

November 11, 2019

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
October 2019 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 October 1, 2019 and ending October 31, 2019.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. A contract for installation of the SWMU 8 sheet pile wall was finalized;
2. On September 25, 2019, MSG conducted a wetlands investigation for the area to be excavated north of SWMU 6. It was confirmed that the work area is outside of any wetland. The report was forwarded to US Army Corp of Engineers in October requesting a letter that the proposed excavation will not constitute a regulated activity under Section 404 of the Clean Water Act and as such, no Department of the Army Permit will be required prior to the commencement of this project.
3. Concrete foundation work was completed for the replacement of AOC 3 (Building C);
4. Leachate system maintenance included:
 - Inspection of piezometers and recovery wells on SWMUs 5 and 6:
 - Recorded liquid level at each location with a control panel;
 - Verified functionality of all pumps without a control panel;
 - RW-1: #2 solenoid valve was not functioning. Split #1 solenoid valve to include RW-1; #1 solenoid valve components were later observed to be separated; Valve was repaired with a zip tie;

- NRP-25: #3 solenoid was observed to stuck open. Split #1 solenoid to include RW-1, NRP-25 and NRP-32; Pump connection and valve train clogged with oily sediment; Cleaned and reinstalled;
- NRP-26: Transducer was observed to be reading 5.8. Transducer was pulled and cleaned; later observed to be above the Hipoint and not pumping; Replaced grundfos pump;
- NRP-32: #3 solenoid was observed to stuck open. Split #1 solenoid to include RW-1, NRP-25 and NRP-32; Pulled the pump and repaired airline connection; Pulled the pump again and drained the water from the airline;
- SWMU 5 Controller: Drained moisture; and
- SWMU 6 Compressor: Emptied buckets; Installed new solenoid valves (#2 and #3); Tightened connections at timers;

5. Semiannual performance elevation measurements for the leachate extraction system were completed. Each deep interior piezometer is below its gradient based Target Leachate Level (TLL) which is defined as an elevation 3.0 feet below the lowest groundwater elevation in the relevant shallow perimeter monitoring well(s);

					Highest / Lowest	Difference (out-in)	
<u>SWMU 5 - Central</u>							
Interior Piezometers	PZ-5	NRP-24				569.73	
	569.73	556.66					
Exterior Wells	F-1S	MR-4S	MR-7S				7
	585.64	582.90	576.59			576.59	
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Interior Piezometers	RW-3	PZ-6				564.36	
	564.36	563.84					
Exterior Wells	F-1S	MR-7S				12	
	585.64	576.59			576.59		
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Interior Piezometers	PZ-7	RW-11	PZ-22	PZ-23			
	565.40	565.26	564.94	571.09	571.09		
Exterior Wells	F-1S	MR-1SA	MR-5S				5
	585.64	578.24	576.50			576.50	
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<u>SWMU 5 - West</u>							
Interior Piezometers	PZ-13				565.69		
	565.69						
Exterior Wells	MR-2S	MR-6S				9	
	575.66	574.49			574.49		
<hr/>							
Interior Piezometers	NRP-31				565.34		
	565.34						
Exterior Wells	MR-6S	MR-7S				9	
	574.49	576.59			574.49		
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<u>SWMU 6</u>							
Interior Piezometers	NRP-25				578.51		
	578.51						
Exterior Wells	SW-1S					4	

								Highest / Lowest	Difference (out-in)
		582.42						582.42	
Interior Piezometers	NRP-26								
		577.76						577.76	
Exterior Wells	SW-2S								3
		580.77						580.77	
Interior Piezometers	RW-1	PZ-1	PZ-2	PZ-3	PZ-15	NRP-27	NRP-28		
		566.34	575.04	572.88	576.27	571.00	571.98	572.78	576.27
Exterior Wells	SW-3S								9
		585.47						585.47	
Interior Piezometers	NRP-32	NRP-33							
		580.53	578.94					580.53	
Exterior Wells	H-2SA	SW-3S	T-5S	T-8S					5
		586.48	585.47	588.26	588.68			585.47	
SWMU 7									
Interior Piezometers	NRP-29								
		577.07						577.07	
Exterior Wells	H-2SA	SW-3S	T-5S	T-8S					8
		586.48	585.47	588.26	588.68			585.47	
Interior Piezometers	PZ-9	NRP-30	RW-34						
		580.98	579.90	582.11				582.11	
Exterior Wells	T-8S								7
		588.68						588.68	
Interior Piezometers	RW-2	PZ-11	DPW-18						
		577.27	578.60	576.68				578.60	
Exterior Wells	T-5S	T-15S							10
		588.26	588.99					588.26	
Interior Piezometers	DPW-19	NRP-35							
		579.60	576.58					579.60	
Exterior Wells	T-15S	T-43S							5
		588.99	584.54					584.54	

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:

Mr. Michael Terpinski

November 11, 2019

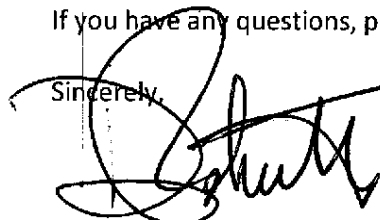
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1. Continued construction for replacement of AOC 3 (Building C);
2. Removal of leachate from SWMU 9;
3. Evaluation, cleaning, and / or repair high priority wells as appropriate;
4. Continued seeding of any areas of bare soil;
5. Continued redevelopment of leachate extraction wells in accordance with priority list, with the siltiest wells being addressed first as time and weather allows; 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

cc: Stephen DeLussa, Envirosource Technologies, Inc.
Mark Nielsen, Ramboll

Michael Momenee, The Mannik & Smith Group