](mailto:jfrost@envgeotech.com)  
(734) 946-1000



ELECTRICAL ENGINEERING | CONTROLS DESIGN  
PANEL FABRICATION | PROJECT MANAGEMENT



**Scope**

Re-certify the Injection Well Flowmeter configurations and calibrations.

**Justification**

Annual re-certification of the plant's Injection Well instrumentation.

The two Injection Well Flowmeters are critical to the operation of the plant, and necessary to meet DEQ recording requirements.

**Description**

The site operates two, parallel injection pumps. Each pump has separate metering for Annulus Pressure, Injection Pressure and Injection Flow.

The flow is measured with Rosemount Magnetic Flowmeters, Model 8742C with Foundation Fieldbus.

Communication from the transmitters to the control system (Allen-Bradely Control Logix) is all Digital - via a 1757-FFLD Foundation Fieldbus Linking Device - eliminating the traditional 4-20mA loop.

Per Rosemount Reference Manual 00809-0100-4793, Section 4: Calibration "Rosemount flowtubes are wet calibrated at the factory. They do not need further calibration during installation."

MAK Controls will Re-Certify the Magnetic Flowmeter installations by verifying the correct configuration data has been loaded into the transmitters and that the Tube Calibration Numbers, stamped onto the Flow Tubes, matches the data entered into the transmitters.

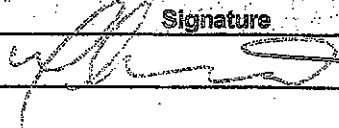
Using a 1,000-psi pressure cell, MAK Controls will check the zero and span on each of the pressure meters.

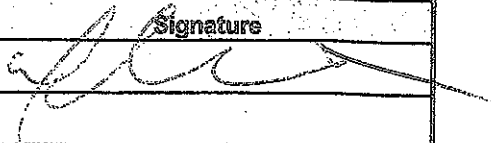
**Result**

On July 30, 2014 the operation of the Well #1 and #2 Injection metering (pressures and flow) was re-certified by Michael Lancina, PE. Both flowmeters were found to be operational and their configurations were confirmed. Each of the four Pressure transmitters were checked. One of the transmitters (PIT-3838) was found to be understating pressure by approximately 20-psi. After failing to accept a calibration method, the transmitter was replaced.

A handwritten signature in dark ink, appearing to read "Michael Lancina", with a stylized flourish at the end.



General Information							
Date Calibration Performed		July 30, 2014					
Process Measurement		Injection Pressure, Well #1					
Customer Name and Tag Number		Environmental Geo-Technologies					
Measuring Device Information							
Instrument tag number		PIT-3835		Manufacturer		Rosemount	
Model number		3051S		Serial number		58971	
Receiving Device Information							
Tag No. or Description		AB_FFLD		Manufacturer		Allen-Bradley	
Model number		1757-FFLD		Serial number			
Calibration data							
Target	Date / Time	Output Signal		Receiving device indication			
		Action	Actual	As Found:	As Left:	Deviation:	
0.0	7/30/14 3:27 PM	Zero	0.000	0.554	0.554	0.554	PSIG
500.0	7/31/14 3:34 PM	Check	501.000	500.891	500.891	-0.109	PSIG
1000.0	7/30/14 3:31 PM	Check	1029.000	1028.778	1028.778	-0.222	PSIG
1500.0							PSIG
2000.0							PSIG
Calibration test equipment used							
Equipment description		Model No.		Serial Number		Calibration Due	
Multifunction Calibrator		Fluke 725		9528015		11-Jul-15	
1000 psi pressure module		Fluke 700P08		21690809		11-Jul-15	
Remarks							
Calibration check found well within accepted error range, no adjustment made.							
Certification & Signatures							
		Name & Company			Signature		
Calib. Performed By		Michael Lancina, PE - MAK Controls					
Witnessed By		Don Anderson, EGT					
Manager review							

General Information							
Date Calibration Performed		July 30, 2014					
Process Measurement		Annulus Pressure, Well #1					
Customer Name and Tag Number		Environmental Geo-Technologies					
Measuring Device Information							
Instrument tag number	PIT-3838		Manufacturer		Rosemount		
Model number	3051S		Serial number		620406		
Receiving Device Information							
Tag No. or Description	AB FFLD		Manufacturer		Allen-Bradley		
Model number	1757-FFLD		Serial number				
Calibration data							
Target	Output Signal			Receiving device indication			
	Date / Time	Action	Actual	As Found:	As Left:	Deviation:	
0.0	7/30/14 5:02 PM	Zero	0.000	-1.002	-1.002	-1.002	PSIG
500.0	7/31/14 5:06 PM	Check	500.500	499.781	499.781	-0.719	PSIG
1000.0	7/30/14 5:04 PM	Check	1005.000	1005.200	1005.200	0.200	PSIG
1500.0							PSIG
2000.0							PSIG
Calibration test equipment used							
Equipment description	Model No.		Serial Number		Calibration Due		
Multifunction Calibrator	Fluke 725		9528015		11-Jul-15		
1000 psi pressure module	Fluke 700P08		21690809		11-Jul-15		
Remarks							
The original xmtr was approximately 20 psig out of calibration, and would not accept a new span value.							
Replaced xmtr with new unit.							
Certification & Signatures							
	Name & Company			Signature			
Calib. Performed By	Michael Lancina, PE - MAK Controls						
Witnessed By	Don Anderson, EGT						
Manager review							



Description  
Injection Well #1 Magnetic Flowmeter


Flowtube Data  
Model Number 8795THA030S6W0N0  
Line Size 3 Inch  
Calibration Number 1003808609934006  
Serial Number 0870083346  
Trace Number 561776  
Build Date August 2002  
Max Pressure 1000 psig  
Max Temperature 350 deg F  
Wet Cal. Facility Ave. Miguel de Cervantes 111, Chihuahua, Mexico 31109  
Sales Order 1061295  
Calibration Date 16-Aug-02


Transmitter Data  
Model Number 8742CFACN0A01M5B4  
Serial Number 0860136047  
Tag FIT3832 (ordered as FIT4004).

Certification  
On 30-July-2014, Environmental Geo-Technologies' Injection Well #1 Flow Metering equipment was investigated as follows:  
  
I have observed that this flowmeter is properly configured: the calibration numbers on the meter tube, on the Wet Calibration data sheet and in the transmitter's Transducer Block all match.  
  
I have also confirmed that transmitter's Analog Input block is properly configured, reporting flow in Gallons Per Minute (GPM). Furthermore, the transmitter's Integrator block is configured to totalize Gallons on a Minute basis.  
  
Finally, I have observed that both the Flow Rate and Accumulated Flow, calculated by the Transmitter, is being properly displayed by the HMI software (Intellution Dynamics).  
  
I certify that to the best of my knowledge and belief all of the information on this form is correct.

Signed

Name Michael Lancina, PE  
Title President / Chief Engineer, MAK Controls  
Date 17-Aug-14

General Information							
Date Calibration Performed		July 30, 2014					
Process Measurement		Injection Pressure, Well #2					
Customer Name and Tag Number		Environmental Geo-Technologies					
Measuring Device Information							
Instrument tag number		PIT-3932		Manufacturer		Rosemount	
Model number		3051S		Serial number		58975	
Receiving Device Information							
Tag No. or Description		AB_FFLD		Manufacturer		Allen-Bradley	
Model number		1757-FFLD		Serial number			
Calibration data							
Target	Output Signal			Receiving device indication			
	Date / Time	Action	Actual	As Found:	As Left:	Deviation:	
0.0	7/30/14 4:03 PM	Zero	0.000	-1.034	-1.034	-1.034	PSIG
500.0	7/31/14 4:13 PM	Check	499.000	499.466	499.466	0.466	PSIG
1000.0	7/30/14 4:11 PM	Check	1001.000	1002.490	1002.490	1.490	PSIG
1500.0							PSIG
2000.0							PSIG
Calibration test equipment used							
Equipment description		Model No.		Serial Number		Calibration Due	
Multifunction Calibrator		Fluke 725		9528015		11-Jul-15	
1000 psi pressure module		Fluke 700P08		21690809		11-Jul-15	
Remarks							
Calibration check found well within accepted error range, no adjustment made.							
Certification & Signatures							
		Name & Company			Signature		
Calib. Performed By		Michael Lancina, PE - MAK Controls					
Witnessed By		Don Anderson, EGT					
Manager review							

General Information							
Date Calibration Performed		July 30, 2014					
Process Measurement		Annulus Pressure, Well #2					
Customer Name and Tag Number		Environmental Geo-Technologies					
Measuring Device Information							
Instrument tag number	PIT-3935		Manufacturer		Rosemount		
Model number	3051S		Serial number		259647		
Receiving Device Information							
Tag No. or Description	AB_FFLD		Manufacturer		Allen-Bradley		
Model number	1757-FFLD		Serial number				
Calibration data							
Target	Output Signal			Receiving device indication			
	Date / Time	Action	Actual	As Found:	As Left:	Deviation:	
0.0	7/30/14 4:07 PM	Zero	0.000	0.312	0.312	0.312	PSIG
500.0	7/31/14 4:24 PM	Check	500.500	500.663	500.663	0.163	PSIG
1000.0	7/30/14 4:21 PM	Check	1006.000	1006.005	1006.005	0.005	PSIG
1500.0							PSIG
2000.0							PSIG
Calibration test equipment used							
Equipment description	Model No.		Serial Number		Calibration Due		
Multifunction Calibrator	Fluke 725		9528015		11-Jul-15		
1000 psi pressure module	Fluke 700P08		21690809		11-Jul-15		
Remarks							
Calibration check found well within accepted error range, no adjustment made.							
Certification & Signatures							
	Name & Company			Signature			
Calib. Performed By	Michael Lancina, PE - MAK Controls						
Witnessed By	Don Anderson, EGT						
Manager review							



Description  
Injection Well #2 Magnetic Flowmeter

Flowtube Data  
Model Number 8795THA030S6W0N0  
Line Size 3 inch  
Calibration Number 1038406310340005  
Serial Number 0870083347  
Trace Number 561777  
Build Date August 2002  
Max Pressure 1000 psig  
Max Temperature 350 deg F  
Wet Cal. Facility Ave. Miguel de Cervantes 111, Chihuahua, Mexico 31108  
Sales Order 1061295  
Calibration Date 16-Aug-02

Transmitter Data  
Model Number 8742CFACN0A01M5B4  
Serial Number 0860136048  
Tag FIT3932 (ordered as FIT4024).

Certification  
On 30-July-2014, Environmental Geo-Technologies' Injection Well #1 Flow Metering equipment was investigated as follows:  
  
I have observed that this flowmeter is properly configured: the calibration numbers on the meter tube, on the Wet Calibration data sheet and in the transmitter's Transducer Block all match.  
  
I have also confirmed that transmitter's Analog Input block is properly configured, reporting flow in Gallons Per Minute (GPM). Furthermore, the transmitter's Integrator block is configured to totalize Gallons on a Minute basis.  
  
Finally, I have observed that both the Flow Rate and Accumulated Flow, calculated by the Transmitter, is being properly displayed by the HMI software (Intellution Dynamics).  
  
I certify that to the best of my knowledge and belief all of the information on this form is correct.

Signed

A handwritten signature in black ink, appearing to read "Michael Lancina", written over a horizontal line.

Name Michael Lancina, PE  
Title President / Chief Engineer, MAK Controls  
Date 17-Aug-14



Index	Device	Description	Page	File Name	File Type
1	1757-FFLD	Fieldbus Communication Diagram	Page 1	Fieldbus Network	.JPG
2	PIT-3838	Resource Block Configuration	Page 1	new PIT3838 Serial Number	.JPG
3	PIT-3838	Transducer Block @ Span	Page 1	new PIT3838 Span 1005	.JPG
4	PIT-3838	Transducer Block @ Zero	Page 1	new PIT3838 Zero	.JPG
5	PIT-3838	Transducer Block @ Span	Page 1	PIT3838 Span 1001	.JPG
6	PIT-3838	Transducer Block @ Zero	Page 1	PIT3838 Zero	.JPG
7	PIT-3835	Resource Block Configuration	Page 1	PIT3835 Serial Number	.JPG
8	PIT-3835	Transducer Block @ Span	Page 1	PIT3835 Span 1029	.JPG
9	PIT-3835	Transducer Block @ Zero	Page 1	PIT3835 Zero	.JPG
10	PIT-3932	Resource Block Configuration	Page 1	PIT3932 Serial Number	.JPG
11	PIT-3932	Transducer Block @ Span	Page 1	PIT3932 Span 1001	.JPG
12	PIT-3932	Transducer Block @ Zero	Page 1	PIT3932 Zero	.JPG
13	PIT-3935	Resource Block Configuration	Page 1	PIT3935 Serial Number	.JPG
14	PIT-3935	Transducer Block @ Span	Page 1	PIT3935 Span 1006	.JPG
15	PIT-3935	Transducer Block @ Zero	Page 1	PIT3935 Zero	.JPG
16	Injection Well #1	Resource Block Configuration	Page 1	FIT3832_RB 1	.JPG
17	Injection Well #1	Resource Block Configuration	Page 2	FIT3832_RB 2	.JPG
18	Injection Well #1	Resource Block Configuration	Page 3	FIT3832_RB 3	.JPG
19	Injection Well #1	Transducer Block Configuration	Page 1	FIT3832_TRD 1	.JPG
20	Injection Well #1	Transducer Block Configuration	Page 2	FIT3832_TRD 2	.JPG
21	Injection Well #1	Transducer Block Configuration	Page 3	FIT3832_TRD 3	.JPG
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23	Injection Well #1	Analog Input Block Configuration	Page 1	FIT3832_FLW 1	.JPG
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26	Injection Well #1	Integrator Block Configuration	Page 1	FIT3832_INT 1	.JPG
27	Injection Well #1	Integrator Block Configuration	Page 2	FIT3832_INT 2	.JPG
28	Injection Well #2	Resource Block Configuration	Page 1	FIT3932_RB 1	.JPG
29	Injection Well #2	Resource Block Configuration	Page 2	FIT3932_RB 2	.JPG
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31	Injection Well #2	Transducer Block Configuration	Page 1	FIT3932_TRD 1	.JPG
32	Injection Well #2	Transducer Block Configuration	Page 2	FIT3932_TRD 2	.JPG
33	Injection Well #2	Transducer Block Configuration	Page 3	FIT3932_TRD 3	.JPG
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35	Injection Well #2	Analog Input Block Configuration	Page 1	FIT3932_FLW 1	.JPG
36	Injection Well #2	Analog Input Block Configuration	Page 2	FIT3932_FLW 2	.JPG
37	Injection Well #2	Analog Input Block Configuration	Page 3	FIT3932_FLW 3	.JPG
38	Injection Well #2	Integrator Block Configuration	Page 1	FIT3932_INT 1	.JPG
39	Injection Well #2	Integrator Block Configuration	Page 2	FIT3932_INT 2	.JPG
40	8742C Transmitter	Reference Manual 00809-0100-4793	rev CA	8742C Manual	.PDF



The terms and conditions stated below shall become a part of any service agreement or contract including services by MAK Controls LLC (hereinafter "MAK Controls")

#### **1. COMPENSATION:**

Unless otherwise agreed to by MAK Controls, the Purchaser will pay MAK Controls for services rendered which shall be invoiced at the hourly rates applicable to the type of service(s) provided by the MAK Controls employee(s) during the billing period. Services shall include the travel spent to Purchaser's place of business from the office or home of the MAK Controls employees. Purchasers shall reimburse MAK Controls for reasonable out of pocket expenses as defined in Section 8. Payments must be made in full within 30 days of the dates of the invoices.

#### **2. TAXES AND OTHER CHARGES:**

The Purchaser shall pay MAK Controls an additional amount equal to any taxes, duties or charges by any governmental or quasi-governmental authority which accrues due to this contract except for taxes on net income.

#### **3. SCOPE CHANGES:**

Any changes in the scope of order other than for services or any material change in the scope of an order for services must be documented in writing by the Purchaser and subject to incorporation in the original agreement by written approval by an Officer of MAK Controls. Any of these changes authorized by Purchaser may result in price, delivery and/or condition changes. Price changes shall be on the then current rates.

#### **4. NORMAL WORK DAY:**

The normal workday shall be an eight (8) hour day shift excluding Saturdays, Sundays and holidays observed by MAK Controls.

#### **5. OVERTIME:**

Any service or travel not performed or done during a normal workday shall be invoiced at MAK Controls's overtime rate only when agreed to by Purchaser.

#### **6. SHIFT WORK:**

When shift work (eight (8) hour shifts other than the normal work day) is required, a twenty percent (20%) premium shall be added for service during the other shifts. Overtime rates plus twenty percent (20%) shall be applicable for work in excess of eight (8) hours during these other shifts.

#### **7. ADVANCED COMMITMENTS:**

Service time committed in advance by MAK Controls on the basis of a pre-specified number of days shall not be deemed to include overtime or shift work. If overtime or shift work is required on such commitments, the pre-specified time so committed in advance shall be appropriately reduced.

#### **8. EXPENSES:**

Unless otherwise agreed upon in writing, Purchaser shall reimburse MAK Controls for expenses as follows:

- A. Automobile travel expenses shall be reimbursed on the basis of the current IRS approved standard mileage rate.
- B. All other travel and living expenses shall be reimbursed at cost.
- C. Applicable communication expense accrued on the job shall be reimbursed at cost.

Travel time and expenses shall accrue from the point of origin. Airline travel shall be at Coach class unless Purchaser's needs versus seat availability dictates otherwise. Living accommodations shall be of business class quality unless unavailable in which case the next best available accommodations shall be selected.

#### **9. DELAYS**

Unless the MAK Controls representative has been released from the jobsite, or has completed his assignment, the Purchaser will pay MAK Controls charges computed as if the MAK Controls representative was working a normal work week, regardless of whether or not the representative is prevented from working due to delays beyond this control. Release from the jobsite shall entitle the representative to return to his point of origin, with travel time and expenses for the account of Purchaser.

#### **10. STANDBY TIME:**

Standby time is defined as the time during which a MAK Controls representative is requested to remain in readiness and available for work commencing at the convenience of the Purchase. Such time shall be considered as time worked, whether or not the representative is at the jobsite, and Purchaser will be billed accordingly. If standby time is outside normal working hours, overtime rates will be applicable. Standby time will be added to time actually worked for the computation of overtime.

#### **11. WORKING CONDITIONS:**

The MAK Controls representative reserves the right to refuse to work under hazardous conditions. In case of doubt, mutual agreement must be reached prior to commencement of any work. All staging and rigging required for access to equipment to be serviced shall be erected by and at the expense of others and shall comply with reasonable safety requirements. The MAK Controls representative shall comply with all plant regulations where applicable. However, any clothing or equipment, except the standard safety hat, safety glasses, safety shoes, and nomex coveralls, shall be provided by Purchaser.

#### **12. LIMITATION OF LIABILITY:**

MAK Controls representatives are authorized to act only in a consulting capacity and are not authorized or licensed to operate equipment. All responsibility for operating equipment shall rest with others. Except as provided in Paragraph 14, MAK Controls shall not be liable for loss or damage of any nature.

#### **13. TOOLS AND TEST EQUIPMENT:**

The MAK Controls representative will be equipped with instruments, tools and test equipment as required to fulfill service obligations.

#### **14. INSURANCE INDEMNITY:**

MAK Controls will at Purchaser's request submit Certificates of Insurance from Sureties chosen by MAK Controls showing the limits of coverage. MAK Controls agrees to indemnify and save harmless Purchaser only against liability imposed on Purchaser by law with respect to bodily injury or property damage to the extent such liability results from the performance of MAK Controls under this contract. MAK Controls does not agree to indemnify and save Purchaser harmless except as set forth herein. Purchaser agrees to indemnify and save harmless MAK Controls for all loss, cost or damage incurred by MAK Controls as a result of Purchaser's or third party's misuse of misapplication of MAK Controls's supplied products. IN NO EVENT, REGARDLESS OF CAUSE, SHALL MAK Controls BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGE EITHER REAL OR ALLEGED.

#### **15. MISCELLANEOUS:**

The validity, construction, and interpretation of any agreement relating to service provided by MAK Controls, and the rights and duties of the parties thereto, shall be governed by the laws of the State of Michigan. No waiver, alteration, or modification to any of the provisions hereunder or the provision of any agreement relating to service provided by MAK Controls shall be binding on MAK Controls unless signed by an Officer of MAK Controls.





Automation Products Group, Inc.  
1025 West 1700 North  
Logan, UT 84321

Tel: 435-753-7300  
Fax: 435-753-7490  
www.apgsensors.com

## NIST CALIBRATION DATA

<b>Certificate Number:</b> 420311		<b>RANGE</b> 3000 PSI S	<b>RATED ACCURACY</b> +/- 0.25 % FS BFSL	<b>OUTPUT</b>	
<b>MODEL NUMBER:</b> PG-3000			<b>ACTUAL LINEARITY</b> 0.09 % FS	<b>ACTUAL HYST.</b> 0.03 % FS	
<b>PART NUMBER</b> 548010-1271	<b>SERIAL NUMBER</b> U0951		<b>CALIBRATION RESULTS</b>		
<b>WORK PERFORMED:</b>  <input checked="" type="checkbox"/> CALIBRATE TO MFG. SPEC. IN ACCORDANCE WITH 9001749  <input checked="" type="checkbox"/> CALIBRATE IN COMPLIANCE WITH ANSI / NCSL Z540.1  <input checked="" type="checkbox"/> REPAIR  <input type="checkbox"/> NEW ITEM  <b>REMARKS:</b>			<b>DISPLAY</b>	<b>PRESSURE</b>	<b>OUTPUT</b>
			0	0	N / A
			597	600	N / A
			1195	1200	N / A
			1796	1800	N / A
			2397	2400	N / A
			3000	3000	N / A
			2397	2400	N / A
			1796	1800	N / A
			1196	1200	N / A
597	600	N / A			
0	0	N / A			
<b>P.O. NUMBER</b> 70-15965	<b>SALES ORDER NUMBER</b> 212331	<b>CUSTOMER I.D.</b>	<b>DATE OF TEST</b> 3/10/2014	<b>DUE DATE</b>	

The calibration 'Due Date' has purposely been left blank, as APG will not dictate to our customers when they should re-calibrate their instruments.

### STANDARD USED

MFG.	MODEL	INSTRUMENT	SERIAL #	ACCURACY	CAL DATE	RECAL DATE	CERT NUMBER	SOURCE
AMETEK	T-150-1/C	Dead Weight	98097	+/-0.025%	12/19/2013	1/6/2015	6339683	Simco
ENVIRONMENT		TEMP.	70	DEG.F	HUMIDITY		27 %	

PERFORMED BY: Daniel Bardwell  
Technician Name and Stamp

### CALIBRATION REPORT - STATEMENT OF TRACEABILITY

This instrument has been checked for accuracy, recalibrated to manufacturer's specifications using Best Fit Straight Line (BFSL), and found to be within the specified tolerance (unless otherwise note). The instruments used in this calibration are traceable to the National Institute of Standards and Technology (NIST) through certification documents on file at APG. APG is in compliance with ANSI/NCSL Z540.1.

This report shall not be reproduced except in full, without the written approval of APG.



Automation Products Group, Inc.  
1025 West 1700 North  
Logan, UT 84321

Tel: 435-753-7300  
Fax: 435-753-7490  
www.apgsensors.com

## NIST CALIBRATION DATA

<b>Certificate Number:</b> 420312		<b>RANGE</b> 2000 PSI S	<b>RATED ACCURACY</b> +/- 0.25 % FS BFSL	<b>OUTPUT</b>	
<b>MODEL NUMBER:</b> PG-3000			<b>ACTUAL LINEARITY</b> 0.03 % FS	<b>ACTUAL HYST</b> 0.05 % FS	
<b>PART NUMBER</b> 548010-0722	<b>SERIAL NUMBER</b> Z3339		<b>CALIBRATION RESULTS</b>		
<b>WORK PERFORMED:</b> <input checked="" type="checkbox"/> CALIBRATE TO MFG. SPEC. IN ACCORDANCE WITH 9001749 <input checked="" type="checkbox"/> CALIBRATE IN COMPLIANCE WITH ANSI / NCSL Z540.1 <input type="checkbox"/> REPAIR <input type="checkbox"/> NEW ITEM  <b>REMARKS:</b>			<b>DISPLAY</b>	<b>PRESSURE</b>	<b>OUTPUT</b>
			0	0	N / A
			400	400	N / A
			800	800	N / A
			1201	1200	N / A
			1601	1600	N / A
			1999	1999	N / A
			1601	1600	N / A
			1201	1200	N / A
			801	800	N / A
400	400	N / A			
0	0	N / A			
<b>P.O. NUMBER</b> 70-15965	<b>SALES ORDER NUMBER</b> 212331	<b>CUSTOMER I.D.</b>	<b>DATE OF TEST</b> 3/10/2014	<b>DUE DATE</b>	

The calibration 'Due Date' has purposely been left blank, as APG will not dictate to our customers when they should re-calibrate their instruments.

### STANDARD USED

MFG.	MODEL	INSTRUMENT	SERIAL #	ACCURACY	CAL DATE	RECAL DATE	CERT NUMBER	SOURCE
AMETEK	T-150-1/C	Dead Weight	98097	+/-0.025%	12/19/2013	1/6/2015	6339683	Simco
ENVIRONMENT		TEMP.	70	DEG.F	HUMIDITY		27%	

PERFORMED BY: Daniel Bardwell *DB*  
Technician Name and Stamp

### CALIBRATION REPORT - STATEMENT OF TRACEABILITY

This instrument has been checked for accuracy, recalibrated to manufacturer's specifications using Best Fit Straight Line (BFSL), and found to be within the specified tolerance (unless otherwise noted). The instruments used in this calibration are traceable to the National Institute of Standards and Technology (NIST) through certification documents on file at APG. APG is in compliance with ANSI/NCSL Z540.1.

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10/21/14 @ 12:32 PM / by J.H.

PH Meter Calibration

offset -3.6mV

$\bar{X}$  Slope = 95.67

Cal 5725 4.01

7.01

10.01

## ATTACHMENT C

# INTEGRATED ENVIRONMENTAL, INC.

## *Certificate of Achievement*

This Is To Certify That

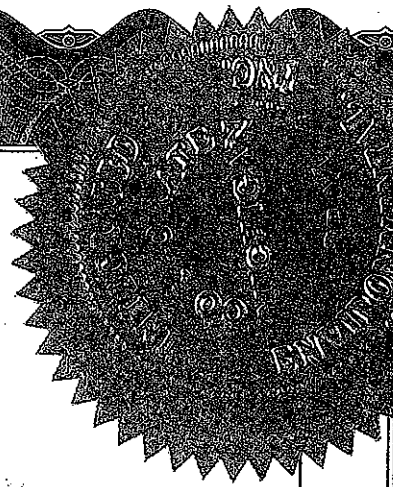
**Don Anderson**

Has Completed The Following Training:

RCRA Compliance Annual Refresher Training for  
Environmental Geo-Technologies, LLC  
November 11 and 13, 2013

  
Rick P. Harding, Ph.D.

18 Nov 2013  
Date



# INTEGRATED ENVIRONMENTAL, INC.

## *Certificate of Achievement*

This Is To Certify That

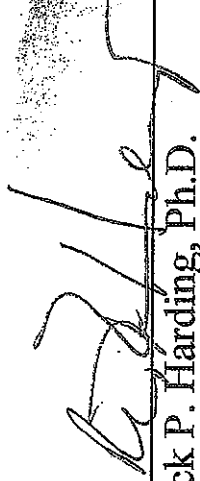
**Don Anderson**

Has Completed The Following Training:

OSHA 29 CFR Part 1910.120  
Hazardous Waste Operations and Emergency Response  
8-Hour Refresher Training

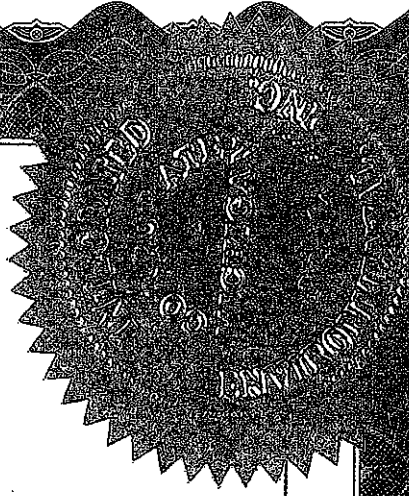
Environmental Geo-Technologies, LLC

November 11 and 13, 2013

  
Rick P. Harding, Ph.D.

Date

18 NOV 2013





# INTEGRATED ENVIRONMENTAL, INC.

## *Certificate of Achievement*

This Is To Certify That

**Don Anderson**

Has Completed The Following Training:

Environmental Geo-Technologies Training Modules as Presented in A10 B 2, Attachment 4  
of the Environmental Geo-Technologies Operating License, Issued September 26, 2011:  
1, 2, 3, 5 through 29 and 31 through 51; and the Revised Hazard Communication Standard for  
Labeling and Safety Data Sheets

Environmental Geo-Technologies, LLC

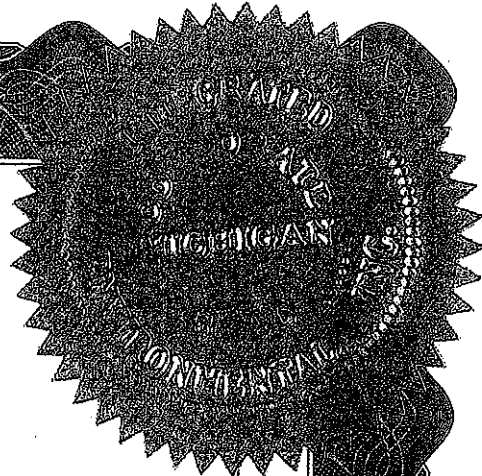
November 11 and 13, 2013



Rick P. Harding, Ph.D.

18 Nov 2013

Date



# State of Michigan Department of Environmental Quality



This is to certify that  
Donald A. Anderson

Is qualified under the rules governing the certification of  
Waste Treatment Plant Operators  
to operate any  
Industrial or Commercial treatment facility  
of the classifications listed hereunder

Classification  
A-2g

Certificate Number: W 6227

Expiration Date: July 1, 2018

ISSUED BY THE DIRECTOR OF THE DEPARTMENT OF ENVIRONMENTAL QUALITY  
UNDER AUTHORITY OF ACT 451 P.A. 1994 AS AMENDED

EQP 3450-2  
REV. 3/2011



# INTEGRATED ENVIRONMENTAL, INC.

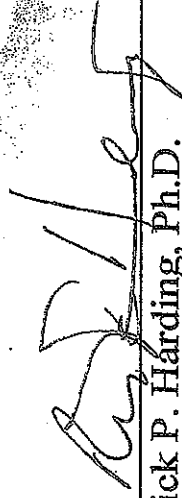
## *Certificate of Achievement*

This Is To Certify That:

**John Frost**

Has Completed The Following Training:

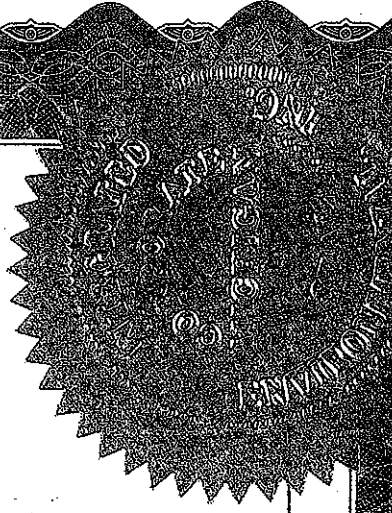
OSHA 29 CFR Part 1910.120  
Hazardous Waste Operations and Emergency Response  
8-Hour Refresher Training  
Environmental Geo-Technologies, LLC  
November 11 and 13, 2013



Rick P. Harding, Ph.D.

Date

19 Nov 2013



# INTEGRATED ENVIRONMENTAL, INC.


## *Certificate of Achievement*

This Is To Certify That

**John Frost**

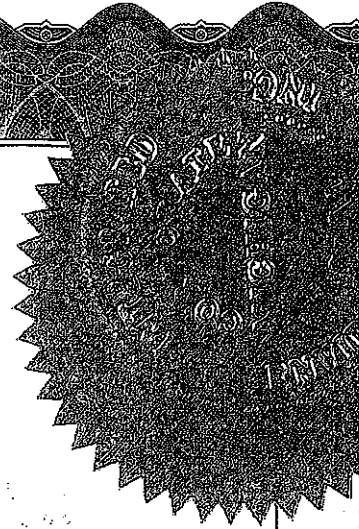
Has Completed The Following Training:

RCRA Compliance Annual Refresher Training for  
Environmental Geo-Technologies, LLC  
November 11 and 13, 2013

  
Rick P. Harding, Ph.D.

Date

18 Nov 2013



# INTEGRATED ENVIRONMENTAL, INC.

## *Certificate of Achievement*

This Is To Certify That:

**John Frost**

Has Completed The Following Training:

Environmental Geo-Technologies Training Modules as Presented in A10.B.2, Attachment 4  
of the Environmental Geo-Technologies Operating License, Issued September 26, 2011:  
1, 2, 3, 5 through 29 and 31 through 31; and the Revised Hazard Communication Standard for

Labeling and Safety Data Sheets  
Environmental Geo-Technologies, LLC  
November 11 and 13, 2013

*Rick P. Harding*

Rick P. Harding, Ph.D.

Date

18 Nov 2013

