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April 10, 2024

VIA ELECTRONIC MAIL

Mr. Michael Terpinski
Ohio EPA, NWDO, DERR
347 North Dunbridge Road
Bowling Green, OH 43402

**Re: Envirosafe Services of Ohio, Inc.
 EPA Identification Number: OHD 045 243 706
 March 2024 Progress Report**

Dear Mr. Terpinski:

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, 2024 and ending March 31, 2024.

Corrective Measures Implementation ("CMI"):

Project Activities:

During this reporting period, CMI activities included the following:

1. Submission of the annual reporting information required by the OMPM Plan for leachate collection systems at SWMUs 5, 6, and 7 with the Annual Report of Groundwater Quality on March 1, 2024;
2. Collection of semi-annual leachate system elevation measurements on March 12, 2024. An inward gradient continues to be maintained. Each unit average interior leachate levels was below the lowest exterior groundwater elevation. However, notice is hereby being provided that the following well did not demonstrate the performance standard: maintenance of the leachate head level measurement below a gradient based TLL of 3.0 feet below the lowest groundwater elevation in the relevant shallow perimeter monitoring well(s).
NRP-25: 2.4 feet below the lowest groundwater elevation

As in previous years, reactivation of all pumps is expected to quickly lower the leachate elevation and achieve the TLL. In accordance with the OMPM Plan, the elevation in this well will be monitored quarterly until the excursion has been eliminated. Response actions such as those listed in Section 6.5 are being taken.

Leachate Level Status For Groundwater Monitoring Avg. Deep Interior Piezometer Levels Compared with Relevant Lowest Shallow Perimeter IGMP Monitoring Wells											Average Interior & Lowest Exterior	Distance Below Lowest Exterior (ft)
SWMU 5 - Central												
Interior Piezometers	RW-3	RW-11	NRP-24	PZ-5	PZ-6	PZ-7	DPW-22	DPW-23				
	567.06	568.36	560.46	571.23	571.94	567.60	562.44	563.59				566.59
Exterior Wells	F-1S	MR-1SA	MR-4S	MR-5S	MR-7S							11
	585.03	584.60	585.19	578.07	577.95							577.95
SWMU 5 - West												
Interior Piezometers	PZ-13	NRP-31										
	570.79	569.34										570.07
Exterior Wells	MR-2S	MR-6S	MR-7S									4
	577.72	574.39	577.95									574.39
SWMU 6												
Interior Piezometers	RW-1	PZ-1	PZ-2	PZ-3	PZ-15	NRP-25	NRP-26	NRP-27	NRP-28	NRP-32	NRP-33	
	573.44	577.14	582.98	578.47	579.10	585.01	584.26	572.28	579.28	580.73	579.64	579.30
Exterior Wells	SW-1S	SW-2S	SW-3S	H-2SA								8
	588.39	587.44	589.19	591.94								587.44
SWMU 7												
Interior Piezometers	RW-2	PZ-9	PZ-11	DPW-18	DPW-19	NRP-29	NRP-30	RW-34	NRP-35			
	578.27	580.98	582.40	576.18	580.30	573.77	564.80	576.81	582.68			577.35
Exterior Wells	T-5S	T-8S	T-15S									10
	590.19	590.85	590.73									590.19

* These wells are not IGWMP Wells but there are none associated with SWMU 7 so they are listed here just for comparison. T-43S was completely removed because it is too impacted by the Waterline Trenches

3. Resumption of operation and maintenance of the leachate extraction systems on SWMUs 5, 6, and 7 on March 13, 2024, as anticipated temperatures were expected to be routinely above 32 degrees Fahrenheit and wells accessible for maintenance;
4. Leachate system maintenance included:
 - Inspection of piezometers and recovery wells on SWMUs 5, 6, and 7:
 - Recorded liquid level at each location with a control panel;
 - Verified functionality of all pumps without a control panel;
 - PZ-13: Not pumping – replaced solenoid valve but solenoid valve not working correctly – will evaluate in April;
 - PZ-15: Repaired discharge line – slight discharge observed;

- NPR-29: Observed above high point – Pump determined to be faulty – will change when replacement pump is available. Transducer reading high in open air – will replace after new pump, if needed. Removed water from inside control panel;
 - NRP-31: Replaced pump – removed damaged section of discharge line, and verified pumping within interval;
 - SWMU 5: Main circuit breaker tripped – allowed moisture inside panel to dry and reset breaker;
 - SWMU 6: Force main break repaired – wells started up after repair and winter shut down;
 - SWMU 5 Compressor: Waiting on ordered part for controller;
 - SWMU 6 Compressor: Emptied buckets, compressor attic fan was observed to be functioning as designed; and
5. Solar Sipper – On March 6, 2024, the socks in the wells were replaced. On March 26, 2024, a peristaltic pump was used to remove the very little remaining NAPL. All that remains is a sheen. The Solar Sipper pumps have been removed and the wells will be operated with socks for a few months to assess progress – Solar Sipper may no longer be useful as levels are not changing – if the test is successful, only sock will be needed on an ongoing basis – progress will be reported monthly and any final decision not to reengage the Solar Sipper will be based on remaining level of NAPL in wells – absorbent socks will remain in place.

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. Further evaluate and repair PZ-13 controller;
2. Replace NRP-29 pump and possibly transducer;
3. Assess ongoing need for Solar Sipper vs absorbent socks at SWMU 5 NAPL wells; 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.

Mr. Michael Terpinski

April 10, 2024

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If you have any questions, please do not hesitate to contact me at (224) 723-8215.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen J. DeLussa", with a long horizontal flourish extending to the right.

Stephen J. DeLussa

Corporate Director – TSDf Compliance

ec: Kristofer Mann, ESOI
Gary Deutschman, Ohio EPA-NWDO, DERR
Mark Nielsen, BBJ Group

Dawn Pleiman, Ohio EPA-NWDO, DERR
Michael Momenee, The Mannik & Smith Group