



**REPUBLIC
SERVICES**

28470 Citrin Drive Romulus, MI 48174
o 734.946.1000 · republicservices.com

April 30, 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-seventh 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, January, February and March 2020 summary sheets) on to you. RIES did not accept any F039 waste in March, 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,

A handwritten signature in black ink, appearing to read 'Richard J. Powals'.

Richard J. Powals, P.E.

cc: J. Frost (RIES)
att.

rijp043020/RIESEPA Monthly Report-March, 2020

AVERAGE INJECTION RATE

Calculation of Average Injection Rate

CURRENT REPORTING YEAR 2020

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	22,154	0	22,154
Since facility first injected			14,590,119
MI-163-1W-C011, Well #2-12			
Current Month	0	0	0
Since facility first injected			4,648,763
		Lifetime Combined	19,238,882

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 75

$$\underline{\hspace{2cm}} \text{ lifetime number of months of injection} \times 43,830 \text{ minutes/month} = \underline{3,287,250} \text{ minutes of injection}$$

$$\text{Lifetime combined injected volume } \underline{19,238,882} \div \underline{3,287,250} \text{ minutes of injection} = \underline{5.9} \text{ gpm average injection rate}$$

WELL 1 DATA

DATA DESCRIPTION

In the month of March, no waste was received, and minimal injection was performed. There is no tabulated data in this report because the SCADA operating system continues to be upgraded and rebuilt. Currently the trend screens are working and the tabulated data reports should be available by next week.

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

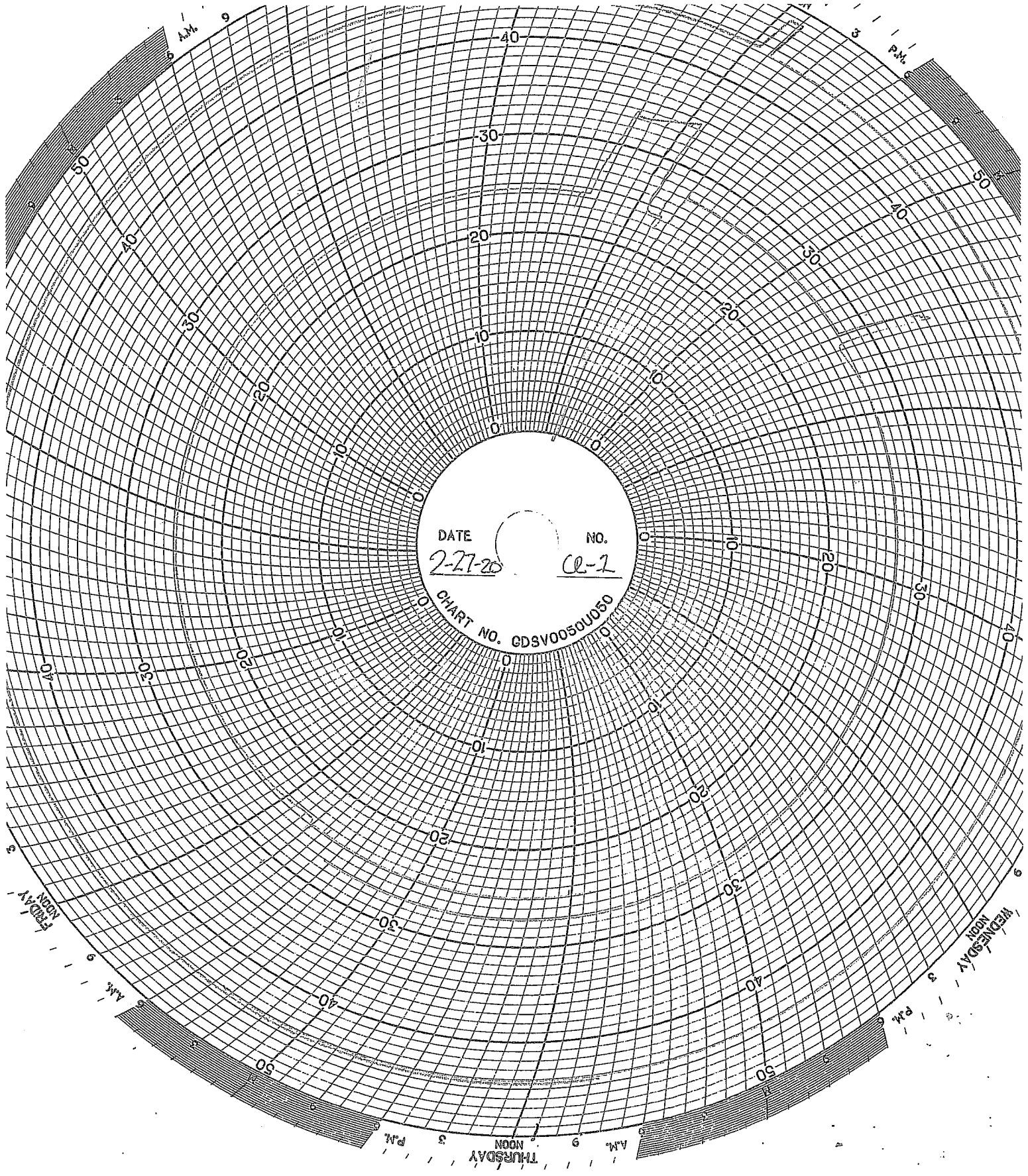
Red Pen - Well 1 Monthly Volume (chart value x 100,000)

Channel #3

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

Channel #4

Black Pen - Temperature (chart value x 0)



DATE 2-27-20 NO. Cc-2
CHART NO. GDSV0050U050

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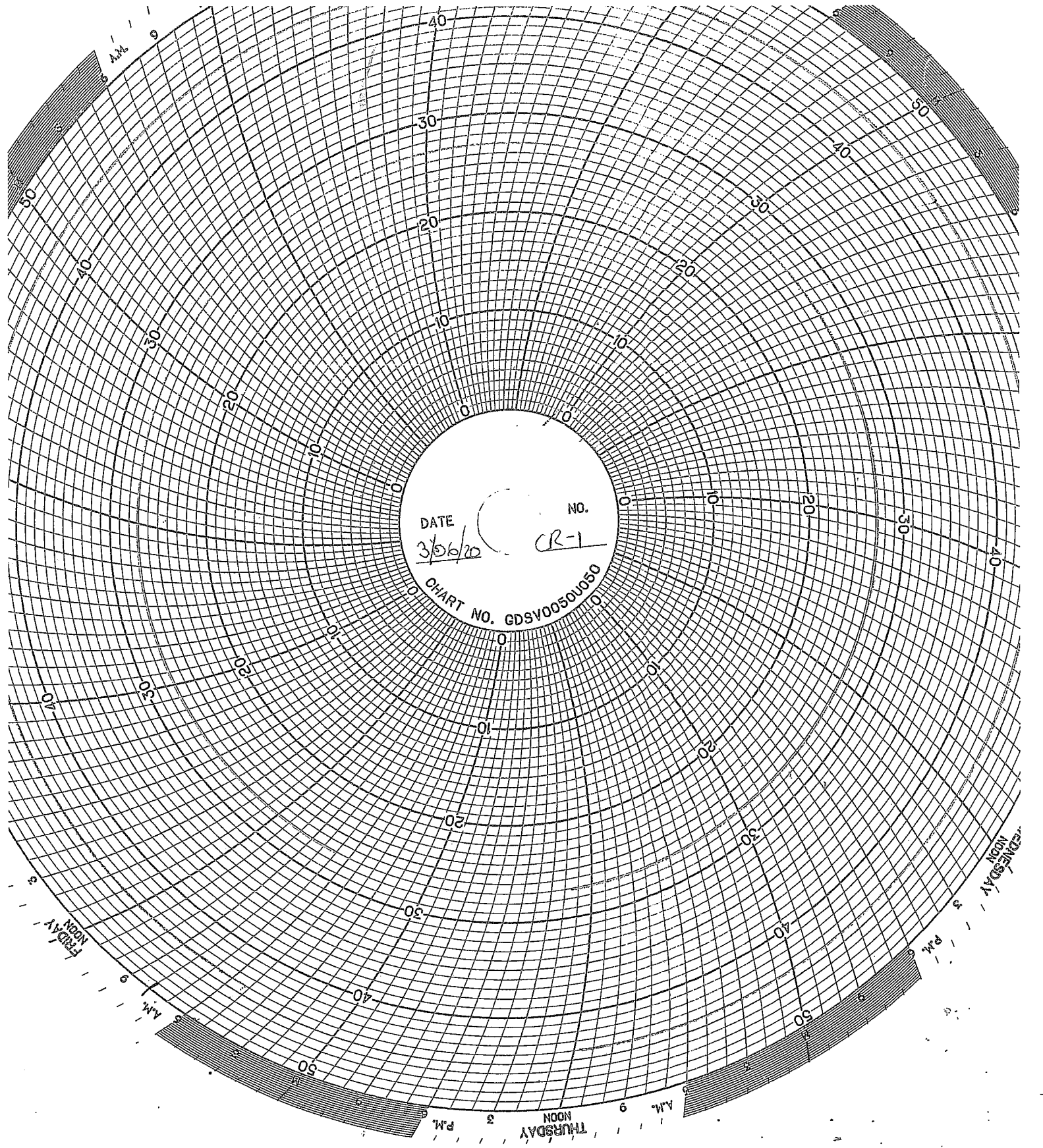
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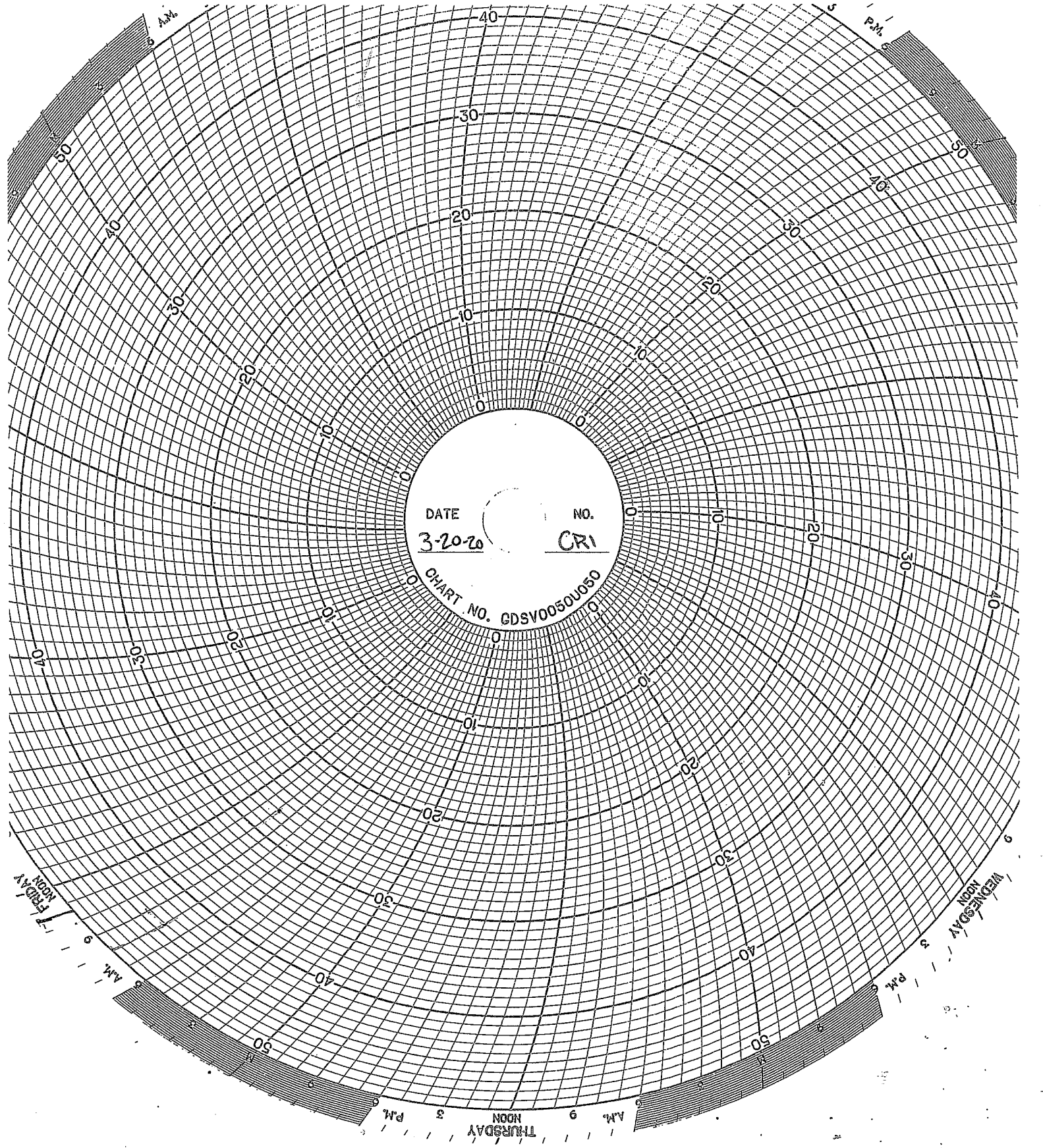
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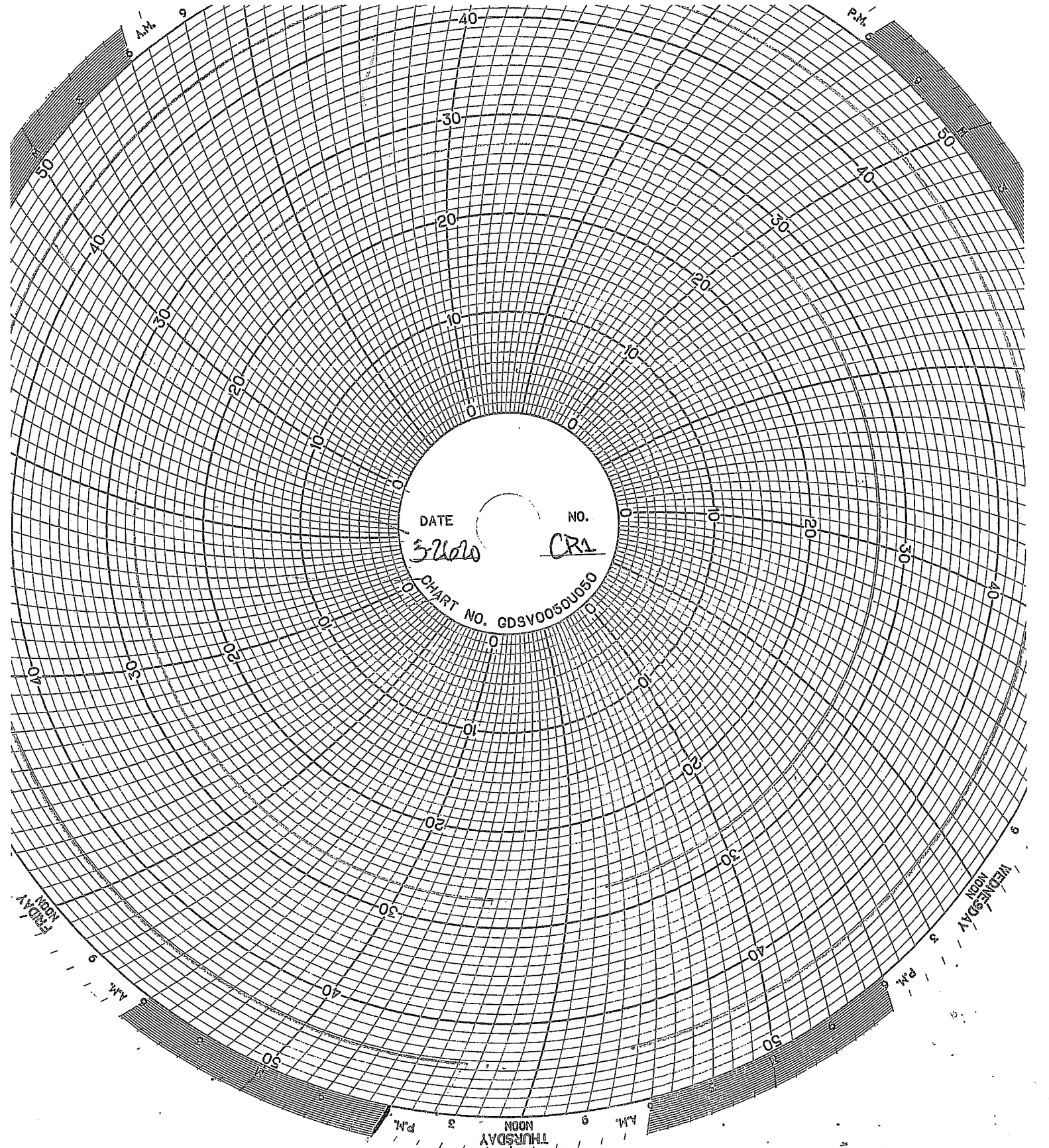


DATE 3-20-20 NO. CRI
CHART NO. GDSV0050U050

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CHART NO. GDSV00500050

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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

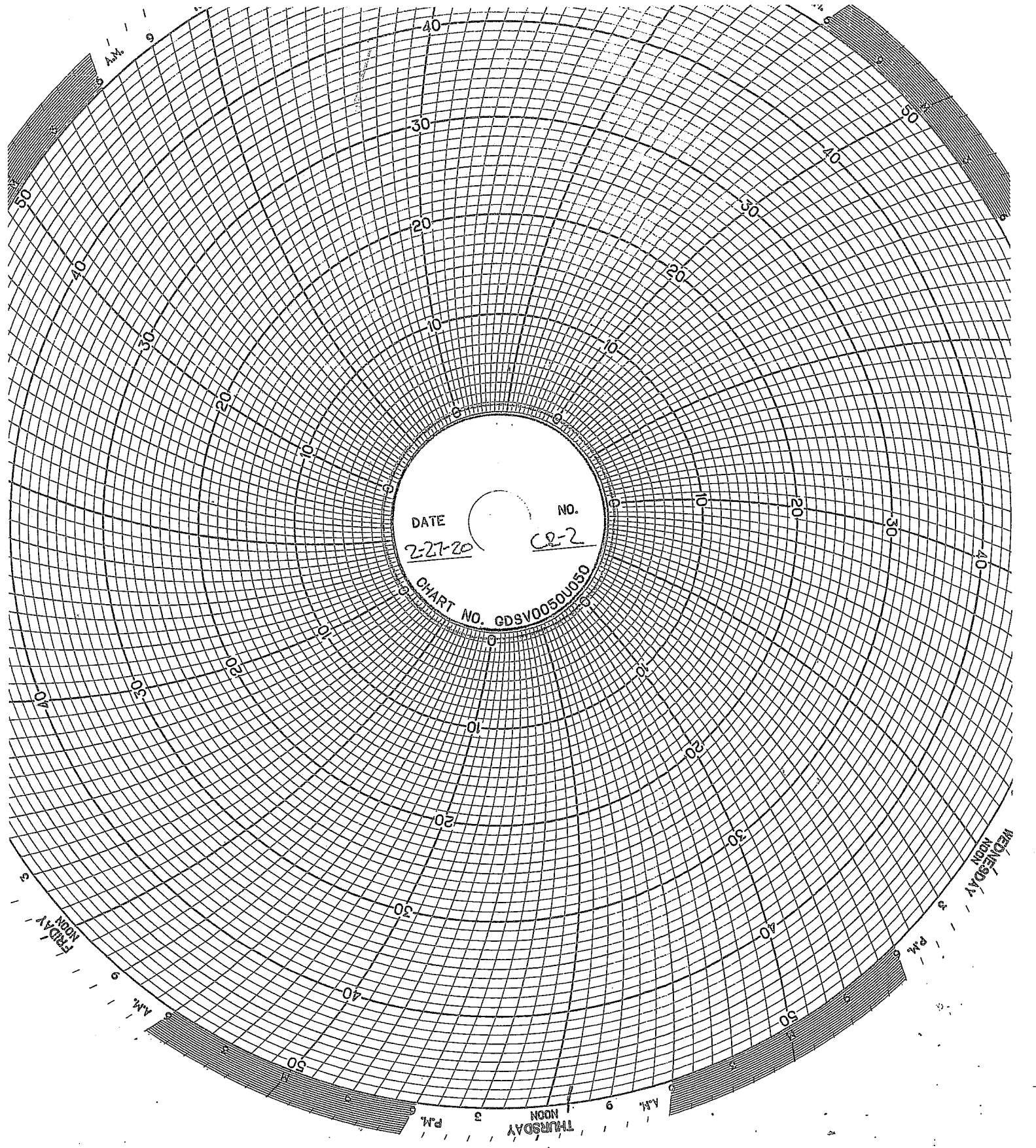
Red Pen - Well 1 Monthly Volume (chart value x 100,000)

Channel #3

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

Channel #4

Black Pen - Temperature (chart value x 0)



DATE 2-27-20 NO. C8-2

CHART NO. GDSV0050U050

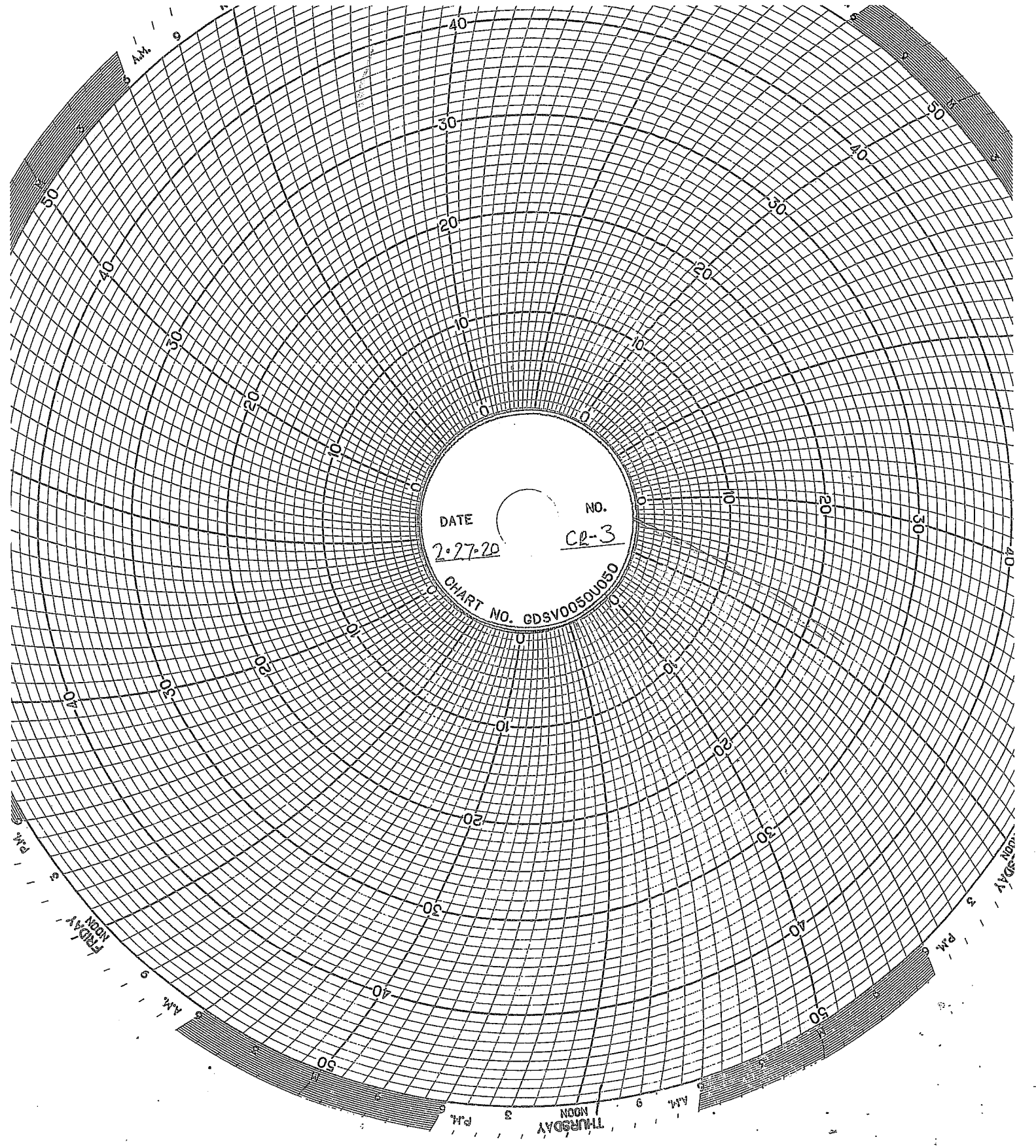
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CHART NO. GDSV0050U050

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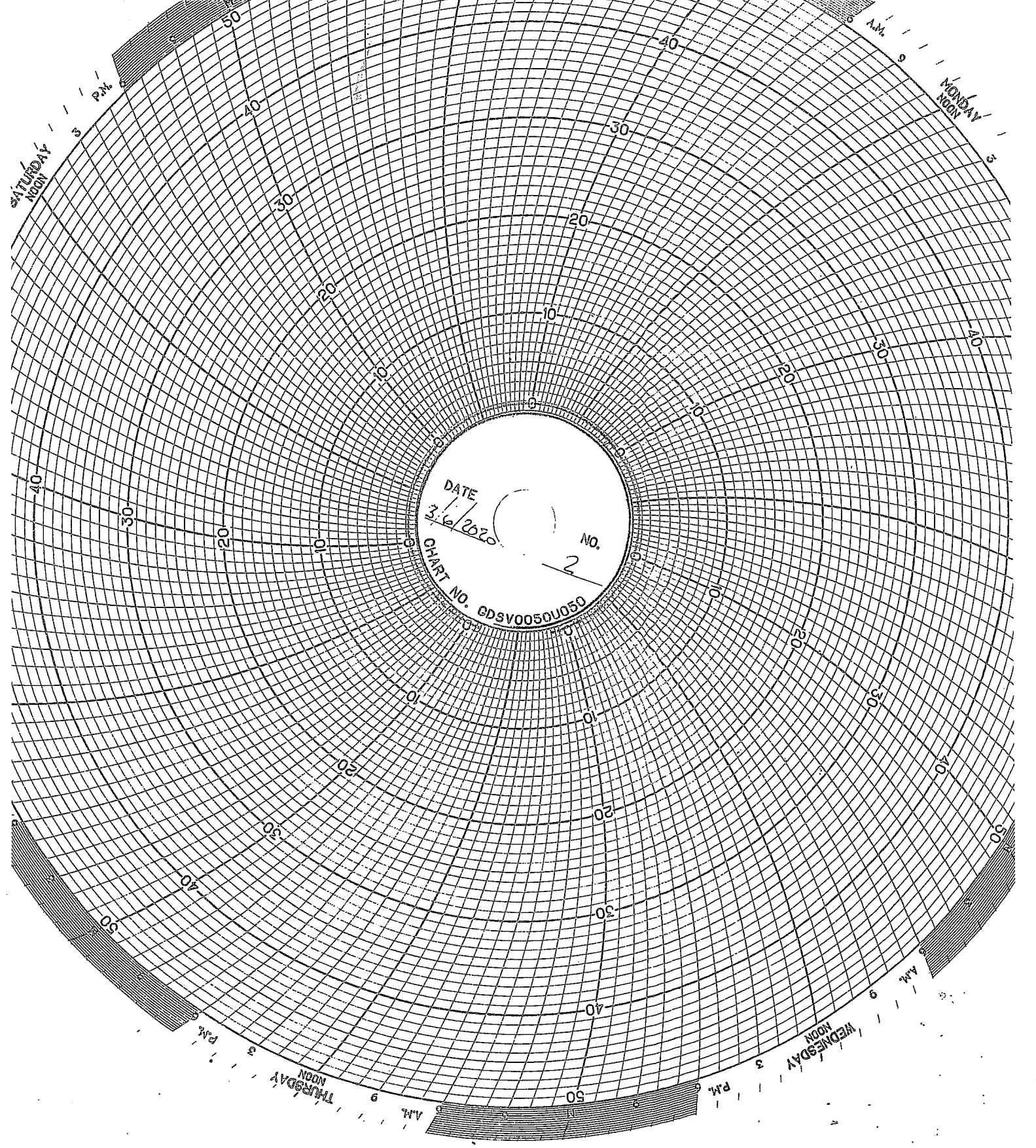
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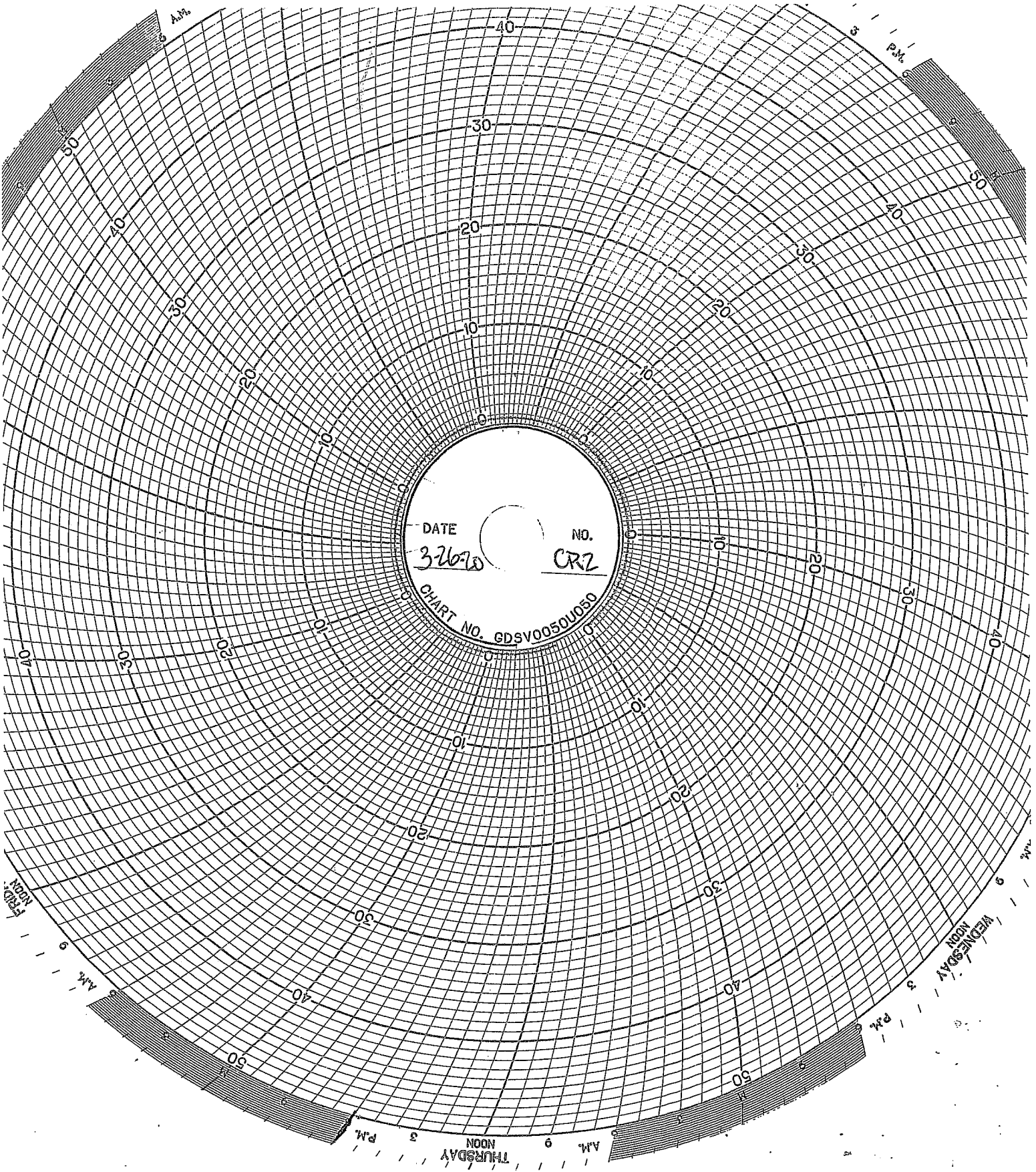
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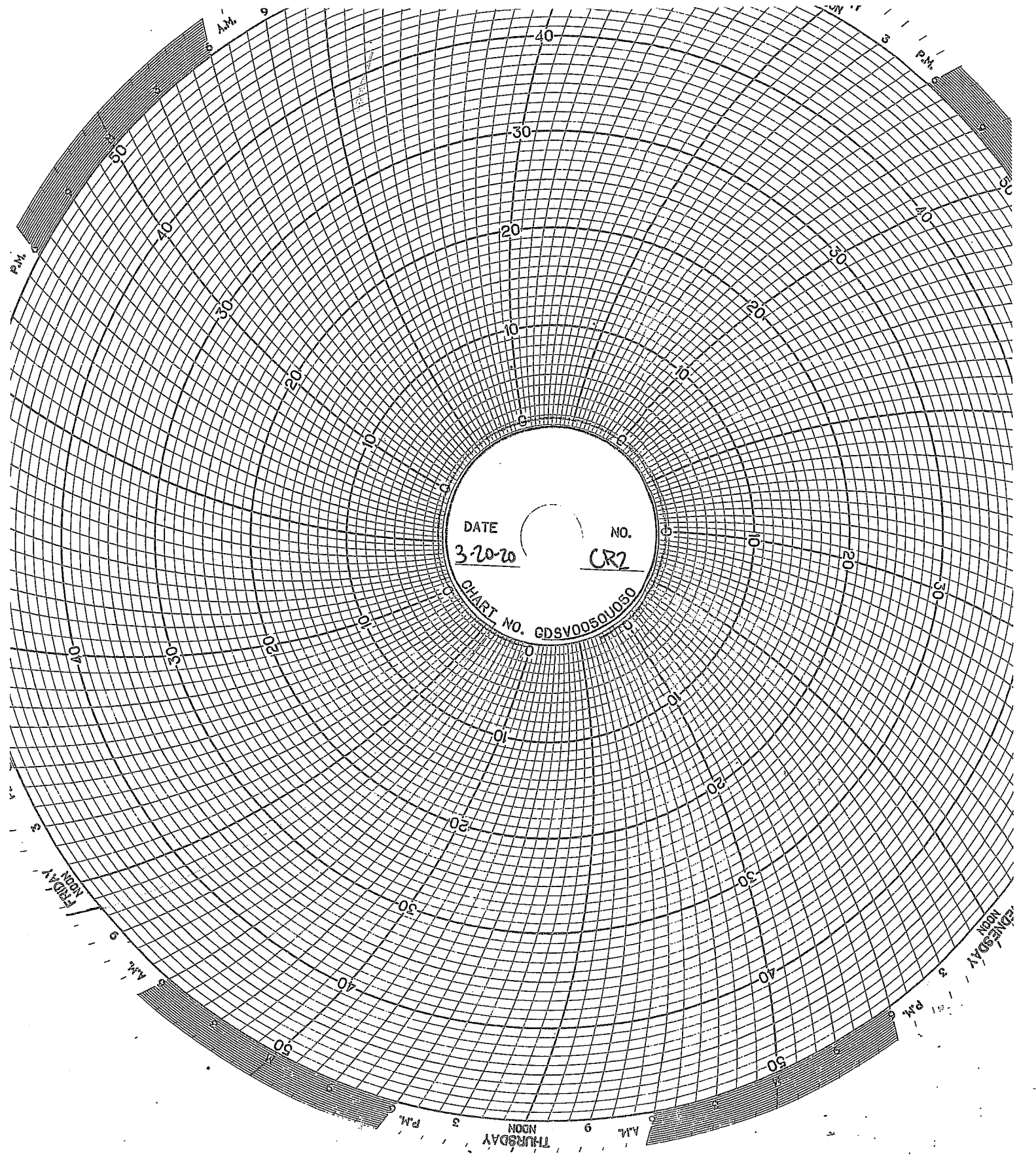
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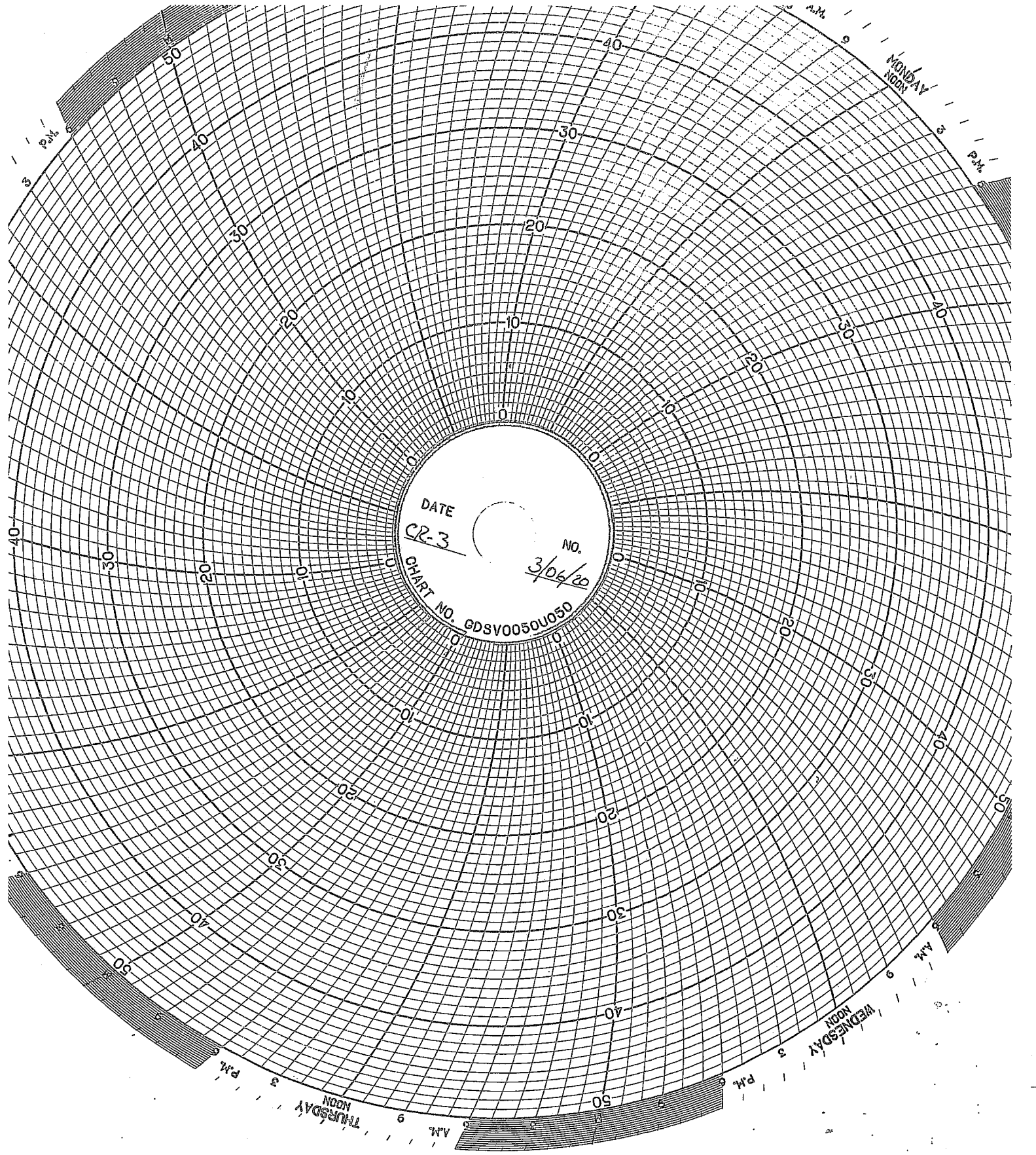
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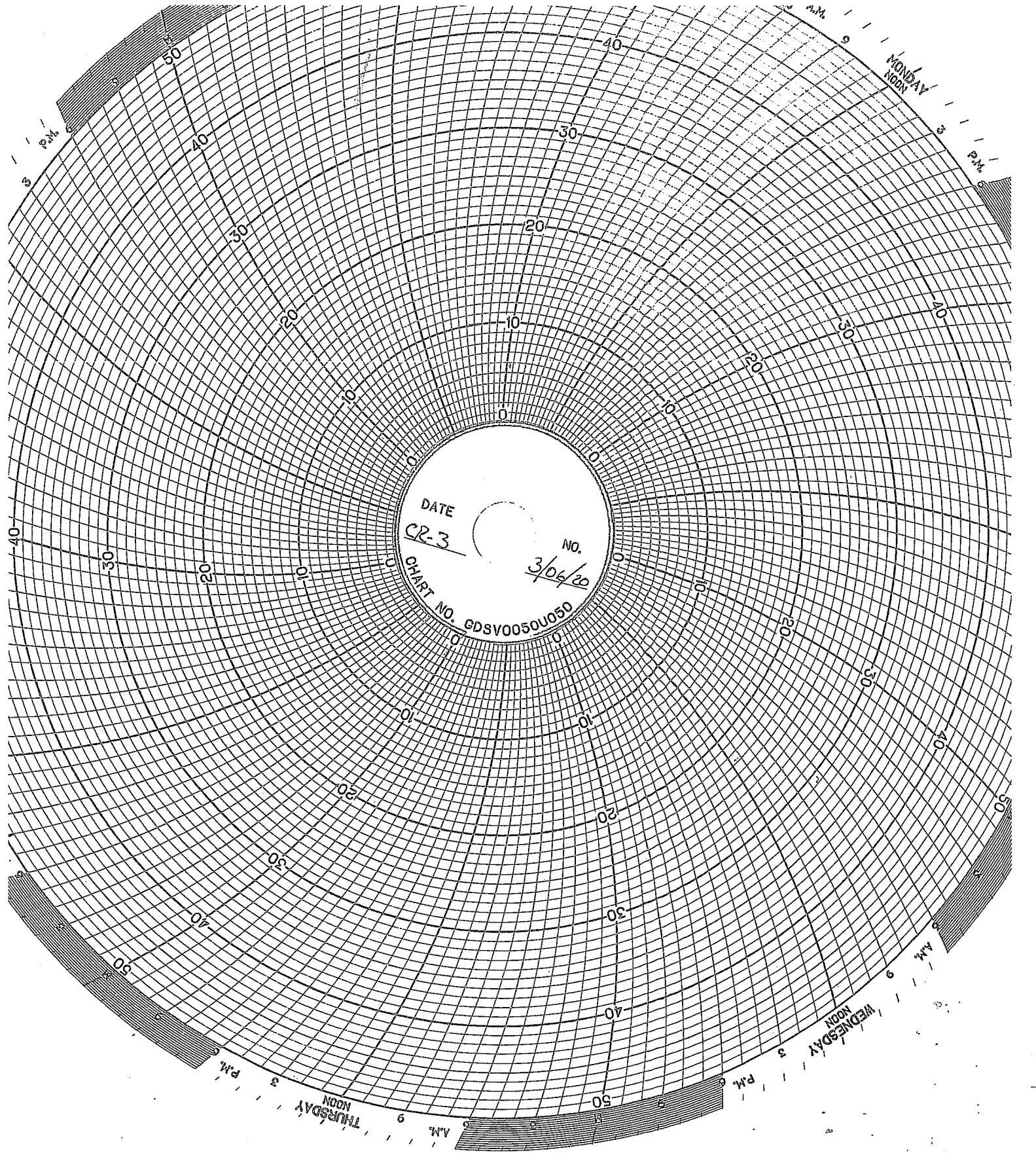
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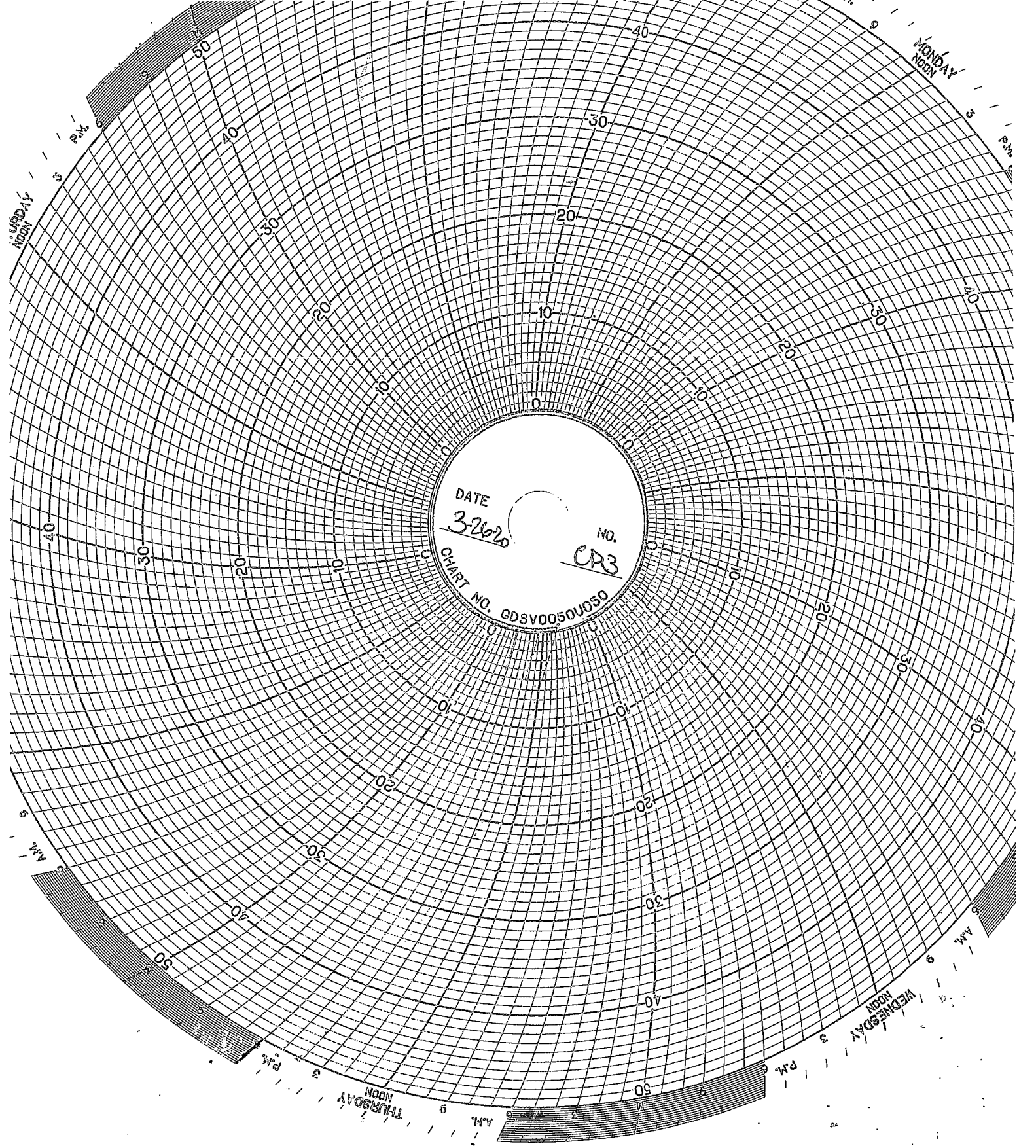
CHART NO. GDSV0050U050

MONDAY
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WEDNESDAY
NOON

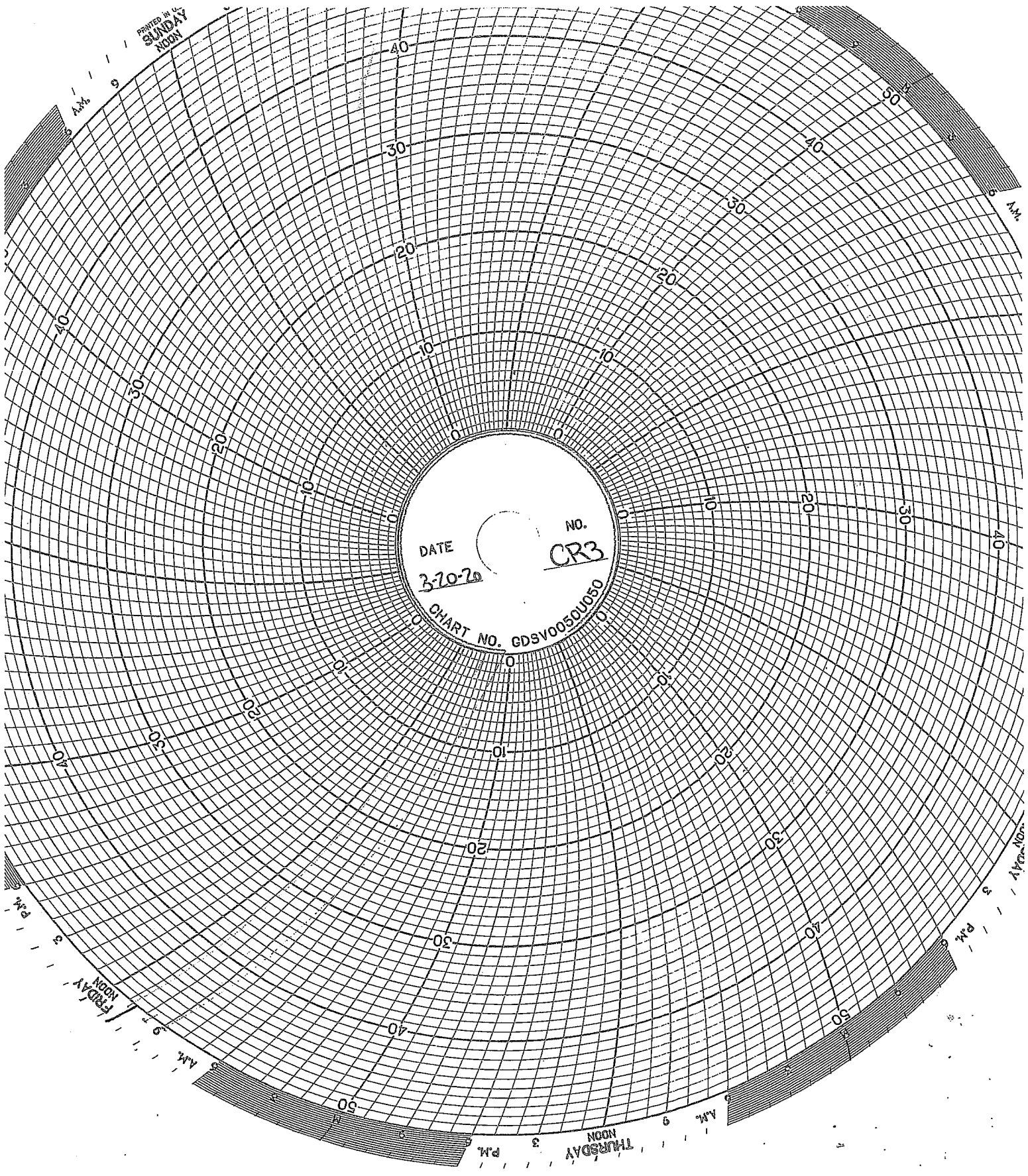
THURSDAY
NOON





DATE 3/26/20 NO. CA3
CHART NO. GDSV0050U050

PRINTED IN U.S.A.
SUNDAY
NOON



DATE

3-10-70

NO.

CR3

CHART NO. GDSV0050U050

MAINTENANCE

UIC Monthly Maintenance Log

This month the Injection well 1 workover was started. The Pump house was finished being rebuilt. New controls were installed for the SCADA program to interface with the well instrumentation. Injection pump VFD's are still being wired and programmed.

CORROSION MONITORING

COOROSION MONITORING PLAN
COUPON SUMMARY

Date	Hasteloy	Stainless Steel	Fiberglass	
1/16/2020	13.326 g	10.840 g	18.033 g	Well 1 workover new well
2/6/2020	13.326 g	10.836 g	18.034 g	
3/3/9/20	13.326 g	10.842 g	18.034 g	



Progress Through Innovation, Technology and Customer Satisfaction

October 22, 2015

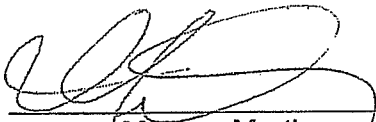
TEST REPORT

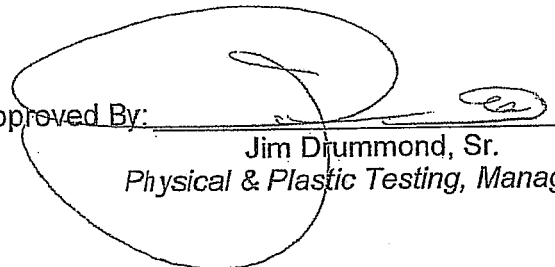
PN 125322
PO 00154

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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ISO 9001:2008 Registered

ISO 9001:2008
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Fax (330) 794-6610 | Worldwide (330) 794-6600



AKRON RUBBER DEVELOPMENT LABORATORY, INC.

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: _____

Melissa Martin
Sr. Project Technician

Approved By: _____

Scott W. Yates
Plastics Testing Assistant Manager

tc



Progress Through Innovation, Technology and Customer Satisfaction

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



An A2LA ISO 17025 Accredited Testing Laboratory — Certificate Numbers 255.01 & 255.02
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ISO 9001:2008
Registered

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AKRON RUBBER DEVELOPMENT LABORATORY, INC.

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

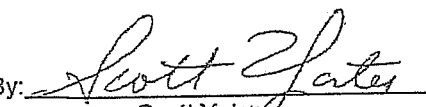
Barcol Hardness, Instant 96

Prepared By:



Melissa Martin
Senior Project Technician

Approved By:



Scott Yates
Plastics Testing, Assistant Manager

wk

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Progress Through Innovation, Technology and Customer Satisfaction

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



An AZLA ISO 17025 Accredited Testing Laboratory — Certificate Numbers 255.01 & 255.02
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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.

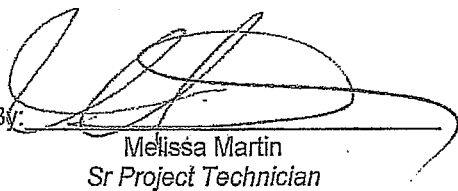
BARCOL HARDNESS ASTM D 2583-13a
Instant Reading

Results

Barcol Hardness, Instant

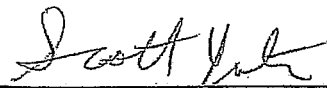
96

Prepared By:



Melissa Martin
Sr Project Technician

Approved By:



Scott Yates
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 ^ 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.

GHESQUIERE PLASTIC TESTING, INC.

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, 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:

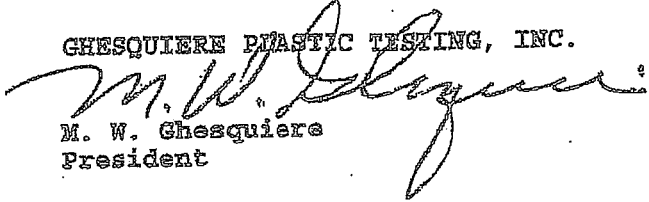
BARCOL HARDNESS

Hardness

Specimen 1 90

Specimen is being returned with this report for further evaluation.

GHESQUIERE PLASTIC TESTING, INC.


M. W. Ghesquiere
President

MWG/kni

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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

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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:

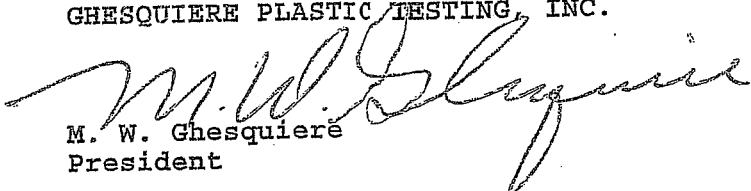
The following determination was made based upon the above test:

BARCOL HARDNESS

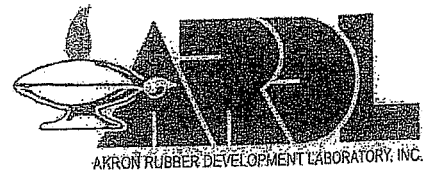
	<u>Hardness</u>
Specimen 1	85

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



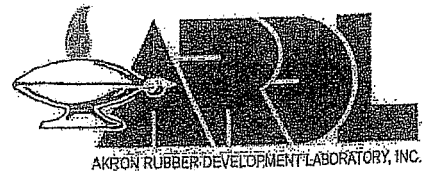
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ISO 9001:2008 Registered

ISO 9001:2008
Registered

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Testing. Development. Problem Solving.

October 2, 2014

John Frost
Environmental Geo-Technologies, LLC

Page 2 of 2
PN118325

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

RECEIVED: One small section identified as; Fiberglass Coupon.

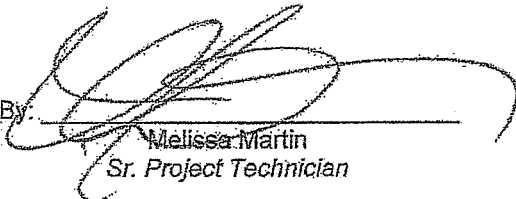
BARCOL HARDNESS ASTM D 2583-13a

Results

Barcol Hardness, Instant

97

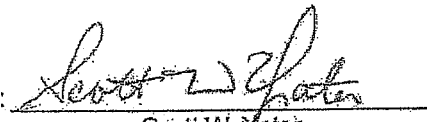
Prepared By:



Melissa Martin
Sr. Project Technician

st

Approved By:



Scott W. Yates
Plastics Testing Assistant Manager


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INJECTION FINGERPRINTS


RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date	3-2-20
Receiving ID#	T03022001
Manifest #	Line
Land Ban Cert included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time in	
Time out	
Received by	JF
Sampled by	JF

LAB INFORMATION	
Compatible? (RT#)	Y
PCBs (ppm) (Oily Waste Only)?	
TOC ppm (CC Waste Only)?	
Flash Point (F)	>140°F
pH (S.U.)	6.8
Cyanides? (mg/L)	
Sulfides? (ppm)?	
Specific Gravity	1.01
Physical Description	
Stream Consistency	Yes No
Oil in Sample?	Yes No
Temperature (F)	63°F
Conductivity	32.6 μS
% Solids	0.5
Turbidity	Yes No
Color	
TSS (%)	<0.1
Radiation Screen (as needed)	
Lab Signature/Initials	

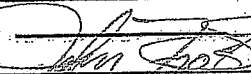
RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date	3-2-20
Receiving ID#	T03022002
Manifest #	Line
Land Ban Cert included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time in	
Time out	
Received by	JF
Sampled by	JF

LAB INFORMATION	
Compatible? (RI#)	Y
PCBs (ppm) (Oily Waste Only)?	
TOC ppm (CC Waste Only)?	
Flash Point (F)	>140°F
pH (S.U.)	6.7
Cyanides? (mg/L)	
Sulfides? (ppm)?	
Specific Gravity	1.01
Physical Description	
Stream Consistency	Yes No
Oil in Sample?	Yes No
Temperature (F)	63°F
Conductivity	44.7 uS
% Solids	0.4
Turbidity	Yes No
Color	
TSS (%)	<0.1
Radiation Screen (as needed)	
Lab Signature/Initials	

RECEIVING & APPROVAL FORM

RECEIVING INFORMATION	
Date	3.3.20
Receiving ID#	103032001
Manifest #	Line
Land Ban Cert included	Yes No
EGT Approval #	
Generator	
Client	
Transporter	
Time in	
Time out	
Received by	JF
Sampled by	JF

LAB INFORMATION	
Compatible? (RT#)	Y
PCBs (ppm) (Oily Waste Only)?	
TOC ppm (CC Waste Only)?	
Flash Point (F)	>140°F
pH (S.U.)	
Cyanides? (mg/L)	6.8
Sulfides? (ppm)?	
Specific Gravity	1.01
Physical Description	
Stream Consistency	Yes No
Oil in Sample?	Yes No
Temperature (F)	63°F
Conductivity	41.5 mS
% Solids	0.5
Turbidity	Yes No
Color	
TSS (%)	20.1
Radiation Screen (as needed)	
Lab Signature/Initials	

WASTE PROFILES