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September 9, 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
 August 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 August 1, 2015 and ending August 31, 2015.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. ESOI review and formulation of response to Ohio EPA comments dated May 5, 2015.

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. ESOI review and formulation of response to Ohio EPA comments dated May 5, 2015.

Corrective Measures Implementation (“CMI”):

Project Activities:

During this reporting period, CMI activities included the following:

- SWMU 6 has resumed an average leachate level below the established TLL. In accordance with the previous schedule, monthly monitoring of individual piezometers above the TLL has also resumed.
- On August 13 and 14, 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 which had exceeded the TLL of 566.9.
 - DPW-16: 572.45 (well no longer usable – a nearby replacement well RW-32 is now operating)
 - NRP-25: 568.84
 - NRP-26: 573.21
- SWMU 7 has achieved an average leachate level below the established TLL of 570.80. In accordance with the schedule for SWMU 6, similar monthly monitoring of individual piezometers above the TLL will be conducted in September. During August ESOI completed monitoring at the following wells. PZ-10 and 11, DPW-18 and 19, NRP-29 and 30, and RW-2 (August 6, 7, 19, 20).
 - PZ-10: 572.86, 572.74
 - PZ-11: 564.89, 564.88
 - DPW-18: 569.83, 568.45
 - DPW-19: 570.33, 567.68
 - NRP-29: 575.80, 575.74
 - NRP-30: 577.94, 569.57
 - RW-2: 570.37, 569.97
- MSG began the redevelopment of all wells and piezometers for SWMU 5, 6 & 7 during the month of August. The redevelopment strategy will help identify and fix wells that are not able to reach compliance as well as complete general maintenance. The following wells were redeveloped:

SWMU 6

- NRP-25 (issue: NAPL and silt)
- NRP-26 (issue: NAPL and silt)
- RW-1 (is now pumping again) (issue: NAPL and silt)
- NRP-32 (Silt is the primary issue for this well and the majority was removed; as a result the pump was able to be lowered 3 feet)

SWMU 7

- NRP-29 (issue: silt)
- NRP-30 (issue: silt)

- Exterior monitoring well T-15S was repaired on August 14, 2015 for damage caused by a lawnmower in July 2015.
- Leachate from SWMU 6 was directed to multiple ESOI approved disposal facilities to accommodate the contracted limit for benzene versus cost of disposal. The concentration is well below the RCRA characteristic level and the leachate remains non-hazardous. ESOI believes this is a temporary change as the concentration has not been above the contracted limit of the primary disposal vendor since the start of the program in 2007.
- Preparation of modifications to the OMPM Plan to document incorporation of the new and converted wells;
- 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. Upon approval from Ohio EPA, ESOI will abandon inactive gas vents that will provide for a larger and more effective retention pond at outfall 12; and
- 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: RW-1 had been pumping slowly or not at all due to the presence of viscous NAPL. MSG redeveloped the well in August and the well is operational and productive. It will be monitored and redeveloped as necessary.
 - SWMU 7: NRP-30 had been able to recover over 20 feet of leachate after being turned off for 24 hours but not able to extract much leachate on a daily basis. The pump rate had been turned down in an effort to slowly draw water out of the unit in a more consistent manner rather than quickly pumping the well dry and waiting for it to recover. In August, MSG redeveloped the well and removed silt. Since redevelopment, the level has dropped and production has improved. It will be monitored and redeveloped as necessary.

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

Projected Work:

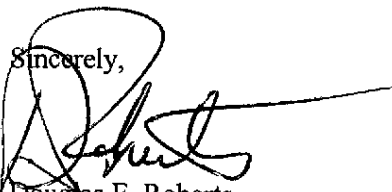
During the next reporting period it is anticipated that the following activities will occur:

1. Preparation of modifications to the OMPM Plan to document incorporation of the 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35 and conversion of the 3 existing piezometers to dual purpose extraction wells and piezometers PZ-21 thru PZ-23;

2. Abandonment of inactive gas vents that will provide for a larger and more effective retention pond at outfall 12 (upon approval of Ohio EPA);
3. Excavation for retention pond at NPDES outfall 012 following abandonment of inactive gas vents;
4. Monitoring of leachate levels in SWMUs 5, 6 and 7;
5. Continued operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7; and
6. 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, RAMBOLL ENVIRON