

INSPECTION REPORT

Contains Confidential Business Information

Inspection Entry Date/Time	12/02/2022 08:20 AM (ET)	Announced: Yes
Inspection Exit Date/Time	12/02/2022 10:57 AM (ET)	Access: Granted
Weather	Day 1 – Cloudy and 48°F	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES)	
Type of Inspection	CAFO - Concentrated Animal Feeding Operation Inspection	
Permittee Information		
Permittee Name	Trillium Farm Holdings LLC, Layer Site 1	
Facility or Site Name	Trillium Farm Holdings LLC, Layer Site 1	
Facility/Site Physical Address	11995 Croton Road	
City, State, Zip Code	Croton, OH	
County/Borough/Parish	Licking County	
Facility GPS Coordinates	40.214559, -82.685305	
Mailing Address (If different)	10513 Croton Road	
City, State, Zip Code	Croton, Ohio 43013	
Facility Information		
FRS ID	Layer1	
Permit Number(s) (If Applicable)	OH0131121	
SIC and/or NAICS	5144	

Regulatory Representatives Participating in Inspection:

Title	Name	Organization
Inspector	Megan Zale	EPA Region 5

Lead Inspector:

Andi Hodaj	ANDI HODAJ <small>Digitally signed by ANDI HODAJ Date: 2023.02.03 16:32:23 -06'00'</small>		
	EPA Region 5	hodaj.andi@epa.gov	(312) 353-4645

Supervisor Review:

Molly Smith	MOLLY SMITH <small>Digitally signed by MOLLY SMITH Date: 2023.02.06 09:27:01 -06'00'</small>		
	EPA Region 5	Smith.Molly@epa.gov	

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

EPA Region 5 Lead Inspector, Andi Hodaj, arrived at the Trillium Farm Holdings Layer Site 1 (the “Site” or “Facility”), located at 11995 Croton Road, Croton, OH, at 08:20 AM (ET) on 12/02/2022 for an announced inspection. EPA Region 5 Lead Inspector presented credentials to Kayla Ferrendelli and Marcus Beer and informed them that this was an EPA Region 5 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Trillium Farm Holdings Layer Site 1 representatives, direct observations made by the EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspectors, physical evidence collected by the EPA Region 5 inspectors, measurements taken by EPA Region 5 inspectors, verbal or written statements made by information supplied by Trillium Farm Holdings Layer Site 1 representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Trillium Farm Holdings Layer Site 1 representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 5	Andi Hodaj	Lead Inspector	Yes	Yes
EPA Region 5	Megan Zale	Inspector	Yes	Yes
Trillium Farm Holdings LLC	Kayla Ferrendelli	Farm Compliance Manager	Yes	Yes
Trillium Farm Holdings LLC	Marcus Beer	General Manager (Layer Sites)	Yes	Yes

Facility/Site Description

EPA Region 5 lead inspector confirmed the following facility information:

Facility representatives made a Confidential Business Information (CBI) claim on all information that was provided to EPA during the inspection.

The Facility houses layer chickens in 14 Belt Battery style barns, and washes and packages eggs produced by the chickens. At the time of the inspection, the site was currently housing 2.087 million layer chickens and had a maximum capacity of 2.4 million layer chickens. Each barn is split into two levels with four rows of cages on the upper level and three rows on the lower level. There are 45 full-time employees on-site. The Facility operates seven days per week and it has one night shift.

According to the Facility representatives, the Facility has two Manure Storage Barns (MSB) with a storage capacity of 629,000 cubic feet each. Manure is conveyed from each belt battery barn to the two MSB via a conveyor belt, where it is stored in two piles. The manure piles in the MSB are inspected weekly for height and temperature. Manure is removed from the MSB twice per year on average and hauled for land application by a third party, pursuant to a Manure Management Plan (MMP). The last time manure was hauled from the manure barns was November 10, 2022, and amount hauled was approximately 990 tons of manure. The Facility generates approximately 26,000 tons of manure per year.

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The Facility also has an egg-wash and an egg-packaging operation. Eggs go through sprayers and the egg-wash water is discharged every five hours via floor drains into a two-celled lagoon. From there water is hauled via a center-pivot for land application on a field next to the Facility. According to Facility representatives, a contractor is also used when there is more egg-wash water than they can apply on the field next to the Facility. The Facility draws approximately 10,000 gallons of water from a well on-site for the egg-wash operation. No other equipment washing takes place on site, according to Facility representatives.

The Facility operates under NPDES Permit No. OH0131121 (NPDES permit) with expiration date of August 31, 2023. The NPDES permit allows discharges from a stormwater pond that drains an area of 40.23 acres, with a storage capacity of 3.5 million gallons. The stormwater pond discharges to an Enhanced Treatment System (ETS) for further treatment of the wastewater before discharging through outfall 001, into an unnamed tributary of Otter Fork. The Facility’s September 2018 – December 2022 certified DMRs to the Ohio Environmental Protection Agency (Ohio EPA) showed 18 instances of effluent limit exceedances for Total Phosphorus (TP), Ammonia-Nitrogen (NH3) and Total Suspended Solids (TSS). All, except one, the effluent limit exceedances start in June 2021 and continued through November 2022. The headwaters (or tributaries) of the Otter Fork are listed in EPA’s CWA Section 303(d) List as impaired due to E.coli, nitrogen, phosphorus, and sediments. The Facility operates wells that provide drinking water for the chickens. Water from the wells is treated prior to being fed to the chickens. Bathroom water and water from the biosecurity showers goes to a septic tank and from there to the stormwater pond.

Facility/Site Information

Do you have any additional biosecurity concerns or issues at this site	No
How many and types of animals are confined	2.087 million Layer chickens
Do you have a permit and/or a Nutrient Management Plan (NMP)	Yes, both
Who can tour the site with us in a facility vehicle or walk	Kayla Ferrendelli and Marcus Beer
How do you land apply manure and wastewater	Egg-wash wastewater is land-applied to a crop field next to the facility via a center pivot.

Location(s)

Location/Area/Sub-area	Description
Chicken barns	There are a total of 16 layer chicken belt battery style barns at this Facility. Two of the barns are decommissioned and do not house any chickens currently. The chicken barns are set in two rows. The north row has eight barns numbered from west to east 1, 3, 48, 5, 7, 9, 11, 13 and 13A (which is one of the decommissioned barns). The south row has eight barns numbered from west to east 2, 4, 6, 8, 10, 12, 14 and 14A (which is the decommissioned one). See map in Appendix 1.

Egg washing and packaging barn	The egg washing and packaging barn is located just west of the chicken barns and east of Croton Road. It also houses office space and restrooms. See map in Appendix 1.
Manure Storage Barns	There are two Manure Storage Barns (MSB) on-site (south and north), at the east end of the chicken barns, where manure is stored in piles before being hauled off site. See map in Appendix 1.
Outfall 001	Outfall 001 is located north of the Facility and just north of Barns 5 and 7. Outfall 001 discharges into the unnamed tributary of the Otter Fork.
Wastewater storage structures	East of the manure barns, there is an egg-wash lagoon divided into two cells, a stormwater pond and the ETS. The Facility discharges into the unnamed tributary of the Otter Fork that flows north on the north side of the property, through outfall 001. See map in Appendix 1.

SECTION II – OBSERVATIONS

Location: Egg washing and packaging barn		
Observation #: AH2-OB-001	Date: 12/02/2022	Weather: Cloudy and 48°F
EPA observed the egg-washing and packaging process that took place in the same area. Water from the egg washing and egg parts from broken eggs were collected via floor drains and sent to the egg-wash lagoon.		
Photos		
<ol style="list-style-type: none"> 1. DSCN0356.JPG 2. DSCN0385.JPG 		

Location: Chicken barns		
Observation #: AH2-OB-002	Date: 12/02/2022	Weather: Cloudy and 48°F
<p>EPA observed 16 chicken barns at the Facility split into two groups, south and north and numbered from 1 to 14 west to east, with the north group of barns being assigned the odd numbers and the south group of barns the even numbers. See map in Appendix 1. The chicken barns did not have roof gutters. EPA observed a concrete driveway between the two group of barns with several stormwater catch basins in it that drain to the stormwater pond, according to Facility representatives. Each chicken barn has 20 electric fans on either side of it. Photos DSCN0359.JPG and DSCN0383.JPG. When in operation, the electric fans emit a creamy dust and feathers on the area outside the barns. On either side of the chicken barns, there is a grass area that is sloped away from the barns and forms a channel that conveys stormwater east for the east barns and west for the west barns. Photo 359 in photolog. Some of the barns have a 3-foot gravel layer on each side of the barn. Photo DSCN0357.JPG. The grassed channels on the north side group of barns drain north via culverts to catch basins north of the north driveway. These catch basins drained into the north-side lift station. EPA observed accumulated sludge in the catch basin west of Barn 1. Photo DSCN0358.JPG. The lift station pumps water into the stormwater pond. At the time of the inspection, EPA observed 3 pipes flowing in it, from southwest, east and west. Photo DSCN0362.JPG. EPA observed parts of the concrete tunnel that house the manure conveying belts were cracked and needed repair.</p>		

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Photos

1. [DSCN0357.JPG](#)
2. [DSCN0358.JPG](#)
3. [DSCN0359.JPG](#)
4. [DSCN0360.JPG](#)
5. [DSCN0361.JPG](#)
6. [DSCN0362.JPG](#)
7. [DSCN0366.JPG](#)
8. [DSCN0382.JPG](#)
9. [DSCN0383.JPG](#)

Location: Manure Storage Barns**Observation #:** AH2-OB-003**Date:** 12/02/2022**Weather:** Cloudy and 48°F

EPA observed a catch basin in the grassed area east of each of the Manure Barns. The catch basins routed water east across the east driveway and into other catch basins located next to the Egg-Wash Lagoon. These catch basins routed water north and into the unnamed tributary of the Otter Fork via a catch basin located at the northeast end of the Facility. Photo [DSCN0368.JPG](#). EPA could not observe the outlet pipe from the catch basin because according to Mr. Beer, the pipe goes underground and outlets into the unnamed tributary on a private cropland north of the Facility.

Photos

1. [DSCN0363.JPG](#)
2. [DSCN0365.JPG](#)
3. [DSCN0364.JPG](#)
4. [DSCN0367.JPG](#)
5. [DSCN0368.JPG](#)
6. [DSCN0378.JPG](#)
7. [DSCN0379.JPG](#)
8. [DSCN0380.JPG](#)
9. [DSCN0381.JPG](#)

Location: Outfall 001**Observation #:** AH2-OB-004**Date:** 12/02/2022**Weather:** Cloudy and 48°F

EPA observed two pipes discharging at outfall 001, a big one from which the samples are taken and a smaller one that Facility representatives were unaware of its function. Photo [DSCN0369.JPG](#).

Photos

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1. [DSCN0369.JPG](#)
2. [DSCN0370.JPG](#)
3. [DSCN0371.JPG](#)

Location: Wastewater storage structures

Observation #: AH2-OB-005

Date: 12/02/2022

Weather: Cloudy and 48oF

EPA observed a series of stormwater catch basins around the egg-wash lagoon and the stormwater pond that would route water towards the unnamed tributary of Otter Fork, north of the Facility.

Location: Wastewater storage structures

Observation #: AH2-OB-006

Date: 12/02/2022

Weather: Cloudy and 48oF

EPA observed the Egg-Wash Lagoon that was split into two cells, north and south cell. The north cell had very little water in it. Photos [DSCN0372.JPG](#) and [DSCN0374.JPG](#). EPA also observed the stormwater pond and the ETS. The stormwater pond had depth markers in it and there was no pooling water in the ETS, even though the stormwater pond was discharging to the ETS at the time. Photos [DSCN0374.JPG](#) - [DSCN0377.JPG](#).

Photos

1. [DSCN0372.JPG](#)
2. [DSCN0373.JPG](#)
3. [DSCN0374.JPG](#)
4. [DSCN0375.JPG](#)
5. [DSCN0376.JPG](#)
6. [DSCN0377.JPG](#)

Location: Manure Storage Barns

Observation #: AH2-OB-007

Date: 12/02/2022

Weather: Cloudy and 48oF

EPA observed the incline room, where the manure conveying belt slopes upwards towards the top of the manure barn and observed accumulated manure dust on the ground below the conveyor belt. Facility representatives stated that when water accumulates in the manure conveying tunnel or the incline room, it gets pumped and hauled off-site. EPA observed the two Manure Storage Barns where the north had one pile of manure in it and south one two smaller piles. Photos [DSCN0380.JPG](#) and [DSCN0381.JPG](#). The concrete driveway in front of the two MSB and driveway between the two rows of chicken barns had several stormwater catch basins that drained to the stormwater pond, according to Facility representatives.

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: DMR Reports

AOC: Yes

Ref #: AH2-RR-006

Reviewed By: Andi Hodaj

Reviewed Date: 02/02/2023

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EPA reviewed DMR reports for the months of August, September and October of 2022. EPA noted that there were 3 Ammonia effluent limit violations during the months of August, September and October 2022. A review of historical data from ECHO, showed a total of 18 effluent limit exceedances from outfall 001. All but one, of the effluent limit exceedances occurred during years 2021 and 2022.		
Record: Other - Chain of Custody Forms		AOC: Yes
Ref #: AH2-RR-005	Reviewed By: Andi Hodaj	Reviewed Date: 02/02/2023
EPA reviewed copies of Chain of Custody (CoC) forms for samples collected from eight sites, including Layer 1, during the period of October 2021 through September 2022. The October 2021 CoC was missing signatures and the sample collection times. All CoC forms were missing signatures.		
Record: Other - Weather data		AOC: No
Ref #: AH2-RR-004	Reviewed By: Andi Hodaj	Reviewed Date: 02/02/2023
EPA reviewed copies of local climatological data spreadsheets for the period November 2021 through November 2022. The weather station located is located at geographic coordinates Lat: 40.2046 Long: -82.6923, per the spreadsheets.		
Record: Manifests		AOC: No
Ref #: AH2-RR-003	Reviewed By: Andi Hodaj	Reviewed Date: 02/02/2023
EPA reviewed manure hauling manifests for the period June 2020 through September 2022 for the Croton Pullet 3 Site. EPA had requested manifests for Layer 1.		
Record: Personnel Training		AOC: Yes
Ref #: AH2-RR-002	Reviewed By: Andi Hodaj	Reviewed Date: 02/02/2023
EPA reviewed copies of Certified Livestock Manager certificates for Emily Hookway and Megan Combs with expiration dates of December 31, 2022 and issued by Ohio EPA September 9, 2019. NPDES Permit OH0131121, Part II, G states, "The permittee (or employee(s) appointed by the owner/operator) shall attend a manure management and water quality protection training and/or seminar at least once per year. The copies of the training records provided by Trillium did not include training records for 2020, 2021 and 2022. EPA could not verify that annual training had occurred in this year as required by the NPDES permit.		
Record: Other - Annual Reports to Ohio Department of Agriculture		AOC: Yes
Ref #: AH2-RR-001	Reviewed By: Andi Hodaj	Reviewed Date: 02/02/2023
EPA reviewed copies of Annual Reports submitted to the Ohio Department of Agriculture (ODA) for years 2019, 2020 and 2021. EPA had asked the Facility to submit Annual Reports submitted to Ohio EPA as required Part II, K. of the NPDES permit. EPA reviewed an Emergency Spill Report Form that was submitted to ODA for a spill of approximately 50,000 gallons of egg-wash water into the unnamed tributary of the Otter Fork via a tile, on November 19, 2020. The report states that "the newly discovered tile will be checked going forward during drag-lining application." No more information is provided about the tile and the manner that the egg-wash water entered the tile and reached the unnamed tributary of the Otter Fork.		

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SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREA OF CONCERN

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: AH2-OB-002	Location: Chicken barns
AOC:	
EPA observed parts of the concrete tunnel that house the manure conveying belts were cracked and needed repair.	

AOC Reference #: AH2-OB-004	Location: Outfall 001
AOC:	
EPA observed two pipes discharging at outfall 001, a big one from which the samples are taken and a smaller one that Facility representatives were unaware of its function or what it was that was discharging.	

AOC Reference #: AH2-OB-005	Location: Wastewater storage structures
AOC:	
EPA observed a series of stormwater catch basins around the egg-wash lagoon and the stormwater pond that would route water towards the unnamed tributary of Otter Fork, north of the Facility.	

AOC Reference #: AH2-RR-001	Records Review: Other - Annual Reports to Ohio Department of Agriculture
AOC:	
EPA reviewed copies of Annual Reports submitted to the ODA for years 2019, 2020 and 2021. EPA had asked the Facility to submit Annual Reports submitted to Ohio EPA as required Part II,K. of the NPDES permit. EPA reviewed an Emergency Spill Report Form that was submitted to ODA for a spill of approximately 50,000 gallons of egg-wash water into the unnamed tributary of the Otter Fork via a tile, on November 19, 2020. The report states that "the newly discovered tile will be checked going forward during drag-lining application." No more information is provided about the tile and the manner that the egg-wash water entered the tile and reached the unnamed tributary of the Otter Fork.	

AOC Reference #: AH2-RR-002	Records Review: Personnel Training
AOC:	
EPA reviewed copies of Certified Livestock Manager certificates for Emily Hookway and Megan Combs with expiration dates of December 31, 2022 and issued by Ohio EPA September 9, 2019. NPDES Permit OH0131121, Part II, G states, "The permittee (or employee(s) appointed by the owner/operator) shall attend a manure management and water quality protection training and/or seminar at least once per year. The copies of the	

training records provided by Trillium did not include training records for 2020, 2021 and 2022. EPA could not verify that annual training had occurred in this year as required by the NPDES permit.

AOC Reference #: AH2-RR-005

Records Review: Other - Chain of Custody Forms

AOC:
 EPA reviewed copies of CoC forms for samples collected from eight sites, including Layer 1, during the period of October 2021 through September 2022. The October 2021 CoC was missing signatures and the sample collection times. All CoC forms were missing signatures.

AOC Reference #: AH2-RR-006

Records Review: DMR Reports

AOC:
 EPA reviewed DMR reports for the months of August, September and October of 2022. EPA noted that there were 3 Ammonia effluent limit violations during the months of August, September and October 2022. A review of historical data from ECHO, showed a total of 18 effluent limit exceedances from outfall 001. All but one, of the effluent limit exceedances occurred during years 2021 and 2022.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA Region 5 Lead Inspector held a closing conference with Facility personnel at 10:40 AM (ET) on 12/02/2022 for the inspection. During the closing conference, EPA Region 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

During the closing conference EPA discussed some preliminary areas of concern with the Facility representatives including:

- Discharges from the Facility that did not go through the wastewater treatment system; and
- The need to identify pipes and sources of discharge that drain into the lift stations and stormwater catch basins throughout the Facility.

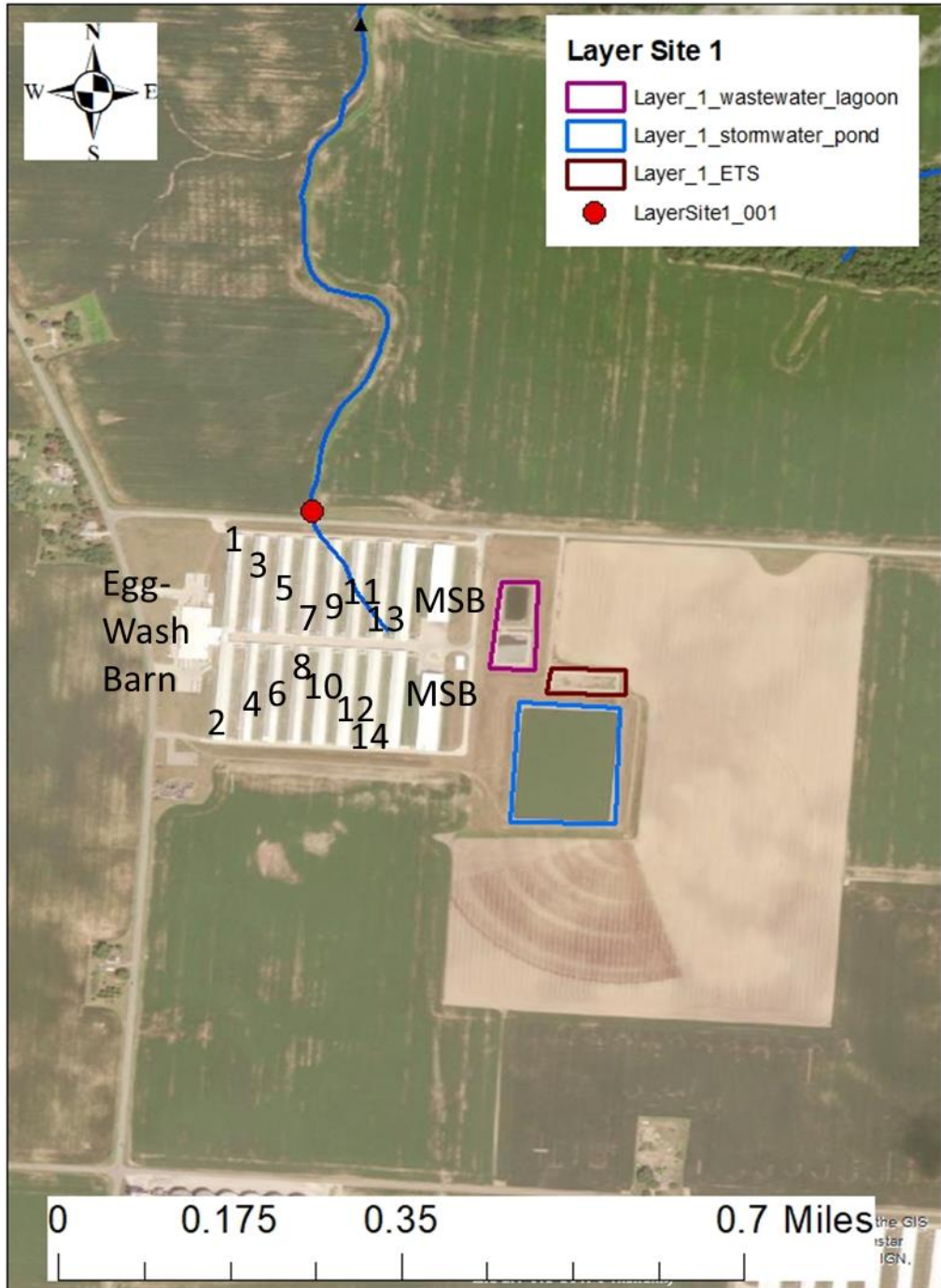
Follow Up

EPA had requested copies of manure hauling manifests for Layer 1. However, Facility sent manure manifests for Croton Pullet 3.

SECTION VII – LIST OF APPENDICES

1. Map of Facility
2. Photo Log
3. List of Effluent Limit Exceedances

APPENDIX 1. MAP OF FACILITY



APPENDIX 2: PHOTO LOG



Egg Wash	DSCN0356.JPG	
12/02/2022 08:52 AM (ET)	Photographer: Andi Hodaj	
Egg washing and packaging barn	CBI	No PII
Egg wash and packaging operation inside the egg-wash and packaging barn. Camera looking east.		



Grassed channel west of Barn 1	DSCN0357.JPG	
12/02/2022 09:00 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Grassed channel west of Barn 1, facing north.		



Catch Basin west of Barn 1	DSCN0358.JPG	
12/02/2022 09:03 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Catch basin that drains the grassed area west of Barn 1.		



Grassed area between Barns 1 and 3	DSCN0359.JPG	
12/02/2022 09:08 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Grassed area between Barns 1 and 3, facing south.		



Storm Sewer	DSCN0360.JPG	
12/02/2022 09:11 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Storm sewer grate in the north driveway of the facility between Barns 5 and 7.		



Grassed area between Barns 5 and 7	DSCN0361.JPG	
12/02/2022 09:12 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Grassed area between Barns 5 and 7, facing south.		



Lift Station	DSCN0362.JPG	
12/02/2022 09:14 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Lift station north of Barn 7.		



Belt from Incline Room to MSB	DSCN0363.JPG	
12/02/2022 09:21 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Belt going from incline room to Manure Storage Barn. Camera looking east.		



Inside Manure Incline Room	DSCN0365.JPG	
12/02/2022 09:22 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Inside manure incline room. Camera facing southwest.		



Manure Incline Room	DSCN0364.JPG	
12/02/2022 09:22 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Inside the manure incline room. Camera looking east.		



Diversion Structure	DSCN0366.JPG	
12/02/2022 09:24 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Location of the diversion structure (y-shaped pipe) discovered at Layer 1 in June 2021. Camera facing west.		



Catch basin	DSCN0367.JPG	
12/02/2022 09:28 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Catch basin at the northwest corner of the Egg-Wash Lagoon. There are two pipes flowing in it from east and southwest and a pipe that flows out and northwest towards the unnamed tributary of Otter Fork.		



Catch Basin	DSCN0368.JPG	
12/02/2022 09:29 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Catch basin at the northwest corner of the Egg-Wash Lagoon. There are two pipes flowing in it from east and southwest and a pipe that flows out and northwest towards the unnamed tributary of Otter Fork.		



Outfall 001	DSCN0369.JPG	
12/02/2022 09:33 AM (ET)	Photographer: Andi Hodaj	
Outfall 001	CBI	No PII
Two pipes discharging in the unnamed tributary of Otter Fork. The big pipe in the photo is where Facility takes its samples for outfall 001. Camera looking south.		



Unnamed tributary of Otter Fork	DSCN0370.JPG	
12/02/2022 09:34 AM (ET)	Photographer: Andi Hodaj	
Outfall 001	CBI	No PII
Unnamed tributary of Otter Fork just west of outfall 001. Camera looking west.		



Outfall 001 Sign	DSCN0371.JPG	
12/02/2022 09:35 AM (ET)	Photographer: Andi Hodaj	
Outfall 001	CBI	No PII
Outfall 001 sign, facing north.		



Egg-Wash Lagoon North Cell	DSCN0372.JPG	
12/02/2022 09:43 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
The north cell of the Egg-Wash Lagoon, facing south.		



Egg-Wash Lagoon South Cell	DSCN0373.JPG	
12/02/2022 09:47 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
South cell of the Egg-Wash Lagoon, facing south.		

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ETS	DSCN0374.JPG	
12/02/2022 09:49 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
ETS, facing east.		



ETS Influent	DSCN0375.JPG	
12/02/2022 09:52 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
ETS influent from stormwater pond. Camera looking south.		



Stormwater Pond	DSCN0376.JPG	
12/02/2022 09:54 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
Stormwater pond from northeast corner. Camera facing southwest.		



Stormwater Pond Level Indicators	DSCN0377.JPG	
12/02/2022 10:04 AM (ET)	Photographer: Andi Hodaj	
Wastewater storage structures	CBI	No PII
Stormwater pond level indicators, west side of pond, facing south.		



Drainage Structure	DSCN0378.JPG	
12/02/2022 10:09 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Drainage structure (concrete catch basin) between the south MSB and Barn 14A. It has one inflowing pipe from north and an outflowing pipe towards south.		



Drainage Structure	DSCN0379.JPG	
12/02/2022 10:09 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
Drainage structure (concrete catch basin) between the south MSB and Barn 14A. It has one inflowing pipe from north and an outflowing pipe towards south.		



South Manure Storage Barn	DSCN0380.JPG	
12/02/2022 10:13 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
South manure storage barn, facing south.		



North Manure Storage Barn	DSCN0381.JPG	
12/02/2022 10:14 AM (ET)	Photographer: Andi Hodaj	
Manure Storage Barns	CBI	No PII
North manure storage barn, facing north.		



Driveway between the two barn rows	DSCN0382.JPG	
12/02/2022 10:16 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
The driveway between the two chicken barn rows has several stormwater catch basins in it. Camera looking west.		



Grassed area between Barns 6 and 8	DSCN0383.JPG	
12/02/2022 10:26 AM (ET)	Photographer: Andi Hodaj	
Chicken barns	CBI	No PII
Grassed area between Barns 6 and 8, facing north.		



Egg-Wash Lift Station	DSCN0384.JPG	
12/02/2022 10:36 AM (ET)	Photographer: Andi Hodaj	
[Location/Area]	CBI	No PII
Egg-Wash water lift station west of chicken barns, facing north.		



Egg Wash Lift Station	DSCN0385.JPG	
12/02/2022 10:38 AM (ET)	Photographer: Andi Hodaj	
Egg washing and packaging barn	CBI	No PII
Egg wash lift station, facing south/southeast.		

APPENDIX 3: List of Effluent Limit Exceedances

Effluent Limit Exceedances Report							
OH0131121: TRILLIUM FARM HOLDINGS LLC - LAYER SITE 1, CROTON, OH 43013							
Monitoring Period Date Range: 09/01/2018 to 01/31/2023							
Exceedance Details							
Monitoring Period Date	Outfall	Parameter Description	Limit Type	DMR Value	Limit Value	Unit	% Exceedance
10/31/2018	1	Nitrogen, ammonia total (as N)	MO AVG	1.34	0.9	mg/L	49
6/30/2021	1	Nitrogen, ammonia total (as N)	MO AVG	1.04	0.9	mg/L	16
7/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	1.42	0.9	mg/L	58
7/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	0.649	0.22	kg/d	195
8/31/2021	1	Solids, total suspended	MO AVG	9	7.2	kg/d	25
8/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	0.96	0.9	mg/L	7
8/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	0.86	0.22	kg/d	291
8/31/2021	1	Phosphorus, total (as P)	DAILY MX	0.26	0.24	kg/d	8
9/30/2021	1	Nitrogen, ammonia total (as N)	MO AVG	1.2	0.9	mg/L	33
9/30/2021	1	Nitrogen, ammonia total (as N)	MO AVG	0.7	0.22	kg/d	218
10/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	0.339	0.22	kg/d	54
10/31/2021	1	Nitrogen, ammonia total (as N)	MO AVG	2.37	0.9	mg/L	163
6/30/2022	1	Nitrogen, ammonia total (as N)	MO AVG	1.19	0.9	mg/L	32
7/31/2022	1	Nitrogen, ammonia total (as N)	MO AVG	1.17	0.9	mg/L	30
7/31/2022	1	Nitrogen, ammonia total (as N)	MO AVG	0.253	0.22	kg/d	15
8/31/2022	1	Nitrogen, ammonia total (as N)	MO AVG	0.92	0.9	mg/L	2
9/30/2022	1	Nitrogen, ammonia total (as N)	MO AVG	1.16	0.9	mg/L	29
10/31/2022	1	Nitrogen, ammonia total (as N)	MO AVG	0.99	0.9	mg/L	10