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December 6, 2016

Mr. Michael Terpinski
Ohio EPA, NWDO, DERR
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 2016 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 November 1, 2016 and ending November 30, 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. 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: SWMUs 5, 6, and 7 November 30, 2016. 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, 5-West, 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		
	569.33	559.12	559.29	546.93*	548.93	545.32	555.21	554.83	554.94	555	
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S					26
	585.016	586.87	578.116	583.74	576.11	576.83				581	
SWMU 5 - West	TLL: 564.9										
Interior Piezometers	PZ-13	NRP-31									
	565.00	564.71								565	
Exterior Wells	MR-2S	MR-6S									10
	575.95	573.01								574	
SWMU 6	TLL: 566.9										
Interior Piezometers	PZ-3	PZ-15	DPW-16	NRP-25	NRP-26	NRP-27	NRP-28	RW-1			
	562.91	567.44	573.98	571.56	573.48	565.34	560.75	556.98		567	
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S						20
	589.04	585.80	584.92	588.68	585.80					587	
SWMU 7	TLL: 570.8										
Interior Piezometers	PZ-10	PZ-11	DPW-18	DPW-19	DPW-20	NRP-29	NRP-30	RW-2			
		574.74	570.28	569.70		565.26	565.92	570.18		569	
Exterior Wells	T-5S	T-8S	T-15S	T-43S							17
	588.03	585.80	588.35	584.39						587	

* PZ-21 is not functional due to a warped well and stuck pump. NRP-30 is scheduled for repair/redevelopment in early December. The elevations presented are from August 23, 2016. Elevations will be taken following repair/redevelopment.

3. On November 29 and 30, 2016 in accordance with the compliance plan of action, ESOI completed monthly elevation monitoring at the following wells which exceeded their respective TLLs in the prior month.
 - SWMU 5 Central: 557.1
 - PZ-5: 569.33
 - PZ-6: 559.12
 - PZ-7: 559.29
 - SWMU 6: 566.9
 - DPW-16: (well not usable - nearby replacement NRP-32 is operating)
 - NRP-25: 571.56
 - NRP-26: 573.48
 - SWMU 7: 570.8
 - PZ-10: (well not usable - nearby wells are operating)
 - PZ-11: 574.74
 - DPW-20: (well not usable - nearby wells are operating)
4. The following work was completed for the installation of a triple pneumatic pumping system at SWMU 6:
 - compressor building installed on SWMU 6 and partially insulated,
 - compressor and electrical and compressed air equipment installed in compressor building,
 - pneumatic pump system commissioned in RW-1, NRP-25, and NRP-32;
5. Unsuccessful attempts were made to set up a pneumatic pump at PZ-5, PZ-6, and PZ-7. The pump could not get past obstructions in the piezometers;
6. Throttle plugs were installed in throttle valves at RW-2, RW-11, DPW-18, NRP-24, and NRP-28;
7. The NRP-24 piping was reinsulated and wrapped with plastic;
8. An attempt was made to pull and reinstall the pump at DPW-21. It is stuck in the well and video of the well confirmed that the well screen has collapsed;
9. 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. In conjunction with this modification, MSG is evaluating the leachate extraction systems after 9 years of operation. The report will include an evaluation of how waste consolidation, decreased pore space, and depth of wells installed since TLLs were established impact measures of success and compliance of the leachate extraction systems. It will also provide an overall assessment of the number and location of leachate wells and monitoring locations;
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. OMPM Plan updates for the SWMU pumping wells that were put into service in 2015 will be submitted;
2. Evaluation/installation of a portable pneumatic pump at PZ-13;
3. Dosing with Simple Green® and evaluation/installation of a pneumatic pump at PZ-15;
4. Installation of throttle plugs in additional wells as needed;
5. Installation of supports for leachate force main piping at wells where needed;
6. Redevelopment of leachate extraction wells in accordance with a priority list that has been developed with the most silty wells being addressed first;
7. Winterization of the leachate extraction systems; and
8. 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: Lynn Ackerson, Ohio EPA NWDO
Stephen DeLussa, Envirosource Technologies, Inc.

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