

June 4, 2015

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
 May 2015 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 May 1, 2015 and ending May 31, 2015.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. Ohio EPA provided additional comments on May 5, 2015 to ESOI's response to comments on the proposed changes to the groundwater monitoring program.
2. ESOI requested a proposal from its contractor, RAMBOLL ENVIRON, to evaluate the comments and provide a response.

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. ESOI review and formulation of response to Ohio EPA comments dated May 5, 2015.

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 – May 12, 2015, (with the exceptions of RW-3, RW-11, NRP-24, and NRP-31 [5/13]; SWMU 6 – May 14, 2015 (with the exceptions of NRP-25 thru 28 [5/15]; and SWMU 7 – May 14, 2015 (with the exceptions of PZ-10 and 11 [5/13]). 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.
 - As identified in the last report, SWMU-6 did not maintain its average Target Leachate Level (TLL). ESOI is evaluated the quarterly data and submitted Level 1 and 2 responses on April 30, 2015. Significant progress has already been made and ESOI anticipates achievement within the next month.

										Average	Difference (out-in)	
SWMU 5 - Central		TLL: 557.1										
Interior Piezometers	PZ-5	PZ-6	PZ-7	PZ-21	PZ-22	PZ-23	NRP-24	RW-3	RW-11			
	571.01	567.48	566.56	570.48	571.09	574.11	561.57	563.57	562.34	568		
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S						14
	584.64	586.86	581.31	583.45	577.39	577.07					582	
SWMU 5 - West		TLL: 564.9										
Interior Piezometers	PZ-13	NRP-31										
	568.01	565.57									567	
Exterior Wells	MR-2S	MR-6S										8
	576.43	573.43									575	
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SWMU 6		TLL: 566.9										
Interior Piezometers	PZ-3	PZ-15	DPW-16	NRP-25	NRP-26	NRP-27	NRP-28	RW-1				
	564.75	566.92	573.44	564.52	572.12	565.43	563.25	565.26	567			
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S							19
	588.00	584.52	585.19	586.31	588.12						586	
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SWMU 7		TLL: 570.8										
Interior Piezometers	PZ-10	PZ-11	DPW-18	DPW-19	DPW-20	NRP-29	NRP-30	RW-2				
	572.71	564.91	569.38	568.55		579.65	569.22	569.93	571			
Exterior Wells	T-5S	T-8S	T-15S	T-43S								16
	588.06	588.12	587.57	583.67							587	

3. On May 14, 15, and 29, 2015 in accordance with the compliance plan of action at SWMU 6, ESOI completed bi-weekly elevation monitoring at the following wells. PZ-15, DPW-16, NRP-25, and NRP-26 which had exceed the TLL of 566.9. A new monitoring probe and tape is on order. The readings were taken with a back-up probe that has been prone to interferences in the past.
 - PZ-15: 566.92, 567.10
 - DPW-16: 573.44, 573.71 (well no longer usable – replacement well RW-32 is now operating)
 - NRP-25: 564.52, 568.91
 - NRP-26: 572.12, 572.42
4. Completion of force main and electrical installation on SWMUs 6 and 7 for new nested recovery wells and piezometers NRP-32, 33, 34, and 35. They have been fully incorporated into the recovery well system before the date specified for completion in the Level 2 Response (June 15, 2015).
5. Preparation of modifications to the OMPM Plan to document incorporation of the new wells;
6. 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 has been completed on SWMUs 5, 6, and 7 with the exception of a new small retention pond at NPDES outfall 012. An evaluation of the pond is currently being conducted; and
7. 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:

1. The following notes and maintenance were observed during the month:
 - SWMU 6: DPW-16 failed and has been replaced. A new well NRP-32 was drilled in the fall and is now operating. This item will be removed from this section next month. RW-1 is pumping slowly due to the presence of viscous NAPL. Simple Green® has been added but did not improve the pumping capacity. ESOI will redevelop the well and research cost and practicality of installing a Solar Sipper to remove the viscous NAPL.
 - SWMU 7: RW-9 pump is stuck in middle of well, well is no longer be useful – a new well NRP-35 has been drilled and is now operating. RW-12 and DPW-20 cables broke during attempts to forcibly remove pumps - wells have shifted due to dewatered waste consolidation – new recovery wells in targeted locations for leachate removal optimization have been drilled and are now operating. This item will be removed from this section next month.

There is nothing else 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 of modifications to the OMPM Plan to document incorporation of the 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35;
2. Completion of utility trenching for final conversion of piezometers PZ-21, 22, and 23 on SWMU 5 to dual purpose extraction wells and piezometers;
3. Excavation for retention pond at NPDES outfall 012
4. Monitoring of leachate levels in SWMU 6;
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

Peter Ramanauskas, USEPA Region 5
Michael Momenece, The Mannik & Smith Group
Mark Nielsen, RAMBOLL ENVIRON