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September 8, 2016

Mr. Michael Terpinski
Ohio EPA, NWDO, DERR
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 2016 Progress Report**

Dear Mr. Terpinski:

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, 2016 and ending August 31, 2016.

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 responses to the proposed groundwater monitoring program changes.

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 responses.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Quarterly inspections, leachate elevation readings, and flow testing of the leachate extraction system;
2. All interior piezometers and exterior wells were measured on the following dates: SWMUs 5, 6, and 7 August 23, 2016, (with the exception of NRP-31 which was undergoing redevelopment*). The following is documentation that:
 - SWMUs 5, 6, and 7 have achieved and are maintaining an inward gradient. The leachate level at each SWMU's interior piezometers has an average head potential at least 1-foot lower than the average liquid potential in the established perimeter shallow till wells, as identified in the draft Table 1.0 of the OMPM Plan update.
 - SWMUs 5-Central, 5-West*, 6, and 7 have achieved and are maintaining Target Leachate Levels (TLLs).

										Average	Difference (out-in)
SWMU 5 - Central	TLL: 557.1										
Interior Piezometers	PZ-5	PZ-6	PZ-7	PZ-21	PZ-22	PZ-23	NRP-24	RW-3	RW-11		
	569.05	559.37	559.90	546.93	548.71	545.68	556.09	549.45	554.85	554	
Exterior Wells	F-15	G-15	MR-15A	MR-4S	MR-5S	MR-7S					25
	582.88	585.53	576.452	581.44	576.04	574.99				580	
SWMU 5 - West	TLL: 564.9										
Interior Piezometers	PZ-13	NRP-31									
	563.49	564.12*								564	
Exterior Wells	MR-2S	MR-6S									10
	575.53	571.32								573	
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SWMU 6	TLL: 566.9										
Interior Piezometers	PZ-3	PZ-15	DPW-16	NRP-25	NRP-26	NRP-27	NRP-28	RW-1			
	547.52	556.41		576.39	572.11	562.67	560.41	549.69		561	
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S						23
	586.04	582.90	579.52	582.68	585.66					583	
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SWMU 7	TLL: 570.8										
Interior Piezometers	PZ-10	PZ-11	DPW-18	DPW-19	DPW-20	NRP-29	NRP-30	RW-2			
		574.60	568.23	570.44		567.29	565.92	570.91		570	
Exterior Wells	T-5S	T-8S	T-15S	T-43S							17
	588.03	585.66	588.45	584.53						587	

* NRP-31 was undergoing redevelopment during the quarterly measurement. The elevation presented is from July 29, 2016. Elevations for all SWMU 5 West wells will be retaken in September.

3. On August 23, 2016 in accordance with the compliance plan of action, ESOI completed monthly elevation monitoring at the following wells which exceeded their respective TLLs in the prior month.

SWMU 5 Central: 557.1

- PZ-5: 569.05
- PZ-6: 559.37
- PZ-7: 559.90
- RW-11: 554.85 (reading is below TLL and will resume quarterly monitoring)

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement RW-32 is operating)
- NRP-25: 576.39 (reading is suspected to be erroneous as pumping has resumed)
- NRP-26: 572.11

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 573.55
- DPW-20: (well not usable - nearby wells are operating)

4. MSG redeveloped the following wells in SWMU 5: RW-3, NRP-24, NRP-31; SWMU 6: NPR-27.
5. The following maintenance items were conducted:
 - RW-1: (SWMU 6) Installation, operation, and maintenance of a Reclaimer pump to improve the ability to remove leachate and NAPL.
6. ESOI is evaluating the use of a pneumatic pumping system in PZ-13 at SWMU 5 West and possibly other wells with intermittent thick and hard to remove NAPL;
7. Continued work on modifications to the OMPM Plan to document incorporation of the new and converted wells and effectiveness evaluation of storm water management improvements. In conjunction with this modification, MSG is evaluating the leachate extraction systems after 9 years of operation. The report will include an evaluation of how waste consolidation, decreased pore space, and depth of wells installed since TLLs were established impact measures of success and compliance of the leachate extraction systems. It will also provide an overall assessment of the number and location of leachate wells and monitoring locations;
8. 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:

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. The globe valves installed on leachate extraction wells to throttle the flow are not working properly; they do not stay where set. These valves will be removed or replaced and alternate throttling techniques will be tested;

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2. A redevelopment priority list has been developed with the most silty wells being addressed first;
3. A complete pneumatic pumping system will be installed on SWMU 6 capable of servicing up to 3 wells. It will address wells that are difficult to pump due to NAPL. If it proves effective and warranted, similar systems will be installed on SWMUs 5 and 7;
4. Preparation for winterizing the leachate extraction systems; and
5. 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,

A handwritten signature in black ink, appearing to read 'D. Roberts', with a long horizontal line extending to the right.

Douglas E. Roberts
President

cc: Lynn Ackerson, Ohio EPA NWDO
Stephen DeLussa, Envirosource Technologies, Inc.

Michael Momenee, The Mannik & Smith Group
Mark Nielsen, RAMBOLL ENVIRON