

April 9, 2018

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  
      March 2018 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 March 1, 2018 and ending March 31, 2018.

**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 were measured on the following dates: SWMUs 5, 6, and 7 March 29, 2018. All exterior wells measured on March 30, 2018. 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.
  - SWMUs 5, 6, and 7 are maintaining Target Leachate Levels (TLL).

										Average	Difference (out-in)	
<b>SWMU 5 - Central</b>		<b>TLL: 557.1</b>										
Interior Piezometers	<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>			
	569.73	562.04	559.40	561.98	549.94	544.79	556.06	555.86	554.26	557		
Exterior Wells	<b>F-1S</b>	<b>G-1S</b>	<b>MR-1SA</b>	<b>MR-4S</b>	<b>MR-5S</b>	<b>MR-7S</b>					26	
	586.008	587.25	582.468	585.04	577.69	577.25				583		
<b>SWMU 5 - West</b>		<b>TLL: 564.9</b>										
Interior Piezometers	<b>PZ-13</b>	<b>NRP-31</b>										
	564.79	564.34									565	
Exterior Wells	<b>MR-2S</b>	<b>MR-6S</b>										11
	576.72	573.86									575	
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<b>SWMU 6</b>		<b>TLL: 566.9</b>										
Interior Piezometers	<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>				
	561.87	560.60		579.51	579.96	565.979	560.38	556.84	566			
Exterior Wells	<b>H-2S</b>	<b>SW-1S</b>	<b>SW-2S</b>	<b>SW-3S</b>	<b>T-8S</b>							18
	590.21	585.02	585.67	572.12	588.74						584	
<hr/>												
<b>SWMU 7</b>		<b>TLL: 570.8</b>										
Interior Piezometers	<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>				
		571.30	570.48	570.50		570.67	570.30	569.87	571			
Exterior Wells	<b>T-5S</b>	<b>T-8S</b>	<b>T-15S</b>	<b>T-43S</b>							18	
	588.51	588.74	588.49	587.14						588		

3. On March 29, 2018 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: 569.73
- PZ-6: 562.04
- PZ-7: 559.40
- PZ-21: 561.98

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement NRP-32 is operating)
- NRP-25: 579.51
- NRP-26: 579.96

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 571.30
- DPW-20: (well not usable - nearby wells are operating)

4. Leachate system maintenance included:

- Inspection of piezometers and recovery wells on SWMU 5, 6, and 7;
  - Recorded liquid level at each location with a control panel;
  - Verified functionality of all pumps without a control panel;

- Drained SWMU-5 compressor and controller moisture, evaluated if auto-drain would work, and replaced auto drain;
  - Exercised all flow control valves;
- RW-1
  - Redeveloped
- NRP-25
  - Observed to have little discharge. May need to redevelop as weather permits;
- NRP-26
  - Observed below the low point and not pumping. May need to be redeveloped as weather permits;
- NPR-27
  - Control panel found to be operational and in good status;
- NRP-29
  - Observed below the low point;
- NRP-33
  - Replaced Grundfos pump (Level started at 109" and dropped to 23" in less than 1 minutes);
- NRP-34
  - Observed not pumping. Transducer code observed;
- SWMU 6 Compressor Shed:
  - Emptied moisture buckets;
  - Additional screws in metal roof may be needed due to wind;
- SWMU 5 Tanker Pad
  - Water was observed on SWMU-5 Tanker pad. Pump was engaged for 20 minutes, removing approx. half of the standing water. Pump timer was set for an additional 20 minutes.

5. Submission of Annual Report on March 1, 2018;
6. Disposal of accumulated non-hazardous leachate in AOC 7 on March 13, 2018;
7. Submission of the OMPM Plan Level 3 Quarterly Report on March 13, 2018;
8. Meeting with Toledo on March 29, 2018 regarding leachate disposal of non-hazardous wastewater into POTW;
9. Conference call on March 29, 2018 with Ohio EPA to discuss ESOI's comments on the Director Initiated Modification Draft Permit to incorporate corrective measures/remedies and corrective action ground water monitoring requirements into ESOI's permit; 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:**

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

**Projected Work:**

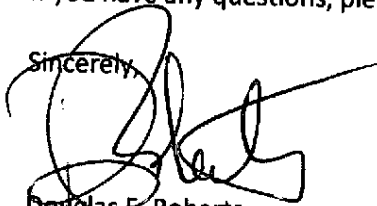
During the next reporting period it is anticipated that the following activities will occur:

1. Replacement of DRP-19 control panel display;
2. Evaluate replacement of DPW-21;
3. Evaluate NRP-29 valves;
4. Evaluate control panels where water was observed and make water-tight;
5. Sample SWMU leachate relative to adjacent monitoring wells; and
6. Continued redevelopment of leachate extraction wells in accordance with priority list, with the siltiest wells being addressed first as time and weather allows;
7. 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

cc: Stephen DeLussa, Envirosource Technologies, Inc.  
Mark Nielsen, Ramboll

Michael Momenee, The Mannik & Smith Group