

December 31, 2016

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 2016 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].

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

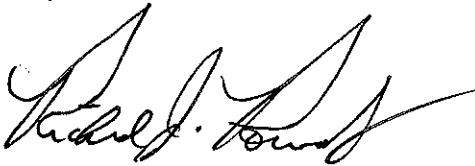
- A. Results of the injection fluid analyses specified in Part III(A) and (E) of the permits, and the approved Waste Analysis Plan ("WAP") as recorded in the file for the permits have already been submitted to EPA as part of each EGT Monthly Report [monthly reports dated 12.20.13, 01.31.14, 02.24.14, 03.31.14, 04.30.14, 05.30.14, 06.30.14, 07.31.14, 08.29.14, 09.30.14, 10.31.14, 11.26.14, 12.26.14, 01.30.15, 02.27.15, 03.31.15, 04.30.15, 05.29.15, 06.30.16, 07.30.15, 08.31.15, 09.30.15, 10.30.15, 11.30.15 & 12.31.15, 01.29.16, 02.19.16, 03.31.16, 04.29.16, 05.31.16, 06.30.16, 07.29.16, 08.31.16, 09.30.16, 10.31.16, 11.30.16 and 12.30.16]. 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 most recent Mechanical Integrity Testing & Pressure Fall-off Testing reports (for both wells) were submitted to EPA on September 19, 2016.
- C. Results of the calibration of measuring equipment as required in Part II(C) (7) of the permits are provided in Attachment A.

- D. Records documenting the annual continuing operator training required in Part II (B) (5) of the permits for 2016 are provided in Attachment B.
- E. EGT has already complied with the Compliance audit report submission requirement in Part II (C) (8) of the permits by submitting the independent third-party (NTH Consultants, Ltd.) Compliance Audit (dated 12.16.16) on December 16, 2016.

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,



Richard J. Powals, P.E.
Vice President

cc: J. Frost (EGT), T. Athans (EGT), P. Sullivan (EGT)

att.

rjp123116/ EGT EPA Annual Report-123116

ATTACHMENT A

Environmental Geo-Technologies, LLC
28470 Citrin Dr.
Romulus, MI 48174

pH Probe Calibration Log

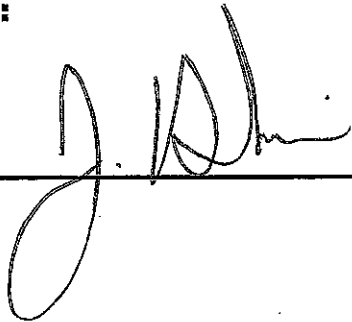
ID: AE3703

Location: Well Pit Area vicinity of Filters

Calibration Date: July 7, 2016

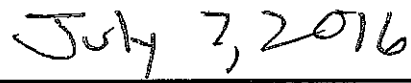
Calibration Performed by:

Name:



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

Date:



A handwritten date in black ink, "July 7, 2016", written over a horizontal line.



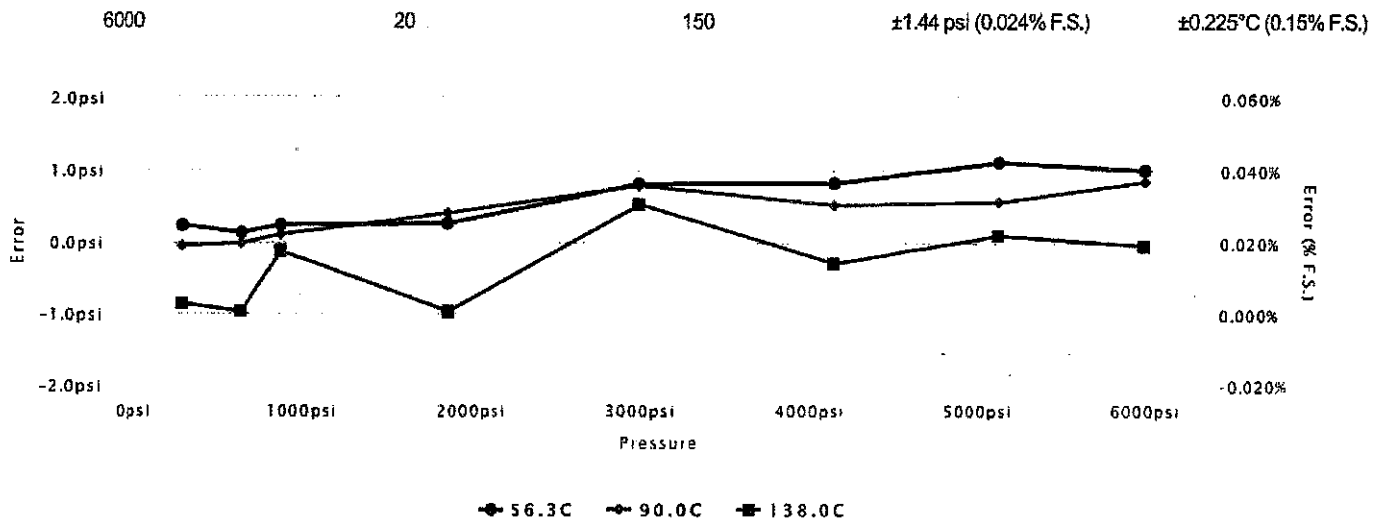
2900 E. 29th St.
 Long Beach, CA 90806 USA
 Tel: +1 (562) 595-0661
 Fax: (562) 426-7897
 www.kusterco.com

Calibration Certificate of Conformance

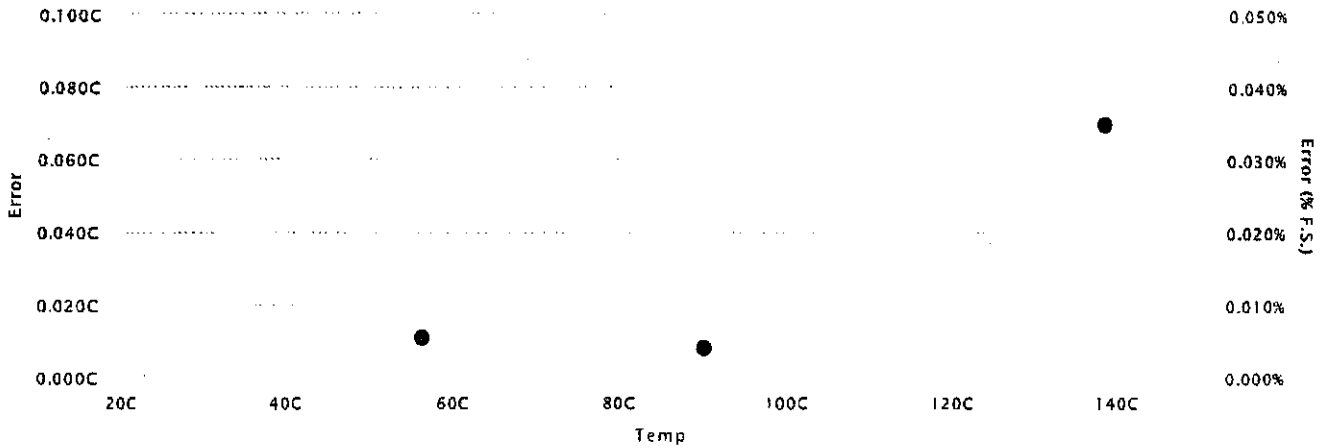
9847

AKS PR625

Jun-25-2016



Max Error: 1.107psi (0.018% F.S.)



Max Error: 0.07°C (0.046% F.S.)

CALIBRATION STANDARDS

Pressure: Fluke Piston Gauge (Uncertainty: $\pm 40\text{Pa} + (25\text{ ppm} + 0.04\text{ ppm/MPa})$)
 Temperature: Fluke PRT Temperature Reference (Accuracy: $\pm 0.018\text{ }^\circ\text{C}$)
 Fluke Metrology Well (Accuracy: $\pm 0.016\text{ }^\circ\text{C}$)

TRACEABILITY

All working standards are traceable to the National Institute of Standards and Technology (NIST), United States

Calibrated By: [Signature]

Date: Jun-25-2016

Approved By: [Signature]

Date: Jun-25-2016

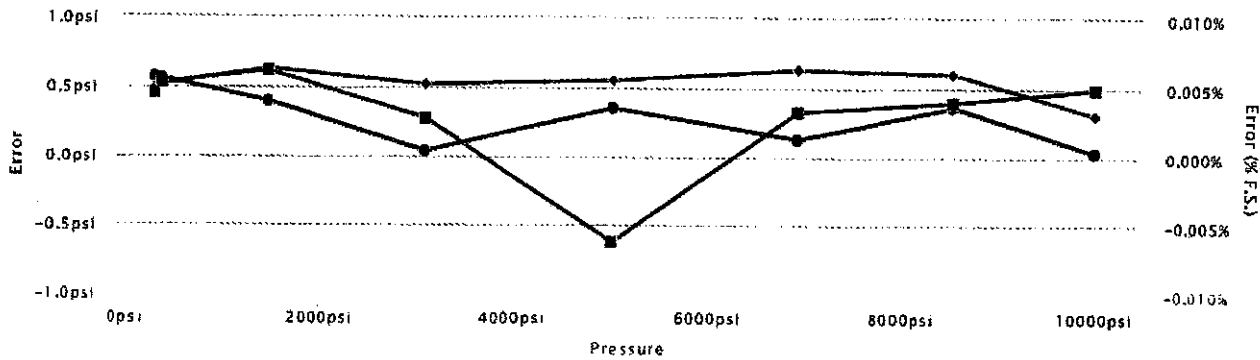


2900 E. 29th St
 Long Beach, CA 90806 USA
 Tel: +1 (562) 595-0861
 Fax: (562) 426-7897
 www.kusterco.com

Calibration Certificate of Conformance

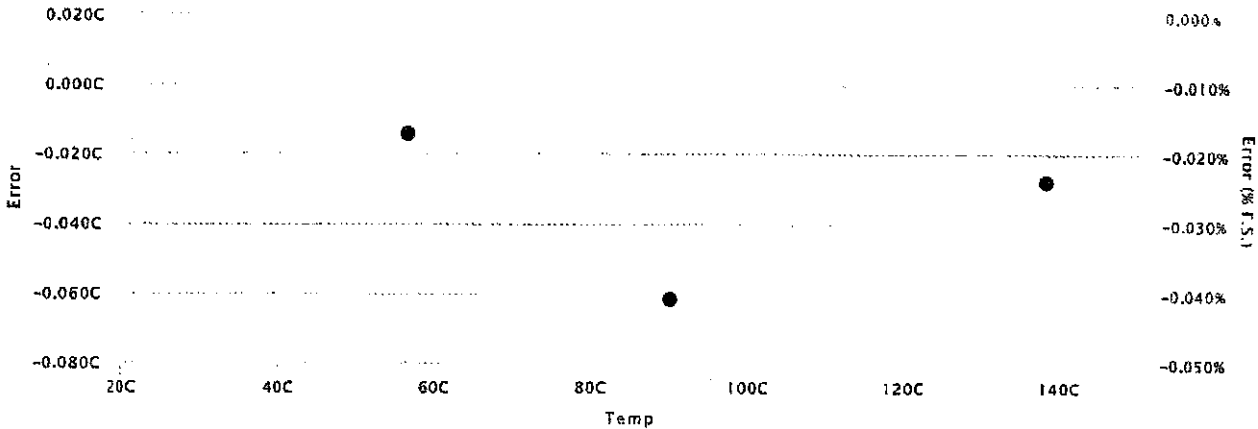
Serial No.	Model	Calibration Date
40010	AKS PR625	Jun-09-2016

Pressure Range (psi)	Temp Range (°C)	Temp Range (°F)	Pressure Spec.	Temp Spec.
10000	20	150	±2.4 psi (0.024% F.S.)	±0.225°C (0.15% F.S.)



● 56.2°C ■ 90.0°C ▲ 138.0°C

Max Error: 0.629psi (0.006% F.S.)



Max Error: -0.062°C (-0.041% F.S.)

CALIBRATION STANDARDS

Pressure: Fluke Piston Gauge (Uncertainty: $\pm 40\text{Pa} + (25\text{ ppm} + 0.04\text{ ppm/MPa})$)
 Temperature: Fluke PRT Temperature Reference (Accuracy: $\pm 0.018\text{ }^\circ\text{C}$)
 Fluke Metrology Well (Accuracy: $\pm 0.016\text{ }^\circ\text{C}$)

TRACEABILITY

All working standards are traceable to the National Institute of Standards and Technology (NIST), United States

Calibrated By: [Signature]

Date: Jun-09-2016

Approved By: [Signature]

Date: Jun-09-2016



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

Certificate Number: 423006		RANGE 2000 PSI G	RATED ACCURACY +/- 0.25 % FS <small>BFSL</small>	OUTPUT N/A	
MODEL NUMBER: PG-3000-2000-PSIG-EX-L7-P1-N1-M1			ACTUAL LINEARITY 0.02 % FS	ACTUAL HYST. 0.05 % FS	
PART NUMBER 548010-0722	SERIAL NUMBER Z3339		CALIBRATION RESULTS		
WORK PERFORMED: <input type="checkbox"/> NEW ITEM, CALIBRATE TO MFG. SPEC IN ACCORDANCE WITH 9003101 <input checked="" type="checkbox"/> REPAIR, CALIBRATE TO MFG. SPEC IN ACCORDANCE WITH 9001749 <input checked="" type="checkbox"/> CALIBRATE IN COMPLIANCE WITH ANSI / NCSL Z540.1 REMARKS:			READING	PRESSURE	OUTPUT
			0	0	N/A
			400	400	N/A
			800	800	N/A
			1200	1200	N/A
			1600	1600	N/A
			1999	2000	N/A
			1601	1600	N/A
			1200	1200	N/A
			800	800	N/A
399	400	N/A			
0	0	N/A			
P.O. NUMBER	SALES ORDER NUMBER 213760	CUSTOMER I.D.	DATE OF TEST 3/3/2016	DUE DATE	

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%	2/22/2016	2/22/2017	1000709587	Quality Calibr
CONTROL CO	Traceable	HUMIDITY/TEMP	140202027	+/- 1%	8/25/2015	8/25/2016	4088-7008525	Control Co.

ENVIRONMENT	TEMP. 72	DEG.F	HUMIDITY 20 %
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PERFORMED BY:

Karl Gibbons



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

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

Certificate Number: 423007		RANGE 3000 PSI S	RATED ACCURACY +/- 0.25 % FS <small>BFSL</small>	OUTPUT N/A	
MODEL NUMBER: PG-3000-3000-PSIS-L7-EX-P1-N1-M1			ACTUAL LINEARITY 0.10 % FS	ACTUAL HYST. 0.10 % FS	
PART NUMBER 548010-1271	SERIAL NUMBER U0951		CALIBRATION RESULTS		
WORK PERFORMED: <input type="checkbox"/> NEW ITEM, CALIBRATE TO MFG. SPEC IN ACCORDANCE WITH 9003101 <input checked="" type="checkbox"/> REPAIR, CALIBRATE TO MFG. SPEC IN ACCORDANCE WITH 9001749 <input checked="" type="checkbox"/> CALIBRATE IN COMPLIANCE WITH ANSI / NCSL Z540.1			READING	PRESSURE	OUTPUT
			0	0	N/A
			596	600	N/A
			1196	1200	N/A
			1795	1800	N/A
			2397	2400	N/A
			3001	3000	N/A
			2399	2400	N/A
			1798	1800	N/A
			1197	1200	N/A
598	600	N/A			
0	0	N/A			
REMARKS: Before test, zero was adjusted -11 counts					
P.O. NUMBER	SALES ORDER NUMBER 213760	CUSTOMER I.D.	DATE OF TEST 3/3/2016	DUE DATE	

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%	2/22/2016	2/22/2017	1000709587	Quality Calibr
CONTROL CO	Traceable	HUMIDITY/TEMP	140202027	+/- 1%	8/25/2015	8/25/2016	4088-7008625	Control Co.

ENVIRONMENT	TEMP. 72	DEG.F	HUMIDITY 20 %
--------------------	-----------------	--------------	----------------------

PERFORMED BY: Karl Gibbons
 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

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

ATTACHMENT B

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

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

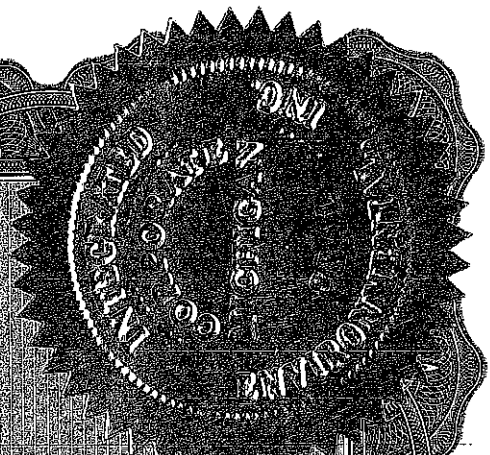
December 8-9, 2016



Rick P. Harding, Ph.D.

H. P. Harding

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

Don Anderson

Has Completed The Following Training

Environmental Geo-Technologies, LLC Training Modules
as Presented in A10/B2, Attachment 4 of the Environmental Geo-Technologies, LLC
Operating License, Issued September 26, 2011, 1, 2, 3, 5 through 29 and 31 through 51.

Environmental Geo-Technologies, LLC

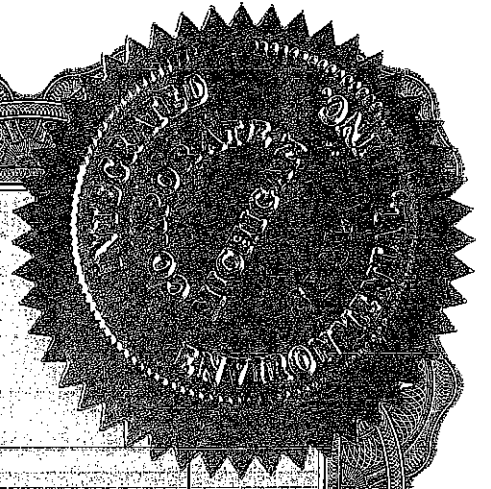
December 8-9, 2016



Rick P. Harding, Ph.D.

17 Dec 2016

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This is to Certify That

Don Anderson

Has Completed The Following Training:

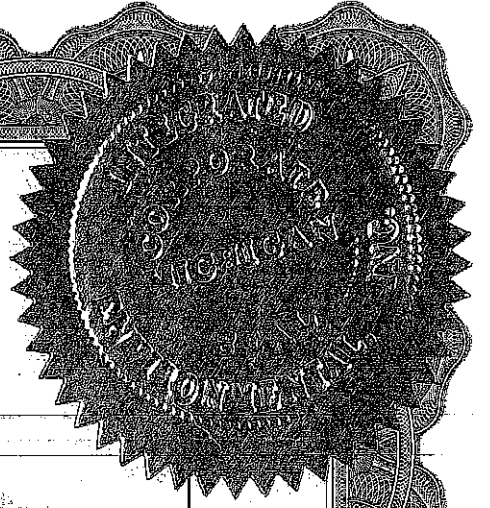
RCRA Compliance Annual Refresher Training for
Environmental Geo-Technologies, LLC
December 8, 2016



Rick P. Harding, Ph.D.

14 Dec 2016

Date



State of Michigan Department of Environmental Quality



This is to certify that
John K. Frost

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 6245

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

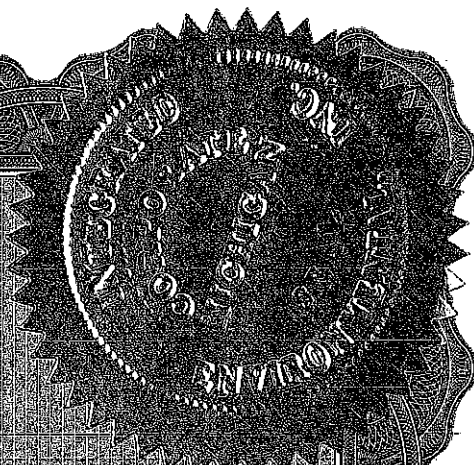
December 8-9, 2016



Rick P. Harding, Ph.D.

14 Dec 2016

Date



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 A-10, 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
Environmental Geo-Technologies, LLC

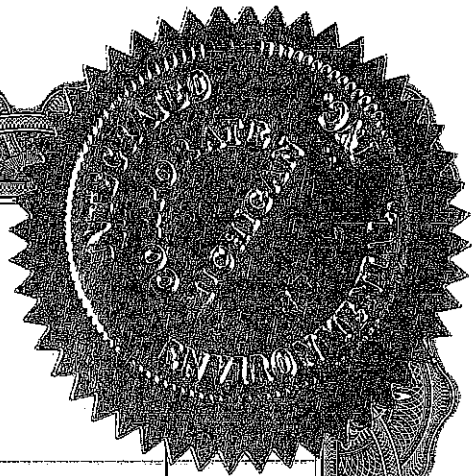
December 8-9, 2016



Rick P. Harding, Ph.D.

Date

14 Dec 2016



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This is to Certify That

John Frost

Has Completed The Following Training

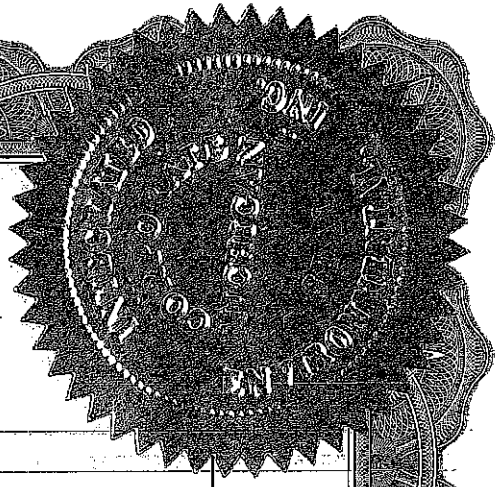
RCRA Compliance Annual Refresher Training for
Environmental Geo-Technologies, LLC
December 8, 2016



Rick P. Harding, Ph.D.

14 Dec 2016

Date



State of Michigan
Department of Environmental Quality



This is to certify that
James D. Hawkins

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 7104

Expiration Date: July 1, 2021

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

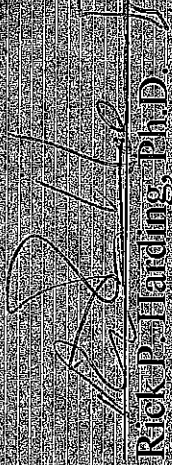
James Hawkins

Has Completed The Following Training:

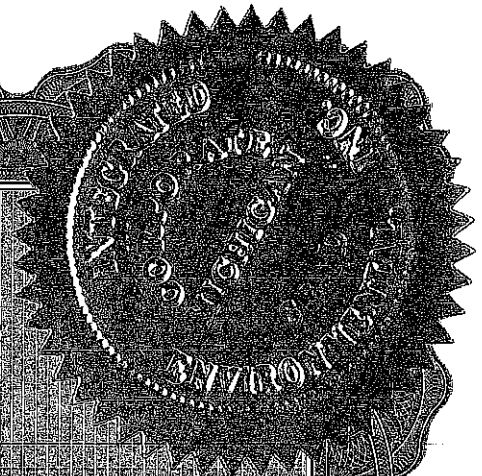
OSHA 29 CFR Part 1910.120
Hazardous Waste Operations and Emergency Response
8-Hour Refresher Training

Environmental Geo-Technologies, LLC

December 8-9, 2016


Rick P. Harding, Ph.D.

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

James Hawkins

Has Completed The Following Training

Environmental Geo-Technologies, LLC Training Modules
as Presented in A10.B.2, Attachment 4 of the Environmental Geo-Technologies, LLC
Operating License, Issued September 26, 2011, 1, 2, 3, 5 through 29 and 31 through 51.

Environmental Geo-Technologies, LLC

December 8-9, 2016

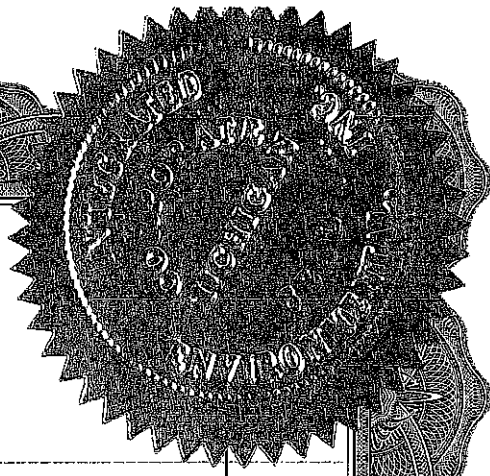
016



Rick P. Harding, Ph.D.

18 Dec 2016

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

James Hawkins

Has Completed The Following Training

RCRA Compliance Annual Refresher Training for
Environmental Geo-Technologies LLC

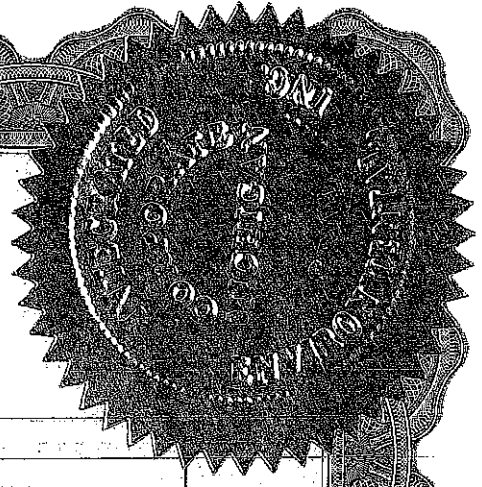
December 8, 2016

R.P. Harding

Rick P. Harding, Ph.D.

17th Dec 2016

Date



State of Michigan Department of Environmental Quality



This is to certify that
Paul J. Pochmara

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, B-2a, B-2c

Certificate Number: W 6535

Expiration Date: July 1, 2021

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

Paul Pochmara

Has Completed The Following Training

OSHA 29 CFR Part 1910.120

Hazardous Waste Operations and Emergency Response

8-Hour Refresher Training

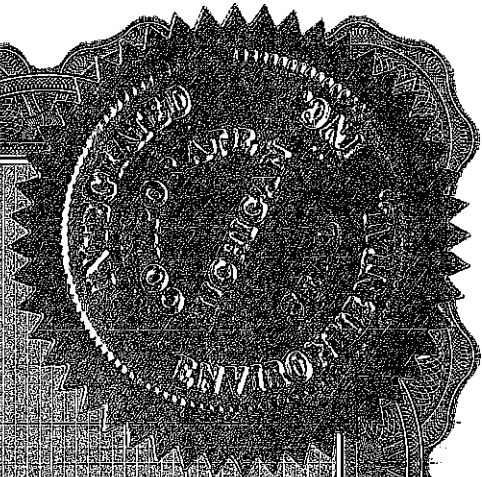
Environmental Geo-Technologies, LLC

December 8, 9, 2016



Rick P. Harding, Ph.D.

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

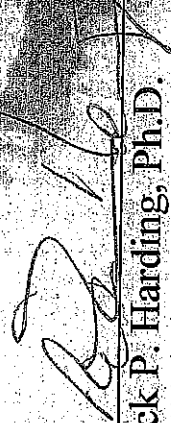
Paul Pochmara

Has Completed The Following Training

Environmental Geo-Technologies, LLC Training Modules
as Presented in A10, B2, Attachment 4 of the Environmental Geo-Technologies, LLC
Operating License Issued September 26, 2011, 1, 2, 3, 5 through 29 and 31 through 51.

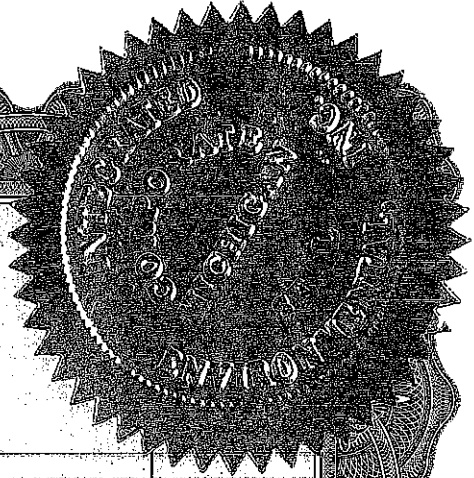
Environmental Geo-Technologies, LLC

December 8-9, 2016



Rick P. Harding, Ph.D.

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

Paul Pochmara

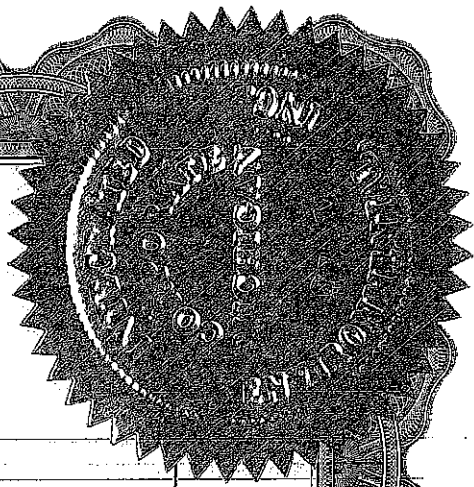
Has Completed The Following Training:

RCRA Compliance Annual Refresher Training for
Environmental Geo-Technologies, LLC
December 8, 2016


Rick P. Harding, Ph.D.

12 Dec 2016

Date



State of Michigan Department of Environmental Quality



This is to certify that
Patrick M. Sullivan

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 7344

Expiration Date: July 1, 2021

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 For Century That

Patrick Sullivan

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

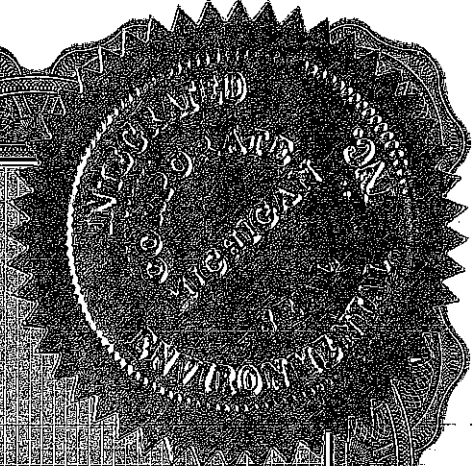
December 8, 2016

Rick P. Harding

Rick P. Harding, PhD

17 Dec 2016

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

Patrick Sullivan

Has Completed The Following Training

Environmental Geo-Technologies, LLC Training Modules
as Presented in A10/B.2, Attachment 4 of the Environmental Geo-Technologies, LLC
Operating License, Issued September 26, 2014, A-2, 3, 5 through 29 and 31 through 51.

Environmental Geo-Technologies, LLC

December 8-9, 2016

617



Rick P. Harding, Ph.D.

14 Dec 2016

Date



INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement

This Is To Certify That

Patrick Sullivan

Has Completed The Following Training:

RCRA Compliance Annual Refresher Training for
Environmental Geo-Technologies, LLC
December 8, 2016



Rick P. Harding, Ph.D.

7 Dec 2016

Date

