

March 9, 2011

Ms. Lynn Ackerson  
Ohio EPA, NWDO  
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  
February 2011 Progress Report**

Dear Ms. Ackerson:

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 February 1, 2011 and ending February 28, 2011.

**Corrective Measures Study ("CMS"):**

**Project Activities and Summary of Findings to Date:**

During this reporting period, CMS activities included the following:

1. Preparation of Public Notice regarding addition of Corrective Action information to ESOI website.

**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. Meeting with Ohio EPA regarding CMS Report Draft comments.

**Corrective Measures Implementation (“CMI”):**

**Project Activities:**

During this reporting period, CMI activities included the following:

1. The following is documentation that SWMUs 5, 6, and 7 are in compliance with 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 Table 1.0 of the OMPM Plan. All interior piezometers and exterior wells were measured on February 10, 2011.

								Avg	Diff. (out-in)
<b>SWMU 5 - Central</b>	<b>TLL: 557.1</b>								
<b>Interior</b>	<b>PZ-5</b>	<b>PZ-6</b>	<b>PZ-7</b>	<b>PZ-21</b>	<b>PZ-22</b>	<b>PZ-23</b>			
	581.61	572.96	571.14	576.77	574.51	576	575		
<b>Exterior Wells</b>	<b>F-1S</b>	<b>G-1S</b>	<b>MR-1SA</b>	<b>MR-4S</b>	<b>MR-5S</b>	<b>MR-7S</b>		<b>6</b>	
	582.41	586.47	582.77	580.37	578.6	576.94	581		
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<b>SWMU 5 - West</b>	<b>TLL: 564.9</b>								
<b>Interior</b>	<b>PZ-13</b>								
	565.34							565	
<b>Exterior Wells</b>	<b>MR-2S</b>	<b>MR-6S</b>						<b>14</b>	
	580.23	578.87					580		
<hr/>									
<b>SWMU 6</b>	<b>TLL: 566.9</b>								
<b>Interior</b>	<b>PZ-1</b>	<b>PZ-2</b>	<b>PZ-3</b>	<b>PZ-4</b>	<b>PZ-14</b>	<b>PZ-15</b>	<b>PZ-16</b>		
	583.56	586.13	577.84	586.31	580.75	578.44	581.49	582	
<b>Exterior Wells</b>	<b>H-2S</b>	<b>SW-1S</b>	<b>SW-2S</b>	<b>SW-3S</b>	<b>T-8S</b>			<b>5</b>	
	587.6	585.21	585.86	589.15	587.78			587	
<hr/>									
<b>SWMU 7</b>	<b>TLL: 570.8</b>								
<b>Interior</b>	<b>PZ-9</b>	<b>PZ-10</b>	<b>PZ-11</b>	<b>PZ-18</b>	<b>PZ-19</b>	<b>PZ-20</b>			
	592.07	579.3	564.41	588.46	585.49	586.1	583		
<b>Exterior Wells</b>	<b>T-5S</b>	<b>T-8S</b>	<b>T-15S</b>	<b>T-43S</b>				<b>5</b>	
	590.14	587.78	589.49	581.34			587		

2. ESOI was unable to remove the pump equipment from RW-6 and RW-7 to convert the wells to piezometers and leachate was found in the wells. The level measuring equipment cannot easily pass by the pump equipment leaving ESOI with little confidence of any measurements taken. ESOI intends on reenergizing the pump equipment to find out if it can be used. If so, the wells will be pumped and the dry status will be reassessed;

3. An update of the Explosive Gas Monitoring Plan to include the newly installed passive vent on SWMU 6 was submitted to DSIWM on January 27, 2011; and
4. 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:**

See the November 2010 progress report for issues previously reported regarding recovery well RW-4. There is nothing new to report in association with this topic for this reporting period.

**Projected Work:**

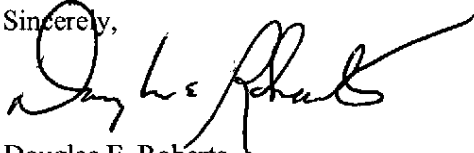
During the next reporting period it is anticipated that the following activities will occur:

1. ESOI will reenergize the pump equipment in RW-6 and RW-7 to determine if pumpable leachate is present in the well and reassess the dry status of the wells;
2. ESOI will evaluate the need for additional actions at SWMU 6 in order to achieve the TLL by the compliance date;
3. ESOI will meet with Ohio EPA to review options for addressing the continued contingency monitoring in accordance with the Explosive Gas Monitoring Plan at MP-13, PB-3 and PB-4
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

cc: Stephen DeLussa, Envirosource Technologies, Inc.  
Ken Humphrey, ESOI  
Michael Terpinski, Ohio EPA, NWDO, DHWM  
Edwin Lim, Ohio EPA, Columbus

Ms. Lynn Ackerson

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Darla Peelle, Ohio EPA, Columbus, PIC

Hak Cho, USEPA Region 5

Michael Momenee, The Mannik & Smith Group

Mark Nielsen, ENVIRON International Corp.