

February 28, 2020

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

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

Dear Mr. Batka:

Republic Industrial and Energy Solutions, LLC. ["RIES", formerly Environmental Geo-Technologies, LLC ("EGT")] hereby timely submits its seventy-fifth Monthly Report ("MR") in conformance with the requirements of its two EPA UIC permits (#s MI-163-1W-C010 & MI-163-1W-C011).

RIES 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. As for the last few months, there are a few computerized sheets absent from this report because the computer systems continue to be upgraded, and once completed, I will forward them (for September, October, November, December 2019, and January 2020 summary sheets) on to you. RIES did not accept any F039 waste in January, 2020 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 (RIES)

att.

**AVERAGE INJECTION RATE** 

# Calculation of Average Injection Rate

CURRENT REPORTING YEAR	2020				
CURRENT REPORTING MONTH	JANWARY!				
Date (month, year) of the first injection into either well at the Citrin Road Facility					
NOV 2013	\$	90			

# CURRENT MONTH (all volumes in gallons)

	Injected Waste	Injected Non-Waste	Total injected
M	I-163-1W-C010, v	Vell #1-12	
Current Month	0	0	0
Since facility first injected			14,567.965
M	II-163-1W-C011, v	Vell #2-12	. ,
Current Month	0	. 6 .	0
Since facility first injected			4,648,763
		Lifetime Combined	19,216,701

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	es V
Calculations Whole number of months of injection	
lifetime number of months of injection × 43,830 minutes/month  = 3,199,590 m	inutes of injection
Lifetime combined injected volume 19, 216, 701    \$\frac{3,199,590}{2,199,590}\$ minut  = 6.0 gpm average injection	

# DATA DESCRIPTION

In the month of January no waste was received, and no injection was performed. There is no tabulated data in this report because the SCADA operating system continues to be upgraded and rebuilt. The tabulated data is still being recorded in the old hard drive but needs to be specifically retrieved by the programmer.

# 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

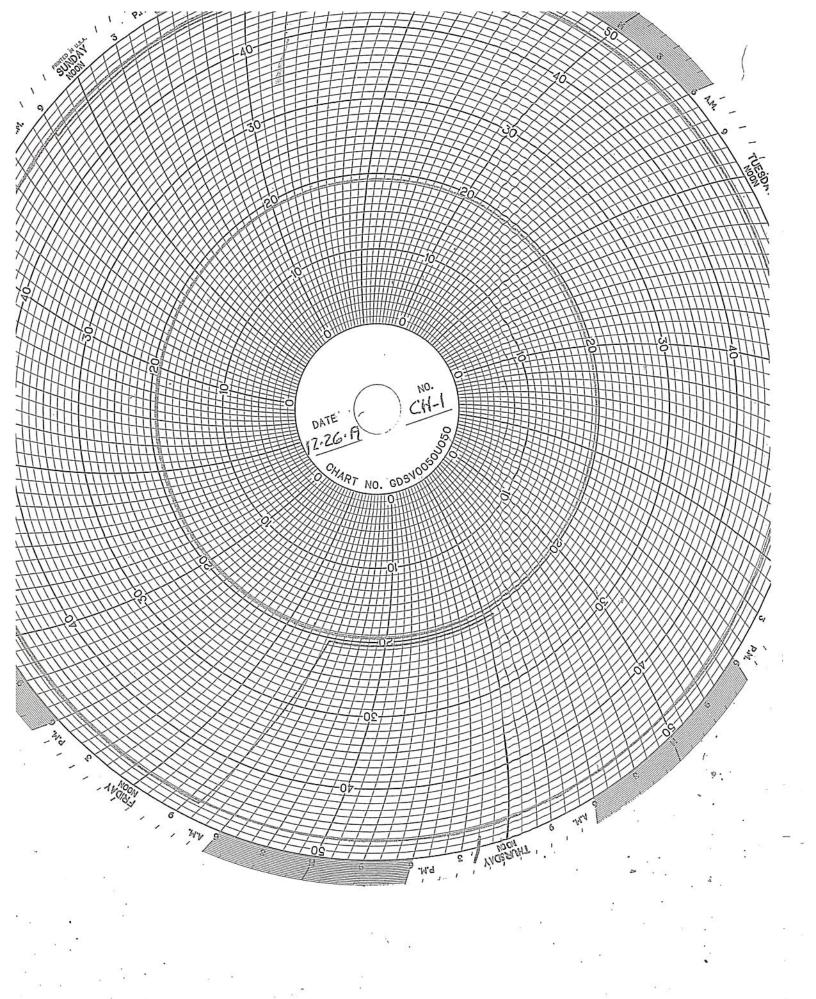
Red Pen - Well 1 Monthly Volume (chart value x 100,000)

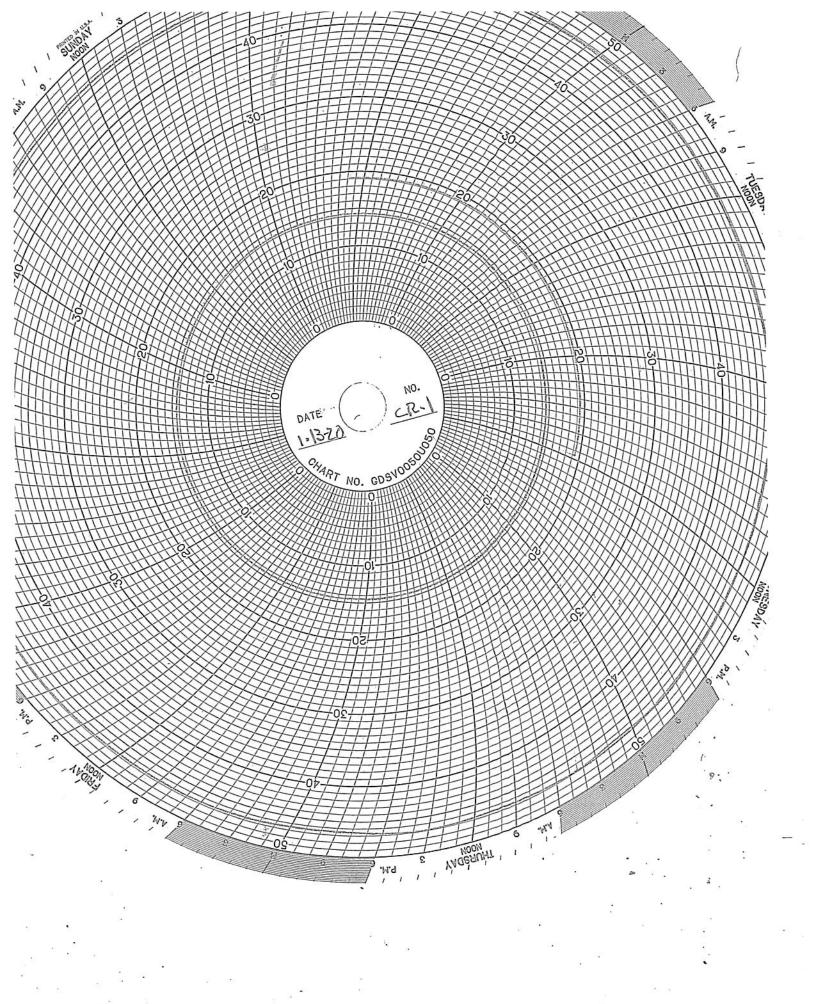
Channel #3

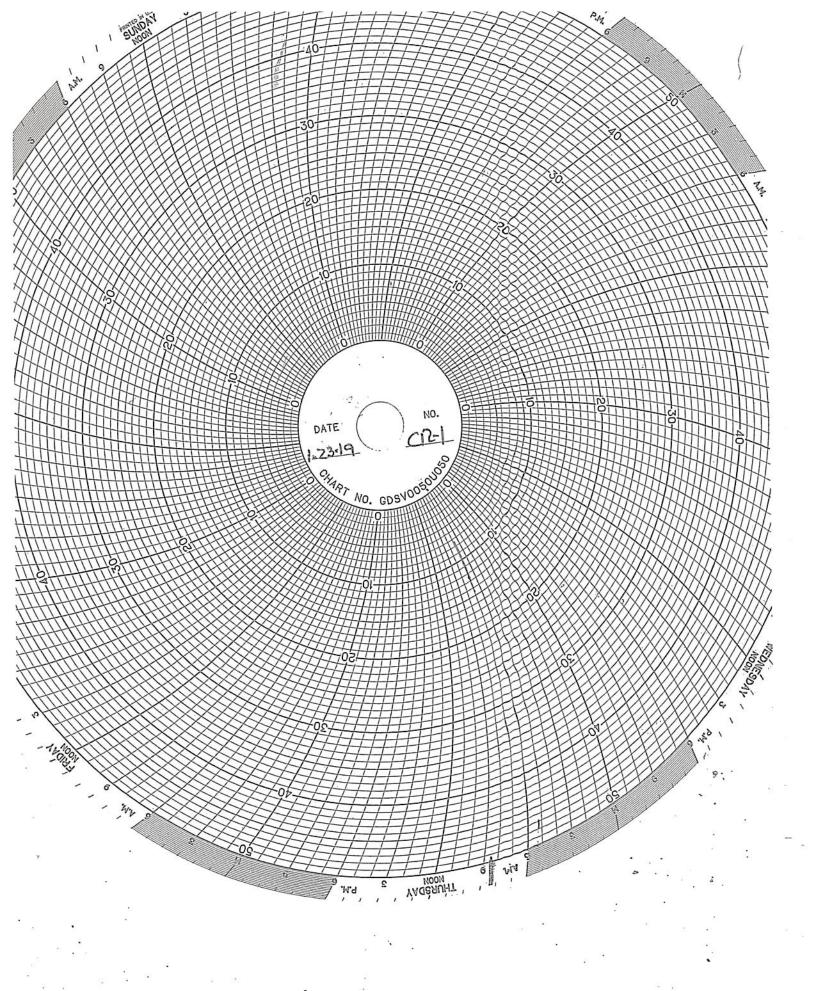
Green Pen - Well 2 Monthly Volume (chart value x 100,000)

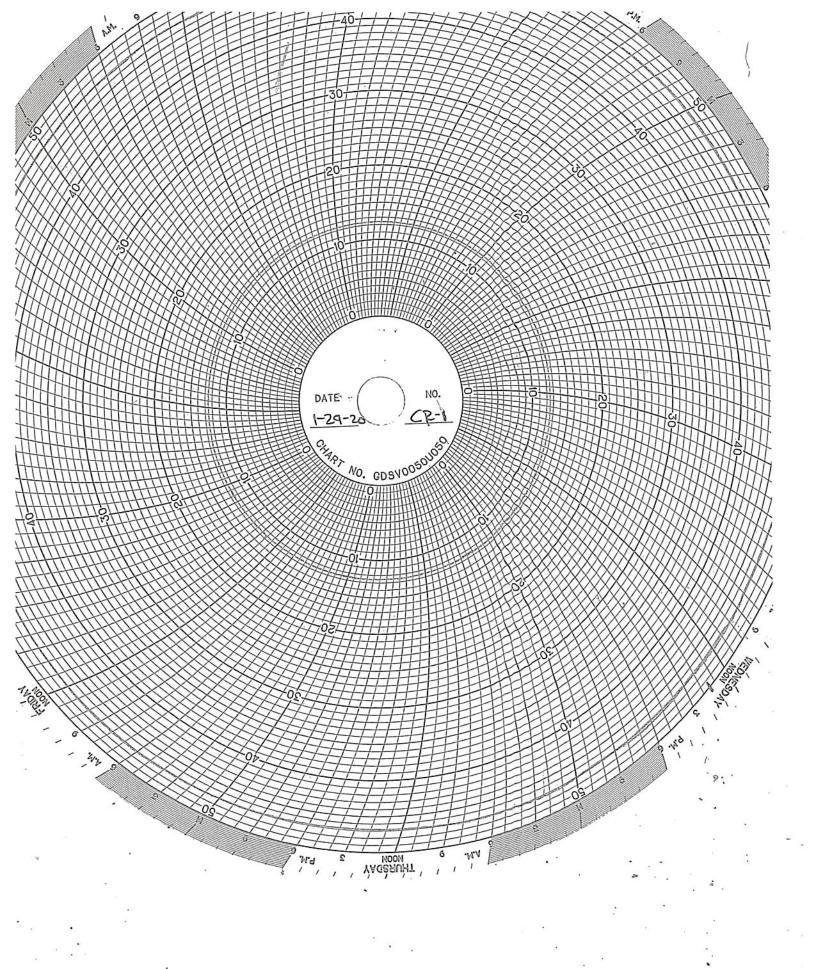
Channel #4

Black Pen - Temperature (chart value x 0)









**WELL 2 DATA** 

# 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

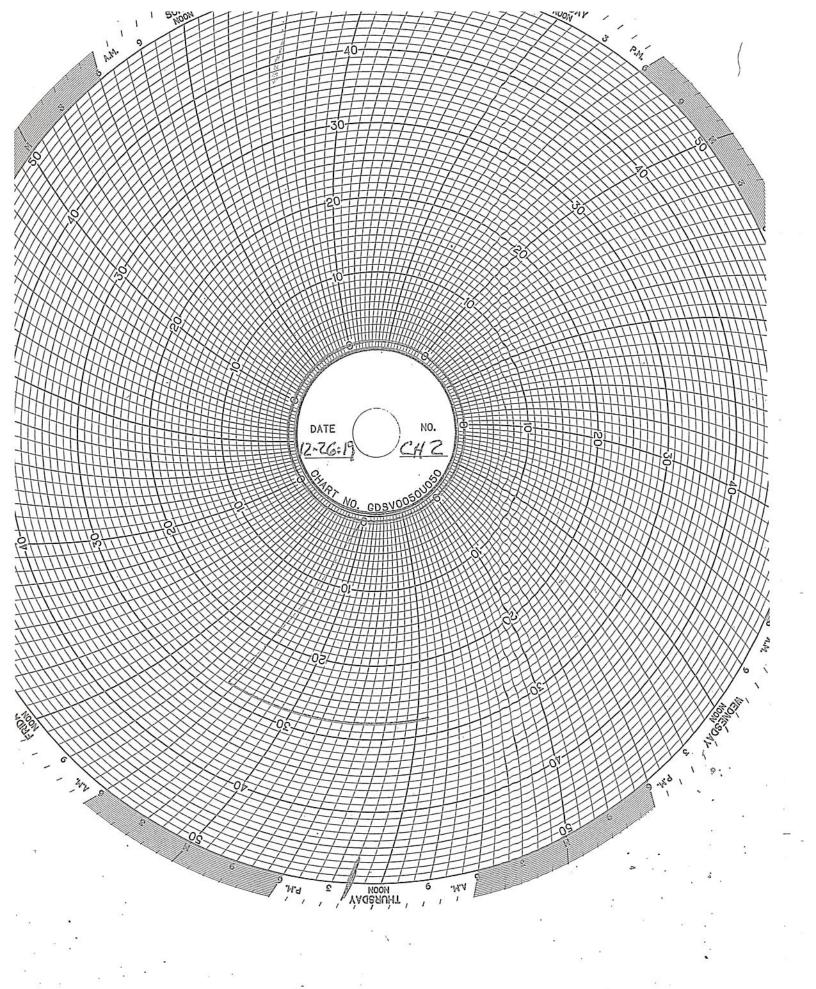
Red Pen - Well 1 Monthly Volume (chart value x 100,000)

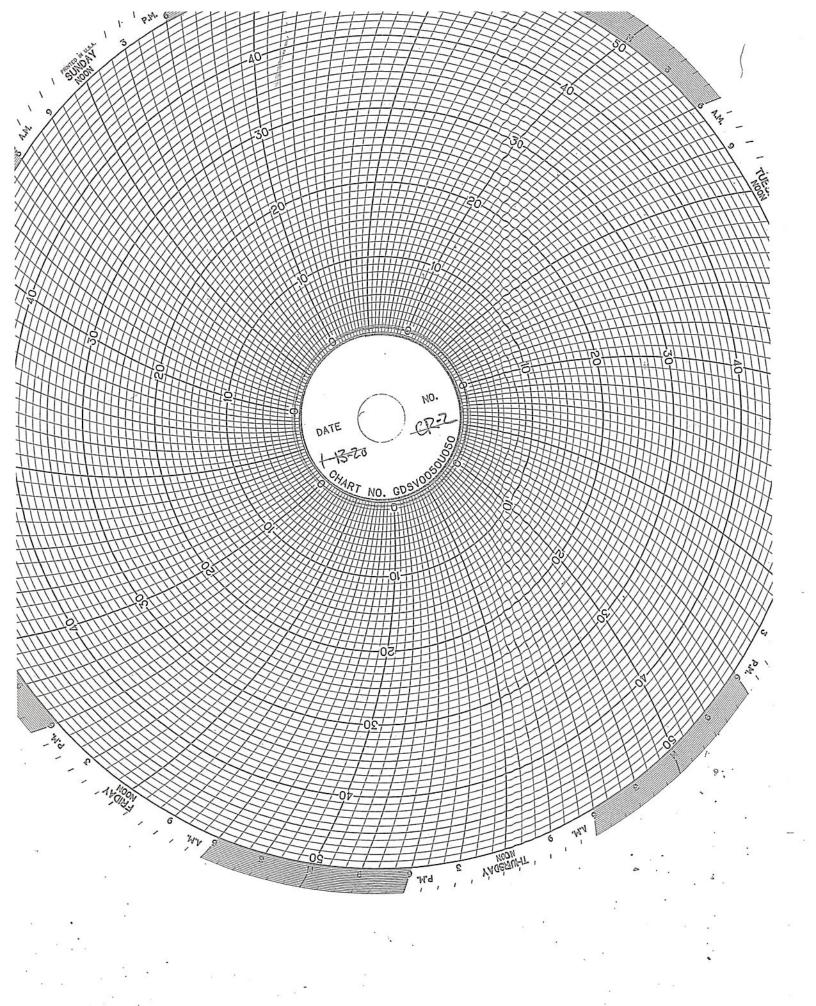
Channel #3

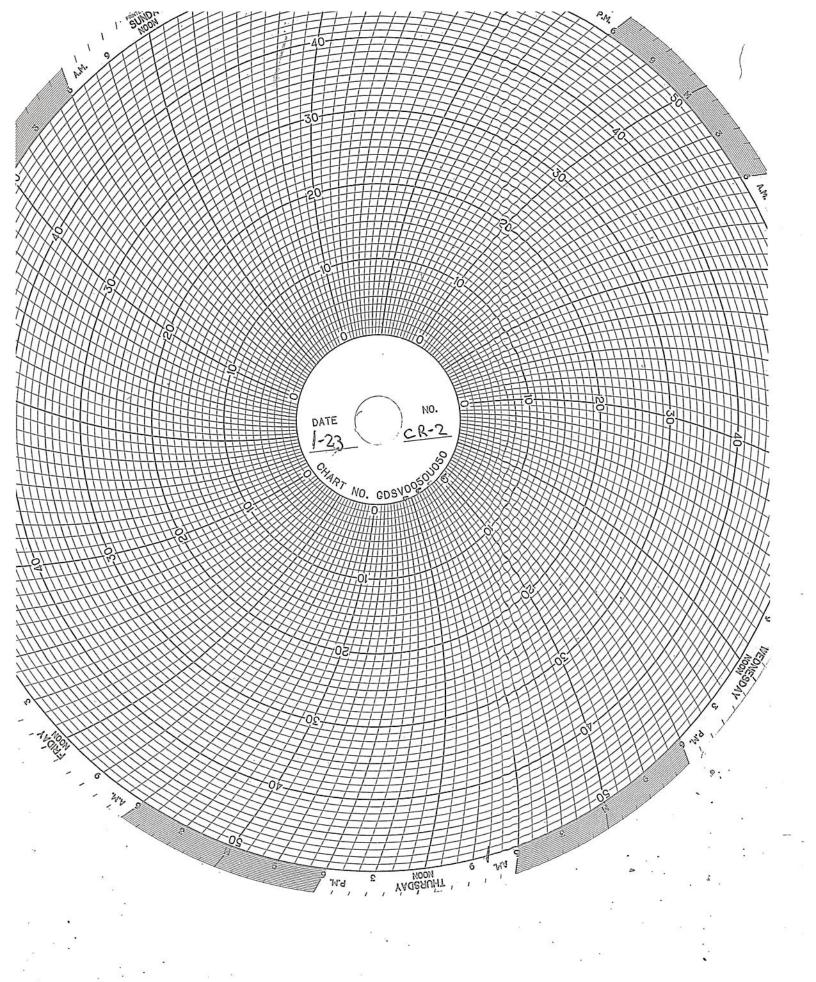
Green Pen - Well 2 Monthly Volume (chart value x 100,000)

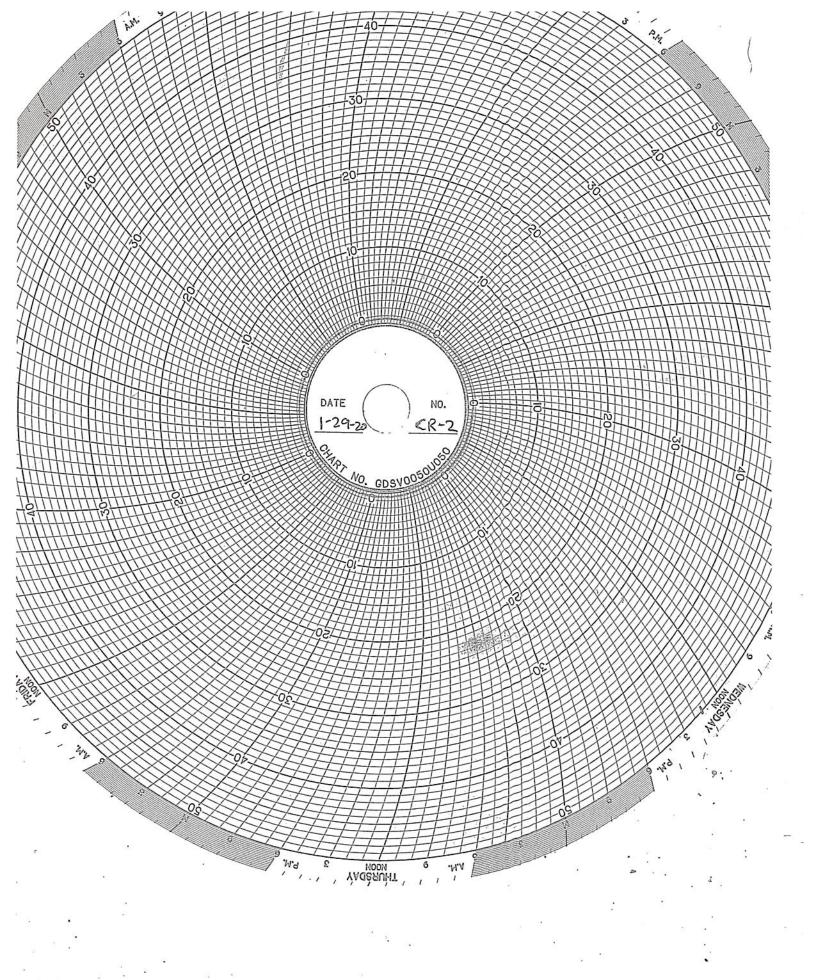
Channel #4

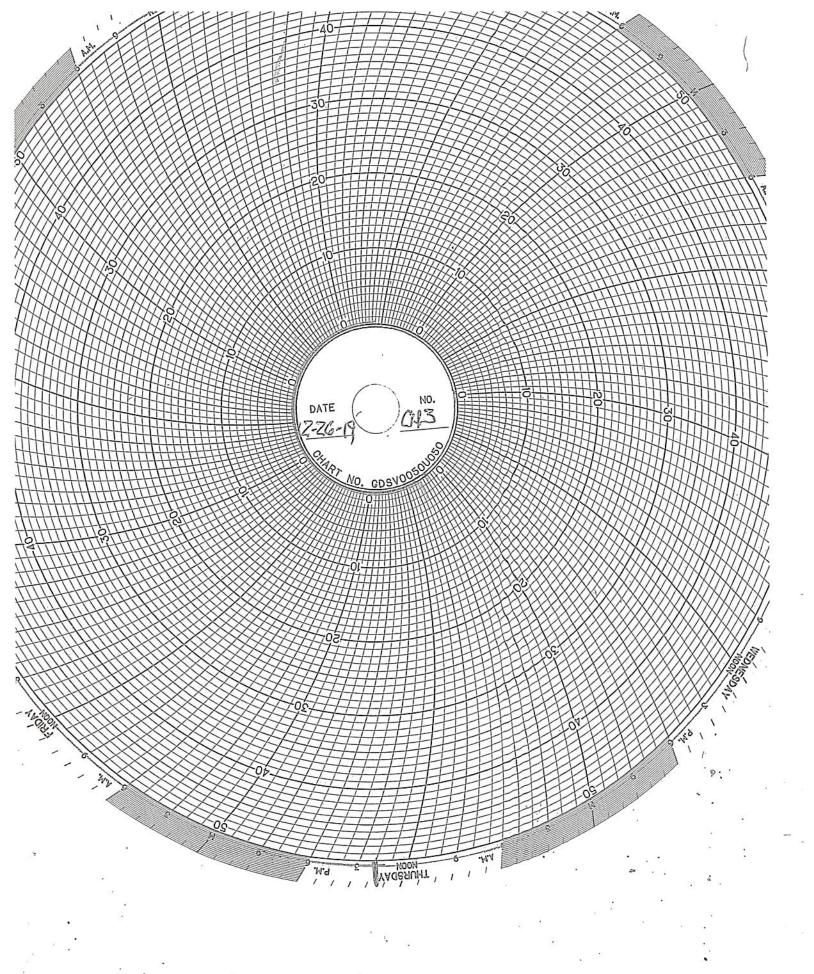
Black Pen - Temperature (chart value x 0)

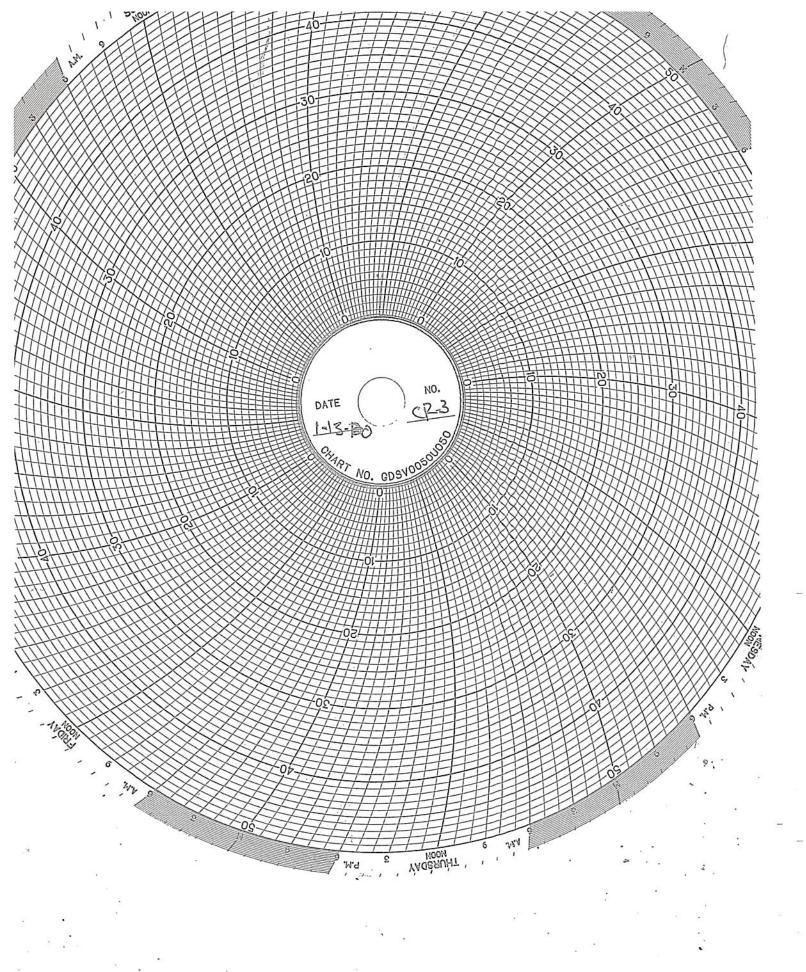


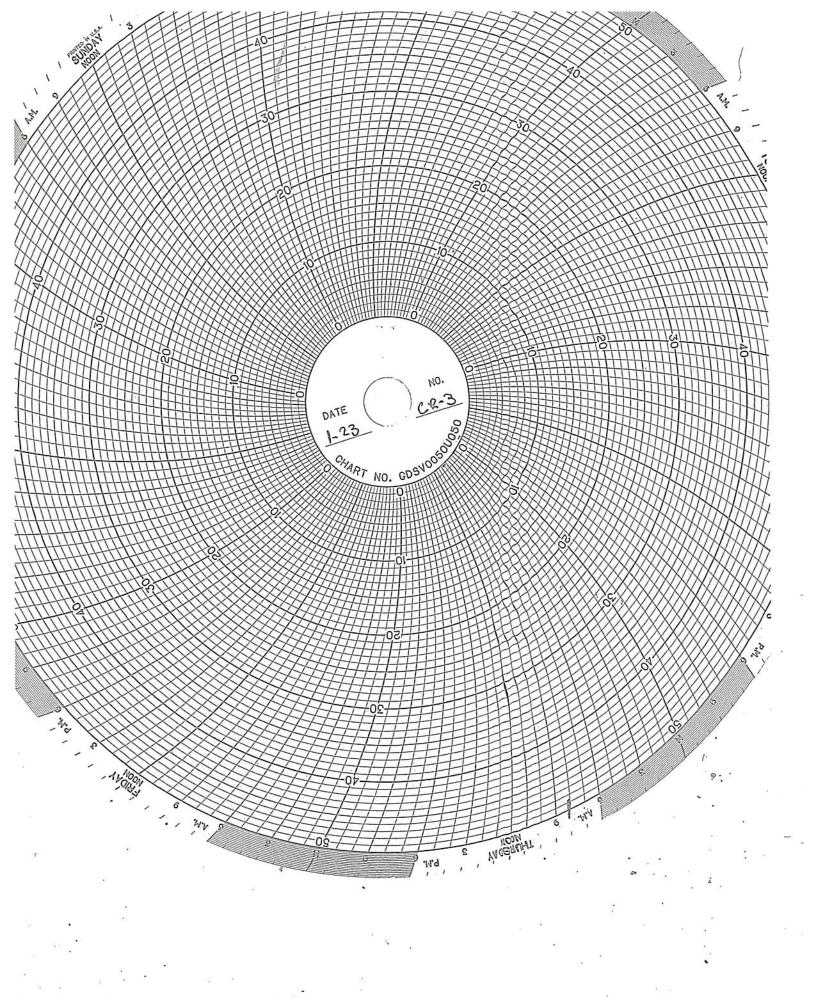












**CROSSION MONITORING** 

# COOROSION MONITORING PLAN COUPON SUMMARY

Fiberglass	18.033 g
Stainless Steel	10.840 g
Hasteloy	13.326 g
Date	1/16/2020

# COOROSION MONITORING COUPONS VISUAL DESCRIPTION

# Jan, 2020

# Fiberglass Coupon

The coupon is dark orange (rust) in color with a semi-smooth texture on both sides. Its cut edges appear sanded. The coupon is free of cracks, pitting, swelling, blemishes, and corrosion. There is no obvious effect on this coupon since last month.

# 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 is no effect to this coupon.

# Stainless Steel Coupon

No change to this coupon since last month. There has been no significant pumping on the wells and no significant exposure to hazardous waste since October 2018.



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



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Progress Through Innovation, Technology and Customer Satisfaction

October 22, 2015

John Frost Environmental Geo-Technologies, LLC Page 2 of 2 PN 125322

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:

tc

Melissa Martin Sr. Project Technician

Scott W. Yátes

Plastics Testing Assistant Manager



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

Melissá Martin Senior Project Technician

Approved By

Jim Diummond Physical Testing, Manager

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Rev 041916

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ISO 9001:2008

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Progress Through Innovation, Technology and Customer Satisfaction

December 12, 2016

John Frost

Environmental Geo-Technologies, LLC

Page 2 of 2 PN 132662

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

ACCREDITED

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ISO 9001:2008

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Progress Through Innovation, Technology and Customer Satisfaction

December 13, 2017

John Frost

Environmental Geo-Technologies, LLC

Page 2 of 2 PN 139140

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:

Plastics Testing, Assistant Manager

SC

\*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 A symbol to differentiate from ISO 17025 accredited methods in the body of the test report.\*

# 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 C1562. 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.

20450 HARPER AVENUE HARPER WOODS, MI 48225 PHONE (313) 885-3535 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, HI 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.

SHESQUIERE PAASTIC TESTING, INC.

M. W. Ghesquiere

President

#### MWG/kmi

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

Contains in Contained their Achardians

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

REFERENCES TERM

FIRE CONTROL OF CARRONS (CARRONS) \*

CHESQUIERE PAASTIC PESTING, INC.

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... M. Chesquiege

President

MWG/dm

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Samples, extra and related test materials will be destroyed 30 days effect the date of the final report unless the offent indicates otherwise in writing.

TOTAL 1 PAGES

· 大学的简单,有效的"企图"。

# 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

Sf. Project Technician

Approved

Jim Drummond Physical & Plastics Festing, Manager

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A Testing Lab

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# **UIC Monthly Maintenance Log**

This month the Pump house continued to be rebuilt. The piping manifold for all three pumps was completed. This system includes suction and discharge surge dampeners, check valves, operational ball valves, and instrumentation. The electrical wiring was started as new power and disconnects needed to be installed.



WASTE PROFILES