

June 10, 2016

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 2016 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, 2016 and ending May 31, 2016.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. Ohio EPA review of ESOI's responses to the proposed groundwater monitoring program changes.

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. Ohio EPA review of ESOI's responses.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. On May 27, 2016 in accordance with the compliance plan of action at SWMU 6, ESOI completed monthly elevation monitoring at the following wells. DPW-16, NRP-25, and NRP-26 which exceeded the TLL of 566.9 in the prior month.
 - DPW-16: (well no longer usable - nearby replacement RW-32 is operating)
 - NRP-25: 582.16 (reading is suspected to be erroneous as pumping has resumed)
 - NRP-26: 572.44
2. On May 27, 2016 in accordance with the compliance plan of action at SWMU 7, ESOI attempted to completed monthly elevation monitoring PZ-10 which exceeded the TLL of 570.8 in Nov. 2015.
 - PZ-10: In November 2015, an attempt was made to redevelop PZ-10, but the interior piezometer liner broke during removal which left a portion of the liner within the well. In December a camera was lowered into the piezometer to help retrieve the liner and investigate why the liner broke. It was determined that PZ-10 is bent from consolidation of waste around the well and attempts to retrieve the liner failed. MSG is investigating options to repair PZ-10 and/or determine if it is no longer functional (RW-2 is a nearby and may be a suitable replacement for elevations).
3. MSG redeveloped the following wells in SWMU 5: PZ-5, PZ-13; SWMU 6: NPR-25, 26, PZ-1, RW-1; SWMU 7: NRP-35 and RW-2. An attempt was made to redevelop RW-8 in SWMU 6 but the pump became wedged in the well as it was being removed. The well has bowed due to waste consolidation. An attempt is going to be made to push it back in place and re-start pumping. However, if the pump fails, it is unlikely that the well will be usable in the future.
4. To gain a better understanding of in well conditions, video inspections were completed on the following wells: SWMU 6: RW-8, PZ-1, PZ-2; SWMU 7: PZ-9, PZ-10, PZ-11, and DPW-20.
5. The following maintenance items were conducted:
 - NRP-25: SWMU 6 pump and transducer were replaced;
 - NRP-26: SWMU 6 corroded plumbing was repaired;
 - RW-1: SWMU 6 corroded connection at pump was repaired;
 - NRP-34: SWMU 7 electrical problems were repaired;
 - NRP-35: SWMU 7 transducer was replaced.
6. ESOI is evaluating the use of a pneumatic pumping system in PZ-13 and possibly other wells with intermittent thick and hard to remove NAPL;
7. On May 6, 2016, a pump was installed in PZ-13 in SWMU 5-West. The leachate level in the unit is close to achieving the Target Leachate Level (TLL). Pumping is being monitored and if effective, a permanent power supply will be installed. The well diameter and leachate level progress will be evaluated and if necessary, a permanent pumping station will be installed.

8. Continued work on modifications to the OMPM Plan to document incorporation of the new and converted wells and effectiveness evaluation of storm water management improvements;
9. 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 on SWMUs 5, 6, and 7 has been completed. The final work for this project includes expansion and upgrades for retention pond at outfall 12. On December 7, 2015 Ohio EPA provided approval for abandonment of inactive gas vents in the location of the new pond. The wells were abandoned during excavation of the area; no waste was encountered and a liner was installed. Work remaining includes installation of a discharge valve at the outfall. In conjunction with the outfall construction, waste materials identified in the RFI and CMS reports near the new pond will be excavated. A plan for the excavation was drafted and is being reviewed; 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. Investigate options for the non-functioning PZ-10 and if possible redevelopment of PZ-2, PZ-11, PZ-15, NRP-27, and NRP-28;
2. Review draft modifications to the OMPM Plan to document incorporation of the 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35, conversion of the 3 existing piezometers to dual purpose extraction wells and piezometers PZ-21 thru PZ-23, and effectiveness evaluation of storm water management improvements;
3. Installation of a discharge valve for new retention pond at NPDES outfall 012 by July 1, 2016;
4. Quarterly Monitoring of leachate levels and well yields in SWMUs 5, 6 and 7;
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

Ms. Lynn Ackerson

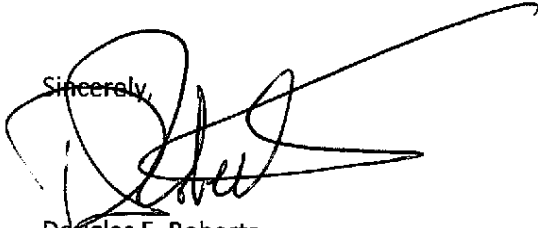
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knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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: Stephen DeLussa, Envirosource Technologies, Inc.
ESOI File Copy

Michael Momenee, The Mannik & Smith Group
Mark Nielsen, RAMBOLL ENVIRON