

April 11, 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
 March 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 March 1, 2011 and ending March 31, 2011.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. Review of preliminary comments on the CMS Report with Ohio EPA on March 2, 2011; and
2. Forwarding of the CMS Report to the City of Toledo to inform them of the proposed corrective measures along the waterline easement trenches and request to coordinate any activities they may have planned.

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 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 March 16, 2011.

							Average	Difference (out-in)
SWMU 5 - Central		TLL: 557.1						
Interior Piezometers	PZ-5	PZ-6	PZ-7	PZ-21	PZ-22	PZ-23	575	
	582.9	572.23	570.39	574.97	574.19	576.03		
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S	582	7
	585.9	587.25	582.77	584.18	578.08	576.52		
SWMU 5 - West		TLL: 564.9						
Interior Piezometers	PZ-13						567	
	567.44							
Exterior Wells	MR-2S	MR-6S					576	8
	576.94	574.32						
SWMU 6		TLL: 566.9						
Interior Piezometers	PZ-1	PZ-2	PZ-3	PZ-15	PZ-16		582	
	583.86	586.2	578.3	579	582.13			
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S		588	6
	590.15	586.71	586.47	589.14	588.81			
SWMU 7		TLL: 570.8						
Interior Piezometers	PZ-9	PZ-10	PZ-11	PZ-18	PZ-19	PZ-20	583	
	591.02	585.41	564.4	588.48	585.62	585.1		
Exterior Wells	T-5S	T-8S	T-15S	T-43S			588	5
	590.43	588.81	587.95	584.4				

2. Revisions to the OMPM Plan and a completion report were completed for the 2010 leachate system expansion project. A permit modification will be submitted to update the changes.
3. ESOI reenergized RW-6 and RW-7. RW-6 did not produce any water. RW-7 is pumping and will continue to be operated as a recovery well until it goes dry again;

4. ESOI evaluated the need for additional actions at SWMUs 5, 6 and 7 in order to achieve the TLL by the compliance dates. A proposal for additional wells has been developed and will be presented to Ohio EPA. It is also noted that ESOI believes it has observed a trend where leachate migration to the recovery wells is significantly hampered by frozen water in the winter months. As of the date of this report, ESOI is observing significantly higher removal volumes than the last few months and believes it may be attributed to the spring thaw. If this is true, leachate removal to the Target Leachate Levels could take a longer period of time than originally estimated which assumed leachate was free flowing through the entire year;
5. ESOI met with Ohio EPA on March 3, 2011 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. It was agreed upon that 2 new vents will be installed at SWMU 5 near MP-13. After the vents are installed, monitoring will continue for the next semiannual report period. If no changes are observed ESOI will submit a request to change the contingency monitoring requirements. ESOI will also continue to monitor PB-3 and PB-4 until the leachate levels are further reduced to the July 2012 target threshold leachate levels. In addition, ESOI will add the leachate extraction wells and piezometers on the gas vent location figures for future submissions as they also act to vent trapped gas from the landfills as the leachate is extracted; and
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:

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:

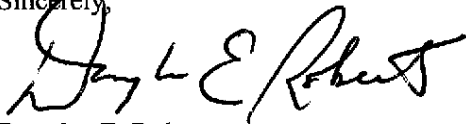
1. ESOI will present Ohio EPA with the plans for additional actions at SWMUs 5, 6 and 7 to achieve the TLLs by the compliance dates;
2. ESOI will contract with a driller to install the additional leachate extraction wells outlined in the expansion plan and the explosive gas vents on SWMU 5;
3. The SWMU 1 access roadway will be repaired when the area has dried out; and
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.

Ms. Lynn Ackerson
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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 the first name "Douglas" being the most prominent.

Douglas E. Roberts
President

cc: Stephen DeLussa, Envirosource Technologies, Inc.
Ken Humphrey, ESOI
Michael Terpinski, Ohio EPA, NWDO, DHWM
Edwin Lim, Ohio EPA, Columbus
Darla Peelle, Ohio EPA, Columbus, PIC
Hak Cho, USEPA Region 5
Michael Momenee, The Mannik & Smith Group
Mark Nielsen, ENVIRON International Corp.