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COPY

February 28, 2007

VIA FEDERAL EXPRESS OVERNIGHT

Ms. Dana Rzeznik
Environmental Engineer
Underground Injection Control Branch
Region 5, U.S. EPA, WU-16J
77 W. Jackson Blvd.
Chicago, IL 60604

Re: *Application To Transfer Permit/ MI-163-1W-C007 & MI-163-1W-C008*

Dear Ms. Rzeznik:

In follow-up to our meeting on January 30, 2007 and our recent telephone conferences, I am submitting an original and a copy of the following documentation for purposes of requesting a transfer of the Underground Injection Control permits for the two (2) deep disposal wells located at 28470 Citrin Drive, Romulus, Michigan:

1. Application to Transfer Permit (EPA Form 7520-7) requesting transfer of permit from Environmental Disposal Systems, Inc. ("EDS") to Environmental Geo-Technologies, LLC ("EGT") for permit numbers MI-163-1W-C007 and MI-163-1W-C008;
2. UIC Permit Transfer Agreement executed by EGT. We are still awaiting an executed copy of this document by EDS. Based on my discussions with the attorney for EDS, I expect to receive this document shortly. In the alternative, I have attached the Acknowledgement and Assignment executed by EDS which appoints the attorneys or designee of the Police and Fire Retirement System of City of Detroit as attorney in fact for EDS for purposes of executing any documents necessary to effectuate the transfer of the UIC permits (*see*, paragraph 4.g.);
3. An Irrevocable Standby Letter of Credit (effective February 22, 2007) issued on behalf of RDD Investment Corp., the present operator of the facility, for purposes of meeting the financial responsibility requirement set for in 40 CFR 144.63 along with a February 8, 2007 cost estimate for plugging and abandonment prepared by Petrotek Engineering Corporation;

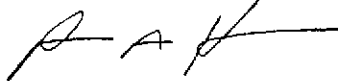
Ms. Dana Rzeznik
Environmental Engineer
Underground Injection Control Branch
Region 5, U.S. EPA, WU-16J
February 28, 2007
Page 2

4. A copy of an Irrevocable Standby Letter of Credit issued on behalf of EGT, effective immediately. The original will be forwarded upon receipt;
5. An updated Plugging and Abandonment Plan certified by Austin Marshall on behalf of EGT for both wells;
6. A copy of the resume and training qualifications for EGT's deep well operator, Donald A. Anderson, along with an expected work schedule for Mr. Anderson;
7. A general overview of Personnel Qualification for EGT, including resumes for each expected individual employee;
8. Documentation demonstrating the intended performance of an Ambient Reservoir Pressure Test by Baker Hughes;
9. Documentation certifying repairs to the automatic warning and shut-off system, plans for installation of a well leak detection system, plan for lining system for well head cellars and certification of facility by Stantec; and
10. Documentation regarding electronic record keeping for process data logging, steps for maintaining electronic records by EGT and an investigation regarding missing chart recordings.

If you have any questions related to this Application to Transfer Permit or the supporting documentation, please do not hesitate to contact me.

Very truly yours,

CLARK HILL PLC



Ronald A. King

RAK:kmt
Enclosures

cc: RDD Investment Corp.
Environmental Geo-Technologies, LLC

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United States Environmental Protection Agency
Washington, DC 20460

Application To Transfer Permit

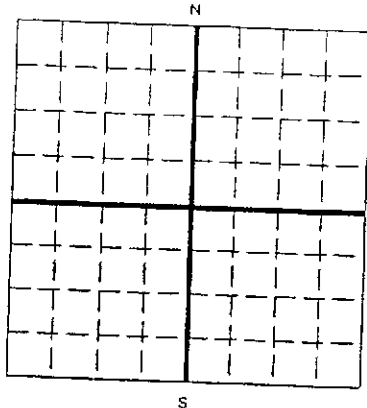
Name and Address of Existing Permittee

Environmental Disposal Systems, Inc.
199 West Brown Street, Suite 200, Birmingham, MI 48009

Name and Address of Surface Owner

RDD Investment Corp.
79 Alfred, Detroit, MI 48226

Locate Well and Outline Unit on
Section Plat - 640 Acres



State

MI

County

Wayne

Permit Number

M-452 / MI-163-1W-C007

Surface Location Description

SW 1/4 of NW 1/4 of SE 1/4 of 1/4 of Section 12 Township 3S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface

Location 0 ft. from (N/S) N Line of quarter section
and 0 ft. from (E/W) W Line of quarter section.

Well Activity

☒ Class I

☐ Class II

☐ Brine Disposal

☐ Enhanced Recovery

☐ Hydrocarbon Storage

☐ Class III

☐ Other

Well Status

☐ Operating

☒ Modification/Conversion

☐ Proposed

Type of Permit

☒ Individual

☐ Area

Number of Wells 1

Lease Number

Well Number

I-12 / MI-163-1W-C007

Name(s) and Address(es) of New Owner(s)

Environmental Geo-Technologies, LLC
1216 Beaubien, Detroit, MI 48226

Name and Address of New Operator

Environmental Geo-Technologies, LLC
1216 Beaubien, Detroit, MI 48226

Attach to this application a written agreement between the existing and new permittee containing a specific date for transfer of permit responsibility, coverage, and liability between them.

The new permittee must show evidence of financial responsibility by the submission of a surety bond, or other adequate assurance, such as financial statements or other materials acceptable to the Director.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title (Please type or print)

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC
BY: AP ACQUISITION, LLC
BY: DIMITRIOS PAPAS

Signature

Date Signed

2-21-07

PAPERWORK REDUCTION ACT

The public reporting and record keeping burden for this collection of information is estimated to average 5 hours per response. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW., Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

Well Class and Type Code

Class I	Wells used to inject waste below the deepest underground source of drinking water.
Type "I"	Nonhazardous industrial disposal well
"M"	Nonhazardous municipal disposal well
"W"	Hazardous waste disposal well injecting below USDWs
"X"	Other Class I wells (not included in Type "I," "M," or "W")
Class II	Oil and gas production and storage related injection wells.
Type "D"	Produced fluid disposal well
"R"	Enhanced recovery well
"H"	Hydrocarbon storage well (excluding natural gas)
"X"	Other Class II wells (not included in Type "D," "R," or "H")
Class III	Special process injection wells.
Type "G"	Solution mining well
"S"	Sulfur mining well by Frasch process
"U"	Uranium mining well
"X"	Other Class III wells (not included in Type "G," "S," or "U")
Other Classes	Wells not included in classes above.
	Class V wells which may be permitted under § 144.12
	Wells not currently classified as Class I, II, III, or V

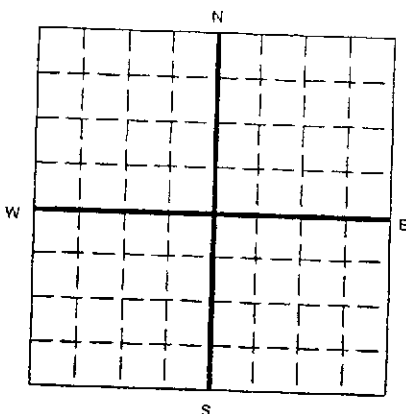
United States Environmental Protection Agency
Washington, DC 20460

Application To Transfer Permit

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199 West Brown Street, Suite 200, Birmingham, MI 48009

Name and Address of Surface Owner

RDD Investment Corp.
79 Alfred, Detroit, MI 48226Locate Well and Outline Unit on
Section Plat - 640 Acres

State

MI

County

Wayne

Permit Number

M-453

C008

Surface Location Description

SW 1/4 of NW 1/4 of SE 1/4 of 1/4 of Section 12 Township 3S Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface

Location 0 ft. from (N/S) N Line of quarter section
and 0 ft. from (E/W) W Line of quarter section.

Well Activity

- ☒ Class I
☐ Class II
☐ Brine Disposal
☐ Enhanced Recovery
☐ Hydrocarbon Storage
☐ Class III
☐ Other

Well Status

- ☐ Operating
☒ Modification/Conversion
☐ Proposed

Type of Permit

- ☒ Individual
☐ Area

Number of Wells 1

Lease Number

Well Number 2-12 / MI-163-1W-C008

Name(s) and Address(es) of New Owner(s)

Environmental Geo-Technologies, LLC
1216 Beaubien, Detroit, MI 48226

Name and Address of New Operator

Environmental Geo-Technologies, LLC
1216 Beaubien, Detroit, MI 48226

Attach to this application a written agreement between the existing and new permittee containing a specific date for transfer of permit responsibility, coverage, and liability between them.

The new permittee must show evidence of financial responsibility by the submission of a surety bond, or other adequate assurance, such as financial statements or other materials acceptable to the Director.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title (Please type or print)

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC
BY: RP ACQUISITION, LLC
BY: DIMITRIOS PAPAS
IT'S ALL ABOUT THE MONEY

Signature

[Signature]

Date Signed

2-21-07

PAPERWORK REDUCTION ACT

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"W" Hazardous waste disposal well injecting below USDWs
"X" Other Class I wells (not included in Type "I," "M," or "W")

Class II Oil and gas production and storage related injection wells.

Type "D" Produced fluid disposal well
"R" Enhanced recovery well
"H" Hydrocarbon storage well (excluding natural gas)
"X" Other Class II wells (not included in Type "D," "R," or "H")

Class III Special process injection wells.

Type "G" Solution mining well
"S" Sulfur mining well by Frasch process
"U" Uranium mining well
"X" Other Class III wells (not included in Type "G," "S," or "U")

Other Classes Wells not included in classes above.
Class V wells which may be permitted under § 144.12
Wells not currently classified as Class I, II, III, or V

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UIC PERMIT TRANSFER AGREEMENT

This Transfer Agreement ("Agreement") entered in on the 21st day of February, 2007, by and between, Environmental Disposal Systems, Inc. ("EDS"), a Michigan corporation with an address at 199 West Brown Street, Suite 200, Birmingham, Michigan 48009 and Environmental Geo-Technologies, LLC ("EGT"), a Michigan limited liability company with an address at 1216 Beaubien, Detroit, Michigan 48226 on the following terms and conditions.

WHEREAS, EDS is the former operator of the hazardous waste deep disposal injection well facility located at 28470 Citrin Drive, Romulus, Michigan (the "Facility"); and

WHEREAS, EDS transferred all of its rights, title and interests in the Facility to RDD Investment Corp. ("RDD"), a Michigan corporation, on or about November 6, 2006; and

WHEREAS, two (2) deep injection wells, No. 1-12 and No. 2-12, are located at the Facility; and

WHEREAS, EDS is the current named permittee of two (2) Underground Injection Control ("UIC") permits issued to EDS by the United States Environmental Protection Agency ("EPA"), MI-163-IW-C007 (Well No. 1-12) and MI-163-IW-C008 (Well No. 2-12), respectively; and

WHEREAS, EGT has entered into an agreement with RDD to acquire all rights, title and interests in the Facility and to assume full control and responsibility for the maintenance and operation of wells No. 1-12 and No. 2-12; and

WHEREAS, EDS now desires to transfer all of its remaining rights, interests and obligations with respect to the UIC permits to EGT and EGT desires to obtain all the rights, interests and obligations with respect to the UIC permits from EDS;

NOW, THEREFORE, in consideration of the premises and the performance of the covenants contained below, EDS and EGT agree as follows:

1. Effective **March 15, 2007** (the "Effective Date"), EDS shall transfer all of its remaining responsibility, coverage and liability with respect to UIC permits MI-163-IW-C007 and MI-163-IW-C008.
2. On the Effective Date, EGT will assume full and complete responsibility for the UIC permit obligations, coverage and liability with respect to UIC permits MI-163-IW-C007 and MI-163-IW-C008.
3. On or before the Effective Date, EGT will demonstrate financial responsibility pursuant to 40 CFR 144.63.

4. As of the Effective Date, EGT will assume liability for performance of all of the UIC permit conditions.

5. This Agreement shall become null, void and unenforceable in the event EPA does not approve the transfer of the UIC permits to EGT.

6. The signatories to this document below represent that they are duly authorized to execute this Agreement on behalf of the respective parties.

IN WITNESS WHEREOF, the parties have executed have executed this Agreement on the date set forth below each of their signatures.

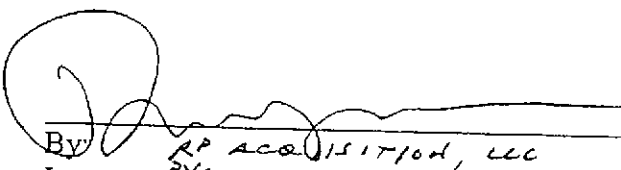
Environmental Disposal Systems, Inc.

By: _____

Its:

Date:

GEO-Technologies, LLC

By:  _____

Its:

Date:

AP ACQUISITION, LLC

BY: DIMITRIOS PAPAS

SOLE MEMBER

2-21-07

ACKNOWLEDGEMENT AND ASSIGNMENT

This Acknowledgement and Assignment (the "Agreement") is made this 14 day of November, 2006, by Environmental Disposal Systems, Inc., a Michigan corporation ("EDS"), Romulus Deep Disposal Limited Partnership, a Michigan limited partnership ("Romulus"), Remus Joint Venture, a Michigan joint venture ("Remus") (EDS, Romulus, and Remus sometimes collectively referred to as the "Borrowers"), and Douglas F. Wicklund, an individual ("Wicklund") (each a "Party" and collectively the "Parties").

WHEREAS, the Police and Fire Retirement System of the City of Detroit, a pension plan and trust established by the Charter and Municipal Code of the City of Detroit, Michigan (the "Lender"), as lender, and EDS, Romulus, and Remus, individually and collectively as borrower(s), have entered into certain transactions wherein money was advanced for the purchase, construction, and operation of the Facility, as documented in the Loan Documents;

AND WHEREAS, the Parties desire to acknowledge and recognize certain rights and obligations arising under the Loan Documents;

AND WHEREAS, the Parties have agreed that the Borrowers will transfer or assign title to the real and personal property that is subject to the Loan Documents to the Lender or the Lender's designee at the request of the Lender;

FOR GOOD AND VALUABLE CONSIDERATION, including but not limited to the terms and conditions set forth herein, the receipt and sufficiency of which are hereby acknowledged,

THE PARTIES HEREBY AGREE AS FOLLOWS:

1. Definitions. For purposes of this Agreement, and unless otherwise indicated, the following terms shall have the definitions set forth below:
 - a. EPA. "EPA" shall mean the United States Environmental Protection Agency and any of its divisions, bureaus, offices, agents, or representatives.
 - b. Event of Default. The term "Event of Default" shall have the meaning set forth in the Loan Documents.
 - c. Facility. The "Facility" shall mean the commercial liquid hazardous waste storage, treatment, and disposal facility located at 28470 Citrin Drive, Romulus, Michigan, sometimes referred to as the "Project" in the Loan Documents, and all equipment, personal property, and facilities related to the operation thereof or located on or in the Property.
 - d. Loan Documents. The "Loan Documents" shall be meant to include, but not be limited to, the following documents and agreements pertaining or relating to the Property or Facility, or the contemplated purchase or construction thereof, and to which the Lender and one or more of the other Parties hereto are parties:

- i) Loan and equity purchase commitment/agreement dated May 27, 1993, as modified and amended;
- ii) Promissory Note dated June 2, 1993, as modified and amended;
- iii) Mortgage and Security Agreement dated June 2, 1993, as modified and amended;
- iv) Security Agreement dated June 2, 1993 (granted by Romulus), as modified and amended;
- v) Security Agreement dated June 2, 1993 (granted by Remus), as modified and amended;
- vi) Collateral Assignment of Permits dated June 2, 1993, as modified and amended;
- vii) Assignment of Options dated June 2, 1993, as modified and amended;
- viii) Mortgage and Security Agreement dated December 21, 1995 and recorded with the Wayne County Register of Deeds at Liber 28528 Page 205 on January 19, 1996, as modified and amended;
- ix) Loan commitment/agreement dated September 13, 2001, as modified and amended;
- x) Promissory Note dated September 13, 2001, as modified and amended;
- xi) Security Agreement: Assignment of All Permits and Licenses dated September 13, 2001;
- xii) Security Agreement: Assignment of Architect's Agreement and Plans and Specifications dated September 13, 2001; .
- xiii) Security Agreement: Assignment of Engineer's Agreement dated September 13, 2001
- xiv) Mortgage dated September 13, 2001 and recorded with the Wayne County Register of Deeds at Liber 34926 Page 688 on October 5, 2001, as modified and amended; and
- xv) All loan documents related to the foregoing documents and transactions or referenced in the foregoing documents, any loan documents for additional draws, advances or extensions of additional loans from the Lender to the Borrowers, and/or any such documents hereafter entered into.

- e. MDEQ. "MDEQ" shall mean the Michigan Department of Environmental Quality and any of its divisions, bureaus, offices, agents, or representatives.
- f. Permits. The "Permits" shall mean the following licenses, permits, authorizations, exemptions, and approvals associated with the Facility and/or Property:
- i) EPA Resource Recovery and Conservation Act (RCRA) Part A permit number MIR 000 016 055;
 - ii) EPA deepwell (UIC) permit number MI 163 1W C006;
 - iii) EPA deepwell (UIC) permit number MI 163 1W C007;
 - iv) EPA deepwell (UIC) permit number MI 163 1W C008;
 - v) EPA deepwell (UIC) permit/application number MI 163 1W C009;
 - vi) MDEQ hazardous waste management facility construction permit, EPA Identification number MIR 000 016 055;
 - vii) MDEQ Hazardous Waste Management Facility Operating License, EPA Identification number MIR 000 016 055;
 - viii) MDEQ deepwell (UIC) permit number M452;
 - ix) MDEQ deepwell (UIC) permit number M453;
 - x) MDEQ air quality permit number PTI 539 97B;
 - xi) MDEQ National Pollutant Discharge Elimination System (NPDES) permit number MI 05565;
 - xii) MDEQ storage tank registration/certification/permit/license numbers RT-10, PST-1-91084013;
 - xiii) MDEQ Wetlands Protection permit number 00 82 0015 P;
 - xiv) Wayne County Storm Water System permit number R01 385;
 - xv) City of Romulus Soil Erosion permit number 80 047 99 0024 701; and
 - xvi) All other governmental permits, authorizations, approvals, exemptions, and licenses associated with the above items and/or related to the operation or possession of the Facility or Property.

- g. Property. The "Property" shall mean the real property described on the attached Exhibit A and all improvements, tenements, hereditament, and appurtenances thereon or thereunto belonging.
2. Acknowledgement of Obligations. EDS, Romulus, and Remus, individually and collectively, hereby expressly acknowledge that each of them is obligated, jointly and severally, under the Loan Documents, and that each of them are equally bound under each of the instruments comprising the Loan Documents.
3. Acknowledgement of Default. EDS, Romulus, and Remus, individually and collectively, hereby expressly acknowledge that Events of Default have occurred under the Loan Documents and have not been timely cured, to the extent that an opportunity to cure is provided for in the Loan Documents, triggering the rights of the Lender thereunder to the remedies set forth therein. The Events of Default include, but are not limited to, the following:
- a. The substantial change in the existing and prospective financial condition or worth of the Borrowers, which is materially adverse to the Lender's rights under the Loan Documents;
 - b. The Borrowers' failure to cause the Facility and Property to be operated at all times; and
 - c. The temporary closure of the Facility.
4. Acknowledgement of Rights Upon Event of Default. EDS, Romulus, and Remus, individually and collectively, hereby expressly acknowledge that as a result of the occurrence of an Event of Default, the Lender, itself or through its designee(s), agent(s), attorney(s), or assign(s), has and is entitled to exercise, at its election, the rights and remedies set forth in the Loan Documents, including, but not limited to, the following:
- a. The right to enter upon and take immediate and exclusive possession of the Facility and Property;
 - b. The right to hold, store, use, operate, manage, and control the Facility and Property and to conduct the business thereof;
 - c. The right to perform such construction, make all necessary and proper maintenance, repairs, renewals, replacements, additions, and improvements to an on the Facility and Property, and purchase or otherwise acquire additional fixtures, equipment, and personal property;
 - d. The right to manage and operate the Facility and Property and exercise all the rights and powers of EDS, Romulus, or Remus, on their behalf or otherwise, with respect to the same;
 - e. The right to enter into agreements with others to exercise the powers of the Lender with respect to the Facility and Property;

- f. The right to collect the rents, income, and other benefits of or related to the Facility or Property; and
 - g. The right to act as attorney-in-fact for EDS, Romulus, and Remus and to demand, receive, and enforce all rights of EDS, Romulus, or Remus under the Permits, and to do any and all acts in the name of EDS, Romulus, or Remus under the Permits or in its own name with the same force and effect as if done by EDS, Romulus, or Remus.
5. Cooperation and Non-Interference. EDS, Romulus, Remus, and Wicklund, individually and collectively, hereby expressly agree to reasonably cooperate with the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s), to effectuate and facilitate the exercising of any right or remedies of the Lender under the Loan Documents, including but not limited to:
- a. allowing the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s) access to the Facility and Property;
 - b. providing the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s) with all requested documentation and information related to the operation of the Facility and Property;
 - c. expressly authorizing third-parties, including the EPA and MDEQ, to release information to and communicate with the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s) in accordance with the Lender's rights and remedies under the Loan Documents;
 - d. executing, contemporaneously with the execution of this Agreement, an assignment conveying all of Borrowers' right, title and interest in the Permits to RDD Investment Corp., a Michigan corporation (the "Assignment of Permits"). The Assignment of Permits shall be in a form substantially similarly to Exhibit B.
 - e. executing such additional acknowledgements, instruments, agreements, or documents as may be necessary to carry out or effectuate any transfer or assignment of the Permits, should such a request be made by the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s);
 - f. executing such additional acknowledgements, instruments, agreements, or documents as may be necessary to carry out or effectuate any transfer or assignment of title to the Facility, Property, or any equipment, assets, or personal property of any sort related to the operation of the Facility, should such a request be made by the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s);
 - g. not interfering with the possession or operation of the Facility or Property by the Lender and/or the Lender's designee(s), agent(s), attorney(s), and

assign(s), should such a right be exercised by the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s); and

- h. executing such additional acknowledgements, instruments, agreements, or documents as may be necessary or reasonably requested by the Lender and/or the Lender's designee(s), agent(s), attorney(s), and assign(s) to effectuate or facilitate the exercising of any of the Lender's rights under the Loan Documents.
- 6. Assignment and Transfer of Title. EDS, Romulus, Remus, and Wicklund, individually and collectively, hereby transfer and assign all of their individual and collective right, title, and interest in the Facility, Property, and any equipment, assets, or personal property of any sort related to the operation of the Facility, to RDD Investment Corp., a Michigan corporation, and further agree to execute such acknowledgements, instruments, agreements, or documents as may be requested by the Lender or RDD Investment Corp. to carry out or effectuate such transfer or assignment. To effectuate the conveyance of the Property to the RDD Investment Corp., the Borrowers, shall, contemporaneously with the execution of this Agreement, execute and deliver to the Lender a quit claim deed to the Property in recordable form acceptable to the Lender and substantially similar to Exhibit C (the "Quit Claim Deed").
- 7. No Effect on Loan Documents. Nothing in this Agreement shall constitute a waiver by the Lender in any way of any of its rights under any of the Loan Documents and Borrowers expressly acknowledge and agree that, irrespective of any provision of this Agreement or the assignments, conveyances, and transfers provided for herein:
 - a. The Loan Documents remain fully enforceable according to their terms and conditions;
 - b. No conveyance, transfer, or assignment pursuant to or in furtherance of this Agreement extinguishes or diminishes in any way the debt or liens represented by or created pursuant to the Loan Documents; and
 - c. No conveyance document executed or delivered pursuant to this Agreement, including the Quit Claim Deed, is in lieu of foreclosure under the Loan Documents.
- 8. No Assumption of Liability. Nothing in this Agreement shall constitute an assumption by the Lender or of RDD Investment Corp. of any liabilities or obligations of any other Party hereto.
- 9. Miscellaneous.
 - a. This Agreement shall be binding upon the Parties and their permitted assigns or successors in interest.
 - b. The paragraph headings are solely for convenience, and shall not be used to effect or interpret the terms or intent of this Agreement.

- c. This Agreement shall be governed in all respects by the laws of the State of Michigan.
- d. In the interpretation of this Agreement, it shall be construed as if it were drawn jointly or by all parties hereto and no inference or presumption shall be made or drawn either for or against any party hereto by virtue of who might have prepared this document or any portion hereof.
- e. This Agreement may be executed in several counterparts and by facsimile, each of which will be deemed an original but all of which will constitute one and the same.

IT IS SO AGREED.

ENVIRONMENTAL DISPOSAL SYSTEMS, INC., a
Michigan corporation

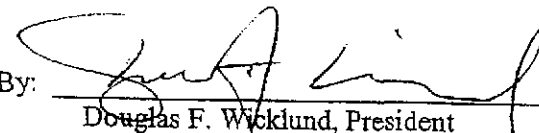
Date: November 7, 2006

By: 
Douglas F. Wicklund, President

**ROMULUS DEEP DISPOSAL LIMITED
PARTNERSHIP,** a Michigan limited partnership

Date: November 7, 2006

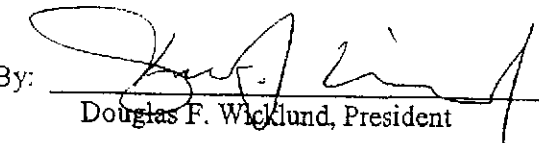
By: Environmental Disposal Systems, Inc.
Its: General Partner

By: 
Douglas F. Wicklund, President

REMUS JOINT VENTURE, a Michigan joint venture

By: Environmental Disposal Systems, Inc.
Its: Managing Operator

Date: November 7, 2006

By: 
Douglas F. Wicklund, President

DOUGLAS F. WICKLUND

Date: November 7, 2006


Douglas F. Wicklund

EXHIBIT "A"

Land situated in the City of Romulus County of Wayne State of Michigan being more particularly described as follows:

Parcel III:

Part of the South 1/2 of Section 12, Town 3 South, Range 9 East, City of Romulus, Wayne County, Michigan, described as follows: Commencing at the East 1/4 corner of said Section 12; thence South 89 degrees 37 minutes 10 seconds West, 70.00 feet along the East-West 1/4 line of Section 12, and South 01 degrees 25 minutes 15 seconds East, 210.45 feet and South 01 degrees 59 minutes 16 seconds West, 315.84 feet along the Westerly line of Inkster Road, as widened, and South 71 degrees 30 minutes 35 seconds West, 2105.00 feet along the Northerly line of Norfolk and Southern Railroad Company Right of Way (100 feet wide), to the point of beginning; thence continuing along the Northerly line of said Norfolk and Southern Railroad Company Right of Way, South 71 degrees 30 minutes 35 seconds West, 559.50 feet; thence South 88 degrees 52 minutes 16 seconds West, 98.96 feet; thence along the North-South 1/4 line of said Section 12, South 01 degrees 39 minutes 22 seconds East, 30.67 feet; thence along the Northerly line of said Norfolk and Southern Railroad Company Right of Way, South 71 degrees 36 minutes 55 seconds West, 514.08 feet; thence North 18 degrees 23 minutes 02 seconds West, 556.74 feet; thence along the Southerly line of the Detroit Industrial Expressway (I-94), North 71 degrees 37 minutes 00 seconds East, 1176.91 feet; thence South 18 degrees 23 minutes 02 seconds East, 555.66 feet to the point of beginning.

Easement benefitting Parcel III:

A 60 foot wide easement for ingress and egress, the Northerly line of which is described as follows: A part of the South 1/2 of Section 12, Town 3 South, Range 9 East, City of Romulus, Wayne County, Michigan, being described as beginning at a point located South 88 degrees 37 minutes 20 seconds West 70.00 feet and South 01 degrees 25 minutes 15 seconds East 210.45 feet and South 01 degrees 59 minutes 16 seconds West 63.68 feet from the East 1/4 corner of Section 12; thence North 88 degrees 09 minutes 44 seconds West 47.20 feet; thence North 49 degrees 43 minutes 07 seconds West 349.97 feet to the Southerly line of the I-94 Expressway; thence along said line South 71 degrees 37 minutes 00 seconds West 1966.53 feet to the point of ending.

Easement burdening Parcel III:

A part of the South 1/2 of Section 12, Town 3 South, Range 9 East, City of Romulus, Wayne County, Michigan, being described as beginning at a point located South 88 degrees 37 minutes 20 seconds West 70.00 feet and South 01 degrees 25 minutes 15 seconds East 210.45 feet and South 01 degrees 59 minutes 16 seconds West 315.84 feet and South 71 degrees 30 minutes 35 seconds West 2105.00 feet along the Northerly line of Norfolk and Southern Railroad Company Right of Way and North 18 degrees 23 minutes 02 seconds West 555.66 feet from the East 1/4 corner of Section 12; thence along the Southerly line of the I-94 Expressway, South 71 degrees 37 minutes 00 seconds West 1176.91 feet to the point of ending.

EXHIBIT B
Assignment of Permits

ASSIGNMENT OF PERMITS

For good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Environmental Disposal Systems, Inc., a Michigan corporation with offices at 199 W. Brown Street, Suite 200, Birmingham, MI 48009 ("EDS"), assigns and transfers to RDD Investment Corp., a Michigan corporation with its registered office located at 79 Alfred Street, Detroit, MI 48201 ("RDD"), all rights, title, and interest of EDS in the following licenses and permits associated with the facility located at 28470 Citrin Drive, Romulus, Michigan (collectively, the "Permits"):

1. United States Environmental Protection Agency RCRA Part A permit number MIR 000 016 055;
2. United States Environmental Protection Agency deepwell (UIC) permit number MI 163 1W C006;
3. United States Environmental Protection Agency deepwell (UIC) permit number MI 163 1W C007;
4. United States Environmental Protection Agency deepwell (UIC) permit number MI 163 1W C008;
5. United States Environmental Protection Agency deepwell (UIC) permit/application number MI 163 1W C009;
6. State of Michigan Department of Environmental Quality hazardous waste management facility construction permit, EPA Identification number MIR 000 016 055;
7. State of Michigan Department of Environmental Quality Hazardous Waste Management Facility Operating License, EPA Identification number MIR 000 016 055;
8. State of Michigan Department of Environmental Quality deepwell (UIC) permit number M452;
9. State of Michigan Department of Environmental Quality deepwell (UIC) permit number M453;
10. State of Michigan Department of Environmental Quality air quality permit number PTI 539 97B;
11. State of Michigan Department of Environmental Quality National Pollutant Discharge Elimination System (NPDES) permit number MI 05565;
12. State of Michigan Department of Environmental Quality storage tank registration/certification/permit/license numbers RT-10, PST-1-91084013;

13. State of Michigan Department of Environmental Quality Wetlands Protection permit number 00 82.0015 P;
14. Wayne County Storm Water System permit number R01 385;
15. City of Romulus Soil Erosion permit number 80 047 99 0024 701; and
16. All other governmental permits, authorizations, approvals, exemptions, and licenses associated with the above items and/or related to the operation of the facility located at 28470 Citrin Drive, Romulus, Michigan, EPA Identification number MIR 000 016 055.

EDS further agrees to fully cooperate with RDD to facilitate and effectuate the transfer of the Permits and to seek and receive approval of the assignments and transfers by the appropriate governmental entities, and EDS consents to RDD, itself or through its designee(s), agent(s), attorney(s), and assign(s), communicating, directly and independently, with such governmental entities to effectuate the transfer of the Permits and to seek and receive approval of the assignments and transfers of the Permits.

The acceptance of any or all of these assignments or transfers shall in no way constitute an acceptance by the assignee or transferee of any obligations or liabilities of EDS, and shall not release EDS from any other obligations it may have to the Police and Fire Retirement System of the City of Detroit.

Dated this ____ day of _____, 2006.

ENVIRONMENTAL DISPOSAL SYSTEMS
INC., a Michigan corporation

By _____
Douglas F. Wickland
Its President

STATE OF MICHIGAN)
) ss.
COUNTY OF _____)

Acknowledged before me this ____ day of _____, 2006 by Douglas F. Wickland, President of Environmental Disposal Systems, Inc, a Michigan corporation, on behalf of the corporation.

Notary Public, _____ County, Michigan
My commission expires: _____
Acting in _____ County

EXHIBIT C
Quit Claim Deed

QUIT CLAIM DEED

The Grantors, ROMULUS DEEP DISPOSAL LIMITED PARTNERSHIP, a Michigan limited partnership, with offices at 199 W. Brown Street, Suite 200, Birmingham, Michigan 48009, REMUS JOINT VENTURE, a Michigan joint venture, with offices at 199 W. Brown Street, Suite 200, Birmingham, Michigan 48009, and ENVIRONMENTAL DISPOSAL SYSTEMS, INC., a Michigan corporation, with offices at 199 W. Brown Street, Suite 200, Birmingham, Michigan 48009, quit claim to RDD INVESTMENT CORP., a Michigan corporation, with offices at 79 Alfred Street, Detroit, Michigan 48201, the following described premises situated in the City of Romulus, County of Wayne, and State of Michigan, to wit:

See Exhibit "A" attached hereto and made a part hereof

commonly known as 28470 Citrin Drive

Tax Parcel Number: 047-99-0024-703

for the full consideration of the sum of One and 00/100 (\$1.00) Dollar.

Dated: November ____, 2006.

**ROMULUS DEEP DISPOSAL LIMITED
PARTNERSHIP**, a Michigan limited partnership

By: Environmental Disposal Systems, Inc.
Its: General Partner

By: _____
Douglas F. Wicklund, President

REMUS JOINT VENTURE, a Michigan joint
venture

By: Environmental Disposal Systems, Inc.
Its: Managing Operator

By: _____
Douglas F. Wicklund, President

ENVIRONMENTAL DISPOSAL SYSTEMS,
INC., a Michigan corporation

By: _____
Douglas F. Wicklund, President

STATE OF MICHIGAN)
)ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this ____ day of November, 2006, by Douglas F. Wicklund, President of Environmental Disposal Systems, Inc., a Michigan corporation, on behalf of said corporation, the general partner of Romulus Deep Disposal Limited Partnership, a Michigan limited partnership, on behalf of said limited partnership.

_____, Notary Public
_____, County, Michigan
Acting in _____ County, Michigan
My Commission expires: _____

STATE OF MICHIGAN)
)ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this ____ day of November, 2006, by Douglas F. Wicklund, President of Environmental Disposal Systems, Inc., a Michigan corporation, on behalf of said corporation, the Managing Operator of Remus Joint Venture, a Michigan joint venture, on behalf of the joint venture.

_____, Notary Public
_____, County, Michigan
Acting in _____ County, Michigan
My Commission expires: _____

STATE OF MICHIGAN)
)ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this ____ day of November, 2006, by Douglas F. Wicklund, President of Environmental Disposal Systems, Inc., a Michigan corporation, on behalf of the corporation.

_____, Notary Public
_____, County, Michigan
Acting in _____ County, Michigan
My Commission expires: _____

Drafted by:
F. Logan Davidson
79 Alfred Street
Detroit, Michigan 48201

Send subsequent tax bills to:
Grantee

Return to:
F. Logan Davidson
79 Alfred Street
Detroit, Michigan 48201

EXHIBIT "A"

Land situated in the City of Romulus County of Wayne State of Michigan being more particularly described as follows:

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Easement benefitting Parcel III:

A 60 foot wide easement for ingress and egress, the Northerly line of which is described as follows: A part of the South 1/2 of Section 12, Town 3 South, Range 9 East, City of Romulus, Wayne County, Michigan, being described as beginning at a point located South 88 degrees 37 minutes 20 seconds West 70.00 feet and South 01 degrees 25 minutes 15 seconds East 210.45 feet and South 01 degrees 59 minutes 15 seconds West 63.68 feet from the East 1/4 corner of Section 12; thence North 88 degrees 00 minutes 44 seconds West 47.20 feet; thence North 49 degrees 43 minutes 07 seconds West 349.97 feet to the Southerly line of the I-94 Expressway; thence along said line South 71 degrees 37 minutes 00 seconds West 1965.53 feet to the point of ending.

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3

IRREVOCABLE STANDBY LETTER OF CREDIT

U.S. Environmental Protection Agency
Underground Injection Control
Financial Responsibility Requirement

To: Regional Administrator
Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Dear Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 2007-2-22 in your favor, at the request and for the account of

RDD Investment Corp.
79 Alfred Street
Detroit, MI 48226

up to the aggregate amount of Ninety-Nine Thousand Six-Hundred and 00/100 U.S. dollars (\$99,600.00), available upon presentation of:

1. Your sight draft, bearing reference to this letter of credit No. 2007-2-22, and marked "Drawn under Police and Fire Retirement System of the City of Detroit irrevocable Letter of Credit #2007-2-22 dated February 22, 2007 for the purpose of completion of well abandonment and capping."
2. Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Safe Drinking Water Act."

This letter of credit is effective as of February 22, 2007 and shall expire on February 22, 2008 but such expiration date shall be automatically extended for a period of one year on February 22, 2008 and each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and RDD Investment Corp. by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and RDD Investment Corp. as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit

the amount of the draft directly into the standby trust fund of RDD Investment Corp.
in accordance with your instructions.

X Marty Bandemer
(Signature)

2-22-07
(Date)

MARTY BANDEMER
(Name)

TRUSTEE
(Title)

X James E. Moore
(Signature)

2-22-07
(Date)

JAMES E. MOORE
(Name)

TRUSTEE
(Title)

This credit is subject to:

() the most recent edition of the Uniform Customs and Practice for Documentary Credits,
published by the International Chamber of Commerce,

OR

(X) the Michigan Uniform Commercial Code.



Petrotek Engineering Corporation 10288 West Chatfield Avenue, Suite 200 Littleton, Colorado 80127 USA (303) 290-9414 FAX (303) 290-9580

February 8, 2007

Mr. Yaser Mahmoud
Environmental Geo Technologies
28470 Citrin Drive
Romulus, MI 48170

RE: Environmental Geo-Technologies
2007 Plugging and Abandonment Cost Update
UIC Permit Numbers: MI-163-1W-0007, MI-163-1W-0008

Dear Mr. Yaser:

As requested, Petrotek has completed an annual review of the plugging and abandonment procedures and associated costs for the closure of Environmental Geo-Technologies injection Wells No. 1-12 and 2-12. Approved procedures in the applicable permits remain consistent with applicable regulations. The plugging costs have been adjusted since the previous cost estimate due to higher rates applicable in the Midwest for workover rigs, oilfield supplies and cementing equipment. The costs are based on the most recently available data from the Producer Price Index for Oil and Gas Extraction and oilfield service costs recently provided to Petrotek.

The total plugging cost estimate for Well No. 1-12 is \$49,800.00. The total plugging cost estimate for Well No. 2-12 is \$49,800.00. The total cost for plugging both existing wells is estimated as \$99,600.00.

Please feel free to call us with any questions or if additional clarification is required.

Sincerely,

Via E-mail

Petrotek Engineering Corporation
Richard Lyle

cc: Ken Cooper - Petrotek

ENVIRONMENTAL GEO-TECHNOLOGIES
DISPOSAL WELL PLUGGING COST ESTIMATE

A cost of closure for the general plugging and abandonment plan described below is \$49,800 for each wells, 1-12 and 2-12. A summary of the major cost elements is presented below.

Workover Rig Mobilization - 1 day	\$2,000
Workover Rig Operations - 3 days	8,000
Workover Rig Demobilization - 1 day	2,000
Location Work/Welding	1,500
Blowout Preventer Rental and Drayage	2,000
2 7/8" Workstring Rental and Drayage	2,000
7" Squeeze Retainer	7,500
Cementing	19,000
Field Supervision	4,000
Engineering Report Preparation	1,800
Total	\$49,800

4

Comerica

TELEX NO: 3772134 MNB INTL DET
FAX NO: 313 222 9115
SWIFT: MNBDUS33

COMERICA BANK
411 W. LAFAYETTE, MC3341
DETROIT, MI 48226

Letter of Credit Division

DATE OF ISSUE: FEBRUARY 28, 2007

BENEFICIARY
REGIONAL ADMINISTRATOR
ENVIRONMENTAL PROTECTION AGENCY REGION 5
77 WEST JACKSON BLVD.
CHICAGO, IL 60604

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. 626857-04 IN YOUR FAVOR FOR THE ACCOUNT OF ENVIRONMENTAL GEO-TECHNOLOGIES, LLC, 1216 BEAUBIEN, DETROIT, MI 48226 UP TO THE AGGREGATE AMOUNT OF USD100,000.00 (ONE HUNDRED THOUSAND AND 00/100 U.S. DOLLARS) AVAILABLE UPON PRESENTATION OF:

1. YOUR SIGHT DRAFT DRAWN ON COMERICA BANK AND REFERENCING THIS LETTER OF CREDIT NUMBER.
2. A WRITTEN AND DATED STATEMENT ON THE BENEFICIARY'S LETTERHEAD SIGNED BY THE BENEFICIARY INDICATING NAME AND TITLE OF THE SIGNER WITH THE FOLLOWING WORDING:

ORIGINAL
"I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO REGULATIONS ISSUED UNDER AUTHORITY OF THE SAFE DRINKING WATER ACT; THEREFORE, THE AMOUNT OF \$ (INSERT AMOUNT) IS NOW DUE AND PAYABLE UNDER COMERICA BANK'S STANDBY LETTER OF CREDIT NO. 626857-04."

3. THE ORIGINAL OF THIS LETTER OF CREDIT AND ANY AMENDMENTS THERETO.

THIS LETTER OF CREDIT IS EFFECTIVE IMMEDIATELY AND SHALL EXPIRE ON MARCH 15, 2008 AT OUR OFFICE LOCATED AT 411 W. LAFAYETTE, MC3341, DETROIT, MI 48226.

IT IS A CONDITION OF THIS LETTER OF CREDIT THAT IT SHALL BE DEEMED AUTOMATICALLY EXTENDED WITHOUT AMENDMENT FOR A PERIOD OF ONE YEAR FROM THE PRESENT OR ANY FUTURE EXPIRATION DATE, UNLESS AT LEAST ONE HUNDRED TWENTY (120) DAYS PRIOR TO THE EXPIRATION DATE WE SEND YOU NOTICE BY CERTIFIED MAIL OR COURIER AND TO ENVIRONMENTAL GEO-TECHNOLOGIES, LLC THAT WE ELECT NOT TO EXTEND THIS CREDIT FOR ANY SUCH ADDITIONAL PERIOD. SAID NOTIFICATION WILL BE SENT TO THE ADDRESS INDICATED ABOVE UNLESS YOU NOTIFY US OF A CHANGE OF ADDRESS IN WRITING BY RECEIPTED MAIL OR COURIER. ANY NOTICE OF ADDRESS CHANGE WILL BE DEEMED EFFECTIVE ONLY UPON ACTUAL RECEIPT BY US AT OUR DESIGNATED OFFICE. UPON RECEIPT OF OUR NOTICE OF NON EXTENSION, THE UNUSED PORTION OF THIS LETTER OF CREDIT SHALL BE AVAILABLE UPON PRESENTATION OF YOUR SIGHT DRAFT DRAWN ON US.

(CONTINUED ON PAGE 2)

Sm

Comerica

TELEX NO: 3772134 MNB INTL DET
FAX NO: 313 222 9115
SWIFT: MNBUS33

COMERICA BANK
411 W. LAFAYETTE, MC3341
DETROIT, MI 48226

Letter of Credit Division

STANDBY LETTER OF CREDIT NO. 626857-04
FEBRUARY 28, 2007
PAGE 2

IN THE EVENT THIS LETTER OF CREDIT IS NO LONGER REQUIRED, THE ORIGINAL LETTER OF CREDIT AND ALL AMENDMENTS THERETO MUST BE SUBMITTED TO COMERICA BANK TOGETHER WITH A SIGNED LETTER ON THE BENEFICIARY'S LETTERHEAD, ADDRESSED TO COMERICA BANK, AGREEING TO ITS CANCELLATION.

THIS LETTER OF CREDIT IS SUBJECT TO AND GOVERNED BY THE 1993 REVISION OF THE UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS OF THE INTERNATIONAL CHAMBER OF COMMERCE (PUBLICATION NO. 500) AND SHALL BE GOVERNED BY THE LAWS OF THE STATE OF MICHIGAN UCC ARTICLE 5, WITHOUT REGARD TO THE STATE'S CONFLICT OF LAWS PRINCIPLES.

WE ENGAGE WITH YOU THAT DOCUMENTS PRESENTED UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT WILL BE DULY HONORED UPON DELIVERY OF THE DOCUMENTS AS SPECIFIED IF PRESENTED AT COMERICA BANK, 411 W. LAFAYETTE, MC3341, DETROIT, MI 48226, ATTENTION: INTERNATIONAL TRADE SERVICES.

O R I G I N A L

YOURS VERY TRULY,

Gail Matheson
AUTHORIZED SIGNATURE

NAME:

Gail Matheson

TITLE:

Asst. Vice President



HELICON
H O L D I N G S

FAX TRANSMISSION COVER PAGE

DATE: 2/28/2007 Total No. of Pages (including this page): 3
TO: Ronald A. King
Clark Hill PLC
FAX NO: (517) 318-3099
FROM: Effic Katsis
FAX NO: (313) 962-9488
RE: Environmental Geo-Technologies, LLC

MESSAGE:

Attached is the Comerica Letter of Credit. The original will arrive tomorrow via UPS.

PLEASE NOTE: The information contained herein may contain privileged or confidential information, and unless otherwise noted, is intended only for the exclusive use of the individual or entity named above. If you have received this fax in error, please contact the sender immediately. Any dissemination, distribution or copying without permission is strictly prohibited.

1216 Beaumont Detroit, MI 48226 Tel: (313) 962-9484 Fax: (313) 962-9488

5



United States Environmental Protection Agency
Washington, DC 20460

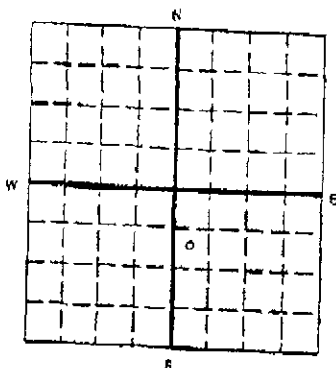
PLUGGING AND ABANDONMENT PLAN

OMB No. 2040-0042 Approval Expires 4/30/07

Name and Address of Facility
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Name and Address of Owner/Operator
Environmental Geo-Technologies, LLC
28470 Citrin Drive
Romulus, MI 48174

Locate Well and Outline Unit on
Section Plot - 648 Acres



State
MI

County
Wayne

Permit Number
MI-163.1W-C007

Surface Location Description

SW 1/4 of NW 1/4 of SE 1/4 of

Section 12 Township 35 Range 06

Locate well in two directions from nearest (line of quarter section and drilling unit
surface

Location 1055 ft. from (N/S) N Line of quarter section

and 303 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- ☒ Individual Permit
☐ Area Permit
☐ Rule

Number of Wells 1

WELL ACTIVITY

- ☒ CLASS I
☐ CLASS II
☐ Brine Disposal
☐ Enhanced Recovery
☐ Hydrocarbon Storage
☐ CLASS III

Lease Name Disposal (MI, M-152)

Well Number EDS 1-12

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE
26"	84	118'	118'	24"
13 3/8"	48	386'	386'	17.5"
8 5/8"	26	824'	824'	12 1/4"
7"	26	4080'	4080'	8 3/4"

METHOD OF ENPLACEMENT OF CEMENT PLUGS

- ☒ The Balance Method
☐ The Dump Bailer Method
☐ The Two-Plug Method
☐ Other

CEMENTING TO PLUG AND ABANDON DATA

Size of Hole or Pipe in which Plug Will Be Placed (Inches)	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Depth to Bottom of Tubing or Drill Pipe (ft.)	8 3/4"	5.276"					
Depth to Bottom of Tubing or Drill Pipe (ft.)	4845'	4000'					
Becks of Cement to Be Used (each Plug)	216	720					
Slurry Volume To Be Pumped (cu. ft.)	234	466					
Calculated Top of Plug (ft.)	4080'	3'					
Measured Top of Plug (ft. tagged ft.)	TBD	TBD					
Slurry Wt. (lb./gal.)	15.6	15.6					
Type Cement or Other Material (Class III)	Class A	Class A					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To
None			

Estimated Cost to Plug Wells

\$45,840.00 per approved procedure (attached).
See Attachment Q-4 from 2004 well permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.12)

Name and Official Title (Please type or print)
Austin Marshall, President

Signature

Austin Marshall

Date Signed

2-20-2007

EPA Form 7420-14 (Rev. 8-01)

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC
PLUGGING AND ABANDONMENT PROCEDURES
CLASS 1 WELL #1-12
(Form 7520-14 Attachment)

1. Conduct one-hour static annulus pressure test on 7" casing x tubing annulus.
2. Rig-up workover rig and equipment. Fill mud tank with 10 lb/gal brine. Tie in rig pump to wellhead and displace tubing with fresh water. Pump approximately 100 gallons, 10 lb/gal brine, or brine necessary to kill wellhead pressure if positive pressure exists.
3. ND wellhead and install blow out preventer or rotating head and engage tubing. Work to release tubing from packer. Circulate annulus with 10 lb/gal brine as necessary until well is dead.
4. Remove injection tubing from well. Run in hole with work string tubing and packer retrieving tool. Latch packer and pull out of hole. Prepare to make up squeeze cement retainer.
5. Run in hole with squeeze retainer or packer on workstring to approximately 4000'. Attempt to pump 150% of calculated cased hole cement volume below retainer or packer into open hole and stop pumping at first attaining a squeeze pressure of 1100 psi or 150% of hole volume. Unstring from tool and clear tubing. Pull workstring out of hole.
6. Wait on cement. Close in BOP and pressure test casing/cement plug to 1000 psi.
7. Run in hole with open ended workstring to top of cement on retainer. Tag cement and pull uphole 1 joint. Pump Class "A" neat slurry in 100 sack increments while pulling approximately 18 joints of tubing after each increment. Use stage and balance method of emplacing plug.
8. Pull uphole to 700' with workstring. Flush tubing with fresh water and assure circulation is achieved. Close in BOP and pressure up on top of plug with approximately 1000 psi.
9. Run in hole and tag up with top of plug. (Should be encountered at approximately 1000'). Pump remaining sacks of Class "A" neat slurry to bring cement to 3 feet below surface. Use any additional cement as required to assure that cement is circulated to surface.
10. Nipple down blow out preventers. Cut off casing heads and evaluate condition for salvage value. Cut off all casing strings 4' below ground level and weld 1/2" steel plate over the strings. Weld on appropriate abandonment markings on steel plate.
11. Rig down and move out pulling unit. Release support equipment.

Justin Marshall

Petronek



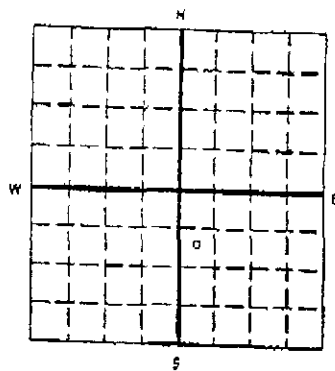
United States Environmental Protection Agency
Washington, DC 20460

PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility
Environmental Geo-Technologies, LLC
28470 Citrus Drive
Romulus, MI 48174

Name and Address of Owner/Operator
Environmental Geo-Technologies, LLC
28470 Citrus Drive
Romulus, MI 48174

Locate Well and Outline Unit on
Section Plat - 649 Acres



State
MI

County
Wayne

Permit Number
MI-103-1W-0009

Surface Location Description

SW 1/4 of NW 1/4 of SE 1/4 of

Section 12 Township 3E Range 9E

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface

Location 1000 ft. from (N/S) N Line of quarter section

and 280 ft. from (E/W) W Line of quarter section.

TYPE OF AUTHORIZATION

- ☒ Individual Permit
☐ Area Permit
☐ Rule

Number of Wells 1

WELL ACTIVITY

- ☒ CLASS I
☐ CLASS II
☐ Brine Disposal
☐ Enhanced Recovery
☐ Geothermal Production
☐ Other

Lease Name Disposal (MI, M-153)

Well Number EDB 2-12

CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	MOLE SIZE
16"	60	177'	177'	20"
15 3/8"	48	598'	598'	12.5"
8 5/8"	38	1444'	1444'	12 1/8"
7"	26	3983'	3983'	8 3/4"

METHOD OF EMPLACEMENT OF CEMENT PLUGS

- ☒ The Balance Method
☐ The Dump Baller Method
☐ The Two-Plug Method
☐ Other

CEMENTING TO PLUG AND ABANDON DATA

Size of Hole or Pipe in which Plug Will Be Placed (Inches)	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Depth to Bottom of Tubing or Drill Pipe (ft.)	0 3/4"	6,276'					
Depth to Bottom of Tubing or Drill Pipe (ft.)	4560'	3860'					
Batch of Cement to Be Used (each plug)	245	720					
Slurry Volume To Be Pumped (cu. ft.)	384	650					
Calculated Top of Plug (ft.)	3860'	8'					
Measured Top of Plug (if tagged ft.)	780	780					
Slurry Wt. (lb./gal.)	15.5	15.5					
Type Cement or Other Material (Class (II))	Class A	Class A					

LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (If any)

From	To	From	To
None			

Estimated Cost to Plug Wells

\$49,400.00 per approved procedure (attached).
See Attachment D-4 from 2004 well permit.

Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title (Please type or print)

Austin Marshall, President

Signature

Austin Marshall

Date Signed

1/20/2007

EPA Form 7520-14 (Rev. 5-01)

ENVIRONMENTAL GEO-TECHNOLOGIES, LLC
PLUGGING AND ABANDONMENT PROCEDURES
CLASS I WELL #2-12
(Form 7520-14 Attachment)

1. Conduct one-hour static annulus pressure test on 7" casing x tubing annulus.
2. Rig-up workover rig and equipment. Fill mud tank with 10 lb/gal brine. Tie in rig pump to wellhead and displace tubing with fresh water. Pump approximately 100 gallons, 10 lb/gal brine, or brine necessary to kill wellhead pressure if positive pressure exists.
3. ND wellhead and install blow out preventer or rotating head and engage tubing. Work to release tubing from packer. Circulate annulus with 10 lb/gal brine as necessary until well is dead.
4. Remove injection tubing from well. Run in hole with work string tubing and packer retrieving tool. Latch packer and pull out of hole. Prepare to make up squeeze cement retainer.
5. Run in hole with squeeze retainer or packer on workstring to approximately 3900'. Attempt to pump 150% of calculated cased hole cement volume below retainer or packer into open hole and stop pumping at first attaining a squeeze pressure of 1100 psi or 150% of hole volume. Unsting from tool and clear tubing. Pull workstring out of hole.
6. Wait on cement. Close in BOP and pressure test casing/cement plug to 1000 psi.
7. Run in hole with open ended workstring to top of cement on retainer. Tag cement and pull uphole 1 joint. Pump Class "A" neat slurry in 100 sack increments while pulling approximately 18 joints of tubing after each increment. Use stage and balance method of emplacing plug.
8. Pull uphole to 700' with workstring. Flush tubing with fresh water and assure circulation is achieved. Close in BOP and pressure up on top of plug with approximately 1000 psi.
9. Run in hole and tag up with top of plug. (Should be encountered at approximately 1000'). Pump remaining sacks of Class "A" neat slurry to bring cement to 3 feet below surface. Use any additional cement as required to assure that cement is circulated to surface.
10. Nipple down blow out preventers. Cut off casing heads and evaluate condition for salvage value. Cut off all casing strings 4' below ground level and weld 1/2" steel plate over the strings. Weld on appropriate abandonment markings on steel plate.
11. Rig down and move out pulling unit. Release support equipment.

Justin Marshall

Petrotek

6

Environmental Geo-technologies
28470 Citrin Dr
Romulus, Michigan 48740

Dear Mr. King:

Subject: Deepwell operator hours

The deepwell operator will be working the following schedule:

Monday through Friday, 7:00 Am to 4:00 Pm

After hours and weekend only if needed.

Please feel free to call me if you have any questions

Sincerely

Yaser Mahmoud

Donald A. ANDERSON
3133 Hayes St.
Jackson, MI 49203
(734) 730-2178

OBJECTIVE: A full-time position as a deep well operator.

EDUCATION: Washtenaw Community College: Ann Arbor, MI
Plumbing and pipe fitting. (1993)

National Institute of Technology, Cross Lanes W.Va.
Associates of Science, Electronics (4.0 GPA) 1983

Fayetteville Technical Institute, Fayetteville NC
GED, (3.5 GPA) 1974

**Certificates of
Training**

Confined space permit supervisor, April 1994
Lockout / Tag out, November 1993
DOT HM-126F Hazardous materials, June 1994
Emergency first responder, June 1994
Hazardous materials chemistry, May 1995
40 hour HAZWOPER, January 2006
Blood born Pathogens, January 2006
CPR / First aid certified, February 2006
Storm water management-Industrial site
Cert # 1-06942 02/28/03 expires 07/01/09

EXPERIENCE:

July 96
Present

Ann Arbor West Tae Kwon Do, Ann Arbor, MI
Position: Administrative Director/Instructor
Duties: Enrolled new students, data entry, filing, sales,
Responsible for advertising, organizing all school functions,
Bookkeeping, updated student requirements, set up all outside programs
Master Instructor.

10/15/01
08/30/03

Environmental Disposal Systems
Position: Director of Deep Well Operations
Duties: Design the injection, annulus, monitoring, alarm, auto shut down,
and the manual E-stop systems. The implementation and supervision of the
construction of these systems. Setting up alarm shut down points as per EPA
requirements (maximum injection pressure, minimum injection / annulus
differential pressure). Supervising construction of treatment center,
plumbing, electrical, and system mechanics. Design and construction of
pump house and well head housing. Setting up maintenance and PM
program for injection systems.

1987
1996

Gelman Sciences, Ann Arbor, MI
Position: Plant Maintenance, deep well operator
Duties: Responsible for maintaining the electrical, plumbing, alarm systems
And all mechanical functions of the well. All sampling, both grab and daily
composites, using chain of custody for release to the labs. Responsible for
daily readings required for EPA and the MDEQ monthly, quarterly and
annual reports. Responsible for assisting in the annual testing of the well
for MIT, Tracer surveys, temperature logs and all other surveys.
Assisting in the plugging and abandoning of the well in 1996.
Robotics tech for hot extrusion equipment.
Preventive maintenance manger, producing a new PM program for all the
equipment at the plant.

1984
1987

Anderson's Mobil service station, Ann Arbor, MI
Position: Master Mechanic
Duties: Responsible for diagnostics of auto electronic systems and repair.
Responsible for repair of any mechanical problems

1974
1980

Willow Run Airport, Ypsilanti, MI
Position: Aircraft Maintenance
Duties: Responsible for maintaining mechanical, electrical, pneumatic and
Hydraulic systems. Repair of aircraft frame and surface skin. Repair of
crashed and wind damaged aircraft.

1972
1974

U.S. Air Force
Position: Aircraft Maintenance
Duties: Responsible for maintaining aircraft mechanical, electrical,
Pneumatic and hydraulic systems.

REFERENCES: Available upon request.

Don Anderson



-3

Administered: January 31, 2006
Revision No. 00: January 23, 2006

94%

Environmental Disposal Systems, Inc.
Citrin Drive Facility
Romulus, Michigan

Instructions:

Please complete the following examination. Read every question carefully.

The questions include:

- Multiple choice (choose the appropriate box or boxes)
- True or False (circle one)
- Yes or No (circle one)
- Fill in the blank

QUALITY ASSURANCE PROGRAM

1. Who is responsible for the proper use of a Self-Contained Breathing Apparatus (SCBA)?
 - ☐ All employees
 - ☒ Fire Brigade members
 - ☒ Those participating in the Respiratory Protection Program
2. Where is the SCBA maintenance area?
 - ☐ Reception area
 - ☒ Safety room
 - ☐ Laboratory
 - ☐ Loading/unloading area
3. What is the number of years that operating record documents (manifests/profiles/inspection reports, and waste tracking forms, etc.) must be kept on file?
 - ☒ Life of facility
 - ☐ 40 years
 - ☐ 7 years
 - ☐ 3 years
4. Visitors are required to be escorted by EDS personnel at all times. True or False?
5. A waste shipment arrives unexpectedly and without pre-approval; can EDS accept the shipment? Yes or No?
6. EDS personnel should treat all spills, regardless of size, as an emergency until determined otherwise by the Emergency Coordinator (EC) or Site Safety Officer (SSO). True or False?
7. The following PPE is required for every individual visiting the plant:
 - ☒ Hardhat
 - ☒ Safety glasses
 - ☒ Closed-toe shoes (no high heels)
 - ☐ Shoe covers
8. Smoking is allowed in what locations?
 - ☐ Anywhere on the plant site.
 - ☐ Anywhere, as long as you are outside of the buildings.
 - ☒ In the designated smoking area located in the parking area of the Administration Building.



9. What should you do if you see an unidentified person on site?
- ☐ Call the police
 - ☐ Escort the individual off-site
 - ☒ Notify security immediately
10. What document(s) must accompany each waste load that enters the site?
- ☐ Pre-approval form
 - ☐ Copy of the transporter's insurance
 - ☒ Manifest
 - ☐ Bill of Lading
11. What type of fire extinguisher should be used on an electrical fire?
- ☐ A
 - ☒ B
 - ☒ C
 - ☒ ABC
12. When is the appropriate time during an emergency to evacuate?
- ☒ When directed to do so by the EC or equivalent
 - ☒ Immediately following hearing the alarm
 - ☒ After securing operations responsible for the emergency
 - ☒ All may be appropriate depending upon the circumstances
13. In terms of policy, what is the quantity of a spill that makes it reportable?
- ☒ Assume that all quantities are reportable until determined otherwise by the Site Manager
 - ☐ 1 pint
 - ☐ Specific to each chemical
 - ☐ 100 pounds
14. What is the difference between Level B and Level C Personal Protection Equipment (PPE)?
- ☒ Supplied air for Level B and Air Purifying Respirator (APR) for Level C
 - ☐ Type of footwear
 - ☐ Type of clothing
 - ☐ Type of face protection
15. Who is the Site Health and Safety Director? *Austin Marshall*
16. What is considered a "confined space?"
- ☒ Limited means for ingress/egress
 - ☒ Area not designed for continuous employee occupancy
 - ☐ Room with no windows

17. Where are high-heeled shoes allowed?

- ☒ Office area only
- ☐ Safety room
- ☐ Anywhere on-site
- ☒ Parking lot

18. When does the transporter get a signed manifest back?

- ☐ 10 days before the end of the month following receipt of the waste
- ☐ Within 30 days of receipt of the waste
- ☒ After unloading of the waste and release of the vehicle from the unloading area
- ☐ When the generator copy is sent out

19. When do you talk to news reporters?

- ☒ Never
- ☐ Whenever approached on or off-site
- ☐ Only when authorized by the site manager
- ☐ When out-of-state

20. What is required before a visitor can enter the plant?

- ☒ PPE
- ☒ Sign in at the reception area
- ☒ Execute Confidentially Agreement
- ☒ Health & Safety Orientation

21. Who informs the drivers of the do's and don'ts upon entering the plant?

- ☒ Security
- ☐ Site manager
- ☐ The receptionist
- ☐ Health & Safety Director

22. What type of fire extinguisher is commonly available at this facility?

- ☐ A
- ☐ B
- ☐ C
- ☒ ABC

23. Where is the Right-to-know Information located?

- ☐ Safety room
- ☒ Reception area
- ☒ Office building
- ☐ Loading/unloading area

24. Where are Material Safety Data Sheets (MSDSs) located?

- ☐ Safety room
- ☐ Reception area
- ☒ Office building
- ☒ Loading/unloading area

25. Are EDS employees allowed on-site after normal working hours?

- ☐ Anytime
- ☐ Monday through Friday only
- ☒ By approved appointment only
- ☐ Never on Holidays

26. Who is responsible for the accuracy of Standard Operating Procedures?

- ☒ Everyone
- ☐ Sales
- ☐ Health & Safety Director
- ☐ Site Manager

27. What do you do if you witness a spill and are unsure of how to deal with it?

- ☒ Contact the Plant Manager immediately.
- ☒ Contact the Health & Safety Director immediately.
- ☐ Investigate the nature and extent of the spill.
- ☐ Call the PEAs Hot-Line.

28. Where is the EDS Emergency Coordinator identified?

- ☐ Quality Assurance Plan
- ☐ Health and Safety Plan
- ☒ Contingency and Emergency Response Plan
- ☐ Chemical Hygiene Plan

29. What are the EDS Emergency Coordinator's responsibilities?

- ☒ Assess the emergency
- ☒ Direct employees in response or evacuation
- ☒ Communication with site and off-site personnel
- ☒ Notification of the appropriate agencies
- ☒ Perform post incident assessment

30. Are eating and/or drinking allowed in the following locations: YES/NO

- ☐ Administration Building
- ☐ Unloading Area
- ☐ By the Filter Press
- ☐ In the breakroom

yes
NO
NO
yes

31. Is smoking allowed inside the fence as long as you are at least 50 feet away from entrances/exits? Yes or No

32. Can a sample be dropped off without a completed profile? Yes or No

33. Five gallons of material has leaked from one of our tanks. You should:
- ☐ Rinse it down with water and inform the plant manager of the problem.
 - ☒ Assess the problem from a safe distance.
 - ☒ Find out what material was loaded in the tank.
 - ☒ Inform the Emergency Response Team immediately.
 - ☐ Go golfing and worry about it tomorrow.
 - ☒ Inform the Emergency Response Team and assist as needed.

34. You see a fire that seems pretty small. You should:
- ☐ Grab the nearest hose and spray it down.
 - ☐ Turn and run as fast as you can for your car.
 - ☒ Get assistance, grab the closest fire extinguisher and make an attempt to put it out. If the fire is not getting smaller, leave the area and inform the Emergency Response Team/Fire Brigade.
 - ☐ Don't worry about it because the plant's fire suppression system is more than capable of handling it.

35. A potential customer stops into our office and requests some pricing information when Sales & Marketing is not available. You should:
- ☐ Ask he/she to have a seat in our conference room while you retrieve our price matrix for their review.
 - ☒ Ask to take their information including the type of waste they are looking to dispose of and tell them someone will contact them very soon regarding pricing and acceptability.
 - ☐ Offer to assist them in classifying their waste and give them pricing right away.
 - ☐ None of the above.

36. Can the Quality Assurance Program be changed based on input from any staff member?

☒ YES _____ NO _____

37. Is the purpose of the QAP to ensure the quality of the company operations, worker safety, or to maintain and improve client service?

☒ YES _____ NO _____

38. Are you responsible for improving the QAP?

☒ YES _____ NO _____

39. What EDS operations does our QAP not cover?

40. Are you encouraged to suggest QAP improvements?

☒ YES _____ NO _____

41. All accidents and injuries should be reported to your supervisor.

☒ TRUE _____ FALSE _____

42. What should you do if you become ill while working?

- ☒ Notify your supervisor.
- ☐ Continue working as long as you can.
- ☒ It depends on what type of symptoms you are experiencing and how you feel.

43. What is EDS's policy for calling in sick or missing work?

- ☐ No phone call is necessary, your supervisor will know that you are sick when you don't show up.
- ☒ Call your supervisor as soon as possible before your scheduled shift and at least leave a voice mail message.
- ☐ Employees are not allowed to call in sick.
- ☐ Call your co-workers and arrange for one of them to replace you.

44. The Contingency Plan is located where?

- ☐ Control Room.
- ☐ Safety Room.
- ☒ Front Office.
- ☐ Security Booth.

☒ The emergency contact information is located Reception

46. Who should respond to questions from regulatory agency inspectors?

- ☐ The General Manager.
- ☒ A Person Authorized by the General Manager.
- ☐ Receptionist.
- ☐ Unloading Operator.

47. What should you do if you smell sulfur even if it is only for a short period?

- ☒ Check your 4-gas meter if it is nearby to check the hydrogen sulfide gas indicator reading.
- ☒ Leave the area immediately.
- ☐ Walk around and find someone else to see if they smell it too.
- ☐ If the smell went away then there is nothing to worry about.

48. What do you do if you find an unidentified/unlabeled container on the facility property?

- ☐ Open it to see what is in it.
- ☒ Inform your supervisor.
- ☐ Put on Level C PPE and then open it to see what is in it.
- ☐ Call the Police or Fire Department and report a suspicious container.

49. If you have a question regarding how to complete a certain task you should?

- ☒ Read the SOP for that task and follow the instructions if you clearly understand them.
- ☐ Ask your supervisor how to complete the task.
- ☐ If it is something that needs to be done right away try to figure it out as you go.
- ☐ Not perform the task until you feel comfortable that you know how to do it.

50. Can EDS accept a waste in a damaged container?

- ☐ Yes
- ☒ No
- ☒ It depends on the degree of the damage.

INTEGRATED ENVIRONMENTAL, INC.

Certificate of Achievement



Signed [Signature]

Date 8 February 2004



EDS TRAINING AND EDUCATIONAL REQUIREMENTS TRACKING MATRIX

Trainee: Don Anderson

Date of Hire: December 2005

Date of Termination: NA

Job Title: Security and Safety Director, Backup Deepwell Operator

Job Description:

The Security and Safety Director is responsible for the oversight of security operations and personnel. He/she is also responsible for the purchasing, inspection, and maintenance of safety equipment required by the Contingency Plan and Operating License. The Deepwell Operator is responsible for the supervision and/or performance of all deepwell operations, reports to the general plant manager, maintains a working knowledge of the facility's spill and accident prevention plan, Contingency Plan, and emergency procedures.

Minimum Required Expertise, Qualifications and Experience:

FCRA Training
40 hour OSHA Hazwoper

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date		Trainee Signature	Management Signature
			Completed			
			1/19/2006			
			5/14/1993			

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
1	Quality Assurance Program (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
2	Health & Safety (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
3	Hazardous Waste Worker Program	Y	1/19/2006		
4	CPR & First Aid (s),(o),(u),(SQ),(UC)	Y	1/27/2006		
5	Right to Know (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
6	Ergonomics (s),(o),(u),(SQ),(UC)	Y	1/19/2006		
7	Evacuation (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
8	Site Security Procedures (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
9	Working with Hazardous Wastewaters (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
10	Spill Control & Contingency Plans (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
11	Health Effects of Working with Hazardous Wastewaters (s),(o),(u),(SQ),(UC)	Y	1/19/2006		
12	Personal Protective Equipment (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
13	Fire Prevention & Protection (s),(o),(u),(SQ),(UC)	Y	1/10/2006		
14	Confined Spaces (s),(o),(u),(SQ),(UC)	Y			

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
15	Environmental Monitoring (I) (SQ) (UO)	Y	1/19/2006		
16	Using, Inspecting, Repairing Equipment (I) (SQ) (UO)	Y	1/10/2006		
17	Communications & Alarm Systems (s)(I) (SQ) (UO)	Y	1/10/2006		
18	Response to Fire & Explosions (s)(I) (SQ) (UO)	Y	1/10/2006		
19	Response to Groundwater Contamination (I) (SQ)	Y	1/19/2006		
20	Shutdown Operations (s)(I) (SQ) (UO)	Y	1/19/2006		
21	Handling Drums (I) (SQ) (UO)	N	1/19/2006		
22	Manifests (s)(I) (SQ) (UO)	Y	1/10/2006		
23	Record Keeping (s)(I) (SQ) (UO)	Y	1/10/2006		
24	Tank Cleaning (I) (SQ) (UO)	N	1/19/2006		
25	Vehicle Unloading (I) (SQ) (UO)	Y	1/10/2006		
26	Sampling (I) (SQ)	Y	1/10/2006		
27	Documentation (s)(I) (SQ) (UO)	Y	1/10/2006		
28	Treatment Operations (I) (SQ) (UO)	Y	1/10/2006		
29	Deaerated Operations (I) (SQ) (UO)	Y	1/10/2006		
30	Bloodbore Pathogens (s)(I) (SQ) (UO)	Y	1/19/2006		
31	Lock Out/Tag Out (s)(I) (SQ) (UO)	Y	1/31/2006		
32	OSHA Lab Safety (I) (SQ) (UO)	N	1/10/2006		
33	Emergency Planning (s)(I) (SQ) (UO)	Y	NR		
34	Automatic Waste Feed Cutoff System (s)(I) (SQ) (UO)	N	1/10/2006		
35	EDS Work Rules (s)(I) (SQ) (UO)	Y	1/10/2006		
36	Vacuum Truck Operation (UO)	N	1/10/2006		
37	Logging of Injuries & Illness (s)(I) (SQ) (UO)	Y	1/10/2006		
38	Accident Avoidance Guidelines (s)(I) (SQ) (UO)	Y	1/10/2006		
39	Decontamination Procedures (I) (SQ) (UO)	Y	1/10/2006		
40	Heat Stress (s)(I) (SQ) (UO)	Y	1/10/2006		
41	Spill Response (s)(I) (SQ) (UO)	Y	1/10/2006		
42	Reporting Procedures (s)(I) (SQ) (UO)	Y	1/10/2006		
43	Back Injury (s)(I) (SQ) (UO)	Y	1/10/2006		
44	Crisis Procedures (s)(I) (SQ) (UO)	Y	1/10/2006		
45	Hydrogen Sulfide Emergency (s)(I) (SQ) (UO)	Y	1/10/2006		
46	Safety Awareness (s)(I) (SQ) (UO)	Y	1/18/2006		
47	Substance Abuse (s)(I) (SQ) (UO)	Y	1/10/2006		
48	Continuous Improvement (s)(I) (SQ) (UO)	Y	1/19/2006		
49	Customer Service (s)(I) (SQ) (UO)	Y	1/10/2006		

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
50	360 Degree Feedback (s)(c)(b)(SQ)(UO)	Y	1/18/2006		
51	Work Procedures (s)(c)(b)(SQ)(UO)	Y	1/10/2006		
52	Respiratory Protection Plan (s)(c)(b)(SQ)(UO)	Y	1/19/2006		

- (s) Training Required for All Security Personnel
(c) Training Required for All Office Staff
(b) Training Required for All Laboratory Staff
(SQ) Training Required for the Safety and Quality Control Officer
(UO) Training Required for Unloading Operators

Additional Training Obtained by This Individual					
Certified Industrial Storm Water Operator			2/28/2003		
Hazardous Materials Chemistry for the Non-Chemist			5/8/2006	AP05	
3 hour Lockout/Tagout Training			11/17/883		
8 hour Hazwoper Refresher			6/17/1994		
DOT HHA-126F Hazardous Materials			6/28/1994		

Emergency First Responder

5/18/1995

Standard Operating Procedures Relevant to this Position					
S1 APP01 - Catalog of Waste Approval Forms	Y				
S2 APP02 - Catalog of (Approval/Rejection) Samples	Y				
S3 APP03 - Creating Generator, Billing and Transporter Identifications	Y				
S4 APP04 - Waste Profile (Approvals) Approval	Y				
S5 APP05 - Waste Profile (Approvals) Foreign Agency Contact	Y				
S6 APP06 - Waste Profile (Approvals) Foreign Agency Contact	Y				
S7 APP07 - Waste Profile Client Contact	Y				
S8 APP08 - Waste Profile (Approval) Renewal	Y				
S9 SEC01 - Pre-Entry Visual Inspection - Box Van	Y				
S10 SEC02 - Pre-Entry Visual Inspection - Tankers	Y				
S11 SEC03 - Pre-Entry Visual Inspection - Rail Cars	Y				
S12 SEC04 - Premises Inspection - After Hours	Y				
S13 SEC05 - EDS Personnel Site Access	Y				

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
S14	SEC06 - Visitors Site Access	Y			
S15	SEC07 - Media Interaction Policy	Y			
S16	SEC08 - Inspections By Regulatory Agencies	Y			
S17	SEC09 - Security's Role In Emergency Response	Y			
S18	SEC10 - Pre-Acceptance At Security	Y			
S19	CUS01 - Client Manifest Preparation & Labels	Y			
S20	CUS02 - (Client) Requests and (Client) Interfaces	Y			
S22	CUS04 - Manifest Copies &lor Waste Tracking Request	Y			
S23	CUS05 - Certificates of Treatment and Disposal	Y			
S24	CUS06 - Audit Packet Preparation & Distribution	Y			
S25	CUS07 - Audits, Inspections & Tours	Y			
S26	CUS08 - Technical Discrepancy Of A Wastestream	Y			
S27	CUS09 - Physical Discrepancy Of A Wastestream	Y			
S28	CUS10 - Chemical Discrepancy Of A Wastestream	Y			
S29	CUS11 - Major Discrepancies, Corrections Relatively	Y			
S30	CUS12 - Minor Discrepancies, Amendments	Y			
S31	CUS13 - Credit Memo Requests	Y			
S32	SCH01 - Client Inquiries	Y			
S33	SCH02 - Inbound Container Scheduling	Y			
S34	SCH03 - Inbound Bulk Scheduling	Y			
S35	SCH04 - Inbound Rail Scheduling	Y			
S36	SCH05 - Rail Car Tracking	Y			
S37	SCH06 - Database Population/Report Generation	Y			
S38	SCH07 - Transporter Requirements	Y			
S39	SCH08 - Unscheduled Bulk Or Container Loads (Profile Approved)	Y			
S40	SCH09 - Unscheduled Bulk Loads (Profile Not Approved)	Y			
S41	SCH10 - Unscheduled Container Loads (Profile Not Approved)	Y			
S42	REC01 - Manifest Review (Inbound)	Y			
S43	REC02 - Manifest Packet Information	Y			
S44	REC03 - Manifest Acceptance	Y			
S45	REC04 - Bulk Manifest Sign Off	Y			
S46	REC05 - Drum Manifest Sign Off	Y			
S47	REC06 - Manifest Filing	Y			
S48	REC07 - Filing and Archiving Approval Forms	Y			
S49	REC08 - Specialty Wastes	Y			
S50	REC09 - Manifest Copy	Y			
S51	REC10 - Manifest Mailing	Y			
S52	REC11 - Rejected Load Procedures	Y			
S53	PLA01 - Information Review Contaminated Waste	Y			

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
S54	PLA02 - Information Review Bulk Waste	Y			
S55	PLA03 - Sampling Containerized Liquid Waste	Y			
S56	PLA04 - Sampling Bulk Container (Sample Bomb)	Y			
S57	PLA05 - Sampling Rail Car (Sample Bomb)	Y			
S58	PLA06 - Receiving Containerized Liquid Waste	Y			
S59	PLA07 - Unloading Bulk Tankers	Y			
S60	PLA08 - Unloading Bulk Tankers	Y			
S61	PLA09 - Storage Of Containerized Waste	Y			
S62	PLA10 - Constructive Rail Fleetment	Y			
S63	PLA11 - The Life Of A Bulk Tanker	Y			
S64	PLA12 - Volume Calculations Tanker - Discrepancy	Y			
S65	PLA13 - Volume Calculations Tank	Y			
S66	PLA14 - Filter Basket Cleaning	Y			
S67	PLA15 - Tank To Tank Transfers	Y			
S68	PLA16 - Tank Management (Field Corrosibilities)	Y			
S69	PLA17 (Chemical Hose Inspection And Storage)	Y			
S70	PLA18 - Dry Hose Disconnects	Y			
S71	PLA19 - Tankers & Railcars Wash System	Y			
S72	PLA20 - Data Recording In The Plant	Y			
S73	PLA21 - Safety Inspection	Y			
S74	PLA22 - Tanker Inspection	Y			
S75	PLA23 - NZ System Blanket	Y			
S76	PLA24 - Emergency Pump Shut Off	Y			
S77	PLA25 - Tankers Start Up Procedures Following An Emergency	Y			
S78	PLA26 - Over Packing A Container	Y			
S79	PLA27 - Tank Farm Emergency Shutdown	Y			
S80	PLA28 - Tank Farm Start Up Procedures Following An Emergency	Y			
S81	TSDF1 - TSD Injection	Y			
S82	TSDF2 - Tank To Tank Transfers	Y			
S86	TSDF6 - Container Labeling	Y			
S87	TSDF7 - Storage	Y			
S88	TSDF8 - PST Operations	Y			
S101	TSDF21 - Filter Press Emergency Shutdown	Y			
S109	TSDF29 - Wet Scrubber Operations	Y			
S113	TSDF33 - Confined Space	Y			
S114	TSDF34 - Spill Management - Acid	Y			
S115	TSDF35 - Spill Management - Caustic	Y			
S116	TSDF36 - Spill Management - Unknown	Y			
S117	TSDF37 - Raw Material Receipt	Y			
S118	TSDF38 - Waste Tracking	Y			
S119	TSDF39 - Emergency Shutdown, Each Engineering Unit	Y			

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
S122	TSD-42 - Discarded Materials	Y			
S123	TSD-43 - Care and Use of PPE	Y			
S124	TSD-44 - Confined Space Entry	Y			
S125	TSD-45 - Hard Hat Safety Glasses	Y			
S126	TSD-46 - Respiratory Program	Y			
S127	TSD-47 - Hazmat	Y			
S128	TSD-48 - Lock Out Tag Out	Y			
S129	TSD-49 - Chemical Identification	Y			
S130	TSD-50 - Facility Inspection	Y			
S131	TSD-51 - Emergency Evacuation Drills	Y			
S132	TSD-52 - Alarm System	Y			
S133	TSD-53 - Hot Work Permit	Y			
S134	TSD-54 - Ladder Safety	Y			
S135	TSD-55 - Fall Protection	Y			
S136	TSD-56 - Hearing Protection	Y			
S137	TSD-57 - Plant Grounding	Y			
S138	TSD-58 - Incident Reporting	Y			
S139	TSD-59 - Rail Operator Blue Flag	Y			
S140	TSD-60 - Environmental Reporting	Y			
S141	TSD-61 - Safety Program Manual	Y			
S142	TSD-62 - Safety Information for Site Visitors	Y			
S143	ENV-02 - Environmental Health & Safety Program Manual	Y			
S144	SAF-01 - Safety Information for Site Visitors	Y			
S145	SAF-02 - Environmental Health & Safety Program Manual	Y			
S146	MT-09 - Daily Checks	Y			
S147	MT-13 - Nitrogen System	Y			
S148	HUR-01 - Rules of Conduct Policy	Y			
S149	HUR-02 - At-Will Employment Policy	Y			
S150	HUR-03 - Sick Day Policy	Y			
S151	HUR-04 - Report Pay Policy	Y			
S152	HUR-05 - Attendance and Tardiness Policy	Y			
S153	HUR-06 - Code of Conduct	Y			
S154	HUR-07 - Absenteeism/ Snow/ Cause Procedure Policy	Y			
S155	HUR-08 - Anti - Drug Plan	Y			
S156	HUR-09 - Access to Personnel Files	Y			
S157	PS-01 - Grounds Maintenance	Y			
S158	PS-02 - Trash Procurement	Y			
S159	PS-03 - Restroom Custodial - Plant	Y			
S160	PS-04 - Restroom Custodial - Admin	Y			

Item No.	Training Element	Training Element Required for this Job Description Y/N	Date Completed	Trainee Signature	Management Signature
S185	P-305 - Universal Waste	Y			
S186	PS08 - Green Programs	Y			

Notes:

1. Item numbers referring to Standard Operating Procedures (SOPs) begin with an S (i.e., S1).
2. NA = Not Applicable, NR = Not Required
3. SOPs not applicable to this job position are not shown on the list.

Hazmat Security Module Final Test Results

Name: Don Anderson

Date: 2-12-2006

Score: 90%

1. Many materials that are classified as hazardous materials are essential products to industry, but potential deadly weapons in the hands of a terrorist.
Your Answer: True (Correct)
2. Hazardous materials are least vulnerable when in transit.
Your Answer: False (Correct)
3. Casual discussions with strangers along transportation routes about loads and destinations are encouraged by general security standards.
Your Answer: False (Correct)
4. Some mixtures containing hazardous materials can cause a powerful explosion if detonated or ignited.
Your Answer: True (Correct)
5. One easy way to increase security of hazardous materials in transportation is to lock all doors of transport vehicles.
Your Answer: True (Correct)
6. The most likely terrorist threats are internal.
Your Answer: True (Incorrect)
7. With the use of commonplace equipment like scanners and color printers, a driver's license, certifications, passports, and other types of personal identification can be forged.
Your Answer: True (Correct)
8. All terrorists fit a preconceived picture of a criminal.
Your Answer: False (Correct)
9. A careful employee background check and verification of information provided on an employment application can be an effective deterrent to the insider threat.
Your Answer: True (Correct)
10. When you are questioned about hazardous materials transportation it is important that you know the person asking and that he or she has a need to know.
Your Answer: True (Correct)

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Environmental Geo-Technologies, LLC (EGT) Personnel Qualifications

EGT personnel qualifications are as follows:

- Ownership- Qualifications of personnel at EGT begins with the ownership. EGT is owned by James Pappas, a very accomplished businessman, who owns numerous operating businesses and properties. Mr. Pappas' career began in the construction and building services industry. The company is also owned by Austin Marshall, a professional engineer with over 30 years of experience in the environmental disposal industry.
- Site Management- The Site is managed by Austin Marshall, a part owner of the facility. Mr. Marshall is a professional engineer who has previously managed hazardous waste disposal facilities and deep well disposal facilities. His resume is attached. Mr. Marshall is assisted by the Assistant Site Manager, Yaser Mahmoud. Mr. Mahmoud is a Chemical Engineer with over six years of experience in management of hazardous waste facilities. Mr. Donald Anderson serves as the Site's Deepwell Operator. Mr. Anderson has over nine years of experience operating disposal wells. Resumes for Mr. Mahmoud and Mr. Anderson are attached.
- On Site Laboratory Manager - EGT has an on site lab managed by Khaled Zreik who is a chemist as described on his attached resume.

Site operations are further supported by our experienced sales manager, Paul Wonsack and Lisa Simon, our operations clerk. Site personnel are further supported by a team of consultants, including:

- Petrotek Engineering - experts in deep disposal well licensing and operations.
- Stantec Engineers - A large civil and environmental engineering firm.
- Midwest Laboratories - experts in laboratory testing
- RTI Laboratories - experts in Environmental testing
- Air Quality Specialists, Inc- experts in environmental compliance

* CURRICULUM VITAE *

AUSTIN MARSHALL

EDUCATION

- * Bachelor of Science, Civil Engineering, Cornell University
- * Master of Science, Civil and Environmental Engineering, The University of Michigan
- * Juris Doctor, The University of Detroit
- * Post Graduate Studies in Geological Engineering, The University of Michigan

REGISTRATIONS, LICENSES

- * Licensed Building Contractor, State of Michigan
- * Licensed Professional Engineer, State of Michigan
- * Licensed Professional Geologist, State of Indiana, 1981 - 1993
- * Registered Environmental Manager, 1984 - 1991
- * Certified Ground Water Professional, National Water Well Association, 1980 - 1990
- * Certified Hazardous Material Manager, 1985 - 1995
- * Diplomate, National Academy of Environmental Engineers, 1987 - 1994
- * Licensed Real Estate Valuation Specialist, State of Michigan

EXPERIENCE

Mr. Marshall currently serves in the following capacities as a consulting engineer and project developer:

- * President and Director, Entropic Technologies Corporation -- Entropic is a firm specializing in developing projects internationally that use patented technology to process municipal solid waste into a coal product.
- * Managing Member, Ethanol Entropic, llc -- Ethanol Entropic is a project being developed in Illinois that produces ethanol fuels and other farm products from corn. The project utilizes the Entropic process to convert municipal solid waste into coal that is used to produce electricity for powering the ethanol production process.
- * Managing Director, One for the Other -- a 501(c)3 charitable organization helping children worldwide.
- * Managing Member, The Ashley International Fund, llc -- a financial investment firm specializing in guaranteed principal based investment projects.
- * President, Geomanagement, llc and Construction Claims, llc -- An international consulting practice in underground engineering,

- geology, construction claims, and expert testimony services.
- * Executive Vice President, Environmental Disposal Systems, Inc. - this company was formed to develop a project involving deep injection well disposal of liquid hazardous wastes about a mile beneath the ground surface in Romulus, Michigan.
- * Consultant, Detroit River Tunnel Partnership - providing consulting engineering services for a railroad tunnel located beneath the Detroit River between Detroit, Michigan and Windsor, Canada.

Mr. Marshall previously served in the following capacities:

- * Consultant, Syndeco Realty Corporation - served as Project Manager on a \$60 million high rise office building and multi-use residential development in Ann Arbor, Michigan, 2000 - 2003.
- * Executive Vice President, Ontario - Michigan Rail Corporation - in charge of Engineering and Construction for the planning of a \$600 million soft clay tunnel project in Detroit, Michigan, 1999 - 2003.
- * President, Red Hawk Landfill, llc - served as the Managing Principal for the permitting, design and construction of a landfill in northern Michigan, 1999- 2003.
- * President, Power Vac Services, Inc. - a firm specializing in the transport and remediation of hazardous and non- hazardous wastes, 1995 - 1998.
- * President, Sierra Environmental, Inc. - served as the Managing Principal of this firm that performed environmental engineering and construction contracting services, 1992 - 1995.
- * President, City Environmental Contracting, Inc. and Specialty Contracting Services, Inc. - served as the Managing Partner of this firm that performed environmental contracting, landfill construction, remediation services, and waste transport services, 1990 - 1993.
- * Regional Manager and Partner, GZA Geoenvironmental, Inc. and Marshall - Halpert Associates, Inc. - served as Managing Principal performing environmental and geotechnical engineering services on large State and EPA Superfund projects, large office buildings, large earth and tailing dams, sewer projects, tunnels, highways, landfills, and power plants, 1984 - 1990.
- * General Manager, The Millgard Corporation - served as Construction Manager on work involving pile and caisson foundations, marine structures and environmental remediation projects, 1981 - 1984.
- * Project Engineer, Bechtel Power Corporation - served as project geotechnical engineer on coal and nuclear power plants, earth dams, harbor construction, refineries, and pipeline projects internationally, 1978 - 1981.
- * Project Engineer, Woodward Clyde Consultants - served as project geotechnical engineer on building projects, tunnels, sewers, earth dams, tailing dams, mining projects, concrete dams, highways and bridges internationally, 1975 - 1978.
- * Engineer, Halpert - Neyer Associates, Inc. - Served as geotechnical engineer performing construction quality control on automobile plant projects, 1974.
- * Surveyor, National Oceanic and Atmospheric Administration, 1973.

- * Construction Superintendent, Granite Valley Construction, 1972 - 1973.
- * Research Assistant, Cornell University School of Civil Engineering Program on Remote Sensing, 1970 - 1972.

ASSOCIATIONS

- * American Society of Civil Engineers, Member - Deep Foundations Committee and Underground Excavation Committee
- * Deep Foundations Institute, President and Director
- * American Society of Testing Materials, Member - Deep Foundations Committee
- * American Arbitration Association
- * Association of Engineering Geologists
- * United States Committee on Large Dams
- * Engineering Society of Detroit
- * Associated General Contractors, Contracts Committee

APPOINTMENTS

- * Adjunct Professor, University of Detroit, Civil Engineering, 1985 - 1988.
- * Lecturer, Wayne State University Department of Chemical Engineering, 1995 - 2003.
- * Lecturer, Wayne State University Department of Occupational and Environmental Health, 2002.
- * State of Michigan Speaker of the House Committee on the Environment, 1995 - 1997.
- * Environmental Protection Board, City of River Rouge, Michigan.
- * Demolition Ordinance Magistrate, City of River Rouge, Michigan
- * Managing Director, The Alternative Dispute Resolution Board
- * Advisory Board, Russell Construction Company, 1988 - 1995.
- * Chairperson, Board of Public Works, Northville Township, Michigan, 1988 - 1997.
- * Technical Advisory Board, Perry Johnson ISO Registrars Inc.
- * City Engineer, the City of River Rouge, 1998 - 2004.
- * Director, Young Men's Christian Association, 1985 - 1990.
- * Dispute Resolution Board, Massachusetts Central Artery Project (The Big Dig)
- * Construction Panel Member, American Arbitration Association
- * Geotechnical Advisor, Integrated Environmental, Inc.
- * American Society of Civil Engineers, Board of University Engineering Program Evaluators, 1990 - 1994.
- * Federal Emergency Management Agency (FEMA) - Urban Search and Rescue Response Team
- * Director, Lamdol Manufacturing, Saigon, Viet Nam.
- * Advisory Committee, Radrick Farms Golf Course, Ann Arbor, Michigan.

SPECIAL TRAINING

- * OSHA 40 Hour 29CFR 1919.120 Hazardous Waste Worker Safety Training

- * OSHA 8 Hour Hazardous Waste Worker Refresher Training
- * Red Cross First Aid and CPR Training
- * Lockout/Tagout Training
- * Lion Technology Hazardous Material Transport Training
- * Emergency Response Institute Manager's Training
- * Arbitrator Training, American Arbitration Association
- * University of Wisconsin Hydrogeologic Aspects of Contaminated Sites

PUBLICATIONS/PRESENTATIONS

- * "Exploration Drilling for Environmental Work, Your Liabilities"; International Drilling Federation Journal, spring 1989.
- * "Deep Shaft Construction Case Studies"; DFI Luxembourg Conference, 1988.
- * "Trench Excavation Stability", Chicago Illinois Power Conference, 1978.
- * "Management of Underground Changed Conditions in Environmental Contracting" American Bar Association Conference, Detroit Section, 1989.

Yaser Mahmoud
1568 BirchCrest Dr
Dearborn, MI 48124
313 271 0535 (H) – 313 575 7454 (C)
yasermah@msn.com

JOB OBJECTIVE

Seeking a position utilizing my educational background, initiative, adaptability, problem-solving skills, engineering experience, and analytical abilities

QUALIFICATIONS

- Solid understanding of diverse range of business management applications
- Thorough knowledge of accounting procedures, including financial statement reporting and analysis, budgeting, and forecasting
- Demonstrated ability to effectively plan, coordinate, and meet multiple project deadlines
- Experience in financial modeling and concepts
- Fast learner, flexible, work well in high-pressure atmosphere
- Ambitious, hardworking, and committed to excellence

EDUCATION

- MBA Major (Marketing & Management)
Wayne State University, Michigan, Dec 2005
- Bachelor of Science in Chemical Engineering
Wayne State University, Michigan, May 1999

EXPERIENCE

EQ Resource Recovery, Romulus, MI 10/2000– 01/2006
Project Manager:

- Implementation of Project Management Principle, Environmental Management System (work processes, standards, procedures)
- Leading a project team to perform overall project management for multiple projects within—new solvent recycling process, upgrading current process, and developing waste water treatment process
- Preparing project charter, scope, business case & work task structure for multiple projects.
- Developing & maintaining detailed project schedules & plans, performing critical path analysis and providing timely feedback
- Preparing & tracking the budget and conducting cost analysis
- Leading project status meetings with the team and management
- Managing project issues and identifying risks and mitigation plans
- Preparing program management scorecard that includes management information on several projects
- Supervise project personnel
- Boilers Maintenance and design of steam system (pipe sizing and Insulations)
- \$200000 annual saving through redesigning a drum emptying system(DES)
- Thin film Evaporator System(Condensers, Pumps, Cooling Towers, Piping and controls) with managing all the utilities

- Molecular Sieve system design and process (Pumps, Cooling Tower, Steam and Process control)
- \$300000 annual saving through profit centers analysis
- Oil Recycling System Design(Tanks, Heat Exchangers, piping and controls)
- Process control and corrective action
- Impact and risk assessment
- Hazardous waste management
- 24 hours a day 7 days a week operation with 48 employees

Double Eagle Steel, Dearborn, MI 8/99 – 10/2000
Quality Engineer

- SPC, FMEA, PPAP, APQP and QS 9000 implementation
- Supervise steel coating operation and process troubleshooting
- Coordinate waste product disposal and chemical deliveries
- Maintain and update the laboratory standard operating procedures
- Perform critical and non-critical audit on process line and key facility sections
- Supervise lab testing personnel
- Report on product quality and chemistry at daily company meetings

COMPUTER SKILLS

Microsoft Office products, (expertise in Excel, Word, PowerPoint), AutoCAD and Microsoft Project

KHALED ZREIK

7838 Maple
Dearborn, MI 48126

(313) 581-1578
zzreik@juno.com

OBJECTIVE

Seeking a challenging position in the field of Chemical and Automotive Industries, Academia, Government, Sales and/or a Research Laboratory.

EDUCATION

OAKLAND UNIVERSITY

Masters of Science in Chemistry, May 2003

WAYNE STATE UNIVERSITY

Bachelor of Science in Chemistry, April 1996

Bachelor of Science in Biology, August 2006

Masters of Arts in Teaching (20 Credits)

UNIVERSITY OF DETROIT-MERCY

Senior Standing in Chemical Engineering

WORK EXPERIENCE

U.S. Army Tank Automotive R&D Engineering Command, Project Scientist/Engineer (Petroleum and Water Business area) August 1997 to Present

- Technical expert for the Army Fuels and Lubricants
- Planned, organized, and directed, research engineering and development activities in support of the Army's RDT&E goals, objectives, and testing of fuels and lubricants for ground systems
- Utilized basic chemistry and research experience to plan and conduct testing of state-of-the-art petroleum quality and handling technology to address future operational objectives of the future Army Force
- Provided leadership on IPT and other technical teams to accomplish program objectives
- Determined specific procedures to be used, specific data to be obtained, and the methodological approach to be followed, to resolve fuel and lubricant issues for ground systems
- Adopted or modified analytical methods and procedures to satisfy specialized and unusual requirements related to fuels, lubricants, Gear and Engine oil.
- Validated experimental data and interpreted results
- Served as POC and COTR on selected tasks (instrument procurements, Fuel Catalyst Projects)
- Performed standardization and qualification tests
- Composed, revised, and evaluated performance specifications for Solid Film Lubricants, Brake fluids, Fuel Additives, Hydraulic Fluids, and Gear Oils
- Facilitated the installations, calibrations, and repairs of laboratory instrumentation
- Secured contractor bids and completed procurement and installations of major instrumentations.
- Served as an Army representative on the Lubricant Review Institute (LRI) Engine and Gear Oil Committees.
- Reviewed and evaluated the test results from candidate lubricants for inclusion to Army Qualified Product Lists

- Served as an Army Representative in the Society of Automotive Engineering (SAE), Society of Tribologist and Lubricant Engineering (STLE), and American Society For Testing Materials (ASTM) committees.

BCS Enterprise: Detroit, Michigan. January 1990 to May 1992.

- Manager - Responsible for ordering gas, and groceries, and supervising the labor team.
- Managed payroll
- Liaison to the chemical and grocery companies

**EXTENDED
EDUCATION**

- Hazardous Waste Operations and Emergency Response (HAZWOPER), certified 1999
- Resource Conservation and Recovery Act (RCRA), certified 1999
- ISO 14001 internal auditor, certified 2002
- Contracting Officer Certified-2003
- LEVEL I, II, and III certified in System Planning, Research Development and Engineering
- Fundamentals of Systems Acquisition Management-Defense Acquisition University
- Intermediate Systems Acquisition-Defense Acquisition University (DAU)
- Intermediate System Planning, Research, Development and Engineering (DAU)
- Defense Specification Management Course (PQM), DAU
- Oil Analysis Short Course, Noria Corporation 1998
- Lubrication, Friction, and Wear Course-STLE 1998
- Basic Lubrication Course-STLE 2001
- Advanced Lubrication Course-STLE 2001
- Synthetic Lubricant Course-STLE-2002
- Hydraulic Fluid Technology Course-STLE 2002
- Automotive and Diesel Tribology Course-STLE 2003

SKILLS

- Computer: Microsoft Office (Access, Excel, PowerPoint, Word) Project and Windows 98
- Knowledge of Fortran, Pascal
- Language: Fluent and Literate in Arabic

VOLUNTEER

ZREIK'S TEAK-WON DO SCHOOL-Present

Master-Instructor (5th degree black belt)

- As a certified 5th degree black belt, taught self-defense, discipline, and martial arts techniques to children and adults.

REFERENCES

Available Upon Request

Paul S. Wonsack

7058 River Park Way, Brighton MI 48116 (810) 231-4201 pwonsack@gmail.com

EDUCATION

B.G.S. with minors in Marketing, Management
1991, Oakland University, Rochester, MI

INDUSTRY

EXPERIENCE

Environmental Disposal Systems, Inc

Then as **RDD Operations, LLC**

January 2006 to Present.

Director of Sales and Marketing/ Interim General Manager

Responsible for the development and implementation of all marketing strategies and sales efforts for the company, in conjunction with financial forecasts and budgets, customer service, billing and 3rd party disposal. As part of this position, I have developed and managed all broker based relationships, facility direct accounts and marketing based contracts for US and Canada. My position also required that I work closely with operations to bring on newly identified business lines as our capabilities increased. When the facility was transitioned to RDD Operations, I was assigned the General Managers position, and was required to over see all operational aspects for the project, including budget forecasts, federal and local regulatory agency responses, site remediation closure, and acted as a liaison between the primary lender and the potential owners.

Philip Services Corporation

September 2003 to January, 2006

Director of Sales and Marketing / Midwest Region

Responsible for developing a new marketing strategy for PSC's largest facility. Included in this strategy is revamping the sales force, identifying and implementing new business lines, creating marketing campaigns for each business line, revenue forecasts for the region, and a myriad of other responsibilities. In addition to the managerial aspect of my position, I was also required to procure new business within the region and maintain several of PSC's largest accounts. Revenues for those top accounts exceeded ten million annually. I worked closely with the National Accounts and In Pant Services divisions in the development of PSC's Total Waste Management (TWM) program.

Allied Waste Industries

November, 2002 to September, 2003

Major Account Manager / Automotive and Account Specialist

Work to better position Allied Waste Industries in the industrial and automotive markets through new business development, and strategic business alliances. Support the Automotive Resource Management Group for new and current contracts. Increase market awareness of Allied Waste's Resource Management capabilities. Work with the landfills on bid pricing for special waste and event business. Work directly with accounts that are experiencing service or price related issues, in an effort to retain their business.

Philip Services Corporation

May, 2000 to November, 2002

Sr. Account Manager / Regional Bid Director

Responsible for new business procurement and account maintenance for Ford, GM, DaimlerChrysler, Dow Corning, Delphi Automotive, Pfizer, and other high profile companies in the region. Worked closely with the Director of Sales and Marketing on regional bids, and developed the strategic process that eventually led to PSC's Regional Account Program.

ATC Associates, Inc.

November, 1999 to May, 2000

New Business and Marketing Manager

Develop strategic marketing campaigns for each Business Group for Michigan while working to increase revenue in a severely neglected territory. Developed a very aggressive marketing plan that positively changed the markets perception of the company.

Onyx Environmental Services / WM Industrial Services
May, 1997 to November, 1999

Sr. Account Manager

Developed a static sales territory into a profitable business unit through an increase in customer base and key account penetration. Supplied turnkey services to key industrial accounts and focused on the development of Waste Management's "In Plant Services" program marketed towards Ford and GM. Played a significant role in contract negotiation and implementing awarded contracts. Spearheaded Waste Management's first four IPS contracts with Ford Motor Company. Consistently surpassed budget goals and ranked in the Top 3 reps for the region.

Environmental Management Company

May, 1995 to May, 1997

Account Executive / Outside Sales

Responsible for new account procurement within sales territory while maintaining and servicing existing accounts in the industrial and automotive industries. Brought a severely neglected and under productive territory to a profitable business unit through an increase in customer base and current customer business.

Lisa M. Simon

3142 Summers
Keego Harbor, MI 48320
(248) 681-3646
(248) 210-3664
lisa_simon67@yahoo.com

Objective:

To obtain a position utilizing my office management skills, as well as enhance my personal growth.

Employment History:

RDD Operations, LLC
Romulus, MI
11/2006 - Present

Office Manager, F/C Bookkeeper, Clerical

Accounts Payable, Accounts Receivable, Payroll, Bank Reconciliations, Draw Requests, Prepare Budgets, General Ledger, Financial Statements, Journal Entries.

Environmental Disposal Systems, Inc.
Birmingham, MI
03/2005 - 05/2006

Controller/Full Charge Bookkeeper

Accounts Payable, Accounts Receivable, Payroll, Payroll Taxes, Invoicing, Banking, Bank Reconciliations for 29 accounts, Draw Requests, General Ledger, Financial Statements, Journal Entries, 1099's, Month and Year-end processing.

Pro-Side, Inc
Pontiac, MI
12/03 - 04/04

Office Manager/Full Charge Bookkeeper

Accounts Payable, Accounts Receivable, Bank Reconciliations, General Ledger, Journal Entries, Waivers, Invoicing, 1099's Month and Year-end processing.

Construction Assoc. of Michigan
Bloomfield Hills, MI
09/03 - 12/04

A/P
This was a temporary position. I was filling in for an employee on maternity leave. Accounts Payable for 3 companies, Invoicing, Month-end processing.

Howard and Howard
Bloomfield Hills, MI
09/2002 - 07/2003

Accounting

Accounts Payable, Accounts Receivable, Payroll through ADP e-time, Billing Support, Back-up support to all accounting positions.

Altype Plumbing & Heating
Walled Lake, MI
06/2000 - 07/2002

Office Manager

Accounts Payable, Accounts Receivable, Payroll through ADP, Human Resources, Banking for both business and Presidents personal accounts, Invoicing, Financial Statements, General Ledger, Journal Entries, Bank Reconciliations, Job Costing, Inventory, Pull Permits, Call in Inspections.

Education:

Diploma	Diploma
Major: Massage	Major: Computer Accounting
Therapist	Dorsey Business School
Body Wise	MI
MI	

Certificates and Licenses:

Massage Therapist, Body Works, MI

Skills and Abilities:

Computer Software, Quickbooks, IBM AS400, Microsoft Office,
Word, Excel, Fast Track Schedule 6.0, TCM, Peachtree,
Wintac, Quickbooks Pro, , Juris, MAS90, Elite, Skyline

Notes and Other Information:

I am professional, hardworking, and adaptable. I enjoy a challenge, learning, and work well with others, as well as on my own.

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RDD Operations, LLC

MEMO

DATE: February 27, 2007

TO: Ron Zajac
Logan Davidson
Joe Turner
Ron King

FROM: Gil Goode
Paul Wonsack

RE: Ambient Reservoir Pressure Test Via Fax 4 Pages

Gentleman,

Recently the EPA mandated that we perform an ambient reservoir pressure test on the wells prior to license transfer (see item #3 on the attached letter dated 2-15-07).

We have received a quote from Baker Atlas to perform this work in the amount of \$5606.00 (see attached quote)

We intend to schedule this work with Baker Atlas as soon as possible.

Although this was not a specific line item on our most recent budget, there is ample funding available in the contingent budget reserves to pay for this test.

Please call if you have any questions.

**Baker Atlas**

Feb 22, 2007

Mr. Paul Wonsack
 RDD Operations LLC
 28470 Citrin Dr.
 Romulus, MI 48174

EDS #2-12
 Romulus Plant
 Wayne Co., MI

Donald Bielecki
 District Manager
 930 S. West St.
 Olney, IL 62450
 Tel (618) 393-2919

Baker Atlas Services appreciates the opportunity to offer the following first call service quotes

Run 1	Depth:	3940	Top Log Interval:	0				Disc.
Code	CASED HOLE SERVICES	Qty	Unit Price	Back Price	Unit Price			
SCCH	Land Service Charge	1	\$2,530.00	\$2,530.00	\$1,265.00			50%
ENVCOM	Environmental Compliance	1	\$200.00	\$200.00	\$200.00			0%
TC-E	Fuel Surcharge	1	\$300.00	\$300.00	\$300.00			0%
DOT	DOT Certification	Vehicles	1	\$100.00	\$100.00	\$100.00		0%
TC-W	Wireline Charge	Runs	1	\$15.00	\$15.00	\$15.00		0%
PMCA	Self-Contained Mast Unit	Mobilization	1	\$2,000.00	\$2,000.00	\$400.00		80%
G306-A	Pressure Cntrl (5000 psi)	Installation	1	\$2,200.00	\$2,200.00	\$440.00		80%
ZA06		Operation	2	\$550.00	\$1,100.00	\$220.00		80%
SPGC-100	Surf Pressure Readout	Depth	3940	\$0.58	\$2,285.20	\$1,142.60		50%
	5 Hours total	Operation	1	\$1,848.00	\$1,848.00	\$924.00		50%
MC	Mileage	Mileage	100	\$8.00	\$800.00	\$800.00		0%
Rev 1.0						SERVICES TOTAL		
						\$5,809.80		

- SERVICE LOCATION: OLNEY, IL PHONE: (618) 393-2919 MGR: Don Bielecki

Operational Remarks:

- Conditions of this quote are good for 90 days from the above quote date.
- Discounts for routine services not specified in this proposal negotiated separately.
- Up to 5 prints of each log delivered to 1 destination are inclusive. Additional prints are \$20.00 each.
Shipping to additional destinations is \$25.00 each.
- Standby time will be charged \$150 per hr.(truck) and \$150 per hr.(crew).

Services are subject to the "Worldwide Terms & Conditions" listed under the Terms & Conditions tab or an active Master Service Agreement. If you have additional questions, call me at Tel (618) 393-2919
THANK YOU for considering Baker Atlas for your wellsite services.

Donald Bielecki
 District Manager

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RDD Investigation and Remedy for the Pump House Alarm Horn
Prime Technologies, Inc. 02/15/2007

Problem:

The pump house alarm horn was not sounding when an alarm had occurred.

Investigation:

The PLC output module (O:6.6) for the pump house alarm horn has two internal fuses. The LED "FUSE" indicator for the output module was on, which means that at least one of those two internal fuses had blown. The output module was removed from the PLC chassis, and it was determined that one of the two internal fuses had blown.

Remedy:

A replacement fuse was provided and installed. The alarm horn now functions properly.

Wells leak detection system

A level switch will be installed in each well containment area which will serve as a leak detection system. The level switches will be tied in series with existing well pump E stop circuits that will disconnect all power to the well pump and indicate at the operator interface panel as e stop condition. The level indicator will be adjusted to any desired level of liquid to be detected in the containment area.

Lining System for Well Head Cellars
#1-12 and #2-12

The project consists of installing a fiber glass reinforcement lining systems in 2 well head cellars 7' DIA X 54" deep, as follows:

1. Stop ground water intrusions at the upper seam of the two sumps, utilizing a foam injection process.
2. Sand blast interior surfaces of both sumps with #400BB coal slag to reach the desired lining adhesive profile on concrete
3. Application of a vinyl ester primer, P-380, at approximately 150-200 Sf per gallon to interior surfaces of sumps.
4. Coating of Novolac Vinyl Ester resin with carbon powder filler at approximately 1/16".

The lining is manufactured by the Ceilcote Co.

A technical data sheet for the lining is available upon request.

Stantec

3959 Research Park Drive
Ann Arbor, Michigan 48108-2219
734-761-1010
734-761-1200 (Fax)

REGISTERED PROFESSIONAL ENGINEER'S CERTIFICATION TO OWNER

Environmental Geo - Technologies
Part 111 Hazardous Waste Management Facility Construction
Permit Dated February 22, 2001
MIR.000 016 055
Citrin Drive Facility
28470 Citrin Drive
Romulus, Michigan 48174

In accordance with the authorization by Environmental Geo-Technologies ("Owner") to Stantec Consulting Michigan Inc. (Stantec), Stantec hereby certifies to Owner the following:

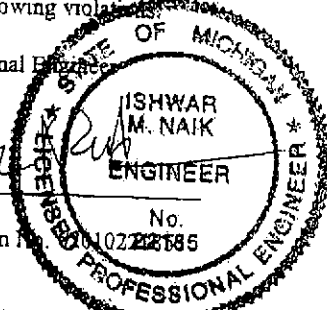
1. We have reviewed the available drawings and revisions thereto submitted by Environmental Disposal Systems (EDS) as a part of the existing license in. The review was made of the following drawings specifically:
 - Integrated Environmental, Inc. Drawing Number M6.04B - Ventsorb Air Purification System Proposed Modifications revision dated November 12, 2003.
 - Integrated Environmental, Inc. Drawing Number M2.01A - Proposed Piping to Unload Railroad Cars revision dated February 16, 2004; and
 - Ayres, Lewis, Norris & May, Inc. Sheet M2.01 - Process Plan Main Level dated February 15, 2005.
2. During the site visits between January 10, 2007 and January 18, 2007, Stantec observed the existing facility.
3. Based on the above two activities, we hereby certify that no significant changes have occurred in the facility since the last certification by Thomas Handyside.
4. The facility in general complies with the drawings and authorized change orders with respect to the functions, containments, size and materials of construction, as required by Permit No. MIR.000 016 055. The facility has been constructed in compliance with the approved plans and is capable of disposing liquid hazardous waste.

I certify under penalty of law that this document was prepared under my direction and/or supervision, to assure that qualified personnel properly gathered and evaluated the information submitted. 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.

Registered Professional Engineer

Date of Certification

Ishwar M. Naik, PE
Michigan Registration No.



February 26, 2007

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RDD Investigation and Remedy for Process Data Logging
Prime Technologies, Inc. 02/15/2007

Problem:

Process data was not logging to the SQL database.

Investigation:

The network connection of the SQL database server was unreliable. Moving or wiggling the network cable back and forth caused the network connection to connect and disconnect intermittently. This indicated that the Ethernet connector on the network cable is shorting out.

In addition, the SQL database server was initially found in a powered-down state (turned off). Accidentally hitting the power-off switch on the server while sitting at the control room desk may have caused the server to turn off.

Remedy:

The network cable connecting the SQL database server to the treatment network was replaced. The SQL server now remains connected to the treatment network.

The SQL database server must be powered on at all times to ensure data is captured by the database. The server was repositioned to keep the power-off button from being pressed accidentally.

RDD Operations, LLC

MEMO

DATE: February 21, 2007
TO: Ron King
FROM: Paul Wonsack 
RE: Chart Recordings for week of 10-2-06 and 10-23-06 to 1-1-07.

After several failed attempts to locate the requested charts, I contacted the original installation vendor for our operating system in an effort to access the raw data that is synchronized with the chart recording stations. The vendor was able to download all the data from 8-1-06 through 11-18-06. All data from 11-19-06 through 1-23-07 has been lost do to a computer malfunction. We are in the process of sorting the available data so that it is in a presentable form.

RDD is now taking steps to develop a program that will insure the chart recordings are properly tracked and maintained for inspection by the EPA. This program includes personnel training, a daily check list for each chart and software that will allow us to view the raw data if necessary.

Environmental Geo-technologies
28470 Citrin Dr
Romulus, Michigan 48740

Dear Mr. King:

Subject: Records Maintenance

The following steps will be taking to maintain the electronic records and circle charts:

- A designated operator will be responsible for changing and filling the circle charts
- A copy of the circle charts will be kept in the control room
- The operator will be inspecting the PLC system to make sure its functioning on daily basis
- Records keeping will be added to the operators training

Please feel free to call me if you have any questions

Sincerely

Yaser Mahmoud