



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

FEB 26 2014

REPLY TO THE ATTENTION OF:  
WU-16J

**CERTIFIED MAIL 7009 1680 0000 7648 4299**  
**RETURN RECEIPT REQUESTED**

Richard J. Powals  
Environmental Geo-Technologies, LLC  
28470 Citrin Drive  
Romulus, Michigan 48174

RE: Request to Issue an Exemption from Land Disposal Restrictions

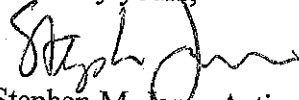
Dear Mr. Powals:

The U.S. Environmental Protection Agency is in receipt of your December 13, 2013 letter requesting an exemption from the Land Disposal Restrictions under the Resource Conservation and Recovery Act, as amended for two wells that Environmental Geo-Technologies, LLC operates in Romulus, Michigan. EPA granted a Land Disposal Restriction Exemption for these wells, numbers 1-12 and 2-12, and published notification of that exemption in the Federal Register on March 25, 2004. Although the exemption identifies Environmental Disposal Systems, Inc. (EDS) as the party that installed the wells and sought the exemption, the exemption applies to the wells themselves.

The March 25, 2004 Federal Register notice identifies compliance with specific conditions for the exemption to be valid. One of the conditions requires the injection operation to be in full compliance with all conditions of the permits issued by EPA. Although the notice identifies the well permit numbers issued to EDS, the exemption is specific to the wells and permit conditions regulating injection into those wells regardless of the permit numbers. EPA therefore will treat your December 13, 2013 letter as formal notice of a non-substantive change to the exemption, to clarify that the exemption is presently conditioned on compliance with permit numbers MI-163-1W-C010 and MI-163-1W-C011. EPA agrees that the change is non-substantive and acceptable. Consistent with EPA's *Modification of Class I Hazardous Waste Injection Well "No Migration" Exemptions—Underground Injection Control Program Guidance #7* (Feb. 13, 1991), all correspondence regarding this non-substantive change will be placed in the Administrative Record for the petition.

If you should have any questions regarding this letter please call Allan Batka at (312) 353-7316 or via e-mail at [batka.allan@epa.gov](mailto:batka.allan@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen Jann". The signature is written in a cursive style with a large, prominent initial "S".

Stephen M. Jann, Acting Chief  
Underground Injection Control Branch

# EGT

## Environmental GEOTechnologies

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28470 Citrin Drive, Romulus, Michigan 48174 | Phone 734-946-1000 | Fax 734-946-1002

December 13, 2013

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

Re: Request to Issue an Exemption from Land Disposal Restrictions

Dear Mr. Batka:

We hereby request that the U.S. EPA issue an exemption from the land disposal restrictions to Environmental Geo-Technologies, LLC. for both of the wells No.1-12 and 2-12. All of the subsurface information previously submitted for these two wells as required by 40 CFR part 138, subpart C remains valid.

This request is in conformance with our verbal request of June 7, 2013 (and in conformance with Mr. Steven Roy's statements of 06.07.13 & 06.26.13) and re-iterated yesterday, December 11, 2013.

Sincerely,



Richard J. Powals, P.E.

cc: J. Frost (EGT), T. Athans (HH)

121313/rjpEGTEPALDRRequest121313