

September 8, 2015

**United States Environmental Protection Agency  
Region 5, WU-16J**

77 West Jackson Blvd.  
Chicago, Illinois 60604-3590  
ATTN: UIC Branch, DI Section

Re: Written Report, Two EGT Injection Parameter Exceedances, Well # 2 Maximum Injection Flowrate (in conformance with MI-163-1W-CO11, Part III.A, page 1 of 3)

Ladies & Gentlemen:

Environmental Geo-Technologies, LLC ("EGT") is writing this to inform you that an injection parameter, maximum injection flowrate, triggered multiple shutdown alarms on 2 separate days (09.03.15 & 09.05.15). The condition that triggered the alarms was a false positive signal, however, the actual operational parameter was not exceeded.

On 09.03.15 at 1:57 pm, an alarm was triggered for the maximum injection flowrate on injection well #2. This was initially confusing since the well had already been shut down previously at 1:00 pm and the system valves were closed. The waste stream that had been injected earlier that day was heavy enough to create a vacuum on the well. After well #2 was shut down, the vacuum emptied the injection pipeline of liquid. The magnetic flow meter needs to have liquid submerging the electrodes when it is in stasis. When liquid is not submerging the electrodes, the meter will create a false positive signal. The signal jumped to a flowrate of 309.04 gpm causing the alarm. This false positive signal continued until an EGT deep well operator could get liquid back into the pipeline and close the valves to lock the liquid in place.

Also on well #2, the identical issue occurred on 09.05.15 at 11:33 am with a signal flowrate of 595 gpm, and at 2:39 pm with a signal flowrate of 440 gpm. These false flowrates were again because of vacuum on the pipeline. September 5<sup>th</sup> was a Saturday where EGT employees were not on site and the site was not operational for the weekend period. The alarm system alerted the onsite security force who alerted an EGT deep well operator to respond. The deep well operator responded twice on September 5<sup>th</sup> because after the first response and filling the pipe, the valves on the well were inadvertently not initially closed to lock the liquid into the pipe, and, vacuum pulled the liquid out of the pipe a second time. The false positive signal continued until an EGT deep well operator could get liquid back into the pipeline and close the valves to lock the liquid in place.

The alarm system is now operating as it should and has alerted operators and security of the condition triggered. The system is also disabling injection operations until the alarm condition is corrected and the system is reset.

This written report of these exceedances is timely [within five (5) working days] and in conformance with EGT's UIC Injection Permit # MI-163-1W-C011, Part 1.E.12.d.3 for the occurrence that occurred on 09.03.15 that was verbally reported to Mr. Allan Batka on 09.03.15, and for the occurrences that occurred on 09.05.15 that were verbally reported to Mr. Allan Batka on 09.05.15.

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), P. Sullivan (EGT), T. Athans (HH)

rjp090815/EGTEPAWell#2WrittenReport090815