



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 5 2013

REPLY TO THE ATTENTION OF:  
WU-16J

**CERTIFIED MAIL 7001 0320 0005 8923 6363**  
**RETURN RECEIPT REQUESTED**

Mr. Dimitrios Papas  
Environmental Geo-Technologies, LLC  
1001 Woodward  
Suite 400  
Detroit, Michigan 48226

**Re: Minor-modified Underground Injection Control Permits #MI-163-1W-C010 and  
#MI-163-1W-C011**

Dear Mr. Papas:

The final minor-modified pages for the two Environmental Geo-Technologies' permits referenced above are enclosed. They replace the correlated pages in the existing permits. Pursuant to Title 40 of the Code of Federal Regulations Section 144.41(e), these permits are modified as follows:

Page / Permit Condition	Modification
Att. E, Page E-4 and E-5 / "List of Presently Approved Sources"	Add sources: 00211 (Hazardous Waste Fluids), 00212 (Non-Hazardous Waste Fluids), 00213 (Oilfield Brines).

This action constitutes issuance of two minor-modified permits which become effective on the date specified in the permits.

Should you have any questions, please contact Allan Batka by phone at (312) 353-7316 or by email to [batka.allan@epa.gov](mailto:batka.allan@epa.gov).

Sincerely

Handwritten signature of Tinka G. Hyde in black ink, consisting of stylized initials and a surname.

✍ Tinka G. Hyde  
Director, Water Division

Enclosures

cc: Mark Snow, Michigan Department of Environmental Quality  
Ray Vugrinovich, Michigan Department of Environmental Quality



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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U.S. ENVIRONMENTAL PROTECTION AGENCY  
UNDERGROUND INJECTION CONTROL PERMIT: CLASS I HAZARDOUS  
MINOR PERMIT MODIFICATION

Permit Number: MI-163-1W-C010

Facility Name: Well #1-12

Pursuant to the Safe Drinking Water Act and Underground Injection Control regulations of the United States Environmental Protection Agency (EPA) codified at Title 40 of the Code of Federal Regulations (40 C.F.R.), Parts 124, 144, 146, 147 and 148,

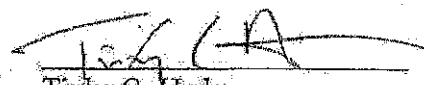
Environmental Geo-Technologies, LLC of Detroit, Michigan

herein after, the permittee, is hereby authorized to operate an existing Class I hazardous waste injection well located in Michigan, Wayne County, T3S, R9E, Section 12, SE Quarter Section, subject to the conditions of this permit. The injection zone, or zone which will contain the hazardous constituents, for this well includes the Mt. Simon, Eau Claire, Franconia-Galesville, Trempealeau, Glenwood, and lower Black River Formations between the depths of 3369 and 4550 feet. Injection is permitted into the interval of the Mt. Simon, Eau Claire, and Franconia-Galesville Formations between the depths of 3937 and 4550 feet upon the express condition that the permittee meets the restrictions set forth in this permit. The designated confining zone for this injection well includes the upper Black River, Trenton, and Utica Formations. Injection shall not commence until the operator has received written authorization from the Director of the Water Division of EPA Region 5, to inject.

References to 40 C.F.R. are to all regulations that are in effect on the date that this permit is effective. The following attachments are incorporated into this permit: A, B, C, D, and E.

This permit is a minor modification of an existing permit which was signed on September 26, 2011. This modified permit shall become effective on 8/27/13, and shall remain in full force and effect during the life of the permit, unless: 1) the statutory provisions of Section 3004(f), (g) or (m) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6924(f), (g) or (m), ban or otherwise condition the authorization in this permit; 2) EPA promulgates rules pursuant to these sections which withdraw or otherwise condition the authorization in this permit; or 3) this permit is otherwise revoked, terminated, modified or reissued pursuant to 40 C.F.R. §§ 144.39, 144.40, or 144.41. This permit and the authorization to inject shall expire at midnight, 10/26/2021, unless terminated prior to the expiration date.

Signed and Dated: 8/27/2013

  
+ Tinka G. Hyde  
Director, Water Division

H. List of Presently Approved Sources

Presently approved "sources" of waste for disposal into the Well #1-12 injection well are identified below by identification number, name, location, and sampling frequency and analytical parameters. Future "sources", as approved by the Director, will be added to these tables.

1) **Hazardous Waste Fluids**

Source ID Number	Source Name	Location (Address)	Waste Analysis Parameters <sup>6</sup>	Waste Sampling Frequency <sup>7</sup>
00211	Environmental Geo-Technologies, LLC	28470 Citrin Drive Romulus, Michigan	Toxicity Characteristic List  Fingerprint	Annual   Per load

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6 Hazardous waste fluid sampling parameters shall be determined on a case-specific basis. In requesting approval for a new source, the permittee may propose to test for a subset of the Toxicity Characteristic List (40 CFR § 261.24), which will be subject to EPA approval.

7 All hazardous waste fluids shall be sampled (fingerprinted) on a per-load basis.

2) Non-hazardous Waste Fluids

Source ID Number	Source Name	Location (Address)	Waste Analysis Parameters <sup>8</sup>	Waste Sampling Frequency <sup>9</sup>
00212	Environmental Geo-Technologies, LLC	28470 Citrin Drive Romulus, Michigan	Toxicity Characteristic List  Fingerprint	Annual  Per load

3) Oilfield Brines

Source ID Number	Oilfield Name	Location (T-R-S)	Geologic Formation	Waste Sampling Frequency
00213	brines received from various oilfields and treated by Environmental Geo-Technologies, LLC	T3S - R9E - S12	various formations	Annual

The permittee will update the Waste Source Characterization information, including detailed sample analysis results, annually and shall submit that information to EPA.

If the permittee seeks approval to inject a waste "source" directly into the well without treatment, its submission for approval of that "source" shall also include any appropriate analytical results necessary to identify waste constituents which may indicate a listed hazardous waste as defined at 40 CFR §§ 261.31, 261.32, 261.33, or 261.34 and if appropriate, a letter describing how the waste was determined to be non-hazardous.

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<sup>8</sup> Non-hazardous waste fluid sampling parameters shall be determined on a case-specific basis. In requesting approval for a new source, the permittee may propose to test for a subset of the Toxicity Characteristic List (40 CFR § 261.24), which will be subject to EPA approval.

<sup>9</sup> All non-hazardous waste fluids shall be sampled (fingerprinted) on a per-load basis.



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U.S. ENVIRONMENTAL PROTECTION AGENCY  
UNDERGROUND INJECTION CONTROL PERMIT: CLASS I HAZARDOUS  
MINOR PERMIT MODIFICATION

Permit Number: MI-163-1W-C011

Facility Name: Well #2-12

Pursuant to the Safe Drinking Water Act and Underground Injection Control regulations of the United States Environmental Protection Agency (EPA) codified at Title 40 of the Code of Federal Regulations (40 C.F.R.), Parts 124, 144, 146, 147 and 148,


Environmental Geo-Technologies, LLC of Detroit, Michigan

herein after, the permittee, is hereby authorized to operate an existing Class I hazardous waste injection well located in Michigan, Wayne County, T3S, R9E, Section 12, SE Quarter Section, subject to the conditions of this permit. The injection zone, or zone which will contain the hazardous constituents, for this well includes the Mt. Simon, Eau Claire, Franconia-Galesville, Trempealeau, Glenwood, and lower Black River Formations between the depths of 3369 and 4550 feet. Injection is permitted into the interval of the Mt. Simon, Eau Claire, and Franconia-Galesville Formations between the depths of 3937 and 4550 feet upon the express condition that the permittee meets the restrictions set forth in this permit. The designated confining zone for this injection well includes the upper Black River, Trenton, and Utica Formations. Injection shall not commence until the operator has received written authorization from the Director of the Water Division of EPA Region 5, to inject.

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Signed and Dated: 8/27/2013

  
Tinka G. Hyde  
Director, Water Division

H. List of Presently Approved Sources

Presently approved "sources" of waste for disposal into the Well #2-12 injection well are identified below by identification number, name, location, and sampling frequency and analytical parameters. Future "sources", as approved by the Director, will be added to these tables.

1) **Hazardous Waste Fluids**

Source ID Number	Source Name	Location (Address)	Waste Analysis Parameters <sup>6</sup>	Waste Sampling Frequency <sup>7</sup>
00211	Environmental Geo-Technologies, LLC	28470 Citrin Drive Romulus, Michigan	Toxicity Characteristic List  Fingerprint	Annual  Per load

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6 Hazardous waste fluid sampling parameters shall be determined on a case-specific basis. In requesting approval for a new source, the permittee may propose to test for a subset of the Toxicity Characteristic List (40 CFR § 261.24), which will be subject to EPA approval.

7 All hazardous waste fluids shall be sampled (fingerprinted) on a per-load basis.

2) Non-hazardous Waste Fluids

Source ID Number	Source Name	Location (Address)	Waste Analysis Parameters <sup>8</sup>	Waste Sampling Frequency <sup>9</sup>
00212	Environmental Geo-Technologies, LLC	28470 Citrin Drive Romulus, Michigan	Toxicity Characteristic List  Fingerprint	Annual   Per load

3) Oilfield Brines

Source ID Number	Oilfield Name	Location (T-R-S)	Geologic Formation	Waste Sampling Frequency
00213	brines received from various oilfields and treated by Environmental Geo-Technologies, LLC	T3S – R9E – S12	various formations	Annual

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<sup>8</sup> Non-hazardous waste fluid sampling parameters shall be determined on a case-specific basis. In requesting approval for a new source, the permittee may propose to test for a subset of the Toxicity Characteristic List (40 CFR § 261.24), which will be subject to EPA approval.

<sup>9</sup> All non-hazardous waste fluids shall be sampled (fingerprinted) on a per-load basis.