



876 Otter Creek Road  
Oregon, Ohio 43616-3518  
Phone: (419) 698-3500 or (800) 537-0426  
Fax: (419) 698-8663  
Website: www.envirosafeservices.com

February 6, 2012

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  
      January 2012 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 January 1, 2012 and ending January 31, 2012.

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

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

During this reporting period, CMS activities included the following:

1. Submission of specifications for the proposed revisions to 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. Conference call with Ohio EPA to discuss finalization of the CMS Report.

2.

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

**Project Activities:**

During this reporting period, CMI activities included the following:

- 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 the following dates: SWMU 5 – January 10, 2012, SWMU 6 – January 11, 2012, and SWMU 7 – January 11, 2012 (with the exception of PZ-18, PZ-19, and PZ-20 [1/12]). Please note that this month’s reading of PZ-10 appears to be an anomaly. It was re-measured on 2/3/12 with a result of 573.33 which is in line with other more recent readings. Also, DPW-16 was not operational due to an electrical failure. Repairs have been made.

							Average	Difference (out-in)
<b>SWMU 5 - Central</b>	<b>TLL: 557.1</b>							
<b>Interior Piezometers</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>		
	577.58	571.74	571.05	573.85	572.39	575.18	574	
<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>8</b>
	584.88	587.13	582.49	582.77	578.18	577.06	582	
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<b>SWMU 5 - West</b>	<b>TLL: 564.9</b>							
<b>Interior Piezometers</b>	<b>PZ-13</b>							
	572.55						573	
<b>Exterior Wells</b>	<b>MR-2S</b>	<b>MR-6S</b>						<b>4</b>
	577.34	576.38					577	
<hr/>								
<b>SWMU 6</b>	<b>TLL: 566.9</b>							
<b>Interior Piezometers</b>	<b>PZ-1</b>	<b>PZ-2</b>	<b>PZ-3</b>	<b>PZ-15</b>	<b>PZ-16</b>			
	582.48	585.44	565.25	568.14	584.40		577	
<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>11</b>
	589.85	586.34	586.25	587.58	591.64		588	
<hr/>								
<b>SWMU 7</b>	<b>TLL: 570.8</b>							
<b>Interior Piezometers</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>		
	591.38	599.62	564.70	576.89	570.29	576.08	580	
<b>Exterior Wells</b>	<b>T-5S</b>	<b>T-8S</b>	<b>T-15S</b>	<b>T-43S</b>				<b>9</b>
	589.75	591.64	588.66	584.74			589	
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<b>Deep Wells 10/03/11</b>	<b>G-10A: 573</b>		<b>MR-03D: 568</b>		<b>SW-02D: 572</b>			

2. Continued work of the completion report and revised OMPM Plan for the newly installed and converted recovery wells and piezometers; and
3. 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. Completion of final survey for the newly installed wells.
2. Submission of the completion report and continued work on the revised OMPM Plan for the newly installed and converted recovery wells and piezometers;
3. 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, DERR  
Edwin Lim, Ohio EPA, Columbus, DERR  
Darla Peelle, Ohio EPA, Columbus, PIC  
Hak Cho, USEPA Region 5  
Michael Momenee, The Mannik & Smith Group  
Mark Nielsen, ENVIRON International Corp.