

December 11, 2017

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  
      November 2017 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, 2017 and ending November 30, 2017.

**Corrective Measures Study ("CMS"):**

**Project Activities and Summary of Findings to Date:**

During this reporting period, CMS activities included the following:

1. Ohio EPA preparation for selection of remedies and initiation of a permit modification to incorporate them as well as the collaboratively drafted revisions for the groundwater monitoring program.

**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 selection of remedies and initiation of a permit modification to incorporate them as well as the collaboratively drafted revisions for the groundwater monitoring program.

**Corrective Measures Implementation ("CMI"):**

**Project Activities:**

During this reporting period, CMI activities included the following:

1. On November 30, 2017, a call was received from Ohio EPA outlining how recommendations from the 9-Year leachate system evaluation report will be incorporated into the upcoming director initiated permit modification for corrective measures.
2. On November 28, 2017 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: 568.83
- PZ-6: 560.74
- PZ-7: 558.70
- PZ-21: 560.58

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement NRP-32 is operating)
- NRP-25: 585.31
- NPR-26: 575.66

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 573.90
- DPW-20: (well not usable - nearby wells are operating)

3. Leachate system maintenance included:

- Inspection of piezometers and recovery wells on SWMU 5, 6, and 7;
  - Inventoried high and low settings as well as liquid level at each location with a control panel;
  - NRP-33 reading HiP – will clean pump and redevelop will;
  - Drained compressor on SWMU-5;
  - Repaired insulation on several wells;
- Evaluated NRP-25;
  - Very little discharge observed;
  - Dismantled globe valve – ice observed potentially due to no insulation around valve;
  - Cleaned globe valve and insulated valve;
  - Added insulation around exposed discharge tubing;
- Evaluated NPR-27;
  - Inspected piezometer with downhole camera;
  - Removed obstruction previously identified – approximately 20 feet of metal conduit was removed;
- Evaluated NRP-32;
  - Pump appeared to be operating as designed;
  - Repaired insulation around valves;
- Evaluated NRP-34;
  - Inspected piezometer with downhole camera;

- Removed obstruction previously identified – approximately 40 feet of 1-inch diameter PVC was removed;
  - Evaluated RW-1;
    - Dismantled, cleaned and reassembled globe valve;
    - Discharge partially frozen – lowered discharge line into well to prevent freezing;
  - Evaluated PZ-15
    - PZ-15 discharge appeared frozen;
    - Repaired discharge line at coupling and removed excess tubing;
4. On November 20, 2017, AOC 7 was sampled in preparation for disposal of accumulated leachate; and
5. 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:**

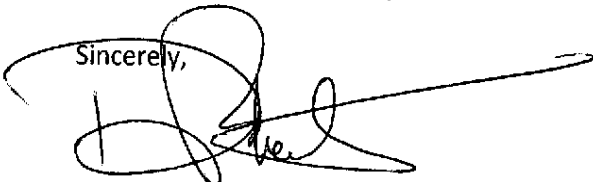
During the next reporting period it is anticipated that the following activities will occur:

1. Redevelopment of leachate extraction wells in accordance with a priority list that has been developed with the most silty wells being addressed first; NRP-25, 32, and 33 as time allows:
  - a. Redevelopment of SWMU-6 piezometers and recovery wells
2. Disposal of accumulated non-hazardous leachate in AOC 7; 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

ec: Lynn Ackerson, Ohio EPA NWDO  
Stephen DeLussa, Envirosource Technologies, Inc.

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