

January 10, 2019

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 2018 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, 2018 and ending December 31, 2018.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Verified flow at each recovery well where leachate is present on December 7, 14, 21, and 28, 2018;
2. Submission of a Corrective Measures Completion of Work (CMCW) Report in accordance with Permit Condition E.12. On June 20, 2018, Ohio EPA finalized a Director Initiated Modification (DIM) to ESOI's RCRA Permit. The modification incorporated specific corrective measures including some of the previously completed storm water management improvements – specifically, those required by Permit Condition E.9(c)(v)(a) and as subset of those required by E.9(c)(xi) located between Cells H and I;
3. Preliminary engineering for SWMU 8;
4. Review of leachate treatment proposal;
5. Leachate system maintenance included:
 - Inspection of piezometers and recovery wells on SWMU 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 on active pumps.
 - NRP-25
 - Observed to not be pumping. Discharge line was stiff and potentially frozen;

- Later in month it was observed pumping 1 gallon per minute;
- NRP-27
 - Pulled transducer and cleaned it;
- NRP-31
 - Methane odor observed in vicinity. Light refraction from gases visible at the top of the extraction well.
- SWMU 5 Compressor
 - Replaced heating lightbulb. Temperature controller shorting out – Adjusted position in box;
 - Later in month heating light was on and airline was partially melted. Airline was repaired and temperature control box was adjusted to a cooler setting;
- SWMU 6 Compressor
 - Emptied moisture buckets; 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. Adjust transducer on/off levels to balance risks of drawdown and leachate removal versus inflow of alternate source contaminants;
2. Insulate extraction wells as appropriate;
3. Evaluate active pump low point settings and adjust accordingly;
4. Continued redevelopment of leachate extraction wells in accordance with priority list, with the siltiest wells being addressed first as time and weather allows; 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.

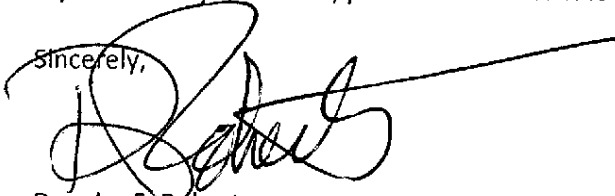
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If you have any questions, please do not hesitate to contact Stephen DeLussa at (215) 659-2001 ext. 15.

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: Stephen DeLussa, Envirosource Technologies, Inc.
Mark Nielsen, Ramboll

Michael Momenee, The Mannik & Smith Group