

July 11, 2017

Mr. Michael Terpinski  
Ohio EPA, NWDO, DERR  
347 North Dunbridge Road  
Bowling Green, OH 43402

**Re:    Envirosafe Services of Ohio, Inc.  
      EPA Identification Number: OHD 045 243 706  
      June 2017 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 June 1, 2017 and ending June 30, 2017.

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

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

During this reporting period, CMS activities included the following:

1. Ohio EPA preparation for selection of remedies and initiation of a permit modification to incorporate them as well as the collaboratively drafted revisions for the groundwater monitoring program.

**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 selection of remedies and initiation of a permit modification to incorporate them as well as the collaboratively drafted revisions for the groundwater monitoring program.

**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 15, 2017. The following is documentation that:
  - SWMUs 5, 6, and 7 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.
  - SWMU 5- Central is maintaining Target Leachate Level (TLL).
  - SWMUs 5-West, 6, and 7 did not maintain their average Target Leachate Levels (TLL). SWMU 5-West has increased 1 foot since last quarter. SWMU 6 remained the same and SWMU 7 decreased by 3 feet. In accordance with the OMPM Plan, ESOI completed and submitted an evaluation following the last quarter results. All necessary measures are currently being taken to return the levels below the TLL. Ohio EPA provided comments on the submitted evaluation and ESOI is reviewing them.

										Average	Difference (out-in)	
<b>SWMU 5 - Central</b>	<b>TLL: 557.1</b>											
<b>Interior Piezometers</b>	<b>PZ-5</b>	<b>PZ-6</b>	<b>PZ-7</b>	<b>PZ-21</b>	<b>PZ-22</b>	<b>PZ-23</b>	<b>NRP-24</b>	<b>RW-3</b>	<b>RW-11</b>			
	563.83	561.04	558.10	559.08	549.04	544.99	556.46	555.26	555.36	556		
<b>Exterior Wells</b>	<b>F-1S</b>	<b>G-1S</b>	<b>MR-1SA</b>	<b>MR-4S</b>	<b>MR-5S</b>	<b>MR-7S</b>					25	
	583.864	585.75	579.508	581.37	577.23	576.69				581		
<b>SWMU 5 - West</b>	<b>TLL: 564.9</b>											
<b>Interior Piezometers</b>	<b>PZ-13</b>	<b>NRP-31</b>										
	566.49	566.34								566		
<b>Exterior Wells</b>	<b>MR-2S</b>	<b>MR-6S</b>									9	
	576.16	574.31								575		
<hr/>												
<b>SWMU 6</b>	<b>TLL: 566.9</b>											
<b>Interior Piezometers</b>	<b>PZ-3</b>	<b>PZ-15</b>	<b>DPW-16</b>	<b>NRP-25</b>	<b>NRP-26</b>	<b>NRP-27</b>	<b>NRP-28</b>	<b>RW-1</b>				
	562.77	564.80		581.71	576.06	560.639	561.38	565.64		568		
<b>Exterior Wells</b>	<b>H-2S</b>	<b>SW-1S</b>	<b>SW-2S</b>	<b>SW-3S</b>	<b>T-8S</b>						19	
	587.42	584.88	587.62	584.87	589.11					587		
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<b>SWMU 7</b>	<b>TLL: 570.8</b>											
<b>Interior Piezometers</b>	<b>PZ-10</b>	<b>PZ-11</b>	<b>DPW-18</b>	<b>DPW-19</b>	<b>DPW-20</b>	<b>NRP-29</b>	<b>NRP-30</b>	<b>RW-2</b>				
		574.30	573.08	570.20		577.37	569.10	571.27		573		
<b>Exterior Wells</b>	<b>T-5S</b>	<b>T-8S</b>	<b>T-15S</b>	<b>T-43S</b>							15	
	588.53	589.11	588.61	583.81						588		

3. On June 15, 2017 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: 563.83
- PZ-6: 561.04
- PZ-7: 558.10
- PZ-21:

SWMU 5 West: 564.9

- PZ-13: 566.49
- PZ-31: 566.34

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement NRP-32 is operating)
- NRP-25: 581.71

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 574.30
- DPW-20: (well not usable - nearby wells are operating)
- NRP-29: 577.37
- NRP-30: 569.10

4. Leachate system maintenance included

- redevelopment of NRP-31 well and piezometer;
- removal of reclaim pump and reinstallation of centrifugal pump at NRP-31; and
- maintenance on malfunctioning reclaim pumps at RW-1 to correct twisted air hose and clogging problems at other locations;

5. Ohio EPA provided comments on June 28, 2017 for the 9-Year leachate system evaluation and recommendations;

6. Continued operation of bladder pumps in PZ-13 and PZ-15; 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:**

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. Review and prepare response to Ohio EPA comments on the 9-Year leachate system evaluation and recommendations;

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2. Redevelopment of leachate extraction wells in accordance with a priority list that has been developed with the most silty wells being addressed first; NRP- NRP-24 well and piezometer are priorities for redevelopment; NRP-25, 32, 33, 34, 35, and DPW-18 as time allows;
3. Attempt to remove an obstruction in the NRP-27 piezometer riser;
4. Removal of NAPL from PZ-1, 2, 4, and 15 as time allows; and
5. 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.

Sincerely,

Douglas E. Roberts  
President

ec: Lynn Ackerson, Ohio EPA NWDO  
Stephen DeLussa, Envirosource Technologies, Inc.

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