

Executive summary

Environmental Geo-Technologies, LLC (EGT), is by means of this document, making application for permits to operate two class 1 Underground Injection Control wells. EGT is proposing to dispose of hazardous wastes via deep well injection Well #1-12 and Well #2-12. These wells were constructed during September 2001 through January 2002 at the Citrin Drive Facility, Romulus, Michigan.

EGT is proposing to inject a dilute solution of inorganic and organic constituents into an injection interval consisting of the Franconia, Eau Claire, Mt Simon, and Precambrian sediments. This combined unit was encountered in Well #2-12 at depth from approximately 3984 feet to 4500 feet relative to kelly bushing (RKB). Well #2-12 was drilled vertically, while Well #1-12 was drilled as a directional hole to intersect the completion zone approximately 800 feet horizontally to the southwest of the bottom whole location of Well #2-12. Depths reported in this document will be relative to true vertical depth (TVD) in Well # 2-12 and measured depth (MD) in Well #1-12 unless otherwise specified. "hole"

A 568-foot thick arrestments interval overlies the injection interval. This interval will effectively contain waste constituents that tend to migrate upward due to pressure driven flow or molecular diffusion. The injection interval and upper and lower arrestment intervals together comprise the injection zone for this site. The confining zone that overlies the injection zone is 1005 feet thick.

EGT proposes to inject an annual volume of 87,249,600 gallons total into Well #1-12 and Well #2-12. This rate is equivalent to 166 gallons per minute (gpm) for an average of 83 gpm per well and is the same as previously permitted.

This document consists of the application forms (EPA FORM 7520-6) and the technical information specified by the instructions attached to form 7520-6. Because the injection interval for Well #1-12 and Well #2-12 is essentially the same, most of the technical information about the wells and their operation is identical. Therefore, the technical information has been combined into this one document to facilitate review.