

UIC 08-03



# Friends of the Jordan River Watershed, Inc.

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March 10, 2008  
United States Environmental Protection Agency  
Clerk of the Board, Environmental Appeals Board  
Colorado Building, 1341 G Street, NW, Suite 600  
Washington, D.C. 20005

RECEIVED  
U.S. E.P.A.  
2008 MAR 11 PM 1:58  
ENVIR. APPEALS BOARD

Dear Environmental Appeals Board,

Pursuant to permit # MI-009-11-0001, and in accordance with 40 CFR~124.19, Friends of the Jordan River Watershed (FOJ) and Star Township, Antrim County hosted a "Community Forum" on 3/8/08 to petition the Environmental Appeals Board to review the many unresolved issues relative to the final permit decision. This "Community Forum" demonstrated the continued widespread opposition to Beeland Group's Class 1 Non-Hazardous Waste Disposal Well and illuminated the magnitude of unresolved issues and questions not considered by EPA under the UIC Rules in granting this permit. The enclosed transcript and video recording constitute a collective petition that clearly show that the conditions being appealed are based on, **"IMPORTANT POLICY CONSIDERATIONS WHICH THE ENVIRONMENTAL APPEALS BOARD SHOULD, IN ITS DISCRETION, REVIEW."** Together and individually, these statements cite the reasons supporting the review decision. While these issues and questions were raised during the initial comment periods, many have been sharpened and refined as we have had eight months to study and better understand the complex problems involved.

In June and July of 2007, during the recognized comment periods, FOJ submitted to Mr. Wm. Bates, EPA Region 5, numerous comments, petitions, resolutions and statements opposing this disposal well and raised many questions and concerns. Included in these submissions were resolutions from Antrim and Charlevoix County Commissions, City of East Jordan, Star Township, several NPOs and many, many others. You should have in your records a CD documenting these submissions as well as a significant electronic and paper file. Resultantly, these people, organizations and citizens should have legal standing with respect to EPA Appeals Rules. Therefore, the submissions included in this mailing, as an outcome of the "Community Forum", represent a continuum of these proceedings.

The reasons cited at the "Community Forum" supporting a review by EPA fell into several major categories not considered under the narrow UIC Rules. These categories include; nearly 30% of the public's comments were either not considered, rejected or inadequate under the narrow UIC Rules, this permit fails to consider all of our water resources and constitutes an unnecessary risk, this is a wrong and inadequate solution to the fundamental problems at Bay Harbor, the permit represents a failure by EPA to enforce its own Administrative Order of 2005 and a failure of EPA to address the total scope of the problems, not just those under UIC Rules, the Environmental Justice

Evaluation was inadequate, and this permit failed to access prudent and feasible alternatives to the disposal well.

By prematurely granting this permit before a final remediation plan is adopted, EPA overlooks vital issues, leaves CMS unaccountable for the continued pollution at Bay Harbor with no incentive to perform a proper cleanup and jeopardizes another community and its natural resources. The UIC Rules, by themselves, are not adequate to address the myriad of issues surrounding the problems at Bay Harbor. But, by granting this permit with only these criteria, EPA is saying that no one, except CMS, is in charge and the rest of us do not matter.

If these are not important policy considerations please tell me what are. If EPA cannot exercise it's discretion here then they loose and sacrifice any authority and credibility to the thousands of citizens living in Northern Michigan. People expect more from the agency entrusted to protect the environment. EPA, you had it right the first time in 2005; **REMOVE, ISOLATE, OR CONTAIN THE CKD AT BAY HARBOR.** We respectfully urge you to exercise your discretion on these important policy considerations and review these issues in their entirety and deny this permit.

Respectfully Submitted,



Dr. John W. Richter

President, Friends of the Jordan River Watershed



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U.S. E.P.A.

2008 MAR 11 PM 1: 58

ENVIR. APPEALS BOARD

**Antrim Conservation District**  
**4820 Stover Road**  
**Bellaire, MI. 49615**  
**(231) 533-8363**

March 10, 2008

United States Environmental Protection Agency  
Clerk of the Board, Environmental Appeals Board  
Colorado Building  
1341 G Street NW  
Suite 600  
Washington, DC 20005

Dear Environmental Appeals Board:

On March 8, 2008, Star Township, Friends of the Jordan and the Antrim Conservation District hosted a Community Forum to discuss and document citizens' concerns with the proposed Alba Well: Permit # MI-009-11-0001. Enclosed is a VHS tape, a written transcript of the community forum and written comments from concerned citizens. The remedy proposed leaves the people of Alba and the people of Bay Harbor vulnerable and at risk.

The consensus from the attendee's was a very impassioned plea to the EPA to reconsider the issuance of permit # MI-009-11-0001. This appeal is being filed based on important policy considerations which the environmental appeals board should, in its discretion, review." I believe the following items should be considered BEFORE finalizing this permitting process:

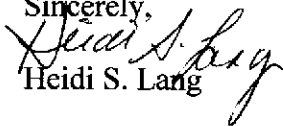
- The amount of the surety bond required should be sufficient to pay for a site investigation once leachate has been detected above the Bell Shale Layer, and should be in the range of \$4 MM to \$6 MM, based on the cost to investigate the TCE plume. (There is a tri-chloroethylene plume moving in a northwesterly direction from Mancelona to Schuss Mountain/Shanty Creek Resort. Tar Lake was a superfund site located in Antrim/Mancelona, Michigan, moving in a northwesterly direction from Mancelona towards Schuss and Shanty Creek Resorts. EPA and DEQ spent millions of dollars cleaning up and remediation of these sites.) DEQ spent an additional \$10 MM to install and extend the public water system in the Mancelona-Cedar River area. Are we going to have cleanup again when the Bell Layer leaks or the Dundee formation is full of brine from the oil and gas wells and the leachate from Bay Harbor?

- The overriding purpose of the bond and the proposed sentinel wells is to trigger the abandoning of the disposal well. Please mandate properly positioned sentinel wells instead of just monitoring wells!
- Since Beeland, LLC. could disappear as a responsible party in the future, will the Michigan tax payers or CMS be obligated to pay for a site investigation in case the Bell Shale Layer fails and results in groundwater contamination sometime in the future?
- DEQ is installing two sentinel wells between the TCE plume and the Cedar River Well Field to detect TCE that migrates vertically through the clay protective layer. This same concept is the basis for Three Lakes Association's (TLA) recommendation for sentinel wells near the proposed well in Alba, i.e. detect leachate above the protective Bell Layer. This detection and warning is the distinction between a "monitoring well" and a "sentinel well". It is not merely a matter of interpreting the concentration of contaminants in drinking water, as suggested by DEQ, but rather the determination that the Bell Layer is protective or not.
- Wear and tear on our roads. Who is going to pay for that?
- Emergency Action Plans – will they be mandated – in the event of an accident on the road or a spill on site? Who will be responsible?
- Will CMS/Beeland work to fix the problem not just apply a band-aide to the wound?
- Currently two miles of beaches at Bay Harbor are closed because of the contamination. Residents of Bay Harbor purchased million dollar condos on the water and the waterfront cannot be used. The proposed solution is inadequate.
- The people of Antrim County do not want Bay Harbor/Emmett County's hazardous waste!
- This is an environmental injustice issue. Look at the per capita income of the people living in Alba and look at the per capita income of the people living in Bay Harbor!!!!

Please, please, please **STOP** and consider all of the above comments, the comments made in Alba on the 8<sup>th</sup>, and all the comments that were originally submitted during the public comment period used to issue the proposed injection well permits.

We need to look at long - term solutions to hazardous waste problems. Maybe we ought to look at hazardous waste problems BEFORE we start a manufacturing process. Our recourses are finite and our health and our world is fragile. Please reconsider the Bay Harbor leachate problem. More needs to be done.

Sincerely,

  
Heidi S. Lang

**Managing Our Natural Resources**

# COMMUNITY FORUM COMMENTS – March 8, 2008, Alba High School

By: Dr. John W. Richter, President – Friends of the Jordan

Thank you all for taking time out of your busy lives to support this effort, and special thanks to Alba Schools for the use of this facility.

This “Community Forum” is designed to demonstrate; to the general public, our elected officials, CMS, DEQ and EPA, the strong – near unanimous opposition to this waste disposal well. It also demonstrates the many legitimate questions that are still unresolved.

According to EPA, an appeal can be based on either, (1) a finding of fact or conclusion of law which is clearly erroneous or, (2) “An exercise of discretion or an important policy consideration which the Environmental Appeals Board should, in its discretion, review.”

We think that the widespread opposition shown here today and during the initial comment periods where over 600 citizens signed petitions, two county commissions & several organizations passed resolutions and thousands of others voiced their disapproval,- plus the fact that over 30%of our public comments, rightfully submitted but were rejected or not considered by EPA,- “CONSTITUTE IMPORTANT POLICY CONSIDERATIONS”, that anyone with an ounce of discretion should reconsider or review.

Furthermore, anyone living in Charlevoix or Antrim Counties, or who signed our petitions, or who gave or submitted comments, has legal standing in this appeal because their concerns were raised and included in Friends of the Jordan’s initial responses during the initial Public Comment Periods.

I’ve said from the beginning that this permit process is DYSFUNCTIONAL. The permits for this well are based on very narrow Underground Injection Control Rules that only consider the engineering and operations of the well itself. All other concerns raised by you and us were not considered. Yet, by allowing this well, CMS will be able to collect and transport millions of gallons of contaminated

water, dump it in Alba, tear up our roads, avoid properly cleaning up that waste site in Bay Harbor and potentially contaminate another site with far reaching consequences.

Talk about dysfunctional ...

\* Why were they allowed to build on top of the kiln dust when they knew it was a problem to begin with?

\* How can CMS continue to ignore and defy EPA's Administrative Order of 2005 which clearly states, "REMOVE, ISOLATE, or CONTAIN the CKD, not transport its leachate to Alba?

\* Why is it that CMS alone can choose the method of cleanup and the site of contaminated waste disposal and the rest of us who live here don't matter?

\* How is it that Bay Harbor and CMS can continue to pollute Little Traverse Bay and now threaten Alba and the Jordan River Watershed?

\* How can EPA approve a very risky disposal well, that nobody wants, except CMS, for up to 20 years, when there isn't even a final cleanup plan in place for Bay Harbor?

\* How can CMS, without question, divert millions or billions of groundwater destined for Lake Michigan and pump it down a hole in Alba?

\* Is this not a major withdrawal or diversion of water?

\* Bay Harbor has been a known contaminated site for 20 years. How many more years will it take to finally contain or isolate the CKD and stop the pollution?

\* This disposal well is just too convenient for CMS and Bay Harbor.

\* We here may not all be geophysists, but we know what a skunk smells like when we smell one and we don't want it in our back yard.

\* Maybe CMS could hookup with Nestle Mountain Water, bottle it and sell it as "Mineral Water", fortified with "Trace Elements." Better yet, mix it with the waste CO2 and call it "Sparkling Mineral Water. They could probably get a permit for that too.

The experts at EPA and DEQ sat that this deep well disposal is a safe and proven method of waste disposal. They have learned from all the past failures

and now the process is fool-proof (until the next failure). Their proof is that the Antrim Gas operations have been pumping into the same formation since the late 80's and nothing bad, to their knowledge has happened, yet. (Are they looking?) They even have nearly complete well logs since 1997! 50 years ago no one ever heard of Tar Lake or the TCE plume spreading out from Mancelona. Now Antrim County has the largest contaminated groundwater plume in Michigan. I'm impressed.(NOT!)

In its permit, Beeland Group cites evidence from a 1996 geologic survey that shows the Bell Shale layer to be impervious and a suitable capping layer for waste disposal in the Dundee Limestone below. However, a more recent and technologically superior survey, reported in 2002, demonstrates two major fault lines in these deep formations, running through Antrim County in the vicinity of this proposed well site and concludes that "the Bell Shale and Dundee Limestone formations are more fractured and permeable than previously thought." Why didn't Beeland Group cite and use these data or EPA acknowledge it in this permit even after it was pointed out to them? Moreover, why does the Department of Energy plan to drill nearly twice as deep (over 4000 ft.) to find a suitable formation to sequester CO<sub>2</sub>, a far less hazardous substance? Won't the Bell Shale and Dundee Limestone do the job as CMS, DEQ and EPA contend? I'm no mathematician but things here just don't add up. According to DEQ, the current estimate of leachate to be transported and disposed of in Alba, 100,000 – 150,000 gallons per day, represents 3% - 8% of the total leachate from East Park only. East Park contains only 20% of the total CKD waste at Bay Harbor. The rest of the leachate still flows untreated into Little Traverse Bay. CMS contends they've improved their collection efficiency. OK, lets say they capture 50% of the leachate from East Park. Now we have 10x the volume of leachate to transport and dispose, 10x the number of tanker truck trips to and from Alba tearing up our roads and 10x the contaminants like mercury and arsenic. Does the Dundee Limestone have 10x the capacity? No one knows for sure. And remember, we're only talking about East Park. What about the other 80%???? Can one well

handle 10x or 100x's the volume of leachate? Not likely. So, how many wells are we talking about? For how long? What happens if 10 or 50 years from now we discover the leachate has migrated elsewhere? It's happened far too often in other deep wells. What then? Sorry, too late? Who pays? - We do.

**These issues were not considered for this well permit!!!!**

There are prudent and feasible alternatives. Other cement plants with similar problems have cleaned up their wastes and contained the CKD without deep disposal wells. Grand Traverse Counties Septage Treatment Plant wants the leachate, can use the business and has the proven ability to dispose of it properly.

Finally, and most importantly, this deep well method of waste disposal doesn't solve the problems at Bay Harbor. Not even close. Even if this well performed as predicted, most of the contamination will still flow into Lake Michigan and will continue to do so for many years to come. Why aren't the people living along Little Traverse Bay outraged??

EPA, you had it right the first time in 2005, **Remove, Isolate or Contain the CKD.** Don't allow this band aid well proposal when the problems at Bay Harbor require major surgery. **DENY THIS PERMIT AND ENFORCE YOUR ORDER !**



## Community Forum Comments – March 8, 2008

### DR. PATTERSON'S ELEVEN TOPICS as presented By Jack Norris, Kewadin, MI.

(Dr. Patterson submitted a geologic report in original public comment period.)

#### DISREGARD OF EXISTING FRACTURES AND FAULTS

Cherry-picking data from quarter-century old study, stiffing recent study with opposite conclusions.

#### SERIOUS FLAWS IN SURVEY REPORT

Map not the required area, information missing, no real survey

#### INCOMPETENT ANALYSES OF WELL'S IMPACT ON USDW

Assumptions made where true data required, available data from nearby wells ignored, again cherry-picking seemingly supporting data, omitting pages of unwelcome data, from recent competent studies.

#### DISREGARD OF DATA FROM OTHER WELLS WITHIN 2 MILES THAT DRILLED INTO OR THROUGH DUNDEE LIMESTONE

#### INCOMPETENT TREATMENT RESPECTING SURFACE WATERS AND SUBSURFACE AQUIFERS

Failure to show required vertical map, "Use summary" not responsive to requirements.

#### FAILURE TO HANDLE DRILLING THROUGH SALT

#### POSSIBLE RADIOACTIVE CONTENTS OF WASTE TO BE INJECTED

#### INCONSISTENCIES IN "INJECTION WELL DATA" FORM EQP 7200-4

Calculations not meaningfully shown, units (feet? psi? Darcy?) not shown.

#### IT FLUIDS & DRILLING FLUIDS DISPOSAL NOT IDENTIFIED

#### TWELVE TIMES AROUND THE EARTH TRUCK TRAFFIC

Gallonage proposed to be trucked to Alba for 20 years requires road travel equal to a dozen world circumnavigations.

#### CONTRADICTS SELF AS TO LAND USE

ASSUMING ALL IS CARRIED OUT AS CMS (BEELAND) HAS PROPOSED, ONLY SOMETHING ON THE ORDER OF HALF A PERCENT OF THE LEACHATE ENTERING THE BAY WILL HAVE BEEN DEALT WITH.

THOSE WHO SEE THIS PROGRAM AS A DEEP POCKETS PR BAMBOOZLE MAY HAVE A POINT.

# **FACT SHEET**

**1) Deep Injection Wells have an 8% malfunction rate and 2% have contaminated drinking water** (according to Tip of the Mitt). The Deep Injection Wells in Romulus Michigan failed and leaked. The well operators vanished in 2006, leaving the community to clean up the mess.

**2) The EPA order for the cleanup at Bay Harbor in 2005 requires CMS to "Remove, Isolate, or Contain" the cement kiln dust (CKD).** Not transport it to Alba and possibly poison our water. Not contaminate groundwater flowing into Little Traverse Bay. Over 50% of the CKD could and should be removed now.

**3) CKD, when mixed with ground water becomes a toxic bleach-like soup releasing large amounts of mercury, lead, other heavy metals, and contaminants.**

- \* Why was CKD exempted from the hazardous waste ruling during the Engler Administration?
- \* Why was a golf course which uses millions of gallons of water built over the CKD piles at Bay Harbor?
- \* The problem was created at Bay Harbor. It should be dealt with there as well, not dumped on a community with fewer economic resources such as Alba.

**4) CMS is currently collecting only 3 to 8 percent of leachate from East Park in Bay Harbor** (according to the DEQ). That means over 1,000,000 gallons of untreated CKD contaminated ground water flows into Little Traverse Bay every day. Why is this allowed? And East Park represents only 20% of the total CKD piles in Bay Harbor. What is being done about the other CKD piles?

**5) Approximately 135,000 gallons of leachate would be transported to Alba daily for 20 years or more.**

- \* This means 15 - 20 tanker truck loads of toxic waste traveling the county roads to Alba, every day, 365 days a year, for 20 or more years.
- \* Who will pay for the maintenance and the wear and tear on the roads due to this heavy and hazardous load?
- \* Are emergency first responders, police, and EMT's ready and equipped to deal with a possible toxic spill from a tanker accident?
- \* What would be the effects of an accident or toxic spill on surrounding communities and natural resources?
- \* This represents only 3 to 8% of the total leachate in Bay Harbor. What if more is collected and transported further increasing truck traffic?

**6) The earth is not static. It is ever-changing.** A mid continental rift runs through the general area of the proposed well. Dumping such a huge amount of contaminated water for years and years is bound to create pressure. The pressure caused by injection wells has been enough to actually trigger earthquakes in other states. Can we say for certain that throughout the next 20 + years, pressure fissures won't occur here, possibly leading to contamination of groundwater?

**7) CKD contaminated sites have been cleaned up elsewhere without using deep well disposal.** Let's not risk contaminating our precious water resources in Alba or Lake Michigan!

## Community Forum

### “An Appeal to EPA and MDEQ to Reconsider Permitting a Waste Disposal Well Near Alba”

Alba High School, Alba Michigan

Saturday, March 8, 2008

Meeting opened by Dr. John Richter, President of Friends of the Jordan at 2:30 p.m. This forum is to demonstrate the strong, unanimous opposition to the EPA and MDEQ issue of permits to allow cement kiln dust (CKD) leachate from Bay Harbor Resort to be disposed in a deep well near Alba. Dr. Richter noted that over 600 people signed petitions last summer that were discounted. Why did CMS choose this site and why does the opinion of the people who live here not matter? How did the EPA approve this risky disposal? How can the EPA and DEQ say this is a safe well? According to the DEQ, East Park represents only 20% of the total CKD piles in Bay Harbor. What is being done about the other CKD piles? Also, how many wells will there be? If they get one well, will they want two or three? If there are issues years from now who will fix them and who will pay for them? This method of waste disposal does not solve the problem for Bay Harbor.

Heidi Lang, Antrim Conservation District, opened the floor to public comment by introducing Kevin Elsenheimer, 105<sup>th</sup> District State Representative. Representative Elsenheimer noted that water is not a democratic or republican issue. The deep injection well is not just an Alba issue; this is a Northern Michigan issue. He is currently working on a bill to change the way permits are issued for wells such as this. Unfortunately, that bill will not be passed in time to help in this situation but will be important in stopping future issues. Elsenheimer stressed the need for citizen involvement in this issue. He also stated that the \$40,000 bond for closing/capping the well is not nearly

enough, and suggested that at a minimum a \$1 million bond be required. He is suggesting that requirement be placed on Beeland/CMS.

**Harold Chase, Regional Representative for Senator Levin.** He noted that if you made a comment this summer, file an appeal.

**Terry Johnson, Antrim County Sheriff,** shared his concerns regarding the magnitude of trucks that will be using Antrim County roads. Are we equipped to take care of emergency situations? And, who will be servicing the equipment at the well site? These are things that need to be considered.

**JoAnne Beeman, concerned citizen.** She is a resident of Charlevoix and member of from Friends of the Jordan Association. See attached.

**Dean Branson, from the Three Lakes Association,** and also a part of the leadership team representing 900-1000 people. He noted that we need to be aware of Environmental Injustice Fund. EPA has an Environmental Injustice Fund available to provide grants for legal support. We need to ask the EPA for more geological study and a sentinel well. See attached.

**Barb Bradford, Antrim Planning Commission and concerned citizen.** She urged all who made a comment in June to file an appeal. But, if you didn't make a comment, you still have a right to complain. Ask all our State Representatives and elected officials to honor us as our representative. She commended Kevin Eisenheimer, but we need to stop this well and we need to tell our representatives to change the bills written that have allowed this well to be permitted. She pointed out a list of notes she made to the comments made by CMS, EPA and DEQ and plans on sending those along with her appeal.

**Connie Saltonstall, concerned citizen and candidate for 105<sup>th</sup> House District.** Noted the following points: Originally said CKD wasn't a problem – now

it's toxic, groundwater must not be contaminated, CMS has sold the nuclear waste site and is no longer responsible, what will happen here?

**Janice McCraner, County Commissioner in Manistee.** She noted this is not an Antrim County issue or a Star Township issue. This is a Northern Michigan issue. She is a member of the Northwest Michigan Council of Government member and has shared this information with them and they need to get involved.

**Jack Norris, a concerned citizen.** Jack shared a list of points by geophysicist. See attached.

**Kerry Oviatt, concerned citizen.** What part of environmental quality does the DEQ not understand? What part of environmental protection does the EPA not understand? Why is it toxic for CKD to stay in Bay Harbor but OK to bring it here? What about the "oops" factor? What if this deep injection well does contaminate water? It will be too late to do anything about it then. There is no going back if this well fails.

**Al Frieze, member of Friends of the Jordan.** He shared a letter he wrote and sent to the EPA and DEQ.

**Lisa Dunson, concerned citizen.** Residents of Michigan have a responsibility to protect the largest fresh water source in the country. Today the fight is in Alba, although the great picture is much larger. Corporations, investors, developers should be the front - runners in protecting this resource. We all need water to survive. Spreading pollution to buy time and money is unacceptable! CMS, I write you a check each month for my utilities. I expect more from you. How dare you endanger the vitality of those who live and breathe in Northern Michigan! Are you willing to be liable for the health and well being of any Northern Michigan resident who is adversely affected by your decision to spread pollution around? Take the hit, clean it up on site, be an example, not a polluter.

**Ann Zubouski, concerned citizen.** 8% of deep rejection wells have failed. 2% have contaminated drinking water. Romulus, Michigan spent 15 years and millions of dollars fighting a similar problem. Can we trust CMS to be any different?

**Rick Beemon, concerned citizen.** He owns a cottage 2 miles from the well site. The community needs to appeal and fight this well.

**Brad Garland, Michigan Environmental Council.** They are aware of the issue and feel the DEQ is hiding behind technicalities.

**Christine Maxbauer, Grand Traverse Commissioner and concerned citizen.** Not speaking on behalf of Commissioners but for herself. Very much against the well. The new treatment facility built in Traverse has been handling the leachate successfully to date; why change now.

**Charlie Koop, concerned citizen and County Prosecutor.** Scott Bauman, treasurer for Star Township is taking donations for a legal defense fund and as a private citizen, Mr. Koop will match up to \$500 donated to the defense fund.

**Marv Goodwin, concerned citizen.** In 1954 he worked for a pharmaceutical company that pumped cyanide into a well. When he asked what if it leaked, he was told it is a deep well, even if it leaks it won't damage or affect anything. But it did leak and it did affect a lot things. He applauds what this community is doing and encouraged everyone to grow in numbers by telling your friends to write a letter of appeal too.

**Frank Cashman, concerned citizen.** Although not the mainline issue (contamination of our water is), 140,000 pounds!!! Gross vehicle weight trucks on Antrim County roads, has not been addressed, but needs to be. Who is going to indemnify Antrim roads against damage?

Jerry Aydilott, concerned citizen. He went on line and printed the 164-page proposal for the well and has many questions. At the least a sentinel well is needed to set off alarms if certain contaminants enter the water.

Ray Bier, concerned citizen and Charlevoix business owner. He watches trucks go down the road on a daily basis. A well here shouldn't be considered, it should be thrown out. It should be illegal to truck contaminants somewhere else. He encouraged everyone to make calls to everyone we can to stop this.

Jinny Heick, concerned citizen. Shared a piece from a Charlevoix newspaper.

Gina Middaugh, concerned citizen. She asked what the cost will be, not monetarily but what if we are right, and the well does leak. What will the cost be? What if CMS is right? What will the cost be? We as citizens do have a voice and this is a Michigan issue.

Heidi Lang, Antrim Conservation District/Soil Erosion Officer and concerned citizen. Does this injection well take care of the entire problem? Is all the leachate captured? Is there an emergency action plan in place for the transport of the fluids? What happens if there is an accident? With regular DEQ permits the applications must be complete before they will be issued. Why was Beeland allowed to submit an incomplete permit: maps are not complete, well logs (for surrounding wells are not complete, current geologic studies were not used? Discretion must be used in the issuance of these permits. Common Sense should prevail. How often will regulators be on site? Will there be regularly scheduled surprise visits? It has been my experience that spills or fractures are only disclosed when people are caught. How will we be sure incidents are disclosed? Isn't Beeland monitoring all this like the fox guarding the hen house? A \$40,000 bond doesn't come close to taking care of things if there is a spill. A greater bond should be required if remediation becomes an issue. Ground water should be an issue! What if there is a spill? What are the accumulated levels of heavy metals after 5,10,15,20 years of injections? Why

isn't a clean up and remediation plan required BEFORE work starts? Scrambling after the fact is hazardous to one's health. A lot of damage can be done before action is taken. Water from one water shed is being injected into another watershed, if you are injecting it 2450 feet into the ground, are you totally taking the water out of the system. Shouldn't that be a concern? How much can the Dundee take? It has been accepting brine for years, has that been taken into the carrying capacity of the formation? Beeland is a limited liability corporation – a wholly owned subsidiary of CMS – the “LLC” part is disconcerting. Is this an opportunity to cut and run if things get dicey? Where does the Governor fall on all this?

**David Cling, concerned citizen.** Shared several handouts with the group and information he has gathered over the past several years. See Attached

**Heidi Kaufman, concerned citizen.** She shared that a letters should be written to the customers of Bay Harbor Golf course asking if they know they are golfing on toxic waste. Make calls to the Golf Digest, PGA and LPGA telling them of the toxic waste on the golf course.

A lady shared the website for Michigan government to make your voice heard. [www.michigan.gov](http://www.michigan.gov) you can e-mail the governor and other elected officials.

Meeting adjourned at 4:52 pm.

Meeting Minutes respectively submitted by Gayle Rider



# Comments from David Clink

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
WATER BUREAU

Alba Well

Community Forum March 8, 08

IN THE MATTER OF: NL-001675

NOTICE LETTER

CERTIFIED MAIL

City of Petoskey Wastewater Treatment Plant  
1000 West Lake Street  
Petoskey, Michigan 49770

TO: City of Petoskey  
101 East Lake Street  
Petoskey, Michigan 49770

City of Petoskey Wastewater Treatment Plant  
NPDES Permit Number M10023787  
December 4, 2005 - NL-001675

ATTENTION: Mr. George Korthauer, City Manager

In a letter dated March 8, 2005, the Water Bureau (WB) of the Department of Environmental Quality (DEQ) notified the City of Petoskey (City) of its concerns regarding the City's Industrial Pretreatment Program (IPP) required under National Pollutant Discharge Elimination System (NPDES) Permit Number M10023787.

One of the DEQ's concerns was related to the delayed completion of the Arsenic/Mercury pilot testing as required in Administrative Consent Order (ACO) Number 01-001-003 entered between the City, CMS Energy, the Bay Harbor Company (Bay Harbor), and Boyne USA. The letter also requested that the City provide the WB with a projected date by which the pilot testing would be completed. This information has never been provided to the WB.

In a meeting on May 27, 2005, between the City and the WB, the City indicated that it was considering terminating the acceptance of cement kiln dust leachate from Bay Harbor. This would have addressed the violations of pilot testing requirements in the City's ACO by CMS Energy. In accordance with the City's approved IPP Enforcement Response Plan (ERP), two options are available for resolving compliance schedule violations of an ACO. One involves civil litigation and the other involves termination of service. To date, the City has taken neither of these actions.

The failure by the City to take adequate enforcement measures in accordance with its approved IPP ERP is a violation of Part I.C.1 of NPDES Permit Number M10023787. The WB is requiring that the City submit to this office a written schedule for taking enforcement action in accordance with the City's IPP ERP by January 9, 2006. This should include a plan for either terminating the acceptance of leachate from Bay Harbor or civil litigation to resolve violations of the ACO.

This Notice Letter does not relieve the City of any liability for past or continuing violations of NPDES Permit Number M10023787. The DEQ reserves its right to take all necessary and appropriate enforcement actions for all violations observed to date and any violations that occur in the future. This may include civil and criminal litigation and petitions for penalties in the maximum amount provided by law, including recovery of all legally incurred costs, and attorney's fees.

Your cooperation is greatly appreciated and if the DEQ may be of any assistance to you, please do not hesitate to contact me at the number listed below.

Sincerely,

Date Issued: December 4, 2005

CC

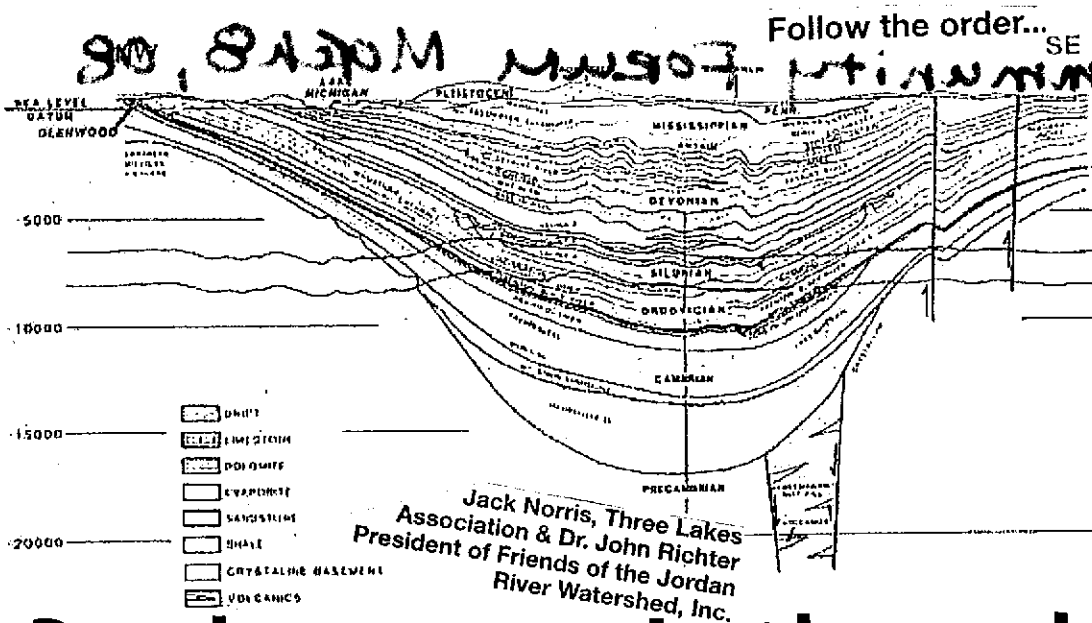
Ryan D. Blazic  
Environmental Quality Analyst  
Water Bureau  
989-705-3420

cc: Ms. Sherrie Elliot/Mr. Lee Arman, City of Petoskey  
Mr. Mike Robbins, City of Petoskey  
Mr. Ralph Döllhoff, U.S. Environmental Protection Agency  
Mr. Michael Stiffler, DEQ  
Mr. Robert Wagner/Ms. Elaine Pelc, Remediation and Redevelopment Division/DEQ  
Mr. Richard Shoemaker, DEQ/ File

dlc 1959 winks e  
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Mr. David Clink  
P.O. Box 612  
Petoskey, MI 49770-0612

MICHIGAN BASIN DEEP GAS GEOLOGICAL CROSS SECTION



Jack Norris, Three Lakes Association & Dr. John Richter President of Friends of the Jordan River Watershed, Inc.

# Petoskey sewage plant honored

JBY RYAN BENTLEY  
NEWS-REVIEW STAFF WRITER

In the eyes of federal environmental regulators, the city of Petoskey does an admirable job of dealing with a rather unappealing waste.

On Thursday, the U.S. Environmental Protection Agency presented city staff with plaques and certificates recognizing Petoskey's wastewater plant as one of the best operated and maintained in the EPA's six-state Region 5.

Region-wide, eight wastewater facilities — including Petoskey's, Traverse City's, three in Wisconsin and three in Minnesota — received these operations and maintenance honors for 2007. Sixteen communities had sought consideration for the awards.

EPA pretreatment program manager Ash Sajjad said a wastewater plant's record of compliance with Clean Water Act requirements weighs heavily in the decision to grant this type of award. Factors such as public education and outreach, financial management, innovation and use of technology are considered, too.

"This is excellent performance," he said of the Petoskey plant's record when he visited city hall Thursday.

To be eligible for EPA consideration, a wastewater facility must undergo an initial screening process by state environmental officials and receive their recommendation. Ryan Blazic, an environmental quality analyst at the Michigan Department of Environmental Quality's Gaylord Field Office, provided this for Petoskey.

"The city's done a great amount of work over the past few years



RYAN BENTLEY/NEWS-REVIEW

**Petoskey city manager George Korthauer (left) accepts an award plaque from Ash Sajjad of the U.S. Environmental Protection Agency. Korthauer and staff from the city's Department of Public Works were recognized by EPA for the city's well-operated and maintained wastewater plant.**

to upgrade the plant," MDEQ water bureau assistant district supervisor Rick Shoemaker told city staff at Thursday's presentation. "It takes the effort of all you guys to run the plant properly."

Sajjad presented award plaques to Petoskey city manager George Korthauer, public works director Mike Robbins and supervisors Lee Arman and Sherrie L. Elliott. Certificates commemorating the honor went to wastewater plant crew leader Robert Wonnacott and crew members Stephen Keel, Brad Cooper, Steven Collick and Gordon Standish Jr.

Ryan Bentley can be contacted at 439-9342, or rbentley@petoskeynews.com.

## Plant facts

**PETOSKEY'S WASTEWATER** plant, located at the west end of Lake Street, is designed to treat an average flow of 2.5 million gallons per day, and receives an average of 1.53 million gallons on a daily basis. The plant serves a population of 9,907 in and near Petoskey, and receives about 18 percent of its flow from industrial sources. The U.S. Environmental Protection Agency noted that the plant does an outstanding job of pollutant removal. Two supervisors, a crew leader and four technicians are involved with plant operations.

The "bucking" part of making buckskin to look the fresh deer hide in hardwood ashes or lye so that the outer skin layer and the hair could be scraped off.

Bay Harbor shoreline seepage would do just as well, it is lye's chemical equivalent, just as strong — but also contains hazardous levels of arsenic, lead, carcinogens, making it unfit for wading clothing. Unfit for use in swimming, fishing, drinking, wading — anything.

In fact, it has been officially known as a hazard to public health, safety, and welfare for over 25 years! Why? Because of the cement kiln dust abandoned there without treatment by the departed Penn-Dixie Cement Plant.

And in February 2005, the EPA generated an Administrative Order (not a "mild suggestion" or a "what about —?" — no, an ORDER) calling for the clean-up of the Bay Harbor Hazard by removing, isolating, or containing the toxic materials. There was no mention of squirting it down a hide-hole in some little nearby town. The order was issued to the CMS Energy Company, a partner in the development and ownership of the Bay Harbor Resort, site of the hazardous waste deposits.

And what has CMS come up with? A plan requiring the drilling of a hide-hole in Alba where the toxic problem can be squirted down into fractured and permeable rock and shale and an active groundwater system.

In September, at an all-day meeting with CMS and a panel of experts and consultants, hosted by Friends of the Jordan, CMS was offered all manner of help in developing a plan consistent with the EPA order, but in the end showed no intent to carry out all the conditions of the EPA order, preferring to clout its way along to the hide-hole method.

The eminent geologist, Dr. Jim McClurg, a long-time property-owner on Torch Lake, intimately acquainted with the geology of the region, points out that bed rock and shale layers in the Michigan Basin — that's where we live — were bent down by the weight of the two-mile-thick glaciers until they fractured. As we've all seen in martial arts displays, once the strong man's blow cracks the top-most tile in the stack, they all break, one after the other, just as the layers of shale and limestone have done here.

So, it doesn't matter that CMS plans to case its hide-hole in steel. When the toxic water comes out at the bottom of the pipe, it's free to flow through the billions of existing fractures in this very active groundwater system and come into our lives in unforeseen ways, such as in some very foreseeable ways, such as poisoned water wells, contaminated streams, rivers and lakes, and heavier emergency room traffic.

Please join us in endorsing Dr. McClurg's request that a meaningful, independent, geological study be done and publicly reported before there is any pumping of toxic wastes into the ground. Visit our website at [www.friendsofthejordan.org](http://www.friendsofthejordan.org), and support our petition.

It looks as though this time, the buck stops here, with us ordinary types joining in a determined effort to get things done right. Buckskin, anyone?

**RESORT TOWNSHIP ENVIRONMENTAL COMMITTEE**

Resort Township Hall  
2232 Resort Pike Petoskey, MI 49770  
(231) 347-7915  
Tuesday, 5 February 2008; 7:00 P.M.

UNAPPROVED MINUTES

- A. **Call Meeting to Order.** The meeting was called to order by the Chair at 7:03 PM.
- B. **Roll Call.** Present were Chair Al Welsheimer, Vice Chair Leo Simon, Clerk Lucy Eppler, Mark Ferguson, Tom Webster, and Jennifer McKay. Absent was Chuck Sanback

**Audience:** None

- G. **Communications to the Committee.**  
Vice Chair Simon provided copies of a handout received in the Petoskey News Review

Unapproved minutes of the 5 February 2008, Environmental Committee Meeting, Page 1.

regarding the cleanup at Bay Harbor and the Petoskey Wastewater Treatment Plant.

**H. Reports from the Members.**

**State's first hazardous waste well to get operating license**

ROMULUS (AP) — A company seeking to operate the state's first liquid hazardous waste well has overcome its final hurdle to open along I-94 about a half mile from Detroit Metropolitan Airport. The Michigan Department of En-

vironmental Quality announced Monday that it will grant Environmental Disposal Systems of Birmingham an operating license on Tuesday, ending a 15-year battle between the company and environmentalists.

The company will operate the disposal site, where sludge and other industrial waste is to be pumped 4,500 feet below ground. The company said the site's two wells and a storage treatment facility will be safely and scientifically operated.

12-27-05

CLOSED

Table 1. Chemical characteristics of Bay Harbor CKD seep

Analyte	Result	Unit
Alkalinity - Bicarbonate	ND	mg/L
Alkalinity - Carbonate	2000	mg/L
Alkalinity (as CaCO3)	4000	mg/L
Aluminum - Total	17000	µg/L
Antimony - Total	ND	µg/L
Arsenic - Total	220	µg/L
Barium - Total	13	µg/L
Beryllium - Total	ND	µg/L
Cadmium - Total	ND	µg/L
Calcium - Total	8.0	mg/L
Chloride	1700	mg/L
Chromium - Total	17	µg/L
Cobalt - Total	ND	µg/L
Conductance	37600	umhos/cm
Copper - Total	28	µg/L
Hardness - Calculated	20	mg/L
Lead - Total	ND	µg/L
Low Level Mercury - Total	300	ng/L
Magnesium - Total	ND	mg/L
Manganese - Total	41	µg/L
Molybdenum - Total	500	µg/L
Nickel - Total	220	µg/L
Nitrite	0.9	mg N/L
Ortho-phosphate	0.65	mg P/L
pH	12.6	pH
Potassium - Total	12900	mg/L
Selenium - Total	110	µg/L
Silver - Total	ND	µg/L
Sodium - Total	820	mg/L
Solids - Suspended	12	mg/L
Solids - Total Dissolved	30000	mg/L
Strontium - Total	38	µg/L
Sulfate	10800	mg/L
Thallium - Total	ND	µg/L
Titanium - Total	46	µg/L
Turbidity	13	NTU
Vanadium - Total	190	µg/L
Zinc - Total	38	µg/L

ND = Not detected.

Why? How can the State and federal

governments allow this to happen? Our underground water source is at risk. The very source of existence for all life on this planet. What is amazing to me is that these people have the power to allow the outcome of a potential disaster to affect all life in the area. How can we be so stupid to think that the outcome of this decision will not be a potential health disaster to the underwater aquifer. CKD put in a tea bag in water would take over 60 years to stop leaching. It's that BAD! I have been told that Mich. rock formation is like a stack of dishes put in a sink of water with the Great Lakes the basin. There has to be an Environmental Impact Study, has anyone seen it? Is it known 100% that the chemicals will not leak into the water supply? If not, How can we fix the problem should it arise and stop the flow of contamination to our water resource, do they have a proven plan? They haven't stopped the 5 x 1 mile plume west of Mancelona, Mi. Did the regulators use the same science to approve the 4,500 deep well in Romulus, Mi. that LEAKED in months, now closed. It is beyond my comprehension to believe that people with such an education, with so much power, can take such a risk with our water resource. Totally amazing. Unless we hold accountable all the governmental officials for these actions who overlooked the dangers of this decision, we are all in for a dire future. God help the children who will be directly effected by a possible future environmental disaster. Why? For what? Is it really worth it? No wonder this country is heading down hill. Our leaders have sided with the few who believe monetary gain is the answer to success. The truth is monetary success comes when the mentality of an individual realizes the potential in the power of goodness and truth. We all need to pray for the people of this country, that WE THE PEOPLE come together as one voice, one common goal, to end the wickedness that has made it a mission to destroy life and cover up the TRUTH! This is GOD'S COUNTRY. Who is on THE LORD'S side? GOD BLESS!

David L. Clink

ENVIRONMENTAL PETOSKEY ADVOCATES

231-347-

3470 P.O. Box 612 Petoskey, Mi. 49770-0612 Mr. Clink has researched the Petoskey-Bay Harbor problems for 2 1/2 years with his own money. His time and over \$ 7,000. of information has been given away for FREE!! Books, 40 page Flyers, Brownfield-Water Quality Hydrology DVD's, Data CD's & Audio CD'S. Can also E-Mail 300 page book with 50 E-Mails / J-peg files. I have walked in 11 Parades in a Haz-Mat suit telling the truth with information on side of my truck. Given to citizens, Environmental Groups, Churches, Local, County, State & Federal Elected Officials & Agencies. contact me [dlc1959winks@yahoo.com](mailto:dlc1959winks@yahoo.com) State and federal environmental agencies have decided to grant permits for a proposed Antrim County injection well which would serve as a disposal site for shoreline contaminants from Bay Harbor.

@ 7:00 I just had 3 guys at my door threatening me to leave Jennifer McKay alone, someone else is texting her threatening messages. I told them it was not me. After 5 mins they left. Michigan plate BVC 3400 I called 911 I need Help!!!

David Clink <[dlc1959winks@yahoo.com](mailto:dlc1959winks@yahoo.com)> wrote:

ON 3/4/08 BOARD REMOVED  
(RECEIVED IN PNR) OUT OF THE  
MINS OF  
2/5/08

Date: Mon, 3 Mar 2008 14:52:14 -0800 (PST)  
From: David Clink <[dlc1959winks@yahoo.com](mailto:dlc1959winks@yahoo.com)>  
Subject: First Amendment Firing ? & Resort twp meeting Mar. 4 Tues night 7:00 PM  
To: George Bush <[president@whitehouse.gov](mailto:president@whitehouse.gov)>,  
David Clink <[dlc1959winks@yahoo.com](mailto:dlc1959winks@yahoo.com)>

CAN you come to Environmental meeting Tues night 7:00 @ Resort Twp. Hall North of Intertown Rd. on Resort Pike Rd. To change Mins. of last month's meeting. Mins. were wrote incorrect that got myself fired from Newspaper. Said ( Vice Chair Simon provided copies of a handout RECEIVED in Petoskey News-Review regarding the cleanup at Bay Harbor and the Petoskey Wastewater Treatment Plant ). The 2 news stories were printed in the Petoskey News-Review in last 3 months were on 1 side. 1 was a letter to editor from Friends of the Jordan & 3 Lakes Assoc. with a DEQ graph of dished rock formations I got from SEE NORTH. 1 was 2 DEQ Employees getting EPA to give Petoskey an award for great service in last few years ( 1 of 2 in the State ). The other side was the same 2 DEQ Employees going after City of Petoskey Treatment Plant for ( Past or Continuing Violations ) Letter wrote DEC. 4 2005 that I had FOIA from DEQ. I will send this out in another E-mail. Newspaper told me that I handing out flyers when I am driving around, ( the TRUTH about the cover-up ) & the Resort mins. that TIP-OFF-the MITT employee Jennifer McKay wrote & sent to paper was why I was taken off all 3 of my contracts!! Even though Pictures of cover-up have been on my truck for 1 3/4 years & in many parades. Mr. Simon HAS NOT BEEN a Subscriber to PNR since Sept. of 2007!!! He also told Jennifer McKay At Last months meeting that it didn't come in the paper, it was in a bag by his mailbox. United States First Amendment to the Constitution was printed last fall in PNR. Under Freedom of the press is written: Citizens can request time on TV to respond to views with which they disagree; they may write letters to newspaper editors. ----- They can pass out leaflets that give their opinions. ----- They can voice their opinions on personal Web pages. You decide if I was fired for telling the truth that nobody else has the will to do. What are you willing to loose to help your fellow citizens? If these rights are taken away from us, George Washington said" If we have no voice we will become like sheep to the slaughter." Have we traded a king & overlords to now CORRUPTION & BIG MONEY in Corp. America? We are a GREAT Country with many voices. We can do things right & still make money if we try a little more. GOD BLESS David L. Clink 231-347-3470

JENNIFER MCKAY WAS A NO SHOW

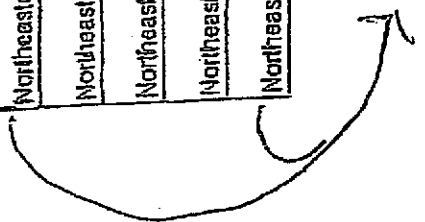
231-347-3470 dlc 1959winks@yahoo.com

Northeastern Exploration	mg/l	Iron		4.06	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020A	pH treated
Northeastern Exploration	mg/l	Lead		0.008	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020A	pH treated
Northeastern Exploration	mg/l	Magnesium		8.43	8/15/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020A	pH treated
Northeastern Exploration	mg/l	Mercury		ND	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 160.1	pH treated
Northeastern Exploration		pH		10.90	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020A	pH treated
Northeastern Exploration	mg/l	Potassium		4020	8/15/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020A	pH treated
Northeastern Exploration	mg/l	Selenium		0.013	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	Standard Methods	pH treated
Northeastern Exploration	mg/l	Silica		17.1	8/5/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 8020	pH treated
Northeastern Exploration	mg/l	Sodium		304	8/15/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 120.1	pH treated
Northeastern Exploration	umho/cm	Specific conductance		14000		7/29/2005	CMS Bay Harbor Treatment Plant	ASTM	pH treated
Northeastern Exploration		Specific gravity		1.014	8/5/2005	7/29/2005	CMS Bay Harbor Treatment Plant	011420	pH treated
Northeastern Exploration	mg/l	Sulfate		3107	8/1/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 375.4	pH treated
Northeastern Exploration	mg/l	Sulfide		ND	8/9/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 375.2	pH treated
Northeastern Exploration	mg/l	Sulfide, reactive on water		ND	8/9/2005	7/29/2005	CMS Bay Harbor Treatment Plant	Modified/HA	pH treated
Northeastern Exploration	ug/l	Toluene		140	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SW 048	pH treated
Northeastern Exploration	mg/l	Total dissolved solids		10575	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SW 046	pH treated
Northeastern Exploration	mg/l	Total organic carbon		584	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	8021B	pH treated
Northeastern Exploration	mg/l	Total suspended solids		230	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 160.1	pH treated
Northeastern Exploration	ug/l	Total xylene		120	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 415.1	pH treated
								EPA 160.2	pH treated
								SW 046	pH treated
								8021B	pH treated

Mr. David Clink  
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FUEL OIL? NOT CKD



Northeastern Exploration	mg/l	Total dissolved solids	22800	6/2/2005	5/2/2005	CMS Bay Harbor Treatment Plant	EPA 160.1	pH treated
Northeastern Exploration	mg/l	Total organic carbon	182	5/30/2005	5/2/2005	CMS Bay Harbor Treatment Plant	EPA 415.1	pH treated
Northeastern Exploration	mg/l	Total suspended solids	93	6/2/2005	5/2/2005	CMS Bay Harbor Treatment Plant	EPA 160.2	pH treated
Northeastern Exploration	mg/l	Aluminum	6.86	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020A	pH treated
Northeastern Exploration	mg/l	Arsenic	0.042	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020A	pH treated
Northeastern Exploration	mg/l	Barium	0.116	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020	pH treated
Northeastern Exploration	ug/l	Benzene	26	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SW846 8021B	pH treated
Northeastern Exploration	mg/l	Bicarbonate as CaCO3	718	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	Calculated	pH treated
Northeastern Exploration	mg/l	Bromide	ND	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6010A	pH treated
Northeastern Exploration	mg/l	Cadmium	ND	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020A	pH treated
Northeastern Exploration	mg/l	Calcium	43.7	8/15/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020A	pH treated
Northeastern Exploration	mg/l	Carbonate as CaCO3	344	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SM 4500- CO2D	pH treated
Northeastern Exploration	mg/l	Chemical oxygen demand	1050	8/10/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 410.1	pH treated
Northeastern Exploration	mg/l	Chloride	1190	8/5/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 300.0	pH treated
Northeastern Exploration	mg/l	Chromium, total	0.023	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 6020A	pH treated
Northeastern Exploration	mg/l	Cyanide, reactive on water	ND	8/8/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 300.0	pH treated
Northeastern Exploration	ug/l	Ethylbenzene	24	8/2/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SW846 8021B	pH treated
Northeastern Exploration	mg/l	Fluoride	ND	8/4/2005	7/29/2005	CMS Bay Harbor Treatment Plant	EPA 340.2	pH treated
Northeastern Exploration	Degrees	Ignitability	ND	8/12/2005	7/29/2005	CMS Bay Harbor Treatment Plant	SW 846 1010	pH treated

→ FUEL OIL? not CKD