Environmental GEO-Technologies, LLC

April 30, 2019

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

Re: EGT Monthly Report (in conformance with MI-163-1W-C010 & MI-163-1W-C011)

Dear Mr. Batka:

Environmental Geo-Technologies, LLC ("EGT") hereby timely submits its sixty-fifth Monthly Report ("MR") in conformance with the requirements of its two EPA UIC permits (#s MI-163-1W-C010 & MI-163-1W-C011).

EGT is providing all of the attached information in the same sequence as required by both subject permits, i.e. Part II.D.1 (a-i), Part III, Attachment A, and Part III, Attachment E.G.2 & E.I.

EGT did not accept any F039 waste in March, 2019 so no Page A-3 of 3 laboratory analyses are necessary to be submitted as part of this MR.

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.

cc: J. Frost (EGT)

att. rjp043019/EGTEPAMonthlyReport-March, 2019

P 734-946-1000 F 734-946-1002 - 28470 Citrin Drive. Romulus, Michigan 48174
www.envgeotech.com

AVERAGE INJECTION RATE

Calculation of Average Injection Rate

CURRENT REPORTING YEAR 2019

CURRENT REPORTING MONTH MARCH

Date (month, year) of the first injection into either well at the Citrin Road Facility

NOV 2013

CURRENT MONTH (all volumes in gallons)

	Injected Waste	Injected Non-Waste	Total injected
MI-163-1W-C010 , Well #1-12			
Current Month	39,353	0	39,353
Since facility first injected			14,369,858
MI-163-1W-C011, Well #2-12			
Current Month	0	0	0
Since facility first injected			4,648,736
		Lifetime Combined	19,018,594

Conversion factors
365.25 days per year ÷ 12 months per year = 30.4375 days per month
30.4375 days per month × 1440 minutes per day = 43,830 minutes per month

Calculations
Whole number of months of injection 63

_____ lifetime number of months of injection × 43,830 minutes/month
= 2,761,290 minutes of injection

Lifetime combined injected volume 19,018,594 ÷ 2,761,290 minutes of injection
= 6.9 gpm average injection rate

WELL 1 DATA

WELL 01 Monthly Data

Date	Min Injection Pressure (PSIG)	Max Injection Pressure (PSIG)	Min Sight Glass Level (in)	Max Sight Glass Level (in)	Min Annulus Pressure (PSIG)	Max Annulus Pressure (PSIG)	Min Injectate pH	Max Injectate pH	Min Flow Rate (GPM)	Max Flow Rate (GPM)	Min Differentall Pressure (PSIG)	Max Differential Pressure (PSIG)
3/1/2019	106.2	106.7	-0.9	-0.4	829.0	829.3	8.2	8.2	0.0	0.0	722.6	722.8
3/2/2019	106.7	107.2	-0.4	0.2	829.3	829.5	8.2	8.2	0.0	0.0	722.3	722.6
3/3/2019	107.2	107.7	0.2	0.7	829.5	829.8	8.2	8.2	0.0	0.0	722.1	722.3
3/4/2019	107.7	108.2	0.7	1.2	829.8	830.1	8.2	8.2	0.0	0.0	721.9	722.1
3/5/2019	108.2	108.6	1.2	1.8	830.1	830.3	8.2	8.2	0.0	0.0	721.7	721.9
3/6/2019	108.6	109.1	1.8	2.3	830.3	830.6	8.2	8.2	0.0	0.0	721.5	721.7
3/7/2019	109.1	109.6	2.3	2.8	830.6	830.8	8.2	8.2	0.0	0.0	721.3	721.5
3/8/2019	109.6	899.3	2.8	3.4	830.8	1189.2	6.2	6.2	0.0	19.5	289.9	721.3
3/9/2019	110.1	110.5	3.4	3.9	831.1	831.4	6.2	6.2	0.0	0.0	720.8	721.1
3/10/2019	110.5	111.0	3.9	4.4	831.4	831.6	6.2	6.2	0.0	0.0	720.6	720.8
3/11/2019	111.0	901.8	4.4	5.0	831.6	1197.1	6.2	6.2	0.0	21.3	295.3	720.6
3/12/2019	111.5	900.5	5.0	5.5	831.9	1196.6	6.2	6.2	0.0	21.1	296.1	720.4
3/13/2019	111.9	112.4	5.5	6.0	832.1	832.4	6.2	6.2	0.0	0.0	720.0	720.2
3/14/2019	112.4	898.7	6.0	6.6	832.4	1189.7	6.6	6.6	0.0	19.4	291.0	720.0
3/15/2019	112.9	908.4	6.6	7.1	832.7	1199.6	6.6	6.6	0.0	21.7	291.2	719.8
3/16/2019	113.4	113.8	7.1	7.6	832.9	833.2	6.6	6.6	0.0	0.0	719.4	719.6
3/17/2019	113.8	114.3	7.6	8.2	833.2	833.5	6.6	6.6	0.0	0.0	719.1	719.4
3/18/2019	114.3	878.6	8.2	8.7	833.5	1159.1	6.6	6.6	0.0	18.2	280.5	719.1
3/19/2019	114.8	115.3	8.7	9.3	833.7	834.0	6.6	6.6	0.0	0.0	718.7	718.9
3/20/2019	115.3	115.7	9.3	9.8	834.0	834.2	6.6	6.6	0.0	0.0	718.5	718.7
3/21/2019	115.7	116.2	9.8	10.3	834.2	834.5	6.6	6.6	0.0	0.0	718.3	718.5
3/22/2019	116.2	116.7	10.3	10.9	834.5	834.8	6.6	6.6	0.0	0.0	718.1	718.3
3/23/2019	116.7	117.2	10.9	11.4	834.8	835.0	6.6	6.6	0.0	0.0	717.9	718.1
3/24/2019	117.2	117.6	11.4	11.9	831.7	831.7	6.6	6.6	0.0	0.0	717.6	717.9
3/25/2019	117.6	892.8	11.9	12.5	835.3	1187.3	6.4	6.4	0.0	19.0	294.5	717.6
3/26/2019	118.1	864.5	12.5	13.0	835.6	1162.1	6.4	6.4	0.0	18.1	297.6	717.4
3/27/2019	118.6	119.1	13.0	13.5	835.8	836.1	6.4	6.4	0.0	0.0	717.0	717.2
3/28/2019	119.1	119.5	13.5	14.1	836.1	836.3	6.4	6.4	0.0	0.0	716.8	717.0
3/29/2019	119.5	120.0	14.1	14.6	836.3	836.6	6.4	6.4	0.0	0.0	716.6	716.8
3/30/2019	120.0	120.5	14.6	15.2	836.6	836.9	6.4	6.4	0.0	0.0	716.4	716.6

Circle Chart Index

Environmental Geo-Technologies, LLC 28470 Citrin Drive Romulus, MI 48174

Chart Recorder #1

Channel #1
Blue Pen - Well 1 Injection Pressure (chart value x 30)

Channel #2
Red Pen – Well 1 Annulus Pressure (chart value x 30)

Channel #3
Green Pen – Well 1 Flow Rate (chart value x 4)

Channel #4
Black Pen – Well 1 Annulus Tank Level (chart value x 0)

Chart Recorder #2

Channel #1
Blue Pen – Well 2 Injection Pressure (chart value x 30)

Channel #2
Red Pen – Well 2 Annulus Pressure (chart value x 30)

Channel #3
Green Pen – Well 2 Flow Rate (chart value x 4)

Channel #4
Black Pen – Well 2 Annulus Tank Level (chart value x 0)

Chart Recorder #3

Channel #1
Blue Pen – Injection pH Well 1 & 2 (chart value ÷ 3.3)

Channel #2
Red Pen – Well 1 Monthly Volume (chart value x 100,000)

Channel #3
Green Pen – Well 2 Monthly Volume (chart value x 100,000)

Channel #4
Black Pen – Temperature (chart value x 0)

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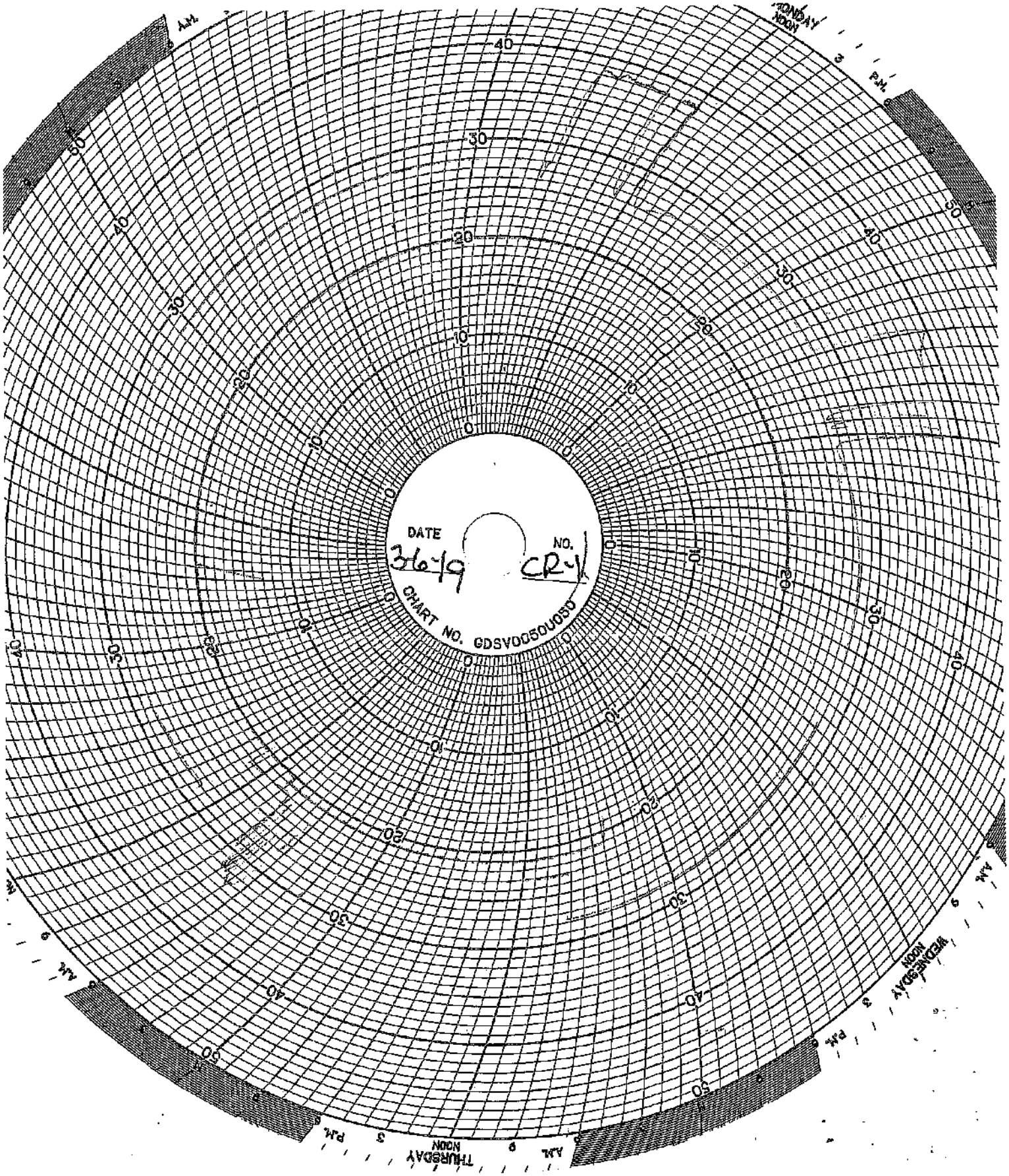
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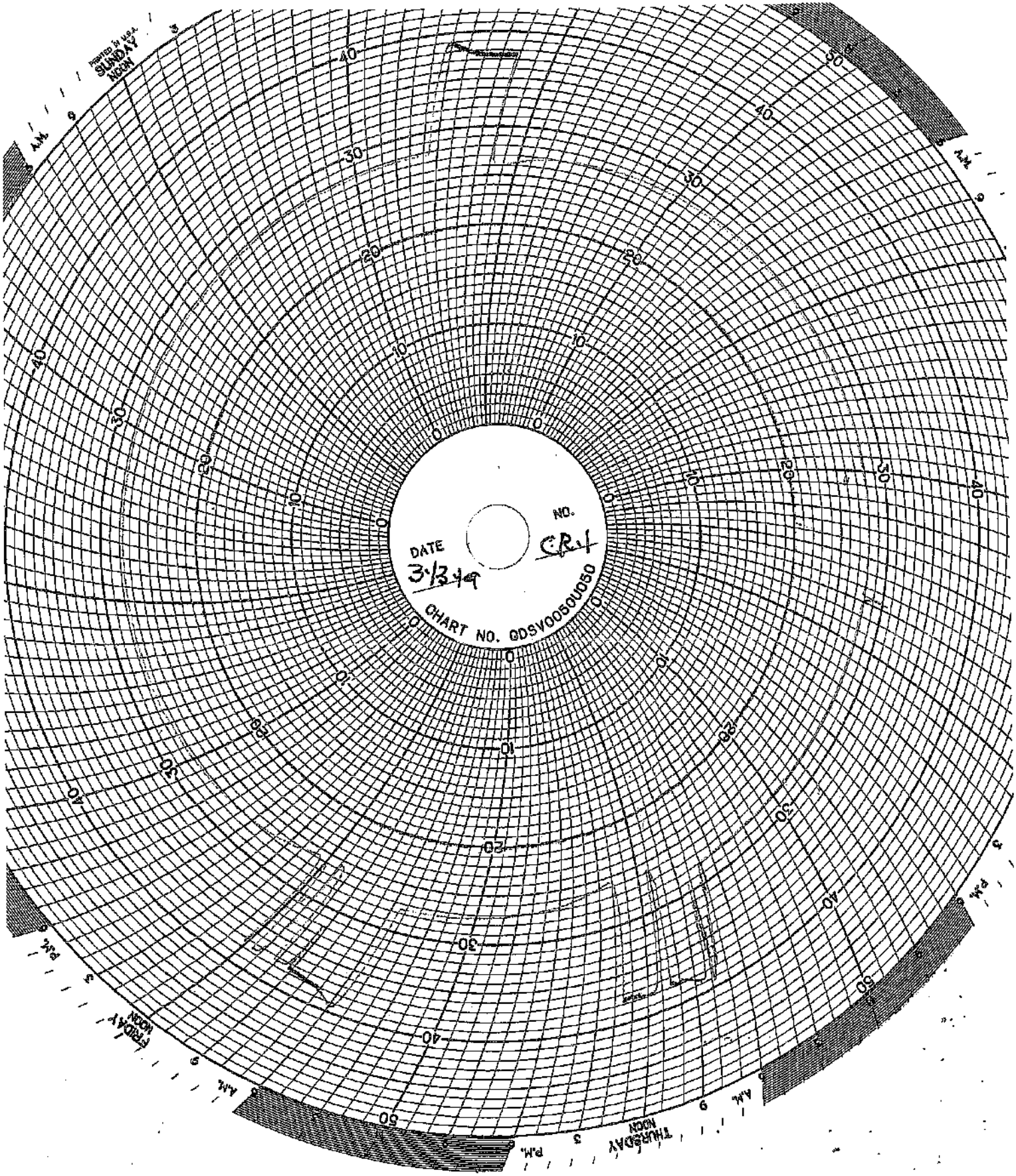
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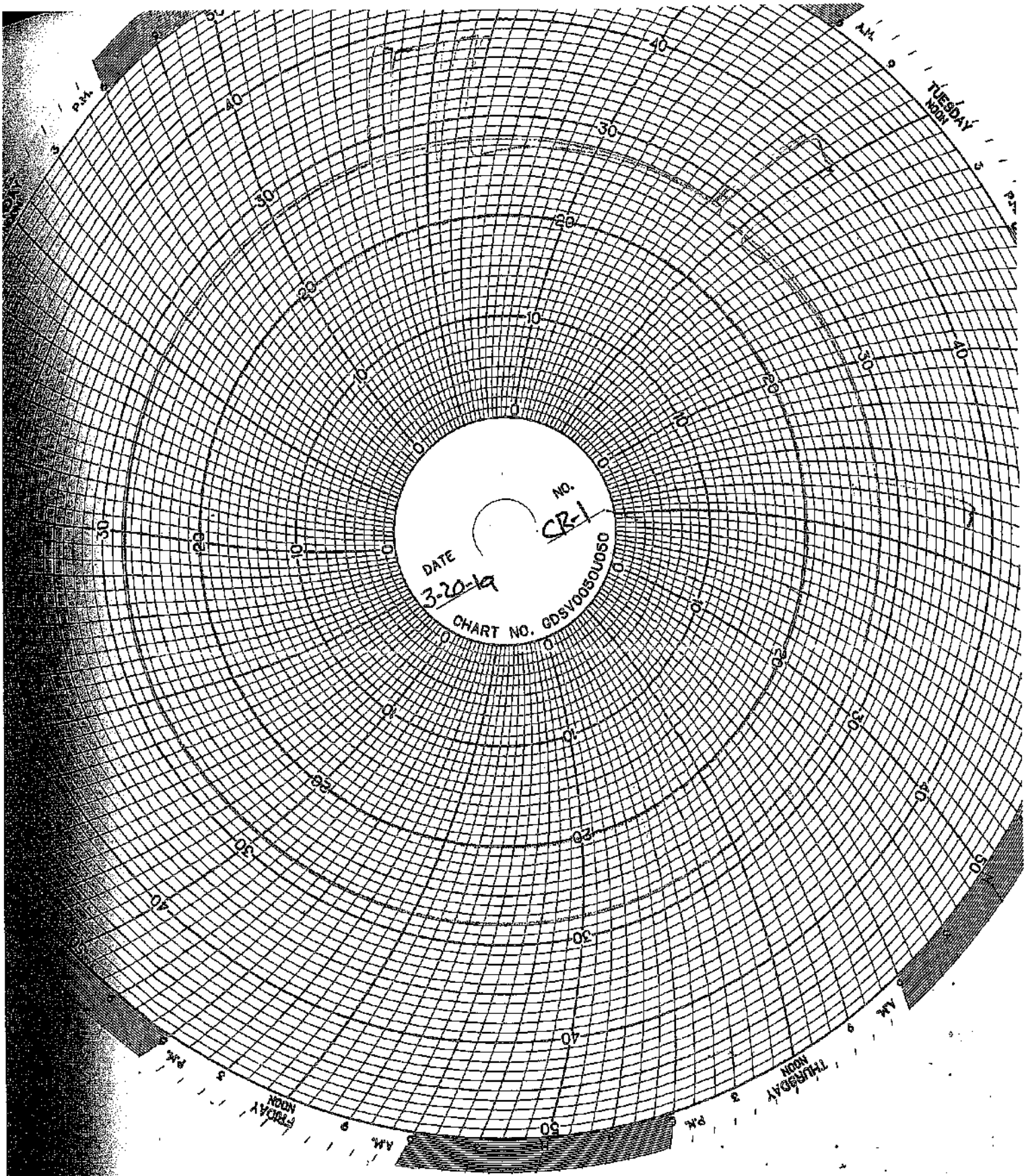
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WELL 2 DATA

Well 02 Monthly Data

Date	Min Injection Pressure (PSIG)	Max Injection Pressure (PSIG)	Min Sight Glass Level (in)	Max Sight Glass Level (in)	Min Annulus Pressure (PSIG)	Max Annulus Pressure (PSIG)	Min Injectate pH	Max Injectate pH	Min Flow Rate (GPM)	Max Flow Rate (GPM)	Min Differentail Pressure (PSIG)	Max Differential Pressure (PSIG)
3/1/2019	0.0	0.0	-8.3	-8.3	96.3	98.7	8.2	8.2	0.0	0.0	96.3	98.7
3/2/2019	0.0	0.0	-8.3	-8.3	94.0	96.3	8.2	8.2	0.0	0.0	94.0	96.3
3/3/2019	0.0	0.0	-8.3	-8.3	91.6	94.0	8.2	8.2	0.0	0.0	91.6	94.0
3/4/2019	0.0	0.0	-8.3	-8.3	89.2	91.6	8.2	8.2	0.0	0.0	89.2	91.6
3/5/2019	0.0	0.0	-8.3	-8.3	86.9	89.2	8.2	8.2	0.0	0.0	86.9	89.2
3/6/2019	0.0	0.0	0.9	1.3	84.5	86.9	8.2	8.2	0.0	0.0	84.5	86.9
3/7/2019	0.0	0.0	1.3	1.6	82.2	84.5	8.2	8.2	0.0	0.0	82.2	84.5
3/8/2019	0.0	0.0	1.6	2.0	79.8	82.2	6.2	6.2	0.0	0.0	79.8	82.2
3/9/2019	0.0	0.0	2.0	2.3	77.4	79.8	6.2	6.2	0.0	0.0	77.4	79.8
3/10/2019	0.0	0.0	2.3	2.7	75.2	77.4	6.2	6.2	0.0	0.0	75.2	77.4
3/11/2019	0.0	0.0	2.7	3.0	72.8	75.2	6.2	6.2	0.0	0.0	72.8	75.2
3/12/2019	0.0	0.0	3.0	3.4	70.4	72.8	6.2	6.2	0.0	0.0	70.4	72.8
3/13/2019	0.0	0.0	3.4	3.7	68.1	70.4	6.2	6.2	0.0	0.0	68.1	70.4
3/14/2019	0.0	0.0	3.7	4.1	65.7	68.1	6.6	6.6	0.0	0.0	65.7	68.1
3/15/2019	0.0	0.0	4.1	4.4	63.3	65.7	6.6	6.6	0.0	0.0	63.3	65.7
3/16/2019	0.0	0.0	4.4	4.8	61.0	63.3	6.6	6.6	0.0	0.0	61.0	63.3
3/17/2019	0.0	0.0	4.8	5.1	58.6	61.0	6.6	6.6	0.0	0.0	58.6	61.0
3/18/2019	0.0	0.0	5.1	5.5	56.2	58.6	6.6	6.6	0.0	0.0	56.2	58.6
3/19/2019	0.0	0.0	5.5	5.8	53.9	56.2	6.6	6.6	0.0	0.0	53.9	56.2
3/20/2019	0.0	0.0	5.8	6.2	51.5	53.9	6.6	6.6	0.0	0.0	51.5	53.9
3/21/2019	0.0	0.0	6.2	6.5	49.1	51.5	6.6	6.6	0.0	0.0	49.1	51.5
3/22/2019	0.0	0.0	6.5	6.9	46.8	49.1	6.6	6.6	0.0	0.0	46.8	49.1
3/23/2019	0.0	0.0	6.9	7.2	44.4	46.8	6.6	6.6	0.0	0.0	44.4	46.8
3/24/2019	0.0	0.0	7.2	7.5	42.0	44.4	6.6	6.6	0.0	0.0	42.0	44.4
3/25/2019	0.0	0.0	7.5	7.9	39.7	42.0	6.4	6.4	0.0	0.0	39.7	42.0
3/26/2019	0.0	0.0	7.9	8.2	37.3	39.7	6.4	6.4	0.0	0.0	37.3	39.7
3/27/2019	0.0	0.0	8.2	8.6	34.9	37.3	6.4	6.4	0.0	0.0	34.9	37.3
3/28/2019	0.0	0.0	8.6	8.9	32.6	34.9	6.4	6.4	0.0	0.0	32.6	34.9
3/29/2019	0.0	0.0	8.9	9.3	30.2	32.6	6.4	6.4	0.0	0.0	30.2	32.6
3/30/2019	0.0	0.0	9.3	9.6	27.8	30.2	6.4	6.4	0.0	0.0	27.8	30.2
3/31/2019	0.0	0.0	9.6	10.0	25.5	27.8	6.4	6.4	0.0	0.0	25.5	27.8

Circle Chart Index

Environmental Geo-Technologies, LLC 28470 Citrin Drive Romulus, MI 48174

Chart Recorder #1

Channel #1
Blue Pen - Well 1 Injection Pressure (chart value x 30)

Channel #2
Red Pen – Well 1 Annulus Pressure (chart value x 30)

Channel #3
Green Pen – Well 1 Flow Rate (chart value x 4)

Channel #4
Black Pen – Well 1 Annulus Tank Level (chart value x 0)

Chart Recorder #2

Channel #1
Blue Pen – Well 2 Injection Pressure (chart value x 30)

Channel #2
Red Pen – Well 2 Annulus Pressure (chart value x 30)

Channel #3
Green Pen – Well 2 Flow Rate (chart value x 4)

Channel #4
Black Pen – Well 2 Annulus Tank Level (chart value x 0)

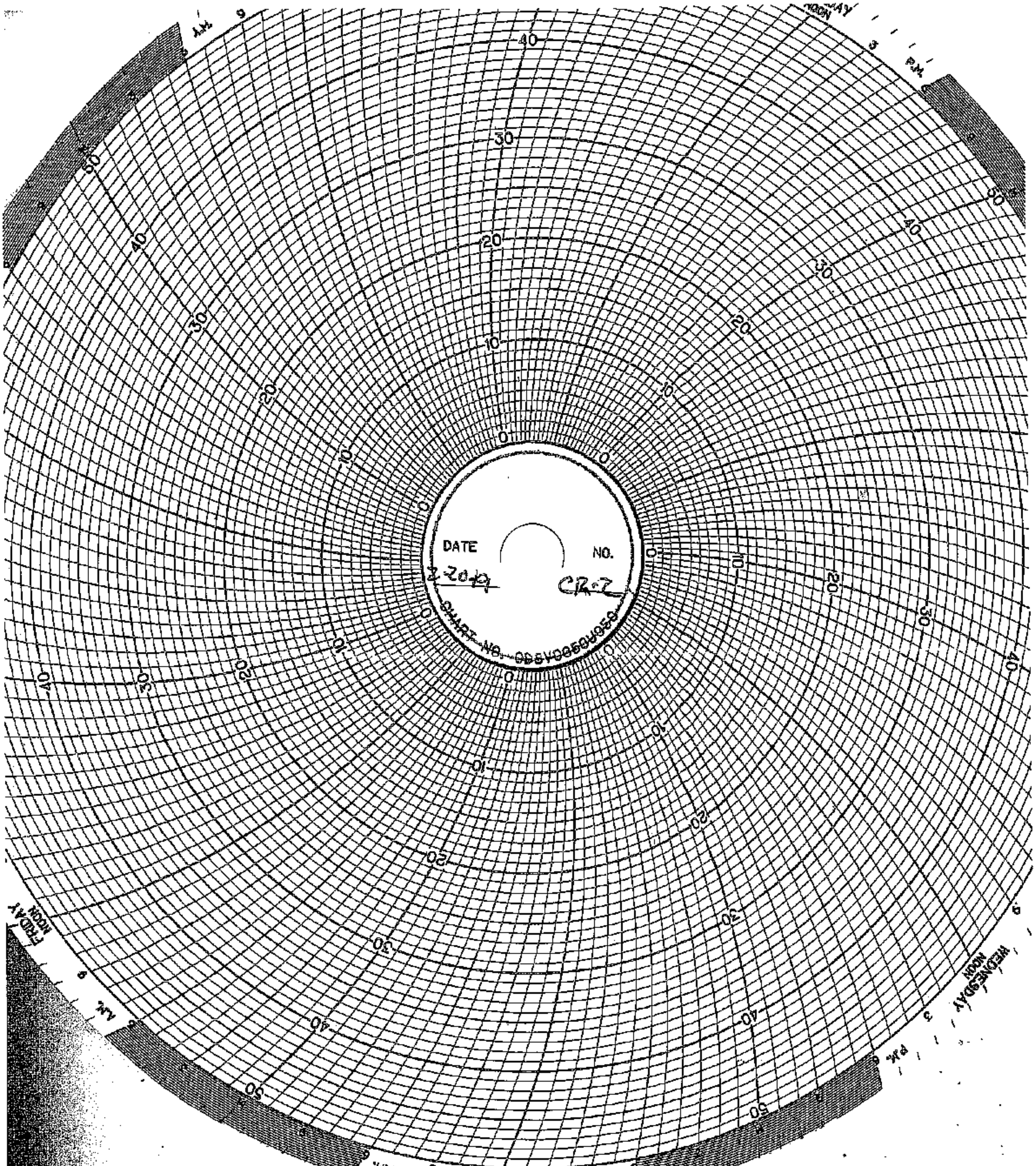
Chart Recorder #3

Channel #1
Blue Pen – Injection pH Well 1 & 2 (chart value + 3.3)

Channel #2
Red Pen – Well 1 Monthly Volume (chart value x 100,000)

Channel #3
Green Pen – Well 2 Monthly Volume (chart value x 100,000)

Channel #4
Black Pen – Temperature (chart value x 0)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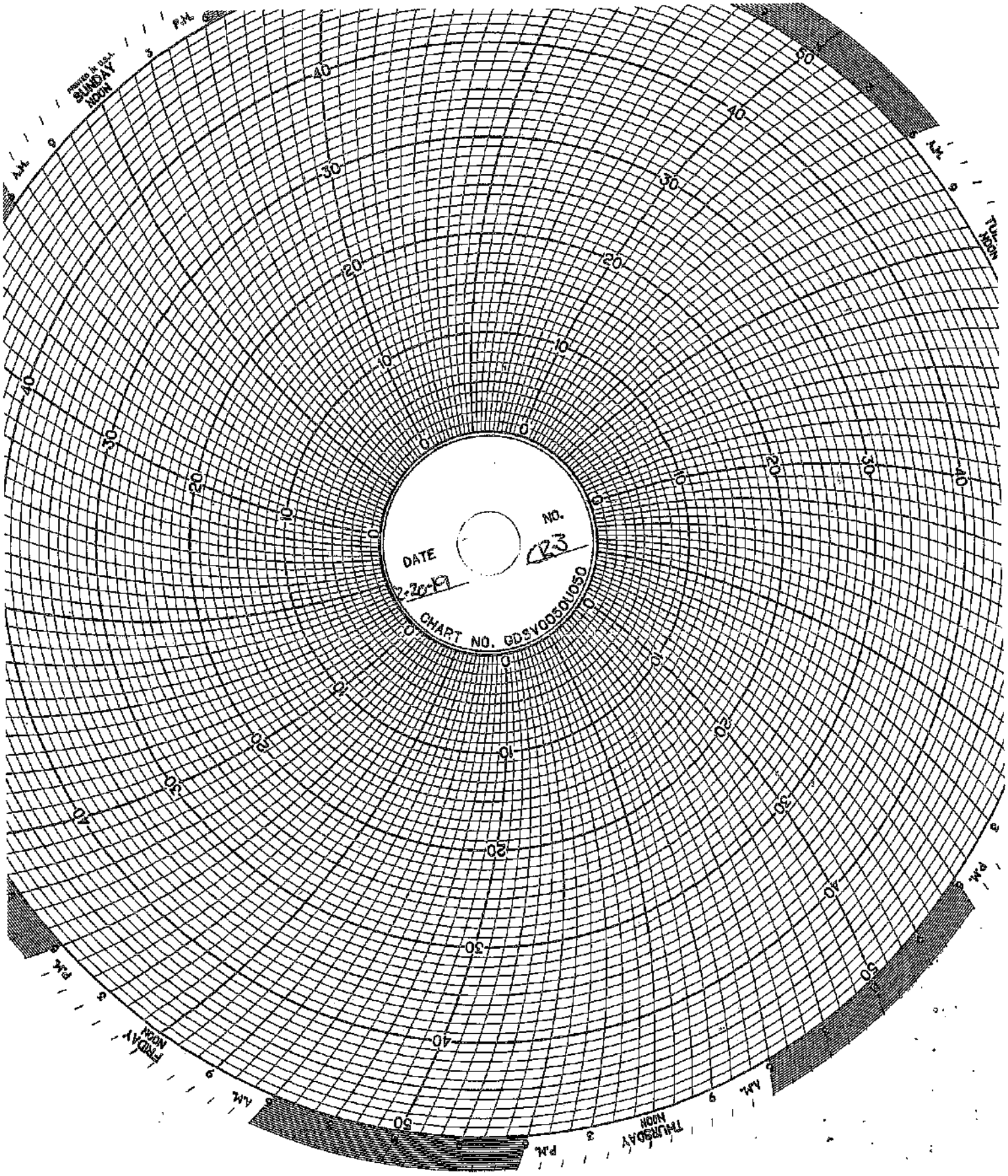
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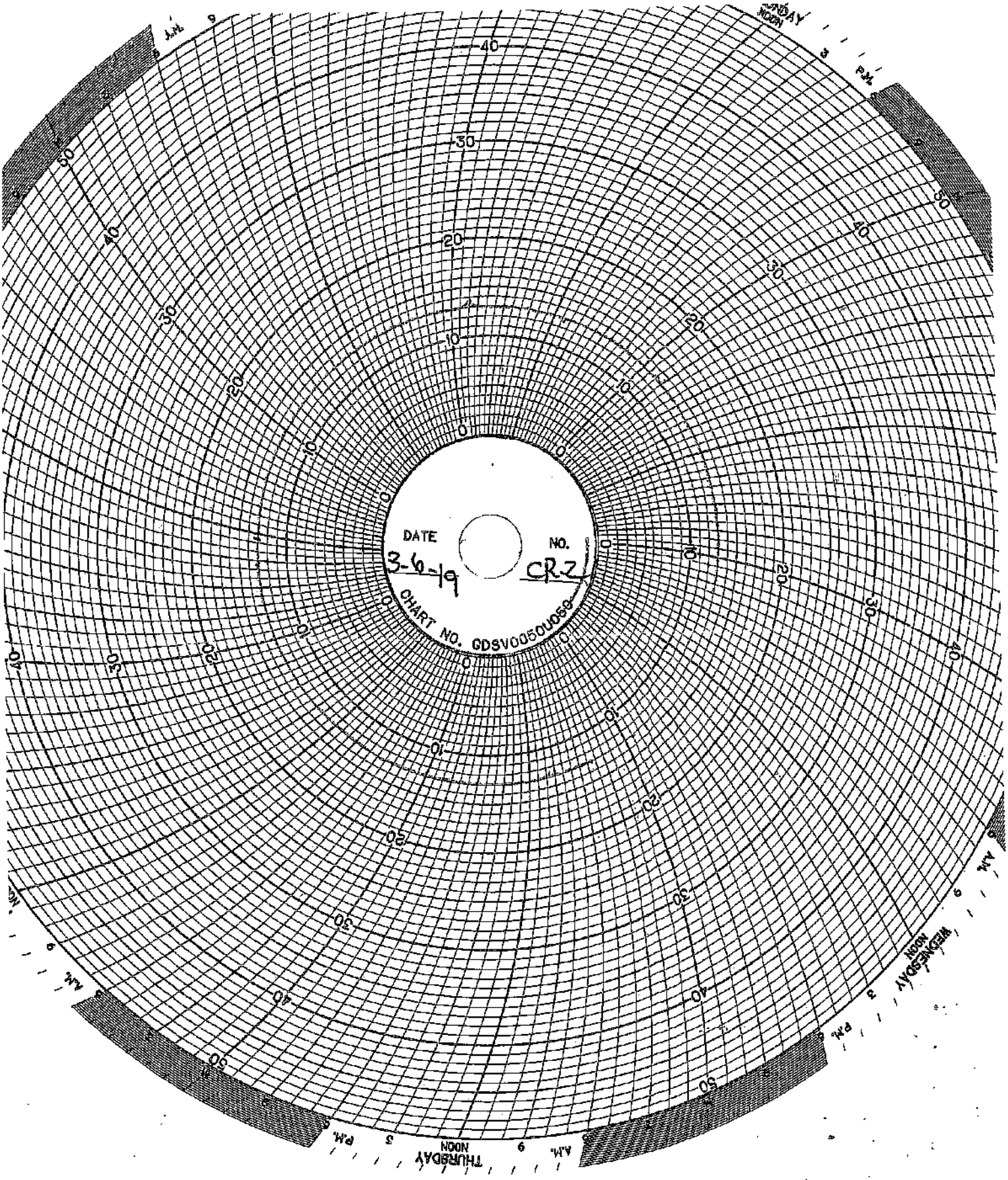
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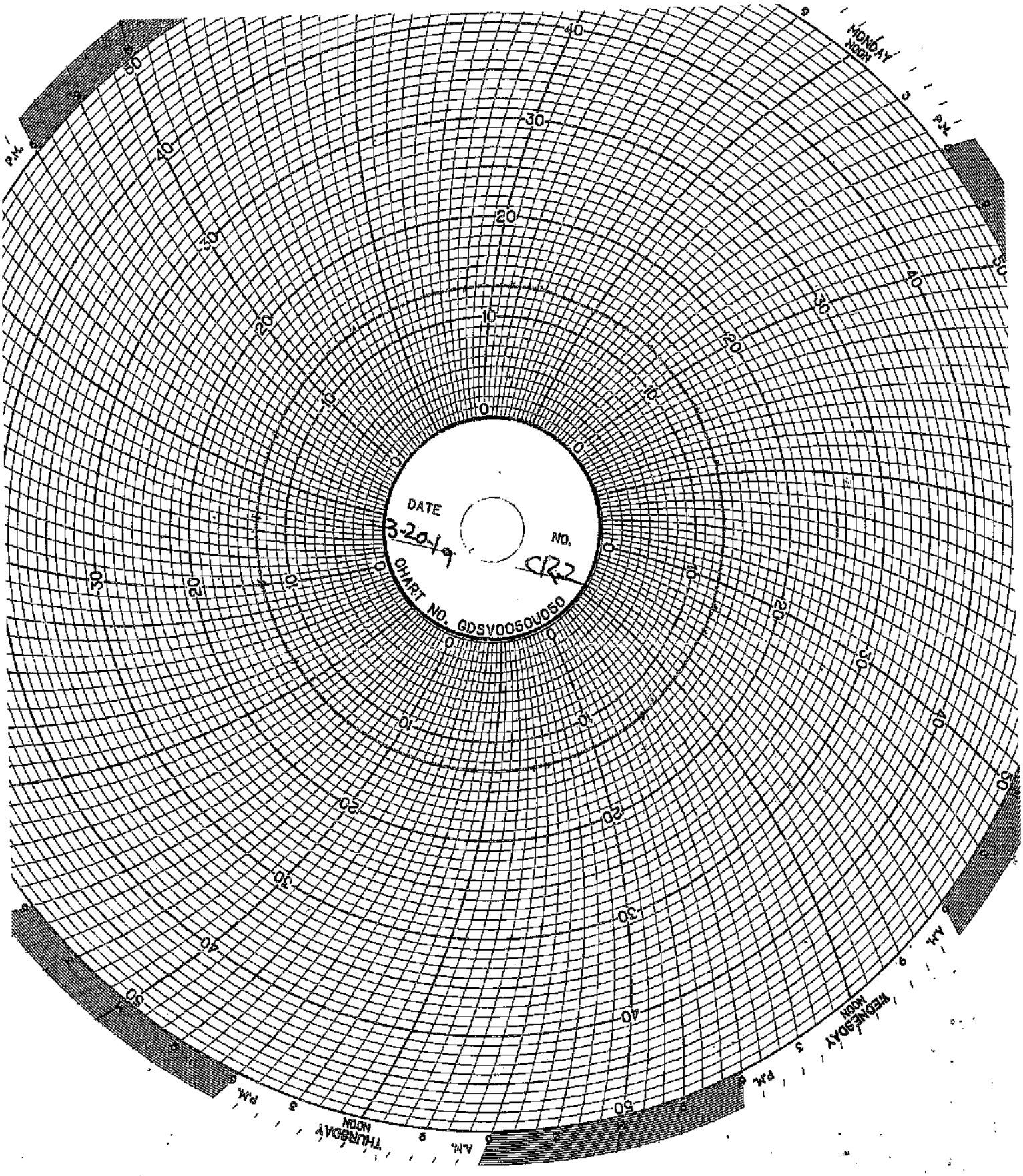
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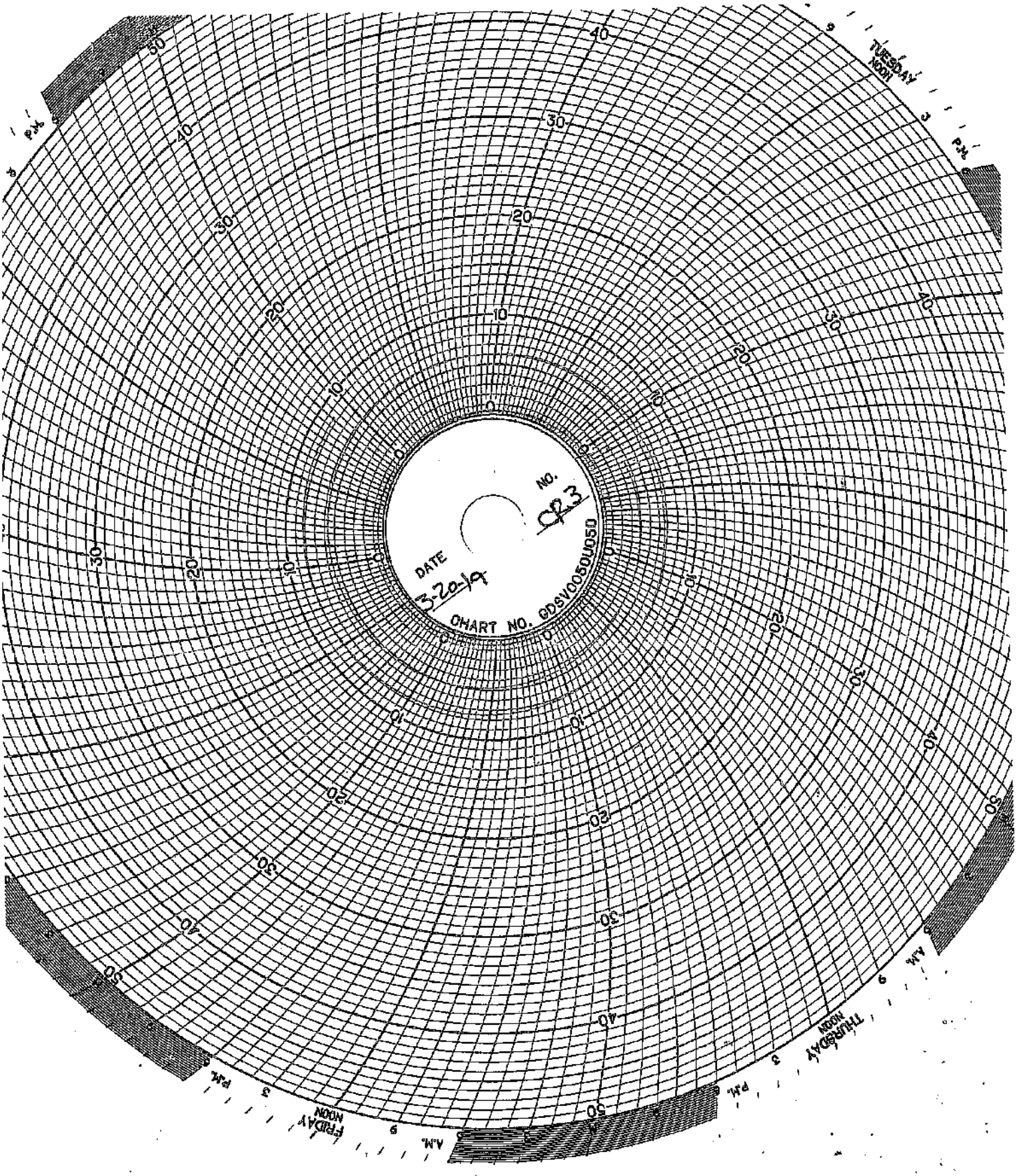
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P.M.

MAINTENANCE LOG

UIC Monthly Maintenance Log

No Maintenance This Month

CORROSION MONITORING

CORROSION MONITORING COUPONS VISUAL DESCRIPTION

March, 2019

Fiberglass Coupon

The coupon is dark orange (rust) in color with similar semi-smooth textures on both sides. Its cut edges appear sanded. The coupon is free of pits, cracks, swelling, wicking and blemishes.

Hastelloy Coupon

This coupon is identified as C276 with Serial Number 5. The coupon is silver in color with a lightly sandblasted texture. It is clean and free of pits, cracks, and blemishes. There appears to be no effect on this coupon.

Stainless Steel Coupon

No change since last month.

CORROSION MONITORING COUPONS BASELINE VISUAL DESCRIPTION

November 4, 2013

Fiberglass

The fiberglass coupon is Red Box 2000 type and is 2-1/2 inches long by 1/2 inch wide and 1/4 inches thick. It is a dark orange (rust) in color with a glossy shine on one side a polished look on the opposite side and the cut edges look sanded.

Hastelloy

The hastelloy coupon is identified as C276 with serial number 1. The dimensions of the coupon are 3 inches long by 1/2 inch wide and 1/4 inch thick. The coupon is silver in color with a lightly sandblasted surface.

Stainless Steel

The stainless steel coupon is identified as 316L with serial number C1582. The dimensions of the coupon are 3 inches long by 1/2 inch wide and 1/4 inch thick. The coupon is silver in color with a lightly sandblasted surface.

CORROSION MONITORING PLAN
COUPON SUMMARY

Date	Hastelloy (C267)	Stainless Steel (316L)	Fiberglass (Redbox)	
12/19/2013	13.330 g	10.848 g	7.309 g	Initial Mass @ start up
2/21/2014	13.329 g	10.846 g	7.306 g	
3/10/2014	13.327 g	10.845 g	7.300 g	
4/18/2014	13.324 g	10.841 g	7.272 g	
5/30/2014	13.328 g	10.818 g	7.226 g	
6/30/2014	13.321 g	10.337 g	7.196 g	
7/11/2014	13.323 g	10.304 g	7.196 g	
8/12/2014	13.328 g	10.045 g	7.182 g	
9/17/2014	13.321 g	9.997 g	7.090 g	
10/30/2014	13.321 g	9.387 g	7.075 g	
11/21/2014	13.320 g	9.386 g	7.069 g	
12/19/2014	13.321 g	9.315 g	7.084 g	
1/12/2015	13.321 g	9.289 g	7.063 g	
2/23/2015	13.339 g	9.286 g	7.005 g	New hastelloy coupon
3/31/2015	13.339 g	9.286 g	7.005 g	
4/27/2015	13.335 g	9.130 g	6.852 g	
5/21/2015	13.336 g	9.124 g	6.809 g	
6/12/2015	13.334 g	9.126 g	6.819 g	
7/27/2015	13.337 g	9.127 g	6.818 g	
8/26/2015	13.337 g	9.022 g	6.780 g	
9/21/2015	13.336 g	8.987 g	6.792 g	
10/19/2015	13.335 g	8.985 g	6.797 g	
11/16/2015	13.334 g	8.982 g	6.788 g	
12/17/2015	13.334 g	8.933 g	6.791 g	
1/29/2016	13.334 g	8.931 g	6.788 g	
2/16/2016	13.332 g	8.799 g	6.757 g	
3/31/2016	13.339 g	9.286 g	7.005 g	
4/22/2016	13.333 g	8.590 g	6.744 g	
5/31/2015	13.334 g	6.084 g	6.784 g	
6/30/2016	13.328 g	10.942 g	6.793 g	New stainless steel coupon
8/3/2016	13.326 g	10.529 g	6.743 g	
8/29/2016	13.325 g	10.020 g	6.723 g	
10/27/2016	13.325 g	8.765 g	6.708 g	
11/29/2016	13.327 g	8.571 g	6.740 g	
12/12/2016	13.323 g	8.223 g	6.717 g	
1/3/2017	13.325 g	8.059 g	6.712 g	
2/28/2017	13.324 g	7.634 g	6.727 g	
3/24/2017	13.325 g	7.370 g	6.732 g	
4/28/2017	13.325 g	6.736 g	6.736 g	
5/11/2017	13.323 g	7.352 g	6.689 g	
6/12/2017	13.323 g	7.357 g	6.689 g	
7/5/2017	13.323 g	7.355 g	6.689 g	
8/30/2017	13.324 g	7.353 g	18.105 g	New Fiberglass coupon
9/28/2017	13.325 g	7.352 g	18.060 g	
10/11/2017	13.324 g	7.350 g	18.038 g	
11/16/2017	13.325 g	7.363 g	18.047 g	
12/12/2017	13.326 g	7.308 g	18.307 g	

CORROSION MONITORING PLAN
COUPON SUMMARY

Date	Hastelloy	Stainless Steel	Fiberglass	
1/29/2018	13.326 g	10.930 g	18.027 g	New stainless steel coupon
2/9/2018	13.325 g	10.932 g	18.044 g	
3/19/2018	13.325 g	10.926 g	18.030 g	
4/16/2018	13.336 g	10.863 g	18.068 g	
5/17/2018	13.325 g	10.858 g	18.037 g	
6/20/2018	13.325 g	10.855 g	18.029 g	
7/12/2018	13.326 g	10.852 g	18.032 g	
8/21/2018	13.326 g	10.854 g	18.031 g	
9/14/2018	13.326 g	10.852 g	18.036 g	
10/10/2018	13.326 g	10.851 g	18.031 g	
11/20/2018	13.326 g	10.853 g	18.032 g	
12/11/2018	13.326 g	10.852 g	18.033 g	
1/14/2019	13.326 g	10.852 g	18.033 g	
2/20/2019	13.326 g	10.850 g	18.033 g	
3/15/2019	13.326 g	10.850 g	18.033 g	

GHESQUIERE PLASTIC TESTING, INC.

20450 HARPER AVENUE
HARPER WOODS, MI 48225
PHONE (313) 885-3585
FAX (313) 885-1771

Report Date: November 15, 2013
Test Date: October 15 - November 14, 2013

Report #1310-77651
Performed for:
Environmental Geo-Technologies
28470 Citrin Drive
Romulus, MI 48174

Attention: Mr. Don Anderson

WORK REQUESTED:

Perform Barcol Hardness test on sample submitted.

DESCRIPTION OF SAMPLE:

Sample submitted was identified as a fiberglass test coupon.

(P. O. #Credit Card).

WORK PERFORMED:

Test specimen was prepared as necessary and conditioned for a minimum of 24 hours at standard laboratory conditions prior to testing.

Barcol Hardness test was performed in accordance with the procedures of ASTM D2583-13. One specimen was tested.

RESULTS:

The following determination was made based upon the above test:

BARCOL HARDNESS

	Hardness
Specimen 1	90

Specimen is being returned with this report for further evaluation.

GHESQUIERE PLASTIC TESTING, INC.

M. W. Ghesquiere
President

MWG/kni

TOTAL 1 PAGES

GHESQUIERE PLASTIC TESTING, INC.

20450 HARPER AVENUE
HARPER WOODS, MI 48225
PHONE (313) 885-3535
FAX (313) 885-1771

Report Date: February 17, 2014
Test Date: February 14 - 17, 2014

Report #1402-78036
Performed for:
Environmental Geo-Technologies
28470 Citrin Drive
Romulus, MI 48174

Attention: Mr. Don Anderson

WORK REQUESTED:

Perform Barcol Hardness test on sample submitted.

DESCRIPTION OF SAMPLE:

Sample submitted was identified as a fiberglass test coupon.

(P. O. #Credit Card).

WORK PERFORMED:

Test specimen was prepared as necessary and conditioned for a minimum of 24 hours at standard laboratory conditions prior to testing.

Barcol Hardness test was performed in accordance with the procedures of ASTM D2583-13. One specimen was tested.

RESULTS:

The following determination was made based upon the above test:

BARCOL HARDNESS

	Hardness
Specimen 1	90

Specimen was returned to the client on February 17, 2014.

GHESQUIERE PLASTIC TESTING, INC.

M. W. Ghesquiere
President

MWG/dm

TOTAL 1 PAGES

GHESQUIERE PLASTIC TESTING, INC.

20450 HARPER AVENUE
HARPER WOODS, MI 48225
PHONE (313) 885-3535
FAX (313) 885-1771

Report Date: June 16, 2014
Test Date: June 13 - 16, 2014

Report #1406-78499
Performed for:
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Attention: Mr. Don Anderson

WORK REQUESTED:

Perform Barcol Hardness test on sample submitted.

DESCRIPTION OF SAMPLE:

Sample submitted was identified as a fiberglass test coupon.

(P. O. #Credit Card).

WORK PERFORMED:

Test specimen was prepared as necessary and conditioned for a minimum of 24 hours at standard laboratory conditions prior to testing.

Barcol Hardness test was performed in accordance with the procedures of ASTM D2583-13. One specimen was tested.

RESULTS:

The following determination was made based upon the above test:

BARCOL HARDNESS	Hardness
Specimen 1	85

Specimen was returned to the client June 16, 2014.

GHESQUIERE PLASTIC TESTING, INC.

M. W. Ghesquiere
President

MWG/dm

October 2, 2014

- TEST REPORT -

PN 118325

PO Attn:John Frost

PLASTICS TESTING DEPARTMENT

Prepared For:

John Frost
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Prepared By: _____
Melissa Martin
Sr. Project Technician

Approved By: _____
Jim Drummond
Physical & Plastics Testing, Manager

www.ardl.com

2887 Gilchrist Rd. | Akron, Ohio 44305 | answers@ardl.com
Toll Free (800) 830-ARDL | Worldwide (330) 794-6600 | Fax (330) 794-6610

October 2, 2014

John Frost
Environmental Geo-Technologies, LLC

SUBJECT: Barcol Hardness on one material.
PO# Attn;John Frost

RECEIVED: One small section identified as; Fiberglass Coupon.

BARCOL HARDNESS ASTM D 2583-13a

	Results
Barcol Hardness, Instant	97

Prepared By: _____
Melissa Martin
Sr. Project Technician

Approved By: _____
Scott W. Yates
Plastics Testing Assistant Manager

st

October 22, 2015

• TEST REPORT •

PN 125322
PO 00154

PLASTICS TESTING DEPARTMENT

Prepared For:

John Frost
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Prepared By: _____
Melissa Martin
Sr. Project Technician

Approved By: _____
Jim Drummond, Sr.
Physical & Plastic Testing, Manager

October 22, 2015

John Frost
Environmental Geo-Technologies, LLC

SUBJECT: Barcol Hardness on one material.

RECEIVED: One small section identified as; Fiberglass Coupon.

BARCOL HARDNESS ASTM D 2583-13a
Instant Reading

	Results
Barcol Hardness, Instant	96

Prepared By: Melissa Martin
Sr. Project Technician

Approved By: Scott W. Yates
Plastics Testing Assistant Manager

tc

December 12, 2016

-TEST REPORT-

PN 132662
PO

PLASTICS TESTING DEPARTMENT

Prepared For:

John Frost
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Prepared By: _____
Melissa Martin
Senior Project Technician

Approved By: _____
Jim Drummond
Physical Testing, Manager

Rev 041916

December 12, 2016

John Frost
Environmental Geo-Technologies, LLC

SUBJECT: Barcol Hardness on one (1) material.

RECEIVED: One (1) small section identified as; Fiberglass Coupon.

BARCOL HARDNESS ASTM D 2583-13a
Instant Reading

	RESULTS
Barcol Hardness, Instant	96

Prepared By: Melissa Martin
Senior Project Technician

Approved By: Scott Yates
Plastics Testing, Assistant Manager

wk

ARDL is ISO 17025 accredited by A2LA for the test methods listed on the certificates referenced on page one. NOTE: Non-ISO 17025 accredited test methods are designated with the ^ symbol to differentiate from ISO 17025 accredited methods in the body of the test report.

December 13, 2017

-TEST REPORT-

PN 139140

PO#

PLASTIC TESTING DEPARTMENT

Prepared For:

John Frost
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Prepared By:_____
Melissa Martin
Sr Project Technician

Approved By:_____
Jim Drummond
Rubber & Plastic Testing, Manager

Rev 041916

December 13, 2017

John Frost
Environmental Geo-Technologies, LLC

SUBJECT: Barcol Hardness on one material.

RECEIVED: One small section identified as; Fiberglass Coupon.

BARCOL HARDNESS ASTM D 2583-13a
Instant Reading

	Results
Barcol Hardness, Instant	96

Prepared By: Melissa Martin
Sr Project Technician

Approved By: Scott Yates
Plastics Testing, Assistant Manager

sc

INJECTION

FINGERPRINTS

FINGERPRINT FORM

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC.

RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date 3-8-19	
Receiving ID#	I0308901
Manifest# Line:	
Land Ban Cert Included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time in	
Time out	
Received by	JKF
Sampled by	

PRESERVATION		OTHER TESTS	
Compatible? (RT#)	Yes No	Barium	
PCBs (ppm)(Oily Waste Only)?		Calcium	
TOC (ppm)(CC Waste Only)?		Total Iron	
Flash Point (°F)	>140°F	Magnesium	
pH (S.U.)	6.2	Sodium Chloride	
Cyanides? (mg/L)		Bicarbonate	
Sulfides? (ppm)		Carbonate	
Specific Gravity	1.02	TDS	12%
Physical Description		Resistivity	
Stream Consistency	Yes No	Sulfate	
Oil in Sample	Yes No		
Temperature	68°F		
Conductivity	88mS		
% Solids	12%		
Turbidity	Yes No		
Color (visual)			
TSS (%)	Soil		
Radiation Screen (as needed)			
Lab Signature			

FINGERPRINT FORM

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC.

RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date	3-14-19
Receiving ID#	I0314901
Manifest# Line:	
Land Ban Cert included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time In	
Time out	
Received by	KF
Sampled by	

LABORATORY ANALYSIS (Waste Sample)			
Compatible? (RT#)	Yes No	Barium	
PCBs (ppm)(Oily Waste Only)?		Calcium	
TOC (ppm)(CC Waste Only)?		Total Iron	
Flash Point (°F)	>140°F	Magnesium	
pH (S.U.)	6.6	Sodium Chloride	
Cyanides? (mg/L)		Bicarbonate	
Sulfides? (ppm)		Carbonate	
Specific Gravity	1.02	TDS	6%
Physical Description		Resistivity	
Stream Consistency	Yes No	Sulfate	
Oil In Sample	Yes No		
Temperature	70°F		
Conductivity	105 MS		
% Solids	6%		
Turbidity	Yes No		
Color (visual)			
TSS (%)	<0.1		
Radiation Screen (as needed)			
Lab Signature			

FINGERPRINT FORM

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC.

RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date	03-25-19
Receiving ID#	10325190 1
Manifest# Line:	
Land Ban Cert included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time In	
Time out	
Received by	IKF
Sampled by	

LABORATORY ANALYSIS			
Compatible? (RT#)	Yes No	Barium	
PCBs (ppm)(Oily Waste Only)?		Calcium	
TOC (ppm)(CC Waste Only)?		Total Iron	
Flash Point (°F)	>140°F	Magnesium	
pH (S.U.)	6.9	Sodium Chloride	
Cyanides? (mg/L)		Bicarbonate	
Sulfides? (ppm)		Carbonate	
Specific Gravity	1.02	TDS	4%
Physical Description		Resistivity	
Stream Consistency	Yes No	Sulfate	
Oil in Sample	Yes No		
Temperature	67°F		
Conductivity	105 mS		
% Solids	4%		
Turbidity	Yes No		
Color (visual)			
TSS (%)	<0.1		
Radiation Screen (as needed)			
Lab Signature			

WASTE STREAMS
CHARACTERIZATIONS

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC
28470 Cliffh Dr, Romulus, MI 48174. Telephone 734 946 1000, Fax 734 946 1002

Generator Waste Profile

Profile # 01402

GENERATOR INFORMATION

Name: [redacted] USEPA ID #: [redacted]

Facility Address: [redacted] SIC/NAICS Code: _____ State Code: _____

City: [redacted] State: [redacted] Zip Code: [redacted]

Contact: _____ Title: _____ Phone: ( ) _____ Fax: ( ) _____

BILLING INFORMATION ☐ SAME AS ABOVE

Company Name: [redacted]

Address: [redacted]

City: [redacted] State: [redacted] Zip Code: [redacted]

Attention: [redacted] Phone: [redacted] Fax: [redacted]

WASTE INFORMATION

Name of Waste/Common Chemical Name:

Wastewater

Process Generating Waste (Please be specific, incomplete information may delay the approval process):

Process wastewater from chemical manufacture of quaternary Ammonium Salts

USEPA / STATE WASTE IDENTIFICATION

1. This waste is considered to be: ☒ Non Hazardous Liquid Industrial Waste ☐ Hazardous Waste
2. Regulated by TSCA? ☐ Yes ☒ No (PCBs, etc.)
3. List ALL Applicable Waste Codes: 029L

PHYSICAL CHARACTERISTICS OF WASTE

Color:	Suspended Solids	Layers:	Specific Gravity:	
☐ White/Clear	☐ 0-1 % ☐ 5-5 %	☐ Multi-Layered	☐ <0.8 ☒ 1.0 – 1.2	acceptable
☒ Black/Brown	☒ 1-3 % ☐ > 5%	☐ Bi-Layered	☐ 0.8 – 1.0 ☐ 1.3 – 1.4	
☒ Other Beige		☒ Single Phase	Exact / Other _____	031519

pH: ☐ NA ☐ ≤ 2 ☐ 2 – 4 ☐ 4 – 6 ☒ 6 – 8 ☒ 8 – 10 ☒ 10 – 12.5 ☐ ≥ 12.5

Liquid Flash Point: ☐ <73°F ☐ 73 – 100°F ☐ 101 – 140°F ☐ 141 – 200°F ☐ >200°F ☒ None ☒ Closed Cup ☐ Open Cup

VOC CONCENTRATION: ≤ 1 PPM (MUST BE COMPLETED)

TOTAL COMPOSITION OF WASTE * MUST BE EQUAL TO OR GREATER THAN 100% (LIST EACH CONSTITUENT >= 0.1%) See Attached

CONSTITUENT	MAX	MIN	CONSTITUENT	MAX	MIN
Water	95	90 %			%
Trace organics	5	0 %			%
Solids	3	0 %			%
		%			%
		%			%

Metals: Indicate if this waste contains any of the following metals. If Generator knowledge provide backup.
☐ Lab Analysis ☒ Generator Knowledge ☐ TCLP ☒ TOTAL

	Not Present	Concentration		Not Present	Concentration
PCB	☒	____ ppm	Aromatic Amine	☐	____ ppm
Dioxins	☐	____ ppm	Pesticides	☐	____ ppm
Cyanides Reactive	☐	____ ppm	Rodenticides	☐	____ ppm
Cyanides Total	☐	____ ppm	Fungicides	☐	____ ppm
Sulfides Reactive	☐	____ ppm			
Sulfides Total	☐	____ ppm			

Arsenic (As)	D004	☐ < 5 ppm	____ ppm
Barium (Ba)	D005	☐ < 100 ppm	____ ppm
Cadmium (Cd)	D006	☐ < 1 ppm	____ ppm
Chromium (Cr)	D007	☐ < 5 ppm	____ ppm
Lead (Pb)	D008	☐ < 5 ppm	____ ppm
Mercury (Hg)	D009	☐ < 0.2 ppm	____ ppm
Selenium (Se)	D010	☐ < 1 ppm	____ ppm
Silver (Ag)	D011	☐ < 5 ppm	____ ppm

TCLP Organics D012 – D043 above regulatory limits: Present ☒ Not Present ☐

IS WASTE ANY OF THE FOLLOWING? *At Least One Box Must Be Checked.*
☐ Radioactive ☐ Water Reactive ☐ Oxidizer ☐ Shock Sensitive ☐ Reactive (other) ☐ DOT Explosives
☐ NIOSH Human-Positive Carcinogens ☐ NESHAP Wastes (Benzene, etc.) ☐ Biological ☒ None Apply

SHIPPING INFORMATION

1. Is this a DOT Hazardous Material (49CFR 172.101 & 173 Subpart D)? ☐ Yes ☒ No
2. Reportable Quantity (RQ) in pounds ____
3. DOT Shipping Name Waste Non-Regulated Material Hazard Class ____ UN/NA ____
PG ____ ERG ____ Hazardous Constituents for "n.o.s." ____
4. Method of Shipment: ☒ Bulk Tanker ☐ Vac truck ☐ Rail Car ☐ Drums ☐ Totes
5. Number of Units to Ship Now: ~11,000 gal. 6. Anticipated Volume / Units per Year: Varies or ☐ One Time
6. Special Handling Requirements Including PPE: ____

CERTIFICATION STATEMENT

I hereby represent and warrant that I have personally examined and am familiar with the information contained and submitted in this and all attached documents. Based on my inquiry and personal knowledge of those individuals responsible for supplying or obtaining the information, the information contained herein is true, accurate, and complete to the best of my knowledge and belief. Furthermore, no material fact has been omitted as to make this information misleading. I understand that others may rely on this representation and warranty in the handling and processing of the waste material described herein. If this box is checked ☐, I request Environmental Geo-Technologies not to correct any inconsistencies. Any corrections Environmental Geo-Technologies makes will be consistent with the results of the sample characterization and/or regulatory requirements.

Printed Name: [redacted] Title: [redacted]

Generator's Signature: [redacted] Date: [redacted]

GENERATOR'S CHAIN OF CUSTODY RECORD INSTRUCTIONS:

Please collect a representative 1-quart sample of the waste described in the above referenced GENERATORS WASTE PROFILE REPORT using an appropriate container. A representative sample is one obtained using any of the applicable sampling methods cited in 40 CFR 261-Appendix 1. Fill in the sampling information in the spaces provided below. If you have problems obtaining a representative sample of your waste, please contact your Environmental Geo-Technologies representative.

1. ____ SAMPLING METHOD 2. ____ COLLECTION POINT

3. ____ SAMPLE COLLECTOR'S NAME, TITLE, EMPLOYER

4. Sample No. ____ Preservation: Yes ☐ No ☐

5. CHAIN OF CUSTODY *Each person who handles the sample must sign below when the sample passes from one to another.*

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time

Wastewater

FIGURE 4-3.

CAMUS WATER

1307 Evanston Avenue Muskegon, MI 49442
ph 231/788-4934 / fx 231/788-6474

GENERATOR'S WASTE MATERIAL PROFILE SHEET

NEW	AMENDMENT	PROFILE NUMBER

GENERATOR

Name	[redacted]
Address	
Contact Name	
Contact Phone:	
Email	
EPA ID #	
SIC Code	2869
Volume	[redacted]
Shipping Method	[illegible]
Comments	

BROKER OR SALESPERSON

Name	[redacted]
Address	
Contact	
Email	

TRANSPORTER

Name	
Address	Same
Contact	
Email	Phone
EPA ID#	[redacted]

WASTE DESCRIPTION

Applicable Manufacturing Category (if any):

Common Name of Process Generating Waste: Waste water

DOT Shipping Name: Non Regulated

Is this waste classified as hazardous under RCRA? ____ Yes ✓ No

If yes, specify:

Is the process by which this waste is generated subject to Federal Categorical Pretreatment Standards? ____ Yes ____ No

If yes, specify:

Description of Organic Waste

- ✓ Wastewater from Organic Chemical Product Operations
- ___ Wastewater from Adhesives and/or Epoxies Formulation
- ___ Tank Clean-out from Organic, non-Petroleum Sources
- ___ Contaminated Groundwater Clean-up from Non-petroleum Sources
- ___ Landfill Leachate
- ___ Still Bottoms
- ___ Byproduct Waste Glycol
- ___ Wastewater from Paint Washes
- ___ Solvent Bearing Wastes
- ___ Off-Specification Organic product

CHEMICAL & PHYSICAL STATE

Color: [illegible]

Odor:

Surfactants present: ____ Yes ✓ No

- ✓ Liquid
- ___ Semi-liquid
- ___ Solid
- ___ Multilayered
- ___ Bilayered
- ___ Single Phase

	Minimum	Typical	Maximum
Flashpoint (°F)	>200		
pH (s.u.)			
Specific Gravity			
Viscosity			
Percent Solids	1	5	8

List key constituents in waste:

Water

[illegible]

MSDS Attached? Yes **No** Comment

TCLP Attached? Yes **No** Comment

SAMPLE INFORMATION (REQUIRED)

Date Collected: [illegible]-08 Time Collected:

Sampled by: [redacted] Sampling Location: Tank [illegible]

Sample Type: ✓ Grab ____ Composite

FIGURE 4-3.

CAMUS WATER

5301 Evanston Avenue Muskegon, MI 49442
ph: 231-788-4934 fx: 231-798-5474

GENERATOR'S WASTE MATERIAL PROFILE SHEET

NEW AMENDMENT PROFILE NUMBER

CHARACTERISTICS

COD	(ppm)		Cyanide	(ppm)	
BOD	(ppm)		Arsenic	(ppm)	
TOC	(ppm)		Lead	(ppm)	
TKN	(ppm)		Mercury	(ppm)	
NH_3-N	(ppm)		Silver	(ppm)	
PO_4-P	(ppm)		Zinc	(ppm)	
TSS	(ppm)		Conductivity		
Oil & Grease	(ppm)				
Cadmium	(ppm)		VOCs by EPA 624	Yes	No
Chromium	(ppm)				
Copper	(ppm)		SVOCs by EPA 625	Yes	No
Nickel	(ppm)				

PESTICIDE/HERBICIDE WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain Endrin, Methoxychlor, 2,4-D Lindane, Toxaphene, 2,4,5-TP (Silvex), Chlordane, or Heptachlor (and its Epoxide). These constituents are not used at the location where this waste was generated, no are they known to be present in the materials of which the above [redacted] reason to suspect their presence in the waste.

Generator's Signature: [redacted]

POLYCHLORINATED BIPHENYL (PCB) WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain PCBs at a concentration of 50 ppm when measured in each container or vessel; that the material is not contaminated with PCBs from [redacted] or greater PCBs; and hereby agree to indemnify and hold harmless from any costs, damages, or liability resulting from the breach of this warranty.

Generator's Signature: [redacted]

HAZARDOUS WASTE WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain any material at a concentration which would render it as hazardous as defined in 40 CFR 261.3 when measured in each container or vessel [redacted] to indemnify and hold harmless from any cost, damages, or liability resulting from the breach of this warranty.

Generator's Signature: [redacted]

GENERATOR CERTIFICATION OF WASTE PROFILE

Name (Print): [redacted] Title: [redacted]

Signature: [redacted] Date: 6/16/08

WWTP ACCEPTANCE OF WASTE FOR TREATMENT

Name (Print): Title:

Signature: Date:

CAMUS ACCEPTANCE OF WASTE

Name (Print): Title:

Signature: Date:

NORTHERN A-1 SERVICES, INC

Generator Waste Profile

Approval # [illegible]

Generator Information

Generator Name: [redacted] Generator EPA ID#: [redacted]

Facility Address: [redacted]

Contact Name: [redacted] Phone: [redacted] Fax: [redacted]

Customer Billing Address

Customer Name: Same

Billing Address:

Contact Name: Phone: Fax:

Waste Information

Waste Name: Wastewater

Process Generating Waste: Chemical Manufacturing

Parameters for Sample: Gasoline ___ Diesel ___ Fuel Oil ___

Date of Last Analysis: MSDS Available:

Volume: ~ 20-30,000 Gal Frequency: Annual

Is this Waste Subject to Corrective Action/Exemption per 40 CFR/RCRA: Yes ___ No X

Does this waste contain:

PCBs: Yes ☐ No ☒ Listed Waste: Yes ☐ No ☒ Reactive Sulfide: Yes ☐ No ☒ Reactive Cyanide: Yes ☐ No ☒ Herbicide or Pesticides: Yes ☐ No ☒

Physical Characteristics

%Solid <3 %Sludge <1 %Liquid ≥97

Odor Mild Color Varies / [illegible]

Composition

Process wastewater from chemical manufacture of quaternary ammonium salts,* alkaline [illegible] [illegible] [illegible] high phosphorous content (<1500 ppm), high pH (7-12.4)

Certification

Generator certifies that all information submitted in this and all attached documents is complete and accurate, that all [illegible] [illegible] have been disclosed [illegible] [illegible] US EPA [illegible]

Printed Name: [redacted] Title: [redacted]

Authorized Signature: [redacted] 1/23/06

Northern A-1 Representative Signature of approval: [redacted]

Approval Date: 1/23/06 Expiration Date: 1/23/08

3947 N. US-131 * P.O. Box 1030 * Kalkaska, Michigan 49646 * 231/258-9961 tel * 231/258-9971 fax * 800/444-3663
1133 Eliot Barney * Muskegon, Michigan 49442 * 231/722-[illegible] tel * 231/722-6201 fax * 800/847-9154
P.O. Box 247 * Manistee, Michigan 49660 * 231/757-0529 tel * 231/757-0529 fax * 800/634-1400

* Tetra-butyl ammonium bromide
Cetyl pyridinium chloride
Dimethyldiallyl ammonium chloride
phenyl trimethyl ammonium chloride

NORTHERN A-1 SERVICES, INC

Generator Waste Profile

Approval # ______

Generator Information

Generator Name: [redacted] Generator EPA ID: [redacted]

Facility Address: [redacted]

Contact Name: [redacted] Phone: [redacted] Fax: [redacted]

Customer/Billing Address

Customer Name: Same

Billing Address: ______

Contact Name: ______ Phone: ______ Fax: ______

Waste Information

Waste Name: Wastewater *

Process Generating Waste: Chemical Manufacturing

Petroleum for Recycle: Gasoline ______ Diesel ______ Fuel Oil ______

Date of Last Analysis: ______ MSDS Available: ______

Volume: ~ 20 - 30,000 gal. Frequency: Annual

Is this Waste Subject to Corrective Action/Exemption per 40 CFR/NREPA: Yes ______ No X

Does this waste contain: Listed Waste: Yes ☐ No ☒ Reactive Cyanide: Yes ☐ No ☒

PCBs: Yes ☐ No ☒ Reactive Sulfide: Yes ☐ No ☒ Herbicide or Pesticides: Yes ☐ No ☒

Physical Characteristics

%Solid <3 %Sludge <1 %Liquid >97

Odor Mild Color Varies / brown

Composition:

Process wastewater from chemical manufacture of quaternary ammonium salts,* ethylene maleic anhydride copolymer (EMA), high phosphorus content (< 1000 ppm), high pH (7-12.4)

Certification

Generator certifies that all information submitted in this and all attached documents is complete and accurate, that all known or suspected hazards have been [redacted] classified non-hazardous according to US EPA ...

Printed Name: [redacted] Title: [redacted]

Authorized Signature: [redacted] Date: 1/23/06

Northern A-1 Representative Signature of approval: ______

Approval Date: ______ Expiration Date: ______

3947 N. * US-131 * P.O. Box 1030 * Kalkaska, Michigan 49646 * 231/258-9961 tel * 231/258-9971 fax * 800/544-2663
1122 East Barney * Muskegon, Michigan 49444 * 231/728-6354 tel * 231/728-6201 fax * 800/847-3154
P.O. Box 247 * Manistee, Michigan 49660 * 231/757-0525 tel * 231/757-0529 fax * 800/634-1400

* Tetrabutyl ammonium Bromide
Cetyl pyridinium Chloride
Distearyl dimethyl ammonium methosulfate

Distearyl dimethyl ammonium bisulfate
phenyl trimethyl ammonium chloride

CAMUS WATER

GENERATOR'S WASTE MATERIAL PROFILE SHEET

✓ NEW AMENDMENT

PROFILE NUMBER

GENERATOR

Name [redacted]
Address
Contact Name
Contact Phone
Email
EPA ID #
SIC Code
Volume
Shipping Method Bulk
Comments

BROKER OR SALESPERSON

Name
Address
Contact
Email Phone

TRANSPORTER

Name
Address
Contact
Email Phone
EPA ID#

WASTE DESCRIPTION

Applicable Manufacturing Category (if any):
Common Name of Process Generating Waste:
DOT Shipping Name:
Is this waste classified as hazardous under RCRA? ___ Yes _X_ No
If yes, specify:
Is the process by which this waste is generated subject to Federal Categorical Pretreatment Standards? _X_ Yes ___ No
If yes, specify:

Description of Organic Waste

- Wastewater from Organic Chemical Product Operations
- Wastewater from Adhesives and/or Epoxies Formulation
- Tank Cleaning from Organic, non-Petroleum Sources
- Contaminated Groundwater Cleanup from Nonpetroleum Sources
- Landfill Leachate
- Still Bottoms
- Byproduct Waste Glycol
- Wastewater from Paint Washes
- Solvent-Bearing Wastes
- Off-Specification Organic product

CHEMICAL & PHYSICAL STATE

Color
Odor
Suspended solids present? Yes No

- Liquid
- Semi-liquid
- Solid
- Multilayered
- Bilayered
- Single Phase

List key constituents in Waste:

	Minimum	Typical	Maximum
Flashpoint (°F)			
pH (s.u.)			12
Specific Gravity			
Viscosity			
Percent Solids			

MSDS Attached? Yes No Comment:
TCLP Attached? _X_ Yes ___ No Comment:

SAMPLE INFORMATION (REQUIRED)

Date Collected:
Sampled by: [redacted]
Time Collected:
Sample Type: _X_ Grab ___ Composite
Sampling Location: [redacted]

CAMUS WATER

5307 Evanston Avenue Muskegon, MI 49442
[illegible]

GENERATOR'S WASTE MATERIAL PROFILE SHEET

✓ NEW AMENDMENT

PROFILE NUMBER 2005-2

CHARACTERISTICS

COD	(ppm)	[illegible]	Cyanide	(ppm)	[illegible]
BOD	(ppm)	[illegible]	Arsenic	(ppm)	[illegible]
TOC	(ppm)	[illegible]	Lead	(ppm)	[illegible]
TKN	(ppm)	[illegible]	Mercury	(ppm)	[illegible]
NH_3-N	(ppm)	[illegible]	Silver	(ppm)	[illegible]
PO_4-P	(ppm)	[illegible]	Zinc	(ppm)	[illegible]
TSS	(ppm)	[illegible]	Conductivity		[illegible]
Oil & Grease	(ppm)	[illegible]			
Cadmium	(ppm)	[illegible]			
Chromium	(ppm)	[illegible]	VOCs by EPA 624	X Yes	___ No
Copper	(ppm)	[illegible]			
Nickel	(ppm)	[illegible]	SVOCs by EPA 625	X Yes	___ No

PESTICIDE/HERBICIDE WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain [illegible] Toxaphene, 2,4,5-TP (silvex), chlordane, or Heptachlor (and its epoxide). These constituents were not used at the location where this waste was generated, do not [illegible] known to be present in the materials of which the [illegible] [redacted] there is no reason to suspect their presence in the waste.

Generator's Signature: [redacted]

POLYCHLORINATED BIPHENYL (PCB) WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain PCBs at a concentration of 40 ppm when measured in each container or vessel; that the material is not contaminated with PCBs [redacted] 50 ppm or greater PCBs; and hereby agree to indemnify and hold harmless from any cost, damages, or liability re[redacted]y.

Generator's Signature: [redacted]

HAZARDOUS WASTE WARRANTY

I hereby certify the following: The waste identified in this waste profile form does not contain any material at a concentration which would render it as hazardous as defined in 40 CFR 261 when measured in each container or vessel [illegible] to indemnify and hold harmless from any cost, damages, or liability resulting from the breach of this warra[redacted]

Generator's Signature: [redacted]

GENERATOR CERTIFICATION OF WASTE PROFILE

Name (Print): [redacted] Title: [redacted]

Signature: [redacted] 5/2/05

WWTP ACCEPTANCE OF WASTE FOR TREATMENT

Name (Print): [redacted] Title: [redacted]

Signature: [redacted] Date: [illegible]

CAMUS ACCEPTANCE OF WASTE

Name (Print): [redacted] Title: [redacted]

Signature: [redacted] Date: [illegible]

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673

TRACE
ANALYTICAL LABORATORIES, INC.

231-773-5998 Phone
888-979-4469 Fax
www.trace-labs.com

March 12, 2019

[redacted]

Phone: [redacted]
Fax: [redacted]

RE: Trace ID: T19C017

Dear [redacted]

Enclosed are your analytical results associated with your project for Vertellus VW / Tank. The results of this report relate only to the samples listed in the body of this report.

The results were obtained from Trident Environmental

Thank you for working with Trace. If you have questions concerning this report, please contact me at 231.773.5998 or by email at .

Sincerely,

Timothy W. Brewer

Tim Brewer
Project Manager

Enclosures

ACCREDITED IN ACCORDANCE WITH nelac

NJDEP Accreditation No. MI008

242 Howard Avenue
Holland, MI 49424
Phone: (855) 875-2532
Fax: (616) 395-8984
TridentPFAS.com

March 12, 2019

[redacted]

Subject: Water Samples for project number PFAS0304A

Dear [redacted]

Enclosed are your analytical results for the samples submitted and listed below. All reported results were obtained in accordance with the EPA Method 537M unless otherwise stated.

If you have any questions concerning this report, please contact us at (855) 875-2532 or by email at LRawlings@TridentBiometrics.com

Sincerely,

Trident Environmental, LLC

242 Howard Avenue
Holland, MI 49424
Phone: (855) 875-2532
Fax: (616) 395-8984
TridentPFAS.com

Definition of Terms

Acronym / Code	Definition
EPA Method 537M - ID	A modified version of the EPA Method 537 to test for water using isotope dilution
PFAS	Poly and Perfluoroalkyl Substances
ppt	Parts per trillion
**	Recovery and/or RPD was outside laboratory acceptable limits
%	Instrument readout is outside of dynamic range of the calibration curve so value shown is an estimate
#	Smaller aliquot of sample was extracted to attempt to quantify high values, concentrations still exceed upper limit
L	Spiked concentration is lower than acceptable recovery
H	Spiked concentration is higher than acceptable recovery

242 Howard Avenue
Holland, MI 49424
Phone: (855) 875-2532
Fax: (616) 393-8981
TridentPFAS.com

Sample Information Summary

Lab ID	Sample ID Assigned	Volume Tested	Matrix	Batch ID	Date Received	Date Reported
400857A	[redacted]	99.80 mL	Aqueous	JR031119A	2/28/2019 10:00:00	3/4/2019 9:30:00

TRIDENT ENVIRONMENTAL
242 Howard Avenue
Holland, MI 49424
Phone: (855) 875-2532
Fax: (616) 396-8964
TridentPFAS.com

PFAS Final Report

Analytical Results

Lab ID:	400667A	Date Collected:	2/26/2019
Sample Description:	[redacted]	Date Received:	3/4/2019
Batch Number:	JR031119A	Date Processed:	3/11/2019
Matrix:	Aqueous	Date Analyzed:	3/12/2019

Acronym	Analyte Name	Results	Reporting Limit	Dilution	Prepared By	Analyzed By	Note
4:2 FTS	4:2 Fluorotelomer Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
6:2 FTS	6:2 Fluorotelomer Sulfonic Acid	Not Detected	25.05 ppt	1.0	JR	CML	
8:2 FTS	8:2 Fluorotelomer Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
FOSA	Perfluorooctane Sulfonamide	Not Detected	25.05 ppt	1.0	JR	CML	
N-EtFOSAA	N-Ethyl Perfluorooctane Sulfonamidoacetic Acid	32.29 ppt	25.05 ppt	1.0	JR	CML	
N-MeFOSAA	N-Methyl Perfluorooctane Sulfonamidoacetic Acid	42.87 ppt	25.05 ppt	1.0	JR	CML	
PFBA	Perfluorobutanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFBS	Perfluorobutane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFDA	Perfluorodecanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFDoA	Perfluorododecanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFDS	Perfluorodecane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFHpA	Perfluoroheptanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFHpS	Perfluoroheptane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFHxA	Perfluorohexanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFHxS	Perfluorohexane Sulfonic Acid	Not Detected	25.05 ppt	1.0	JR	CML	
PFNA	Perfluorononanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFNS	Perfluorononane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFOA	Perfluorooctanoic Acid	36.77 ppt	5.01 ppt	1.0	JR	CML	
PFOS	Perfluorooctane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFPeA	Perfluoropentanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFPeS	Perfluoropentane Sulfonic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFTeDA	Perfluorotetradecanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFTrDA	Perfluorotridecanoic Acid	Not Detected	5.01 ppt	1.0	JR	CML	
PFUnDA	Perfluoroundecanoic Acid						

Quality Control Results

Sample Description:	Blank	Date Processed:	3/11/2019
Batch Number:	JR031119A	Date Analyzed:	3/12/2019

Analyte	Analyte Name	Result	Reporting Limit	Extracted By	Analyzed By	QC
4:2 FTS	4:2 Fluorotelomer Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
6:2 FTS	6:2 Fluorotelomer Sulfonic Acid	Not Detected	10.00 ppt	JR	CML	
8:2 FTS	8:2 Fluorotelomer Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
FOSA	Perfluorooctane Sulfonamide	Not Detected	10.00 ppt	JR	CML	
N-EtFOSAA	N-Ethyl Perfluorooctane Sulfonamidoacetic Acid	Not Detected	10.00 ppt	JR	CML	
N-MeFOSAA	N-Methyl Perfluorooctane Sulfonamidoacetic Acid	Not Detected	10.00 ppt	JR	CML	
PFBA	Perfluorobutanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFBS	Perfluorobutane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFDA	Perfluorodecanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFDoA	Perfluorododecanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFDS	Perfluorodecane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFHpA	Perfluoroheptanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFHpS	Perfluoroheptane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFHxA	Perfluorohexanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFHxS	Perfluorohexane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFNA	Perfluorononanoic Acid	Not Detected	10.00 ppt	JR	CML	
PFNS	Perfluorononane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFOA	Perfluorooctanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFOS	Perfluorooctane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFPeA	Perfluoropentanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFPeS	Perfluoropentane Sulfonic Acid	Not Detected	2.00 ppt	JR	CML	
PFTeDA	Perfluorotetradecanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFTrDA	Perfluorotridecanoic Acid	Not Detected	2.00 ppt	JR	CML	
PFUnDA	Perfluoroundecanoic Acid	Not Detected	2.00 ppt	JR	CML	

242 Howard Avenue
Holland, MI 49424

Phone: (855) 875-2832
Fax: (616) 395-6984

TridentPFAS.com

Quality Control Results

Sample Description:	Low Laboratory Control Sample	Date Received:	3/11/2019
Batch Number:	JR031119A	Date Analyzed:	3/12/2019

Acronym	Analyte Name	Spiked Conc.	Result	Rec.	Recovery Limits	Note
4:2 FTS	4:2 Fluorotelomer Sulfonic Acid	10.00 ppt	10.87ppt	108.70%	50% - 150%	
6:2 FTS	6:2 Fluorotelomer Sulfonic Acid	10.00 ppt	18.64ppt	186.44%	50% - 150%	H
8:2 FTS	8:2 Fluorotelomer Sulfonic Acid	10.00 ppt	13.91ppt	139.13%	50% - 150%	
FOSA	Perfluorooctane Sulfonamide	10.00 ppt	14.40ppt	144.01%	50% - 150%	
N-EtFOSAA	N-Ethyl Perfluorooctane Sulfonamidoacetic Acid	50.00 ppt	52.78ppt	105.56%	50% - 150%	
N-MeFOSAA	N-Methyl Perfluorooctane Sulfonamidoacetic Acid	50.00 ppt	74.34ppt	148.69%	50% - 150%	
PFBA	Perfluorobutanoic Acid	10.00 ppt	11.71ppt	117.10%	50% - 150%	
PFBS	Perfluorobutane Sulfonic Acid	10.00 ppt	14.81ppt	148.08%	50% - 150%	
PFDA	Perfluorodecanoic Acid	10.00 ppt	14.87ppt	148.67%	50% - 150%	
PFDoA	Perfluorododecanoic Acid	10.00 ppt	12.66ppt	126.61%	50% - 150%	
PFDS	Perfluorodecane Sulfonic Acid	10.00 ppt	11.26ppt	112.58%	50% - 150%	
PFHpA	Perfluoroheptanoic Acid	10.00 ppt	12.12ppt	121.15%	50% - 150%	
PFHpS	Perfluoroheptane Sulfonic Acid	10.00 ppt	11.42ppt	114.18%	50% - 150%	
PFHxA	Perfluorohexanoic Acid	10.00 ppt	10.95ppt	109.49%	50% - 150%	
PFHxS	Perfluorohexane Sulfonic Acid	10.00 ppt	10.56ppt	105.56%	50% - 150%	
PFNA	Perfluorononanoic Acid	10.00 ppt	9.84ppt	98.40%	50% - 150%	
PFNS	Perfluorononane Sulfonic Acid	10.00 ppt	11.53ppt	115.26%	50% - 150%	
PFOA	Perfluorooctanoic Acid	10.00 ppt	11.56ppt	115.62%	50% - 150%	
PFOS	Perfluorooctane Sulfonic Acid	10.00 ppt	9.45ppt	94.48%	50% - 150%	
PFPeA	Perfluoropentanoic Acid	10.00 ppt	11.39ppt	113.86%	50% - 150%	
PFPeS	Perfluoropentane Sulfonic Acid	10.00 ppt	12.43ppt	124.28%	50% - 150%	
PFTeDA	Perfluorotetradecanoic Acid	10.00 ppt	8.99ppt	89.87%	50% - 150%	
PFTrDA	Perfluorotridecanoic Acid	10.00 ppt	8.79ppt	87.92%	50% - 150%	
PFUnDA	Perfluoroundecanoic Acid	10.00 ppt	13.67ppt	136.66%	50% - 150%	

Quality Control Results

Sample Description:	High Laboratory Control Sample	Date Received:	3/11/2019
Batch Number:	JR031119A	Date Analyzed:	3/12/2019

Acronym	Analyte	Spike Conc.	Result	Rec.	Test Limits	
4:2 FTS	4:2 Fluorotelomer Sulfonic Acid	200.00 ppt	241.77 ppt	120.88%	50% - 150%	
6:2 FTS	6:2 Fluorotelomer Sulfonic Acid	200.00 ppt	271.38 ppt	135.70%	50% - 150%	
8:2 FTS	8:2 Fluorotelomer Sulfonic Acid	200.00 ppt	287.73 ppt	143.87%	50% - 150%	
FOSA	Perfluorooctane Sulfonamide	200.00 ppt	243.69 ppt	121.85%	50% - 150%	
N-EtFOSAA	N-Ethyl Perfluorooctane Sulfonamidoacetic Acid	1,000.00 ppt	959.32 ppt	95.93%	50% - 150%	
N-MeFOSAA	N-Methyl Perfluorooctane Sulfonamidoacetic Acid	1,000.00 ppt	1,303.92 ppt	130.39%	50% - 150%	
PFBA	Perfluorobutanoic Acid	200.00 ppt	244.64 ppt	122.32%	50% - 150%	
PFBS	Perfluorobutane Sulfonic Acid	200.00 ppt	330.42 ppt	165.21%	50% - 150%	H
PFDA	Perfluorodecanoic Acid	200.00 ppt	223.42 ppt	111.71%	50% - 150%	
PFDoA	Perfluorododecanoic Acid	200.00 ppt	206.61 ppt	103.26%	50% - 150%	
PFDS	Perfluorodecane Sulfonic Acid	200.00 ppt	236.72 ppt	118.36%	50% - 150%	
PFHpA	Perfluoroheptanoic Acid	200.00 ppt	271.62 ppt	135.81%	50% - 150%	
PFHpS	Perfluoroheptane Sulfonic Acid	200.00 ppt	232.63 ppt	116.31%	50% - 150%	
PFHxA	Perfluorohexanoic Acid	200.00 ppt	223.79 ppt	111.89%	50% - 150%	
PFHxS	Perfluorohexane Sulfonic Acid	200.00 ppt	254.61 ppt	127.31%	50% - 150%	
PFNA	Perfluorononanoic Acid	200.00 ppt	236.79 ppt	118.40%	50% - 150%	
PFNS	Perfluorononane Sulfonic Acid	200.00 ppt	202.27 ppt	101.14%	50% - 150%	
PFOA	Perfluorooctanoic Acid	200.00 ppt	240.48 ppt	120.24%	50% - 150%	
PFOS	Perfluorooctane Sulfonic Acid	200.00 ppt	242.10 ppt	121.05%	50% - 150%	
PFPeA	Perfluoropentanoic Acid	200.00 ppt	247.88 ppt	123.94%	50% - 150%	
PFPeS	Perfluoropentane Sulfonic Acid	200.00 ppt	236.58 ppt	118.29%	50% - 150%	
PFTeDA	Perfluorotetradecanoic Acid	200.00 ppt	170.92 ppt	85.46%	50% - 150%	
PFTrDA	Perfluorotridecanoic Acid	200.00 ppt	208.38 ppt	104.19%	50% - 150%	
PFUnDA	Perfluoroundecanoic Acid	200.00 ppt	237.09 ppt	118.55%	50% - 150%	

CHAIN-OF-CUSTODY RECORD

TRACE ANALYTICAL LABORATORIES, INC.

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673

Phone 231.773.5998
Fax 888.979.4469
www.trace-labs.com

Page 1 of 1

Trace ID No.: T19C017

Report Results To:		Bill To:
Company Name: [redacted]		PO#: 185768
Report To: [redacted]		Contact Name:
Mailing Address:		Billing Address (if different):
City, State, Zip Code:		City, State, Zip Code:
Office Phone:	Cell Phone:	Phone Number:
Email Address:		Billing Email Address:

Trace Use:
Logged By: MLP
Checked By: [illegible]
Soil Volatiles Preserved (circle if applicable): MeOH Low Level Lab
Sampling Time:

Turnaround Requirements:
- [x] Standard (crossed out)
- [ ] 4 Day*
- [ ] 3 Day*
- [ ] 48 Hour*
- [ ] 24 Hour*

* Requires Prior Approval

10 day please

Matrix Key:
S = Soil / Solid; W = Water; SL = Sludge; Oil = Oil; WI = Wipes; LW = Liquid Waste; A = Air; D = Drinking Water

Project Name: [redacted]
Sampled By: [redacted]

Analysis Requested

Trace No.	Date Collected	Time Collected	Client Sample ID	Metals Field Filtered (Y/N)	Matrix	Number of Containers	Preservation: Cool	HCl	HNO3	H2SO4	NaOH	Other	PFAS	Remarks	Possible Health Hazards?
1	2/28/19	10am	[redacted]		W	1							1		

Please Sign		Date	Time	Released By	Received By	Date	Time
1)	[redacted]	3/1/19	11:20	2) [signature]	[signature]	3-1-19	1501
3)				4)			

In executing this Chain of Custody, the client acknowledges the terms as set forth at www.trace-labs.com/terms-of-agreement.

☐ Check this box if you would not like your samples analyzed if received outside of the conditions outlined in the Trace Sample Acceptance Policy at www.trace-labs.com/downloads.

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673

TRACE ANALYTICAL LABORATORIES, INC.

231-773-5998 Phone
888-979-4469 Fax
www.trace-labs.com

SAMPLE LOG IN CHECKLIST

Trace ID #: T19C017 Date: 3-1-19 Package Description: Cooler Temperature: 14.3

Client Name: [redacted] Time: 1505 Logged In by: mb

Cooler Receipt

Cooler/samples delivered by: Trace courier [X]

Hand delivered [ ] Name of delivery person: _____

Commercial courier [ ] UPS [ ] FED EX [ ] US Mail [ ]

Tracking Number: [X] Not Applicable

Tracking #: _____

COC Seals present and intact on cooler? [X] Not Applicable [ ] No [ ] Yes

Custody seals signed by Client? [ ] No [ ] Yes Client custody seal # (if applicable): _____

Coolant and Temperature

Type of Coolant Used

Slurry w/ crushed, cubed, or chip ice? [ ]

Multiple bags of ice around samples? [ ]

Ice Packs/ Blue Ice ? [ ]

No Coolant Present: [X]

Ice still present upon receipt (circle one):

Yes No N/A

Cooler Temperature

Correction Factors: -Digital Stick Thermometer CF = -0.6°C

-IR Thermometer CF = -0.8°C

Representative Sample Temperature: 13.8 °C (check one below)

[ ] Temp Blank (Stick Thermometer)

[X] Client Sample (IR Thermometer)

Melt Water: 0 / M °C (Use Digital Stick Thermometer)

General

	Yes	No	NA	Comments
All bottles arrived unbroken with labels in good condition?	X			
Each sample point is in a sealed plastic bag?			X	
Labels filled out completely?	X			
All bottle labels agree with Chain of Custody (COC)?	X			
Sufficient sample to run tests requested?	X			
pH checked and samples at correct pH?			X	See Below*
Correct preservative added to samples?	X			
Air bubbles absent from VOAs?			X	
COC filled out properly and signed by client?	X			
COC signed in by TRACE sample custodian?	X			
Was project manager called and samples discussed?			X	

Notes:

EMD pH Test Strips Used:

[ ] pH 0-2.5 Lot: HC781462 [ ] pH 11.0-13.0 Lot: HC800681

[ ] Other _____

Form 70-A.25
Effective 7/25/18

TRACE Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS