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April 7, 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  
March 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 March 1, 2016 and ending March 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 and ESOI discussed proposed permit language for updating the groundwater protection standards at a set frequency.

**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: SWMU 5 – March 18, 2016, (with the exceptions of MR-1SA, MR-2S, and MR-4S thru MR-7S [3/21]; SWMU 6 and SWMU 7 – March 18, 2016. 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, 6, and 7 have achieved and are maintaining Target Leachate Levels (TLLs).

										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>		
	570.37	560.39	559.82	546.32	549.64	544.37	556.86	554.48	557.53	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>					27
	585.264	587.05	581.476	584.2	577.64	577.25				582	
<b>SWMU 5 - West</b>	<b>TLL: 564.9</b>										
<b>Interior Piezometers</b>	<b>PZ-13</b>	<b>NRP-31</b>									
	567.68	564.89								566	
<b>Exterior Wells</b>	<b>MR-2S</b>	<b>MR-6S</b>									9
	577.12	573.46								575	
<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>			
	561.78	564.83	573.02	573.85	573.21	558.84	559.45	558.99		565	
<b>Exterior Wells</b>	<b>H-2S</b>	<b>SW-1S</b>	<b>SW-2S</b>	<b>SW-3S</b>	<b>T-8S</b>						21
	589.13	585.40	585.03	588.16	586.34					587	
<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>			
	N/A	565.07	570.74	570.45	N/A	565.22	582.59	568.29		570	
<b>Exterior Wells</b>	<b>T-5S</b>	<b>T-8S</b>	<b>T-15S</b>	<b>T-43S</b>							17
	588.49	586.34	587.93	585.07						587	

3. On March 18, 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: 573.02 (well no longer usable - nearby replacement RW-32 is operating)
  - NRP-25: 573.85
  - NRP-26: 573.21
4. On March 18, 2016 in accordance with the compliance plan of action at SWMU 7, ESOI attempted to completed 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).
5. MSG redeveloped the following wells in SWMU 5: NRP-24; SWMU 6: PZ-14, NRP-27, and NRP-28.
6. The following maintenance items were conducted:
  - DPW-19: SWMU 7 transducer was replaced
  - NPR-30: SWMU 6 pump was repaired but failed again on the 30<sup>th</sup>.
7. Submittal of Groundwater Annual Report including corrective action on March 1, 2016;
8. 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;
9. 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 on SWMUs 5, 6, and 7 has been completed. The final work for this project includes expansion and upgrades for retention pond at outfall 12. On December 7, 2015 Ohio EPA provided approval for abandonment of inactive gas vents in the location of the new pond. The wells were abandoned during excavation of the area; no waste was encountered and a liner was installed. Work remaining includes installation of a discharge valve at the outfall. In conjunction with the outfall construction, waste materials identified in the RFI and CMS reports near the new pond will be excavated. A plan for the excavation was drafted and is being reviewed; and
10. 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:**

Ms. Lynn Ackerson

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There is nothing to report in association with this topic for this reporting period.

**Projected Work:**

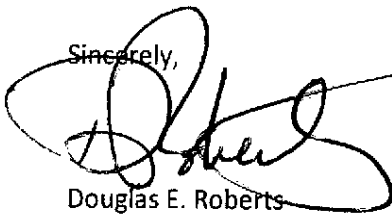
During the next reporting period it is anticipated that the following activities will occur:

1. Investigate options for the non-functioning PZ-10 and if possible redevelopment of PZ-5, RW-3, RW-8, DPW-16, NRP-31, and PZ-13;
2. Review of 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. Installation of a discharge valve for new 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.

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