

April 9, 2021

VIA ELECTRONIC MAIL

Ms. Colleen Weaver
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 2021 Progress Report**

Dear Ms. Weaver:

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, 2021 and ending March 31, 2021.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Submission of the annual reporting information required by the OMPM Plan for leachate collection systems at SWMUs 5, 6, and 7 with the Annual Report of Groundwater Quality on March 1, 2021;
2. Collection of elevations on March 4, 2021 prior to resumption of operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7;

									Avg/ Lowest	Difference (out-in)
<u>SWMU 5 - Central</u>										
Interior										
Piezometers	PZ-5	NRP-24	RW-3	PZ-6	PZ-7	RW-11	PZ-22	PZ-23		
	568.79	566.01	569.46	569.63	569.63	571.91	571.84	575.63	570.36	
Exterior Wells										
	F-1S	MR-4S	F-1S	MR-7S	MR-1SA	MR-5S				7
	585.20	585.15	585.20	577.68	583.10	577.66			577.66	
<u>SWMU 5 - West</u>										
Interior										
Piezometers	PZ-13	NRP-31								
	569.02	570.39							569.71	
Exterior Wells										
	MR-2S	MR-6S	MR-7S							6
	576.61	575.27	577.68						575.27	

SWMU 6

Interior												
Piezometers	NRP-25	NRP-26	RW-1	PZ-1	PZ-2	PZ-3	PZ-15	NRP-27	NRP-28	NRP-32	NRP-33	
	584.66	583.50	573.94	575.94	576.44	576.32	573.00	573.93	576.60	579.86	578.64	577.53
Exterior Wells												
	SW-1S	SW-2S	SW-3S	H-2SA	T-5S	T-8S						
	585.31	586.67	588.91	592.19	588.90	587.23						585.31

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SWMU 7

Interior												
Piezometers	NRP-29	PZ-9	NRP-30	RW-34	RW-2	PZ-11	DPW-18	DPW-19	NRP-35			
	578.04	580.98	587.60	585.06	581.67	581.66	582.78	582.15	585.58			582.83
Exterior Wells												
	H-2SA	SW-3S	T-5S	T-8S	T-15S	T-43S						
	592.19	588.91	588.90	587.23	588.01	583.4						583.40

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3. Resumption of operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7 on March 4, 2021 as anticipated temperatures were expected to be routinely above 32 degrees Fahrenheit and wells accessible for maintenance;
4. Discussion with Ohio EPA on March 10, 2021 regarding Ohio EPA’s recommendations for winter weather shutdown of the leachate systems for SWMUs 5, 6, and 7;
5. Preparation of a basis for permit modification options regarding Ohio EPA’s recommendations for winter weather shutdown of the leachate systems for SWMUs 5, 6, and 7;
6. Submission of a Class 1A permit modification request on March 18, 2021 that Incorporates Ohio EPA’s recommendations to the SWMU 5 LNAPL Recovery System O&M Plan and includes the Corrective Measures Completion Report and O&M Plan into the permit;
7. Leachate system maintenance included:
 - Inspection of piezometers and recovery wells on SWMUs 5, 6, and 7:
 - Recorded liquid level at each location with a control panel;
 - Verified functionality of all pumps without a control panel;
 - All pumps with a control panel were observed to be below their respective low points with the exception of: DPW-18 and 19, NRP-24, 25, 26, 27, 29, 30, 31, 33, 34, and 35;
 - RW-1, NRP 29, 32 & 33: Tightened test valves;
 - RW-2, 3, & 11, DPW-21R, 22, & 23, NRP-28: Verified and tested the pump by adding water to the recovery wells;
 - PZ-7 & 10: Stickups found broken below ground surface and repaired;
 - NRP-29: Reset control panel; adjusted Hi and Lo Points; pump began to function, but was reading a negative level; repaired transducer cable; and, cleaned and repositioned corroded ground wire inside control panel. Began to pump and cycle as designed;
 - NRP-30: Transducer cable was observed to be severed; repaired cable, began to pump and cycle as designed;
 - SWMU 5 Tank Containment: Ran sump pump until dry;
 - SWMU 5 Compressor: Started for season; verified auto drain was working; and drained moisture from controller;

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- SWMU 6 Compressor: Tightened tie-down straps for compressor shed; emptied buckets, and compressor attic fan was observed to be functioning as designed; and

8. Solar Sipper maintenance included:

- Repaired severed airline;

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. Submission of draft permit modification option regarding Ohio EPA's recommendations for winter weather shutdown of the leachate systems for SWMUs 5, 6, and 7;
2. Moving and disposal of material in AOC 3 (Building C) in preparation for demolition;
3. Continued redevelopment of leachate extraction wells in accordance with priority list, with the siltiest wells being addressed first as time and weather allows; and
4. 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: Michael Terpinski, Ohio EPA-NWDO, DERR
Stephen DeLussa, Envirosource Technologies, Inc.
Mark Nielsen, Ramboll

Dawn Pleiman, Ohio EPA-NWDO, DERR
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