

April 6, 2023

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 2023 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, 2023 and ending March 31, 2023.

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, 2023;
2. Collection of semi-annual leachate system elevation measurements on March 22 and 23, 2023. 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 well 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).
NRP-25: 2.0 feet below the lowest groundwater elevation

As in previous years, reactivation of all pumps is expected to quickly lower the leachate elevation and achieve the TLL. In accordance with the OMPM Plan, the elevation in this well will be monitored quarterly until the excursion has been eliminated. Response actions such as those listed in Section 6.5 are being taken.

												Average Interior & Lowest Exterior	Distance Below Lowest Exterior (ft)	
SWMU 5 - Central														
Interior Piezometers	RW-3	RW-11	NRP-24	PZ-5	PZ-6	PZ-7	DPW-22	DPW-23						
	571.76	573.76	564.06	571.03	572.84	570.80	570.44	570.99					570.71	
Exterior Wells	F-15	MR-15A	MR-4S	MR-5S	MR-7S									7
	585.58	583.52	584.07	578.01	577.61								577.61	
SWMU 5 - West														
Interior Piezometers	PZ-13	NRP-31												
	572.49	565.04											568.77	
Exterior Wells	MR-2S	MR-6S	MR-7S											7
	577.59	575.49	577.61										575.49	
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			
	573.64	577.34	577.08	578.97	579.10	585.21	565.76	571.18	577.38	580.93	570.64	576.11		
Exterior Wells	SW-1S	SW-2S	SW-3S	H-2SA										10
	587.24	585.68	588.76	592.14									585.68	
SWMU 7														
Interior Piezometers	RW-2	PZ-9	PZ-11	DPW-18	DPW-19	NRP-29	NRP-30	RW-34	NRP-35					
	579.67	580.98	583.70	576.28	580.60	579.17	584.00	584.61	580.98				581.11	
Exterior Wells	T-5S	T-8S	T-15S											5
	589.45	589.84	589.12										589.12	

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

3. Resumption of operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7 on March 22 and 23, 2023 as anticipated temperatures were expected to be routinely above 32 degrees Fahrenheit and wells accessible for maintenance;
4. 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-19, NRP-25, 27, 28, 29, and 30;
 - RW-1: Repaired airline (separated from pump);
 - PZ-13: Repaired leak in discharge line;
 - PZ-15: Repaired severed discharge line;
 - NRP-32: Repaired severed airline and leak in airline;
 - SWMU 5 Compressor: Started compressor, verified autodrain working, and drained moisture from controller; and

- SWMU 6 Compressor: Changed oil and air filter, started compressor, verified autodrain working emptied buckets, compressor attic fan was observed to be functioning as designed;
5. Solar Sipper – inspected and found to be operating as designed; and
 6. Development of an O&M Plan for the newly installed SWMU 8 extraction wells and gas vents and development of a Corrective Measures Completion of Work (CMCW) Report for SWMU 9. The documents are being finalized and expected to be submitted in April.

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:

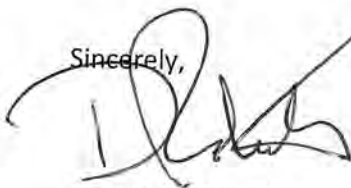
During the next reporting period it is anticipated that the following activities will occur:

1. Submission of an O&M Plan for the newly installed SWMU 8 extraction wells and gas vents;
2. Submission of the SWMU 9 CMCW Report; and
3. 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: 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