



876 Otter Creek Road
Oregon, Ohio 43616-3518
Phone: (419) 698-3500
Fax (419) 698-8663
Website: www.envirosafeservices.com

December 8, 2022

VIA ELECTRONIC MAIL

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 2022 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. ("ESO") hereby submits this progress report to the Ohio Environmental Protection Agency ("Ohio EPA") for the period beginning November 1, 2022 and ending November 30, 2022.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Submission of the SWMU 7 roadway evaluation in the area of boring S7-202 on November 21, 2022;
2. Collection of semi-annual leachate system elevation measurements on November 1, 2, and 4, 2022. An inward gradient continues to be maintained. Each unit average interior leachate levels was below the lowest exterior groundwater elevation. However, notice is hereby being provided that the following wells did not demonstrate the performance standard: maintenance of the leachate head level measurement below a gradient based TLL of 3.0 feet below the lowest groundwater elevation in the relevant shallow perimeter monitoring well(s).
NRP-26: 2.8 feet
NRP-35*: 2.0 feet

* This well is not compared to an IGWMP Well as there are none in close proximity. It is listed as a point of reference to corrective actions wells on the edge of waste directly between and adjacent to other landfill units.

In accordance with the OMPM Plan, the elevation in these wells will be monitored quarterly until the excursion has been eliminated. Drought conditions have impacted the typical shallow perimeter monitoring well groundwater elevations. The lower external levels therefore require the interior well pump set levels to also be lowered. That action is being taken as well as other response actions such as those listed in Section 6.5 of the OMPM Plan.

Leachate Level Status For Groundwater Monitoring											Average Interior & Lowest Exterior	Distance Below Lowest Exterior (ft)		
Avg. Deep Interior Piezometer Levels Compared with Relevant Lowest Shallow Perimeter IGMP Monitoring Wells														
SWMU 5 - Central														
Interior Piezometers	RW-3	RW-11	NRP-24	PZ-5	PZ-6	PZ-7	DPW-22	DPW-23						
	571.48	565.88	561.18	570.73	571.26	570.40	563.44	573.11					568.44	
Exterior Wells	F-1S	MR-1SA	MR-4S	MR-5S	MR-7S									6
	585.73	578.06	582.01	576.47	574.90								574.90	
SWMU 5 - West														
Interior Piezometers	PZ-13	NRP-31												
	569.89	567.44											568.67	
Exterior Wells	MR-2S	MR-6S	MR-7S											5
	575.44	573.19	574.90										573.19	
SWMU 6														
Interior Piezometers	RW-1	PZ-1	PZ-2	PZ-3	PZ-1S	NRP-25	NRP-26	NRP-27	NRP-28	NRP-32	NRP-33			
	574.24	576.76	576.08	576.17	579.10	575.61	577.96	567.36	576.58	579.73	578.94		576.23	
Exterior Wells	SW-1S	SW-2S	SW-3S	H-2SA										5
	582.02	580.79	582.92	591.44									580.79	
SWMU 7														
Interior Piezometers	RW-2	PZ-9	PZ-11	DPW-18	DPW-19	NRP-29	NRP-30	RW-34	NRP-35					
	581.42	580.98	582.70	577.08	580.10	577.52	574.41	581.41	582.48				579.79	
Exterior Wells	T-5S*	T-8S*	T-15S*											4
	587.15	587.17	588.39										587.15	

* These wells are not IGWMP Wells but there are none associated with SWMU 7 so they are listed here just for comparison. T-43S was completely removed because it is too impacted by the Waterline Trenches

3. Leachate system maintenance included:

- Inspection of piezometers and recovery wells on SWMUs 5, 6, and 7:
 - Recorded liquid level at each location with a control panel;
 - Verified functionality of all pumps without a control panel;
 - All pumps with a control panel were observed to be below their respective low points with the exception of: RW-11, DPW-18, 19, 22, NRP-24, 25, 26, 27, 28, 29, 30, 31, 33, 34, and 35;
- RW-1: Observed to have a foamy discharge;
- PZ-13: Observed to have no discharge – unclogged discharge line near pump and began pumping with significant discharge;
- PZ-15: Repaired severed discharge line;
- NRP-26: Lowered pumping interval;
- SWMU 5 Compressor: Drained moisture from controller; and
- SWMU 6 Compressor: Emptied buckets;

4. Solar Sipper – inspected and found to be operating as designed, evaluated; and

Mr. Michael Terpinski

December 8, 2022

Page 3

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:

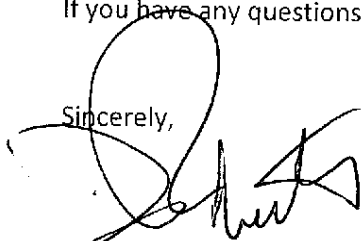
During the next reporting period it is anticipated that the following activities will occur:

1. Lower pumping interval on leachate system wells to address leachate levels relative to perimeter groundwater monitoring well elevations – drought conditions have lowered typical elevations;
2. Development of an O&M Plan for the newly installed SWMU 8 extraction wells and gas vents;
3. SWMU 9 Corrective Measures Completion of Work (CMCW) Report target first quarter 2023; and
4. 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: Gary Deutschman, Ohio EPA-NWDO, DERR
Stephen DeLussa, Envirosource Technologies, Inc.
Michael Momenee, The Mannik & Smith Group

Dawn Pleiman, Ohio EPA-NWDO, DERR
Mark Nielsen, Ramboll