

876 Otter Creek Road Oregon, Ohio 43616-3518

Phone: (419) 698-3500 or (800) 537-0426

Fax: (419) 698-8663

Website: www.envirosafeservices.com

July 2, 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

June 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 June 1, 2015 and ending June 30, 2015.

<u>Corrective Measures Study ("CMS"):</u>

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. ESOI and Ohio EPA discussed the May 5, 2015 comments on the proposed changes to the groundwater monitoring program and will set up a conference call with all parties to finalize the documents.

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 June 11, 12, 25, and 26, 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 appears to have reduced its level below the TLL.

• PZ-15: 566.77, 566.62

• DPW-16: 572.90, 572.87 (well no longer usable – replacement well RW-32 is now operating)

NRP-25: 569.49, 569.71
 NRP-26: 572.98, 573.27

- 2. As of the last quarterly readings in May, SWMU 7 achieved its TLL. Ongoing monitoring is in place since installation of the new wells. An evaluation is being conducted to determine which wells exceed the TLL on an individual basis for inclusion in more frequent monitoring.
- Completion of electrical installation full conversion of existing piezometers PZ-21, PZ-22, and PZ-23 on SWMU 5 to dual purpose extraction wells and piezometers DPW-21, DPW-22, and DPW-23.
- 4. Preparation of modifications to the OMPM Plan to document incorporation of the new and converted wells;
- 5. Extraction of leachate at the highest monthly rate in 3 years and the ninth most productive month since start-up in 2007;
- 6. 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. ESOI submitted a request to Ohio EPA for abandonment of inactive gas vents that will provide for a larger and more effective retention pond at outfall 12; and
- 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:

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. Simple Green® has been added but did not improve the pumping capacity. ESOI will redevelop the well and research cost and practicality of installing a Solar Sipper to remove the viscous NAPL.

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. Excavation for retention pond at NPDES outfall 012
- 3. Monitoring of leachate levels in SWMUs 6 and 7;
- 4. Continued operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7; and
- 5. Continued work on the storm water management improvements around 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

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

Peter Ramanauskas, USEPA Region 5
Michael Momenee, The Mannik & Smith Group
Mark Nielsen, RAMBOLL ENVIRON