



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

October 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
September 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 September 1, 2011 and ending September 30, 2011.

Corrective Measures Study ("CMS"):

Project Activities and Summary of Findings to Date:

During this reporting period, CMS activities included the following:

1. Ohio EPA issued a second CMS Report NOD dated September 16, 2011.

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. Review and preparation of responses to the CMS Report NOD comments.

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 – September 15, 2011, SWMU 6 – September 13, 2011, and SWMU 7 – September 14, 2011. Please note that several of the new wells and pumps were being installed during this time period. Some of the piezometer readings from the dual purpose wells in SWMUs 6 and 7 may not be reflective of fully recovered conditions. In October, all dual purpose wells will have the pumps turned off and leachate levels will be recorded at multiple time intervals to document that leachate levels have fully recovered. The documented times will then be used in taking future readings.

							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	
	582.71	570.32	569.95	573.79	572.59	578.03		
Exterior Wells	F-1S	G-1S	MR-1SA	MR-4S	MR-5S	MR-7S	581	6
	584.11	585.88	579.22	583.68	576.57	576.69		
<hr/>								
SWMU 5 - West	TLL: 564.9							
Interior Piezometers	PZ-13							
	567.51						568	
Exterior Wells	MR-2S	MR-6S						7
	576.31	573.64					575	
<hr/>								
SWMU 6	TLL: 566.9							
Interior Piezometers	PZ-1	PZ-2	PZ-3	PZ-15	PZ-16			
	583.14	585.09	572.53	573.03	556.72		574	
Exterior Wells	H-2S	SW-1S	SW-2S	SW-3S	T-8S			14
	589.24	585.53	585.81	587.32	590.96		588	
<hr/>								
SWMU 7	TLL: 570.8							
Interior Piezometers	PZ-9	PZ-10	PZ-11	PZ-18	PZ-19	PZ-20		
	589.88	584.84	564.58	566.97	544.19	569.19	570	
Exterior Wells	T-5S	T-8S	T-15S	T-43S				19
	590.37	590.96	590.23	584.9			589	
<hr/>								
Deep Wells 04/01/11	G-10A: 574		MR-03D: 569		SW-02D: 572			

2. Installation of nested leachate recovery wells/piezometers on SWMUs 6 and 7 and trenching work for piping and electric to all new wells and piezometers that will be converted to dual purpose use;
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. 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 continue to implement the enhancement plan to install the additional leachate extraction wells;
2. 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.