

November 10, 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
 October 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 October 1, 2011 and ending October 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 and preparation of responses to the CMS Report NOD comments.

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 to discuss responses to the CMS Report NOD comments; and
2. Submission of response to the CMS Report NOD comments to Ohio EPA.

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 – October 29, 2011, SWMU 6 – October 30, 2011 (with the exception of PZ-16*), and SWMU 7 – October 31, 2011(with the exception of PZ-10, 18, 19, and 20*). Please note that recovery rates were evaluated for the new recovery/piezometer wells that were installed. However, recovery rates on the converted dual purpose wells have not yet been completed. Measurements of these wells were taken based on the longest recovery periods established for the new wells.

*ESOI encountered some difficulty inserting level measuring probes into some of the wells due to insulation and/or obstructions from pump equipment. Work is ongoing to resolve the issues and measurements were able to be obtained as of the writing of this report.

| | | | | | | | Average | Difference (out-in) |
|-----------------------------|-------------------|--------------|---------------|--------------|--------------|--------------|---------|------------------------|
| SWMU 5 - Central | TLL: 557.1 | | | | | | | |
| Interior Piezometers | PZ-5 | PZ-6 | PZ-7 | PZ-21 | PZ-22 | PZ-23 | 574 | |
| | 581.85 | 571.03 | 570.00 | 573.89 | 572.53 | 575.77 | | |
| Exterior Wells | F-1S | G-1S | MR-1SA | MR-4S | MR-5S | MR-7S | 582 | 8 |
| | 585.17 | 587.97 | 582.58 | 583.02 | 577.52 | 576.98 | | |
| <hr/> | | | | | | | | |
| SWMU 5 - West | TLL: 564.9 | | | | | | | |
| Interior Piezometers | PZ-13 | | | | | | 569 | |
| | 568.64 | | | | | | | |
| Exterior Wells | MR-2S | MR-6S | | | | | 576 | 7 |
| | 576.99 | 574.08 | | | | | | |
| <hr/> | | | | | | | | |
| SWMU 6 | TLL: 566.9 | | | | | | | |
| Interior Piezometers | PZ-1 | PZ-2 | PZ-3 | PZ-15 | PZ-16 | | 577 | |
| | 582.88 | 585.43 | 571.63 | 569.16 | 578.04 | | | |
| Exterior Wells | H-2S | SW-1S | SW-2S | SW-3S | T-8S | | 584 | 7 |
| | 589.98 | 586.38 | 585.01 | 569.16 | 590.88 | | | |
| <hr/> | | | | | | | | |
| SWMU 7 | TLL: 570.8 | | | | | | | |
| Interior Piezometers | PZ-9 | PZ-10 | PZ-11 | PZ-18 | PZ-19 | PZ-20 | 575 | |
| | 590.70 | 577.02 | 564.73 | 573.47 | 569.56 | 574.63 | | |
| Exterior Wells | T-5S | T-8S | T-15S | T-43S | | | 589 | 14 |
| | 590.12 | 590.88 | 589.12 | 584.93 | | | | |

Deep Wells 10/03/11

G-10A: 573

MR-03D: 568

SW-02D: 572

2. Activation of all new and converted leachate recovery wells/piezometers on SWMUs 5, 6, and 7;
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:

See the November 2010 progress report for issues previously reported regarding recovery well RW-4. A dual purposed recovery / piezometer replacement well (NRP-31) was installed on October 26-27, 2011. It will become operational in November 2011.

Projected Work:

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

1. ESOI will initiate the completion report for the newly installed and converted recovery wells and piezometers; revise the OMPM Plan to include them;
2. ESOI will activate the RW-4 replacement well on SWMU 5 (NRP-31)
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
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Mark Nielsen, ENVIRON International Corp.