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July 12, 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
 June 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 May 1, 2016 and ending May 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:

1. Ohio EPA review of ESOI's responses.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Quarterly inspections, leachate elevation readings, and flow testing of the leachate extraction system;
2. All interior piezometers and exterior wells were measured on the following dates: SWMUs 5, 6, and 7 June 16, 2016, (with the exceptions of RW-1, 2, & NRP-29 [7/1]). The following is documentation that:
 - SWMUs 5, 6, and 7 have achieved and are maintaining an inward gradient. The leachate level at each SWMU's interior piezometers has an average head potential at least 1-foot lower than the average liquid potential in the established perimeter shallow till wells, as identified in the draft Table 1.0 of the OMPM Plan update.
 - SWMUs 5-Central, and 7 have achieved and are maintaining Target Leachate Levels (TLLs).
 - SWMU-6 did not maintain its average Target Leachate Level (TLL). The quarterly measurement is less than 2 inches over the TLL. In accordance with the OMPM Plan, ESOI will complete an evaluation within 30 days of the end of the calendar quarter and proceed with the appropriate level responses.

										Average	Difference (out-in)
SWMU 5 - Central TLL: 557.1											
Interior Piezometers	PZ-5	PZ-6	PZ-7	PZ-21	PZ-22	PZ-23	NRP-24	RW-3	RW-11		
	570.34	559.87	560.69	546.55	549.15	544.64	557.94	555.90	557.19	556	
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S					25
	583.784	586.24	579.244	581.97	577.28	576.27				581	
SWMU 5 - West TLL: 564.9											
Interior Piezometers	PZ-13	NRP-31									
	566.44	565.19								566	
Exterior Wells	MR-2S	MR-6S									9
	576.18	574.01								575	
SWMU 6 TLL: 566.9											
Interior Piezometers	PZ-3	PZ-15	DPW-16	NRP-25	NRP-26	NRP-27	NRP-28	RW-1			
	560.76	565.59		580.14	573.45	564.36	561.49	563.51		567	
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S						18
	586.90	584.15	584.43	584.75	588.61					586	
SWMU 7 TLL: 570.8											
Interior Piezometers	PZ-10	PZ-11	DPW-18	DPW-19	DPW-20	NRP-29	NRP-30	RW-2			
		574.60	568.23	570.44		567.29	565.92	570.91		570	
Exterior Wells	T-5S	T-8S	T-15S	T-43S							17
	588.48	588.61	589.32	584.21						588	

3. In addition to conducting an evaluation for SWMU 6, ESOI will also conduct an evaluation for SWMU 5 West. SWMU 5 West previously achieved its TLL and has been in maintenance of leachate levels below the TLL since then. The quarterly measurement is 11 inches over the TLL. ESOI will complete an evaluation and level responses. Significant progress has been made in SWMU 5 West in just the last month with the addition of a test pump to piezometer PZ-13.
4. On June 16, 2016 in accordance with the compliance plan of action at SWMU 6, ESOI completed monthly elevation monitoring at the following wells. DPW-16, NRP-25, and NRP-26 which exceeded the TLL of 566.9 in the prior month.
 - DPW-16: (well no longer usable - nearby replacement RW-32 is operating)
 - NRP-25: 580.14 (reading is suspected to be erroneous as pumping has resumed)
 - NRP-26: 573.45
5. On June 16, 2016 in accordance with the compliance plan of action at SWMU 7, ESOI attempted to complete monthly elevation monitoring PZ-10 which exceeded the TLL of 570.8 in Nov. 2015.
 - PZ-10: In November 2015, an attempt was made to redevelop PZ-10, but the interior piezometer liner broke during removal which left a portion of the liner within the well. In December a camera was lowered into the piezometer to help retrieve the liner and investigate why the liner broke. It was determined that PZ-10 is bent from consolidation of waste around the well and attempts to retrieve the liner failed. MSG is investigating options to repair PZ-10 and/or determine if it is no longer functional (RW-2 is a nearby and may be a suitable replacement for elevations).
6. MSG redeveloped the following wells in SWMU 5: NRP-24; SWMU 6: NRP-27, 28, 32, PZ-2, 15; RW-1, 6; SWMU 7: PZ-11. An attempt was made to push the RW-8 pump in SWMU 6 back into place following the May redevelopment attempt. However, it would not move back into place. Therefore, ESOI is evaluating options and assessing overall impact since new wells have been installed.
7. The following maintenance items were conducted:
 - NRP-24: SWMU 5 Central globe valve tightened and halted flow. It was readjusted.
 - RW-11: SWMU 5 Central globe valve tightened and halted flow. It was readjusted.
 - RW-1: SWMU 6 pump became plugged with NAPL or has a bad transducer and is scheduled for repair.
 - PZ-11: SWMU 7 liner was removed for inspection. Silt was found, removed and redeveloped.
 - NRP-29: SWMU 7 hose fitting was leaking and recycling water into well. Repaired.
 - DPW-20: SWMU 7 was inspected with a camera. Well is unusable and is recommended for abandonment and replacement with newly installed well NRP-35.
8. 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;
9. The pump installed on May 6, 2016, in PZ-13 SWMU 5-West pumped very strong and was able to reduce the level in the well in just a few weeks. However, the pump failed in that short amount of time. ESOI is confident that a pump in that location will effectively dewater the unit. The Mannik and Smith Group is working with ESOI to make the location an effective and permanent pumping location.
10. 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;

11. Work on expedited corrective measures outlined in the CMS Report:

- Storm water management has been 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. Installation of a discharge valve for new retention pond at NPDES outfall 012 was completed on June 29, 2016; and

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:

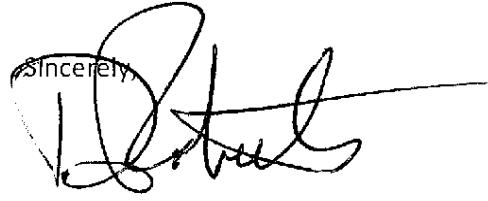
During the next reporting period it is anticipated that the following activities will occur:

1. 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. Initiate a review of the leachate extraction systems after 9 years of operation. It 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 and 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
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.

Ms. Lynn Ackerson
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Sincerely,


Douglas E. Roberts
President

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

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