

Richard Powals

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