

August 11, 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  
July 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 July 1, 2015 and ending July 31, 2015.

### **Corrective Measures Study ("CMS"):**

#### **Project Activities and Summary of Findings to Date:**

During this reporting period, CMS activities included the following:

1. There were no activities conducted during this reporting period.

#### **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:

- On July 16, 17, 30, and 31, 2015 in accordance with the compliance plan of action at SWMU 6, ESOI completed bi-weekly elevation monitoring at the following wells. PZ-15, DPW-16, NRP-25, and NRP-26 which had exceeded the TLL of 566.9. PZ-15 has reduced its level below the TLL for the second consecutive month and will resume quarterly monitoring.
  - PZ-15: 566.48, 566.37
  - DPW-16: 572.77, 572.50 (well no longer usable – replacement well RW-32 is now operating)
  - NRP-25: 568.36, 569.32
  - NRP-26: 574.18, 572.81
  
- Ongoing monitoring of SWMU 7 has determined the following wells exceed the TLL and will be included in more frequent monitoring. ESOI proposes to place them on a bi-weekly schedule like those for SWMU 6. ESOI completed monitoring at the following wells. PZ-10 (June 30, July 1, 23, and 24, 2015), NRP-29 (June 30, July 1, 23, and 24, 2015), and NRP-30 (June 30, July 1, 8, 9, 23, and 24, 2015) which all exceeded the TLL of 570.8.
  - PZ-10: 573.19, 572.83
  - NRP-29: 578.29, 576.68
  - NRP-30: 588.84, 588.25, 585.82
  
- All recovery wells on SWMU 5 are operating and the newly converted wells DPW-21, DPW-22, and DPW-23 are extracting large quantities of leachate.
  
- All recovery wells on SWMU 6 are operating with the exception of RW-1. RW-1 is in compliance with the TLL. As part of a system wide maintenance program, The Mannik & Smith Group (MSG) is evaluating redevelopment and other options to make it operational and productive. The newly installed well NRP-33 is extracting large quantities of leachate.
  
- All recovery wells on SWMU 7 are operating including the newly installed wells NRP-34 and NRP-35 (RW-9, RW-12, and DPW-20 are abandoned). Exterior monitoring well T-15S was damaged by a lawnmower and elevation readings cannot currently be collected. The well is scheduled for repair in August.
  
- MSG will begin 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.
  
- 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 is pumping slowly due to the presence of viscous NAPL. MSG has been retained to redevelop the well and determine the best approach for making it operational and productive.
  - SWMU 7: Although NRP-30 is able to recover over 20 feet of leachate after being turned off for 24 hours, the pump is not extracting much leachate on a daily basis. The pump rate has 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. The leachate elevation at this well will have a significant negative impact on the average leachate level in SWMU 7. MSG is scheduled to redevelop the well. Production will then be re-evaluated along with any other necessary actions.

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;
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.

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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 "Douglas E. Roberts". The signature is fluid and cursive, with a large initial "D" and "R".

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