



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

October 12, 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  
September 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 September 1, 2016 and ending September 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. As discussed in the previous report, NRP-31 was undergoing redevelopment during the quarterly evaluation in August and the elevation presented for that well was from July 29, 2016. Elevations for all SWMU 5 West wells were retaken in September. All interior piezometers and exterior wells were measured on September 14, 2016. The following is documentation that:
  - SWMU 5 West has achieved and is maintaining an inward gradient. The leachate level of SWMU’s interior piezometers have 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.
  - SWMU 5- West has achieved and is maintaining its Target Leachate Level (TLL).

			Average	Difference (out-in)
<b>SWMU 5 – West</b>	<b>TLL: 564.9</b>			
<b>Interior Piezometers</b>	<b>PZ-13</b>	<b>NRP-31</b>		
	564.29	564.60	564.4	
<b>Exterior Wells</b>	<b>MR-2S</b>	<b>MR-6S</b>		<b>9</b>
	575.46	571.10	573.8	

2. On September 27 and 28, 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: 569.47
- PZ-6: 559.27
- PZ-7: 559.40

SWMU 6: 566.9

- DPW-16: (well not usable - nearby replacement RW-32 is operating)
- NRP-25: 577.16 (reading is suspected to be erroneous as pumping has resumed)
- NRP-26: 572.84

SWMU 7: 570.8

- PZ-10: (well not usable - nearby wells are operating)
- PZ-11: 574.61
- DPW-20: (well not usable - nearby wells are operating)

3. The following maintenance items were conducted:
  - Pump cycle times were checked and several throttling valves were adjusted.
4. The reclaimer pump at RW-1 was tested.
5. Purchasing of equipment for installation of a triple pneumatic pumping system at SWMU 6;

6. 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;
7. On September 15, 2016, Ohio EPA provided ESOI with a report review of the Evaluations and Recommendations for SWMU 5 West and SWMU 6 Leachate extraction systems. ESOI will address these issues in the upcoming 9-Year report and OMPM Plan updates.
8. 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. 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;
2. The OMPM Plan updates for the SWMU pumping wells that were put into service in 2015 will be submitted.
3. The globe valves installed on leachate extraction wells to throttle the flow are not working properly; they do not stay where set. These valves will be removed or replaced and alternate throttling techniques will be tested;
4. A redevelopment priority list has been developed with the most silty wells being addressed first;
5. 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;
6. Preparation for winterizing the leachate extraction systems; and
7. 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

Mr. Michael Terpinski

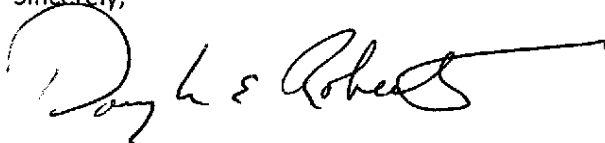
October 12, 2016

Page 4

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,

A handwritten signature in black ink, appearing to read "Douglas E. Roberts". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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