

May 5, 2015

Ms. Lynn Ackerson  
Ohio EPA, NWDO  
347 North Dunbridge Road  
Bowling Green, OH 43402

**Re: EnviroSAFE Services of Ohio, Inc.  
Oregon, Lucas County, Ohio  
EPA Identification Number: OHD 045 243 706; Ohio Permit Number: 03-48-0092  
April 2015 Progress Report**

Dear Ms. Ackerson:

In accordance with Condition E.13 of its Ohio Hazardous Waste Facility Installation and Operation Permit (the "Permit"), EnviroSAFE Services of Ohio, Inc. ("ESOI") hereby submits this progress report to the Ohio Environmental Protection Agency ("Ohio EPA") for the period beginning April 1, 2015 and ending April 30, 2015.

**Corrective Measures Study ("CMS"):**

**Project Activities and Summary of Findings to Date:**

During this reporting period, CMS activities included the following:

1. Ohio EPA review of ESOI's response to comments on the proposed changes to the groundwater monitoring program.

**Summary of All CMS-Related Contacts with the Public:**

ESOI has not had any related contacts with the public during this reporting period.

**Summary of Potential or Encountered Problems and Rectification Actions:**

There is nothing to report in association with this topic for this reporting period.

**Changes in Personnel:**

There have been no changes to CMS personnel during this reporting period.

**Projected Work:**

During the next reporting period it is anticipated that the following activities will occur:

1. Ohio EPA review of ESOI's response to comments on the proposed changes to the groundwater monitoring program.

## **Corrective Measures Implementation (“CMI”):**

### **Project Activities:**

During this reporting period, CMI activities included the following:

1. On April 16 and 17, 2015 in accordance with the compliance plan of action at SWMU 6, ESOI completed monthly elevation monitoring at the following wells. DPW-16, NRP-25, and NRP-26 exceed the TLL of 566.9.
  - DPW-16: 590.22 (well no longer usable – accuracy of elevation is questionable – back-up tape used for measurement)
  - NRP-25: 570.80 (accuracy of elevation is questionable - back-up tape used for measurement)
  - NRP-26: 572.36 (accuracy of elevation is questionable - back-up tape used for measurement)
2. On April 30, 2015, ESOI provided notification to Ohio EPA that the average leachate level in SWMU 6 may not have maintained an elevation below the established TLL. The Level 1 and 2 response was provided. PZ-15 in addition to the above listed wells exceeds the TLL of 566.9.
  - PZ-15 567.97 (accuracy of elevation is questionable - back-up tape used for measurement)
3. Draft modifications to the OMPM Plan for incorporation of the new wells;
4. Work on expedited corrective measures outlined in the CMS Report:
  - Storm water management is being improved on and around SWMUs 5, 6, and 7 through improvements to existing swales and construction of new intermediate drainage ditches on the side slopes of SWMUs 6 and 7: All grading and liner work has been completed on SWMUs 5, 6, and 7 with the exception of a new small retention pond at NPDES outfall 012. An evaluation of the pond is currently being conducted; and
5. Continued operation and monitoring of the leachate extraction systems on SWMUs 5, 6, and 7.

### **Summary of All CMI-Related Contacts with the Public:**

ESOI has not had any related contacts with the public during this reporting period.

### **Summary of Potential or Encountered Problems and Rectification Actions:**

1. The following notes and maintenance were observed during the month:
  - SWMU 6: DPW-16 has failed and is in the process of being replaced. A new well NRP-32 was drilled in the fall and is currently operating through temporary measures until the permanent equipment and power is installed. RW-1 is pumping slowly due to the presence of viscous NAPL. Simple Green® has been added and other measures such as the use of a different type of pump and/or dispersants is being evaluated. NRP-28 was not pumping. The transducer was repaired on April 16, 2015 and it is now operational;

- SWMU 7: RW-9 (pump is stuck in middle of well, well is no longer be useful – a new well NRP-35 has been drilled and is anticipated to be operational in late May or early June), RW-12 and DPW-20 (cables broke during attempts to forcibly remove pumps - wells have shifted due to dewatered waste consolidation – new recovery wells in targeted locations for leachate removal optimization have been drilled including NRP-35.)

There is nothing else to report in association with this topic for this reporting period.

**Projected Work:**

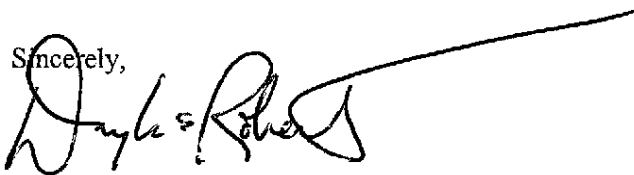
During the next reporting period it is anticipated that the following activities will occur:

1. Initiate utility trenching for operation of 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35;
2. Initiate utility trenching for final conversion of piezometers PZ-21, 22, and 23 on SWMU 5 to dual purpose extraction wells and piezometers;
3. Monitoring of leachate levels in SWMU 6;
4. Continued operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7; and
5. Continued work on the storm water management improvements around SWMUs 5, 6, and 7.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please do not hesitate to contact Stephen DeLussa at (215) 659-2001 ext. 15.

Sincerely,



Douglas E. Roberts  
President

cc: Stephen DeLussa, Envirosource Technologies, Inc.  
ESOI File Copy

Peter Ramanauskas, USEPA Region 5  
Michael Momenee, The Mannik & Smith Group  
Mark Nielsen, ENVIRON International Corp.