

December 9, 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
 November 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 November 1, 2015 and ending November 30, 2015.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. Preparation of a response and revisions to the Ohio EPA groundwater program comments dated May 5, 2015 based on the October 29, 2015 conference call.

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. Submission of a response and draft revisions to the Ohio EPA groundwater program comments dated May 5, 2015 based on the October 29, 2015 conference call.

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 November 13, 2015. 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.
 - SWMUs 5-Central, 6, and 7 have achieved and are maintaining Target Leachate Levels (TLLs).

										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			
	570.69	561.35	561.08	547.66	550.62	545.08	559.11	557.74	556.45	557		
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S					25	
	585.184	586.02	578.652	583.5	576.84	576.74						
										581		
SWMU 5 - West												
TLL: 564.9												
Interior Piezometers	PZ-13	NRP-31										
	567.26	565.14									566	
Exterior Wells	MR-2S	MR-6S										8
	575.78	573.16									574	
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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				
	561.99	565.10	573.12	568.17	571.96	565.62	560.08	563.64	566			
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S						20	
	588.37	584.34	584.95	585.56	585.61							
										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				
	572.66	564.79	569.88	567.52	NA*	566.28	562.40	570.37	568			
Exterior Wells	T-5S	T-8S	T-15S	T-43S							19	
	588.32	585.61	588.28	584.51								
										587		

*Abandoned

3. On November 12 and 13, 2015 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 had exceeded the TLL of 566.9 in the prior month.
 - DPW-16: 573.12 (well no longer usable – a nearby replacement well RW-32 is now operating)
 - NRP-25: 568.17
 - NRP-26: 571.96
4. On November 12 and 13, 2015 in accordance with the compliance plan of action at SWMU 7, ESOI completed monthly elevation monitoring PZ-10 which had exceeded the TLL of 570.8 in the prior month.
 - PZ-10: 572.66
5. MSG continued redevelopment of all wells and piezometers for SWMU 5, 6 & 7. The redevelopment strategy will help improve leachate extraction efficiency, identify and fix wells that are not able to reach compliance, and complete general maintenance. An inertia pump, HDPE tubing, surge block and foot valve were used to remove oily and silty material from the wells until leachate contained minimal NAPL and silt. Simple Green® was added to breakup oily material and clean the well screen. The following wells were redeveloped:

SWMU 5

- NRP-24
- RW-11

SWMU 7

- RW-2
- 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 down well camera will be used to help retrieve the liner and investigate why the liner broke.

6. Globe valves have been installed on all leachate recovery wells. It is anticipated that this valve will slow the discharge rate so that sand pack around the well can be dewatered to improve leachate removal rates.
7. All recovery wells were inspected to ensure the heat-tape is working. An extra layer of insulation was wrapped around the plumbing above ground surface.
8. Continued work on modifications to the OMPM Plan to document incorporation of the new and converted wells;
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 has been completed on SWMUs 5, 6, and 7 with the exception of a new small retention pond at NPDES outfall 012. Upon approval from Ohio EPA, ESOI will abandon inactive gas vents that will provide for a larger and more effective retention pond at outfall 12. In conjunction with the outfall construction, waste materials identified in the RFI and CMS reports will need to be excavated. A plan for the excavation is being prepared by Ramboll Environ; 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.

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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. A down well camera will be used in PZ-10 to help retrieve the liner and investigate why it broke;
2. A floating layer of NAPL material (~500 gallons) will be removed from the SWMU 6 leachate storage tank and disposed by ERG Environmental Services.
3. Review of modifications to the OMPM Plan to document incorporation of the 4 new and/or replacement leachate extraction wells NRP-32 thru NRP-35 and conversion of the 3 existing piezometers to dual purpose extraction wells and piezometers PZ-21 thru PZ-23;
4. Abandonment of inactive gas vents that will provide for a larger and more effective retention pond at outfall 12 (upon approval of Ohio EPA);
5. Excavation for new retention pond at NPDES outfall 012 and excavation of waste outside fence line near the new pond (following abandonment of inactive gas vents);
6. Monitoring of leachate levels in SWMUs 5, 6 and 7;
7. Continued operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7; and
8. 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

Ms. Lynn Ackerson
December 9, 2015
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Mark Nielsen, RAMBOLL ENVIRON