

April 8, 2022

VIA ELECTRONIC MAIL

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 2022 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, 2022 and ending March 31, 2022.

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, 2022;
2. Collection of semi-annual leachate system elevation measurements on March 9 and 11, 2022. An inward gradient continues to be maintained. Each unit average interior leachate levels was below the lowest exterior groundwater elevation. However, notice is hereby being provided that the following wells did not demonstrate the performance standard: maintenance of the leachate head level measurement below a gradient based TLL of 3.0 feet below the lowest groundwater elevation in the relevant shallow perimeter monitoring well(s).

RW-11:	2.5 feet
PZ-13:	1.9 feet
NRP-31:	1.0 feet
NRP-25:	0.2 feet
NRP-26:	2.3 feet
NRP-30*:	0.3 feet
DPW-19*:	-2.9 feet
NRP-35*:	-1.1 feet

* These wells are not compared to IGWMP Wells as there are none in close proximity. They are listed as a point of reference to corrective actions wells on the edge of waste directly between and adjacent to other landfill units.

A significant lowering of leachate elevation has occurred since the pumping wells were reactivated and it is believed that these wells have already achieved the performance standard. The trend is expected to continue. In accordance with the OMPM Plan, the elevation in these wells will be monitored quarterly until the excursion has been eliminated. Response actions such as those listed in Section 6.5 are being taken.

Leachate Level Status For Groundwater Monitoring											Average Interior & Lowest Exterior	Distance Below Lowest Exterior (ft)
Avg. Deep Interior Piezometer Levels Compared with Relevant Lowest Shallow Perimeter IGMP Monitoring Wells												
SWMU 5 - Central												
Interior Piezometers	RW-3	RW-11	NRP-24	PZ-5	PZ-6	PZ-7	DPW-22	DPW-23				
	572.22	575.76	567.64	571.05	572.38	571.32	574.39	573.79				572.32
Exterior Wells	F-15	MR-15A	MR-4S	MR-5S	MR-7S							
	585.09	583.82	584.91	578.27	577.89							577.89
SWMU 5 - West												
Interior Piezometers	PZ-13	NRP-31										
	573.33	574.26										573.80
Exterior Wells	MR-2S	MR-6S	MR-7S									
	577.58	575.27	577.89									575.27
SWMU 6												
Interior Piezometers	RW-1	PZ-1	PZ-2	PZ-3	PZ-15	NRP-25	NRP-26	NRP-27	NRP-28	NRP-32	NRP-33	
	575.54	576.33	577.08	577.97	579.10	588.11	585.76	573.68	578.58	579.53	580.02	579.25
Exterior Wells	SW-1S	SW-2S	SW-3S	H-2SA								
	588.31	588.07	589.01	592.14								588.07
SWMU 7												
Interior Piezometers	RW-2	PZ-9	PZ-11	DPW-18	DPW-19	NRP-29	NRP-30	RW-34	NRP-35			
	580.97	580.98	582.60	583.74	587.90	579.61	589.35	586.06	586.13			584.15
Exterior Wells	T-5S*	T-8S*	T-15S*									
	589.34	589.61	588.90									588.90

* These wells are not IGWMP Wells but there are none associated with SWMU 7 so they are listed here for comparison. T-43S was completely removed because it is too impacted by pumping of the Waterline Trenches.

3. Resumption of operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7 on March 9, 2022 as anticipated temperatures were expected to be routinely above 32 degrees Fahrenheit and wells accessible for maintenance;
4. Upon reactivation of the electrical supply for the resumption of operations as noted above, the dry grassy surface of SWMU 6 caught fire due to an electrical short. The incident is documented in a report that was submitted to Ohio EPA on March 24, 2022. The electrical supply was repaired and restored to SWMU 6 on March 17, 2022;
5. 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, 19, NRP-24, 25, 26, 27, 29, 30, 31, 33, 34, and 35;
- PZ-13: Observed to have a frozen discharge line (no discharge) – repaired severed and clogged airline, removed leaking valve, cleaned pump screen, drained water from airline;
- PZ-15: Repaired burnt air and discharge lines;
- NRP-24: Observed above the hi point – flushed valve train (clogged with silt) and began pumping down;
- NRP 25, 27, 28: Reset tripped circuit breakers;
- NRP-29: Observed above the hi point – restarted and pumped down and began cycling normally;
- NRP-32: Replaced leaking (burnt) section of airline;
- SWMU 5: Reinforced all electrical connections and reconfigured wires to avoid crimping from box lid.
- SWMU 6: Replaced damaged electrical junction box. The wires within the junction box were shrink wrapped to prevent shorting by moisture;
- SWMU 5 Tank Containment: Ran sump pump until dry;
- SWMU 5 Compressor: Started, drained moisture from controller, and verified the auto-drain is functioning; and
- SWMU 6 Compressor: Emptied buckets, verified the auto-drains are functioning, compressor attic fan was observed to be functioning as designed; and

6. Solar Sipper – inspected and found to be operating as designed.

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. Preparation and submission of a Corrective Measures Completion of Work Report for the northern property line excavation at SWMU 6.
2. Development of an O&M Plan for the newly installed SWMU 8 extraction wells and gas vents;
3. Action on the Environmental Covenant pending Ohio EPA review of the draft document;
4. Evaluate for improvement discharge at PZ-13 and NRP-24; 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

Mr. Michael Terpinski

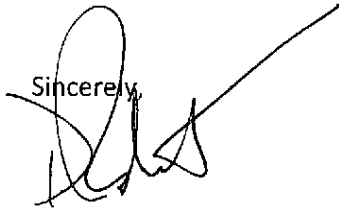
April 8, 2022

Page 4

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,

A handwritten signature in black ink, appearing to read 'D. Roberts', with a long horizontal stroke extending to the right.

Douglas E. Roberts

President

cc: Gary Deutschman, Ohio EPA-NWDO, DERR
Stephen DeLussa, Envirosource Technologies, Inc.
Michael Momenee, The Mannik & Smith Group

Dawn Pleiman, Ohio EPA-NWDO, DERR
Mark Nielsen, Ramboll