

October 10, 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
 September 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 September 1, 2017 and ending September 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. Quarterly inspections, leachate elevation readings, and flow testing of the leachate extraction system;
2. All interior piezometers and exterior wells were measured on the following dates: SWMUs 5, 6, and 7 September 29, 2017. The following is documentation that:
 - SWMUs 5, 6, and 7 are maintaining an inward gradient. The leachate level at each SWMU’s interior piezometers has 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.
 - SWMUs 5 and 7 are maintaining Target Leachate Levels (TLL).
 - SWMU 6 did not maintain its average Target Leachate Levels (TLL). The level increased by 6 inches since last quarter. In accordance with the OMPM Plan, ESOI completed and submitted an evaluation and will prepare a quarterly report by November 15, 2017. All necessary measures are currently being taken to return the levels below the TLL. Ohio EPA are working toward revisions to the program.

										Average	Difference (out-in)	
SWMU 5 - Central	TLL: 557.1											
Interior Piezometers	PZ-5	PZ-6	PZ-7	PZ-21	PZ-22	PZ-23	NRP-24	RW-3	RW-11			
	569.03	561.94	558.30	560.48	548.64	544.59	555.36	554.96	554.36	556		
Exterior Wells	F-15	G-15	MR-15A	MR-45	MR-55	MR-75					24	
	584.032	585.65	578.172	582.16	575.43	576.54				580		
SWMU 5 - West	TLL: 564.9											
Interior Piezometers	PZ-13	NRP-31										
	563.49	564.44								564		
Exterior Wells	MR-25	MR-65									10	
	575.58	573.33								574		
<hr/>												
SWMU 6	TLL: 566.9											
Interior Piezometers	PZ-3	PZ-15	DPW-16	NRP-25	NRP-26	NRP-27	NRP-28	RW-1				
	563.07	565.90		585.21	574.72	561.039	560.08	566.04		568		
Exterior Wells	H-25	SW-15	SW-25	SW-35	T-85						17	
	587.84	584.16	585.12	586.63	586.66					586		
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SWMU 7	TLL: 570.8											
Interior Piezometers	PZ-10	PZ-11	DPW-18	DPW-19	DPW-20	NRP-29	NRP-30	RW-2				
		574.50	570.48	570.20		568.75	570.80	569.57		571		
Exterior Wells	T-55	T-85	T-155	T-435							16	
	588.14	586.66	588.27	584.51						587		

3. On September 19, 2017, a conference call was held with Ohio EPA to discuss comments on the 9-Year leachate system evaluation and recommendations. A follow-up will be held next month.
4. On September 29, 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: 569.03
 - PZ-6: 561.94
 - PZ-7: 558.30
 - PZ-21: 560.48
 - SWMU 5 West: 564.9
 - PZ-13: 563.49 (reading is below TLL and will resume quarterly monitoring)
 - SWMU 6: 566.9
 - DPW-16: (well not usable - nearby replacement NRP-32 is operating)
 - NRP-25: 585.21
 - NRP-26: 574.72
 - SWMU 7: 570.8
 - PZ-10: (well not usable - nearby wells are operating)
 - PZ-11: 574.50
 - DPW-20: (well not usable - nearby wells are operating)
5. Leachate system maintenance included:
 - Evaluated RW-1 – pneumatic pump was not operating at optimal conditions.
 - Pulled and cleaned pneumatic pump;
 - Checked discharge for obstructions; and
 - Troubleshoot and adjusted control regulator within the compressor shed;
 - Evaluated piezometers and recovery wells on SWMU 5, 6, and 7;
 - Repaired airline and discharge for PZ-15;
 - Inventoried high and low settings as well as liquid level at each location with a control panel; and
 - Drained compressor on SWMU-5.
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:

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. Conference call with Ohio EPA to follow-up on discussing comments on the 9-Year leachate system evaluation and recommendations;

Mr. Michael Terpinski

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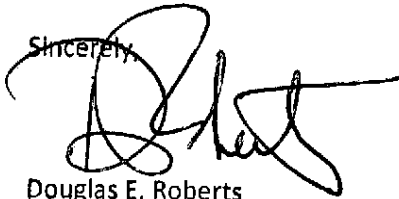
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2. Redevelopment of leachate extraction wells in accordance with a priority list that has been **developed** with the most silty wells being addressed first; NRP-25, 32, and 33 as time allows:
 - a. Evaluate NRP-25, NRP-32 and NRP-33 – pumps are not operating at optimal conditions;
 - b. Redevelopment of SWMU-6 piezometers and recovery wells;
3. Attempt to remove an obstruction in the NRP-27 and 34 piezometer risers;
4. Change out pneumatic pumps on RW-1, NRP-25, and 32;
5. Repair broken riser of PZ-15, installation of conduit for pneumatic pump discharge and airlines; 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