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January 9, 2017

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

**December 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 December 1, 2016 and ending December 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:

Ohio EPA review of ESOI's responses.

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

### **Project Activities:**

During this reporting period, CMI activities included the following:

- 1. As discussed in the previous report, NRP-30 was scheduled for repair/redevelopment during the quarterly evaluation in November and the elevation presented for that well was from August 23, 2016. The elevation was retaken in December following maintenance and found to be 558.84. This is well below the unit TLL of 570.8.
- 2. On December 29 and 30, 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: 568.91
PZ-6: 560.82
PZ-7: 559.05
SWMU 6: 566.9

DPW-16: (well not usable - nearby replacement NRP-32 is operating)

NRP-25: 563.60 (reading is below TLL and will resume quarterly monitoring)

NRP-26: 573.64
SWMU 7: 570.8

PZ-10: (well not usable - nearby wells are operating)

• PZ-11: 574.27

• DPW-20: (well not usable - nearby wells are operating)

- 3. Additional insulation was installed at the SWMU 6 pneumatic pumping system compressor building;
- 4. Pneumatic pump was installed in PZ-15 for use in warmer weather;
- 5. Throttle plugs were installed in throttle valves at NRP-26, 27, 33, and 34;
- Winterization improvements were made at RW-1, RW-2, DPW-18, NRP-25, 26, 27, 28, 29, 30, 32, 33, and 35;
- Improved support of pipes at RW-1, NRP-25, & NRP-32;
- 8. Checked pump and air compressor status;
- 9. Adjusted various throttle valves;
- 10. Purchased and set up deck box at PZ-13 to provide weather protection for portable compressor and pneumatic pump controller;
- 11. 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;

12. 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. OMPM Plan updates for the SWMU pumping wells that were put into service in 2015 will be submitted;
- 2. Initiate operation of pneumatic pumps at PZ-13 and PZ-15 when temperature permits;
- 3. Evaluate potential corrective actions for frozen wells such as NRP-24, NRP-27;
- 4. Redevelopment of leachate extraction wells in accordance with a priority list that has been developed with the most silty wells being addressed first;
- 5. Install fencing on well development trailer, time permitting; and
- 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.

Douglas E. Roberts

President

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