

August 8, 2016

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 2016 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 June 1, 2016 and ending June 30, 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. ESOI prepared and submitted (August 1, 2016) a TLL plan of action for SWMUs 5 West and 6 based on the 2nd quarter elevations readings. In July, both SWMUs re-attained compliance with their TLLs.
2. On July 28 and 29, 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: 569.59
 - PZ-6: 559.60
 - PZ-7: 560.36
 - NRP-24: 556.51 (reading is below TLL and will resume quarterly monitoring)
 - RW-11: 557.31
 - SWMU 5 West: 564.9
 - PZ-13: 564.36 (reading is below TLL and will resume quarterly monitoring)
 - NRP-31: 564.12 (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: 576.31 (reading is suspected to be erroneous as pumping has resumed)
 - NRP-26: 572.56
 - SWMU 7: 570.8
 - PZ-10: (well not usable - nearby wells are operating)
 - PZ-11: 574.33
 - NRP-29: 567.29 (7/1 reading is below TLL and will resume quarterly monitoring)
 - RW-2: 570.53 (reading is below TLL and will resume quarterly monitoring)
 - DPW-20: (well not usable - nearby wells are operating)
3. MSG redeveloped the following wells in SWMU 5: RW-11; SWMU 6: RW-5, NPR-33; SWMU 7: RW-12, NPR-29.
4. The following maintenance items were conducted:
 - DPW-23: (SWMU 5 Central) Dislodged the pump and returned it to service on 7/14.
 - RW-8: (SWMU 6) Dislodged pump so that it was lowered back down into the well on 7/14. However it was not able to be extracted for maintenance. The pump remains out of service.
 - RW-12: (SWMU 7) Dislodged and removed pump on 7/5. This well has been out of service for a considerable time because previous efforts to remove the pump for maintenance had been unsuccessful.
5. 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;
6. 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;

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7. 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:

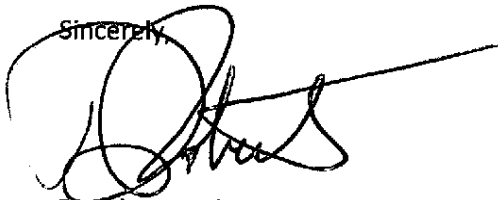
During the next reporting period it is anticipated that the following activities will occur:

1. Possible redevelopment of PZ-15 and other wells as needed;
2. Review draft modifications to the OMPM Plan to document incorporation of the 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35, conversion of the 3 existing piezometers to dual purpose extraction wells and piezometers PZ-21 thru PZ-23, and effectiveness evaluation of storm water management improvements;
3. 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;
4. Continued operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7; and

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

cc: Stephen DeLussa, Envirosource Technologies, Inc.
ESOI File Copy

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