

January 12, 2018

Mr. Michael Terpinski
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
December 2017 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 December 1, 2017 and ending December 31, 2017.

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 were measured on the following dates: SWMUs 5, 6, and 7 December 6, 2017. All exterior wells measured on December 8, 2107. The following is documentation that:
 - SWMUs 5, 6, and 7 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 and 7 are maintaining Target Leachate Levels (TLL).
 - SWMU 6 did not maintain its average Target Leachate Levels (TLL). The level increased by over 1 foot since last quarter. In accordance with the OMPM Plan, ESOI completed and submitted an evaluation and will prepare a quarterly report by November 15, 2017. All necessary measures are currently being taken to return the levels below the TLL. Ohio EPA has public noticed a permit modification that will resolve this issue through program revisions.

										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		
	569.03	560.94	558.90	561.18	549.64	544.49	554.86	555.36	555.06	557	
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S					25
	584.544	585.05	580.38	582.84	577.15	576.95				581	
SWMU 5 - West	TLL: 564.9										
Interior Piezometers	PZ-13	NRP-31									
	563.09	564.04								564	
Exterior Wells	MR-2S	MR-6S									12
	576.17	575.39								576	
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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			
	562.87	565.60		585.71	576.36	564.479	562.88			570	
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S						17
	587.84	584.16	585.12	586.63	586.66					586	
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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			
		574.50	570.48	570.20		568.75	570.80	569.57		571	
Exterior Wells	T-5S	T-8S	T-15S	T-43S							16
	588.14	586.66	588.27	584.51						587	

3. On December 6, 2017 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: 569.03
- PZ-6: 560.94
- PZ-7: 558.90
- PZ-21: 561.18

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement NRP-32 is operating)
- NRP-25: 585.71
- NRP-26: 576.36

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 574.00
- DPW-20: (well not usable - nearby wells are operating)

4. Leachate system maintenance included:

- Inspection of piezometers and recovery wells on SWMU 5, 6, and 7;
 - Inventoried high and low settings as well as liquid level at each location with a control panel;

- Drained compressor on SWMU-5 and emptied moisture buckets;
 - Compressor on SWMU-6 was observed to be off, evaluated, and restarted;
 - Many valves noted to be freezing: PZ-13, 15, NRP-26, 27, 28, 31, 32, 34;
 - RW-1
 - not pumping – solenoid valve suspected to be faulty;
 - DPW-23
 - Observed to have 3-cycles of discharge at the high point – 6 second, 10 second and 6 second;
 - NRP-29
 - fluid level below low point;
 - NRP-33
 - reading HiP; fluid level at 31.4 inches – Pump was pulled and cleaned. Level dropped 93 inches in 15 minutes and remained at 25.4 – inches;
 - NRP-34
 - reading -34.6 inches – suspected transducer issue;
5. On December 21, 2017, Ohio EPA issued a Director Initiated Modification Draft Permit to incorporate corrective measures/remedies and corrective action ground water monitoring requirements into ESOI's permit; and
6. 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. Comment period on the Director Initiated Modification Draft Permit to incorporate corrective measures/remedies and corrective action ground water monitoring requirements into ESOI's permit.
2. Redevelopment of leachate extraction wells in accordance with a priority list that has been developed with the most silty wells being addressed first; NRP-25, 32, and 33 as time and weather allows:
 - a. Redevelopment of SWMU-6 piezometers and recovery wells;
 - b. Insulating valves to reduce freezing issues;
3. Evaluate solenoid valve for RW-1 and replace if needed;
4. Evaluate transducer for NRP-34 and replace if needed;
5. Disposal of accumulated non-hazardous leachate in AOC 7; and

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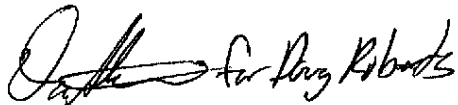
Page 4

6. 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: Stephen DeLussa, Envirosource Technologies, Inc.
Mark Nielsen, RAMBOLL ENVIRON

Michael Momenee, The Mannik & Smith Group