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November 10, 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

October 2016 Progress Report

Dear Mr. Terpinksi:

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 October 1, 2016 and ending October 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:

Ohio EPA review of ESOI's responses.

# Corrective Measures Implementation ("CMI"):

## **Project Activities:**

During this reporting period, CMI activities included the following:

 On October 28 and 29, 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: 569.46
PZ-6: 558.77
PZ-7: 558.99
SWMU 6: 566.9

DPW-16: (well not usable - nearby replacement RW-32 is operating)

NRP-25: 574.40(reading is suspected to be erroneous as pumping has resumed)

NRP-26: 572.96
SWMU 7: 570.8

PZ-10: (well not usable - nearby wells are operating)

PZ-11: 573.49

DPW-20: (well not usable - nearby wells are operating)

- 2. On October 11, 2016, the construction completion report for the SWMU pumping wells that were put into service in 2015 was submitted to Ohio EPA;
- 3. The reclaimer pneumatic pump in RW-1 was reinstalled and connected to the leachate force main. The pump is being temporarily powered by a portable air compressor until the more permanent air compressor installation is completed;
- 4. Selection and purchasing of equipment for installation of a triple pneumatic pumping system at SWMU 6;
- 5. 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;
- 6. 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:

Mr. Michael Terpinski November 10, 2016 Page 3

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. The OMPM Plan updates for the SWMU pumping wells that were put into service in 2015 will be submitted.
- 2. The globe valves installed on leachate extraction wells to throttle the flow are not working properly; they do not stay where set. Alternatives will be evaluated;
- 3. A redevelopment priority list has been developed with the most silty wells being addressed first;
- 4. A complete pneumatic pumping system will be installed on SWMU 6 capable of servicing up to 3 wells. It will address wells that are difficult to pump due to NAPL. If it proves effective and warranted, similar systems will be installed on SWMUs 5 and 7;
- 5. Preparation for winterizing the leachate extraction systems; and
- 6. 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