

# **ENVIROSAFE**

ENVIROSAFE SERVICES OF OHIO, INC.

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May 11, 2021

**VIA ELECTRONIC MAIL**

Ms. Colleen Weaver  
Ohio EPA, NWDO, DERR  
347 North Dunbridge Road  
Bowling Green, OH 43402

**Re:    Envirosafe Services of Ohio, Inc.  
      EPA Identification Number: OHD 045 243 706  
      April 2021 Progress Report**

Dear Ms. Weaver:

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, 2021 and ending April 30, 2021.

## **Corrective Measures Implementation ("CMI"):**

### **Project Activities:**

During this reporting period, CMI activities included the following:

1. Review of SWMU leachate concentration data in relation to shallow till action levels. The information will be used to supplement a basis for a permit modification regarding leachate elevation response following winter weather shutdown of the leachate systems for SWMUs 5, 6, and 7;
2. Discussion with Ohio EPA and submission of minor changes to the Class 1A permit modification request submitted on March 18, 2021 for the SWMU 5 LNAPL Recovery System O&M Plan;
3. Collection of semi-annual leachate system elevation measurements on April 28-29, 2021. An inward gradient continues to be maintained. However, notice is hereby being provided that DPW-19 and NRP-35 did not demonstrate the performance standard: maintenance of the leachate head level measurement below a gradient based TLL of 3.0 feet below the lowest groundwater elevation in the relevant shallow perimeter monitoring well(s). The data is provided below. A significant lowering of leachate elevation has occurred in DPW-19 and NRP-35 since the pumping wells were reactivated last month. This trend is expected to continue. In accordance with the OMPM Plan, the elevation in these wells will be monitored quarterly until the excursion has been eliminated. Response actions such as those listed in Section 6.5 will be taken. However, note that the limiting factor in this demonstration is T-43S. The well is not a groundwater monitoring program well. It is located adjacent to the interface of SWMU 9 and the Cell G sheet pile wall and at a significant distance from the SWMU 7 deep interior piezometers. Given the location of T-43S, the elevation is believed to be

impacted more by pumping of the City of Toledo Water Line Security Program perimeter trenches than pumping of SWMU 7. The elevation of T-43S is more like an interior shallow piezometer than an exterior groundwater monitoring location. It is further noted that any leachate from SWMU 7 that may potentially move in the direction of T-43S would be collected in the waterline security trench system and be properly disposed; it is unlikely to result in contamination of the shallow till zone.

			Highest / Lowest	Difference (out-in)
Interior Piezometers	DPW-19	NRP-35		
	580.33	581.74	581.74	
Exterior Wells	T-15S	T-43S		2
	589.00	583.27	583.27	

4. Moving and disposal of material in AOC 3 (Building C) in final preparation for demolition;
  - Redevelopment trailer for the SWMU leachate system was moved from AOC 3 to SWMU 6 and 7 leachate storage secondary containment area;
  
5. Leachate system maintenance included:
  - Inspection of piezometers and recovery wells on SWMUs 5, 6, and 7:
    - Recorded liquid level at each location with a control panel;
    - Verified functionality of all pumps without a control panel;
    - Exercised all globe valves; and
    - All pumps with a control panel were observed to be below their respective low points with the exception of: DPW-18 and 19, NRP-24, 25, 26, 27, 29, 30, 31, 33, 34, and 35;
  - PZ-13: Observed not pumping; reset tripped breaker located at NRP-31 and then observed pumping with significant discharge;
  - PZ-15: Discharge line was repaired;
  - NPR-24: Observed above HiPoint; pulled, cleaned and tested pump; pump appeared to be functioning, however no discharge observed within discharge tubing; further evaluation required;
  - SWMU 5 Compressor: Verified auto drain was functioning; and drained moisture from controller; and
  - SWMU 6 Compressor: Emptied buckets, repaired air leak on #1 solenoid valve, cleaned and repaired compressor valve that was stuck open, and compressor attic fan was observed to be functioning as designed; and
  
6. Solar Sipper maintenance included:
  - Repaired severed airline;

**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:**

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

**Projected Work:**

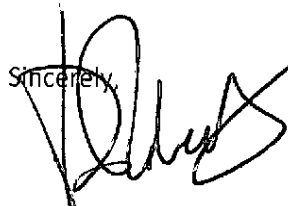
During the next reporting period it is anticipated that the following activities will occur:

1. Submission of draft permit modification option regarding Ohio EPA's recommendations for winter weather shutdown of the leachate systems for SWMUs 5, 6, and 7;
2. Demolition of AOC 3 (Building C);
3. Staking and preparation of SWMU 6 property line excavation for waste removal;
4. Replacement of the #1 and #2 Solenoid valves;
5. Evaluation of NRP-24 functionality;
6. Continued redevelopment of leachate extraction wells in accordance with priority list, with the siltiest wells being addressed first as time and weather allows; and
7. Continued operation and maintenance of the leachate extraction systems on 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

ec: Michael Terpinski, Ohio EPA-NWDO, DERR  
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