

INSPECTION REPORT

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|----------------------------------------------------|----------------------------------------|---------------------|----------------------------------------------------------------------|---------------------------------|---------------------------------|
| Inspection Date(s): | 02/17/2022 - 02/17/2022 | Announced: Yes | | | |
| Time: | Entry: 08:00 AM (ET) | Exit: 10:30 AM (ET) | | | |
| Media: | Water | | | | |
| Statute(s)/Program(s): | Clean Water Act, NPDES | | | | |
| Type of inspection: | CEI - Compliance Evaluation Inspection | | | | |
| Access: | Granted | | | | |
| Permittee Name: | | | | | |
| Meigs County Commissioners - Meigs County Landfill | | | | | |
| Facility or Site Name: | | | | | |
| Meigs County Landfill | | | | | |
| Facility/Site Physical Address: | | | | | |
| Howell Hill Cemetary Road | | | | | |
| (City, state, zip code) | | | | | |
| Salisbury Township, OH | | | | | |
| County/Parish: | | | | | |
| Meigs County | | | | | |
| Facility GPS Coordinates: | | | | | |
| 39.05656, - 82.05073 | | | | | |
| Mailing address: | | | | | |
| 100 East Second Street, Suite 301 | | | | | |
| (If different) | | | | | |
| (City, state, zip code) | | | | | |
| Pomeroy, Ohio, 45769 | | | | | |
| Facility/Site Identifier: | | | | | |
| Meigs | | | | | |
| Permit Number: | | | | | |
| OH0135038 | | | | | |
| SIC or NAICS: | | | | | |
| 9999 | | | | | |
| Persons Participating in Inspection: | | | | | |
| Title | Name | Phone | Email | Present at Opening Conf. | Present at Closing Conf. |
| Lead inspector | Andi Hodaj | (312) 353-4645 | hodaj.andi@epa.gov | Yes | Yes |
| Inspector | Jake Berger | (312) 353-8024 | berger.jake@epa.gov | Yes | Yes |
| Meigs County Engineer | Eugene Triplett | (740) 992-2911 | eugenetriplett.mchd@yahoo.com | Yes | Yes |
| Lead inspector: | | | | | |
| Andi Hodaj | ANDI HODAJ | Region 5 | Digitally signed by ANDI HODAJ Date: 2022.04.05 20:24:29 -05'00' | hodaj.andi@epa.gov | (312) 353-4645 |
| Supervisor Review: | | | | | |
| Molly Smith | MOLLY SMITH | | Digitally signed by MOLLY SMITH Date: 2022.04.05 20:33:49 -05'00' | | |

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| | Region 5 | Smith.Molly@epa.gov | |
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SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

A CWA inspection at the closed landfill of Meigs County.

Region 5 Lead inspector, Andi Hodaj, arrived at the Meigs County Landfill (the “Site” or “Facility”), located at Howell Hill Cemetary Road, at 08:00 AM (ET) on 02/17/2022 for an announced inspection. Region 5 Lead inspector presented his credentials to Eugene Triplett and informed him that this was an inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted by the Region 5 NPDES permit program, under the authority of Section 308 of the CWA. The table above identifies the attendees that participated in the inspection. This report is based on information supplied by Meigs County Landfill representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and Region 5 including: direct observations made by the Region 5 inspectors, photographs taken by Region 5 inspectors, physical evidence collected by the Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made by information supplied by Meigs County Landfill representatives (the permittee) during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspectors by Meigs County Landfill representatives during or subsequent to the on-site Inspection. In addition, information gathered prior or subsequent to the Inspection from a review of EPA, State, and public records may be included in this report.

Facility/Site Description

Region 5 lead inspector confirmed the following facility information:

Meigs County operated a municipal landfill at the site until 1988, at which time it stopped receiving waste. The landfill was subsequently capped with 18 inches of clay taken from a nearby area. Leachate from the landfill drains through a system of four-inch perforated pipes into a two-cell constructed wetland for treatment, before discharging into an unnamed tributary of Thomas Fork. Thomas Fork flows south approximately 10 miles into Ohio River. The capped landfill area is approximately 3.5 acres and each wetland cell has dimensions of 75 feet by 30 feet. Cell One of the wetland was lined with a geosynthetic bentonite clay liner and filled with 18 inches of gravel. Cell Two was constructed similarly to Cell One, except without the bentonite liner, and was capped with four inches of top soil. The cells are connected by four-inch polyethylene pipes. The water levels in Cell One and Cell Two are controlled by Agri Drain inline water level control structures. Discharge from Cell Two is regulated under an Ohio EPA issued permit, number OH0135038.

Facility/Site Information

| | |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Responsible official | Eugene Triplett |
| Do you use in-house or contract out for laboratory analyses? (including for metals or WET testing?) | Contract out to Ream & Haager Environmental Laboratory Inc. |
| Do you accept waste from septage haulers? | No |

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| If so, what problems have you experienced? | |
| Is there currently any portion of the treatment train that is non-operational? | No |
| Are there any plans for renovation or additional equipment to allow for increased wastewater flow? | No |

Unit(s)

| Unit/Area/Sub-area | Description |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Landfill | The landfill is located at Howell Hill Cemetary Road in Salisbury Township, Meigs County, Ohio, and includes a two-cell wetland that treats leachate from the landfill. |

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

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| Unit: Landfill | Contains CBI: No |
| Observation #: AH2-OB-001 | Date: 03/25/2022 |
| <p>EPA arrived at the landfill area at approximately 8:45 a.m. Eastern Time where we met with Jim Freeman of Meigs County Soil and Water Conservation District. Mr. Freeman performs the sampling at the end of the wetland and submits the Discharge Monitoring Reports (DMR) to Ohio EPA. Mr. Triplett stated that two BioDiffusers were installed at the start and end of each Cell in 2021. EPA observed the two-cell wetland and the outlet of Cell Two where samples are taken, as required by the Facility’s NPDES permit. EPA observed discharge from Cell Two and from the pipe discharging into the unnamed tributary of Thomas Creek at the time of the inspection. During the inspection, EPA observed less than an inch of water on the top of the wetland cells, which was gold/brown in color. Also during the inspection, EPA observed a sheen layer on the top of Cell Two. Mr. Freeman attributed the sheen layer on the top of Cell Two to a bacteria colony resulting from past mining activities in the area. The AgriDrain water level control structure at the start of Cell One was flooded at the time of the inspection and there was water pooling around it.</p> | |
| <p>Photo(s)</p> <ol style="list-style-type: none"> RIMG2475.JPG RIMG2476.JPG RIMG2477.JPG RIMG2479.JPG RIMG2480.JPG RIMG2482.JPG | |

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

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| Record: Permit | | AOC: Yes |
| Ref #: AH2-RR-003 | Reviewed By: Andi Hodaj | Reviewed Date: 03/28/2022 |
| <p>EPA reviewed the NPDES permit, number OH0135038, that was issued to Meigs County Commissioners - Meigs County Landfill ("facility") by Ohio EPA with effective date February 1, 2021, and expiration date January 31, 2026. Part I, C. of the permit contains a Schedule of Compliance that requires the facility to submit a plan to Ohio EPA that details any necessary construction or process changes to the treatment process to achieve compliance with the final effluent limits for ammonia. The compliance schedule requires the facility to implement the specific plan within 12 months of the effective date of the permit. At the time of the inspection, the facility had not submitted nor implemented the plan.</p> | | |
| Record: Laboratory Analysis Reports | | AOC: No |
| Ref #: AH2-RR-002 | Reviewed By: Andi Hodaj | Reviewed Date: 03/28/2022 |
| <p>EPA reviewed laboratory reports for analysis of samples from Outfall 001 for the period January 2019 - January 2022. Samples were analyzed by Ream & Haager Environmental Laboratory Inc. and provided to EPA by Mr. Freeman on February 17, 2022.</p> | | |
| Record: DMR Reports | | AOC: Yes |
| Ref #: AH2-RR-001 | Reviewed By: Andi Hodaj | Reviewed Date: 03/25/2022 |
| <p>EPA reviewed DMRs submitted by Meigs County to Ohio EPA for the period of January 1, 2017, to February 28, 2022. The DMR review showed 53 exceedances of the effluent limit for Ammonia-Nitrogen.</p> | | |
| Document(s) | | |
| <p>1. Effluent Limit Exceedances Report.pdf</p> | | |
| Photo(s) | | |
| <p>1. RIMG2473.JPG 2. RIMG2474.JPG 3. RIMG2478.JPG 4. RIMG2481.JPG</p> | | |

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS 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.

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| Unit: Landfill | Citation: |
| AH2-RR-001 | |

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| <p>The DMR review showed 53 exceedances of the NPDES permitted effluent limit for Ammonia-Nitrogen.</p> | <p>Citation: NPDES permit OH0135038 Part I, A.</p> |
| <p>AH2-RR-003</p> | |
| <p>Part I, C. of the NPDES permit contains a Schedule of Compliance that requires the Facility to submit a plan to Ohio EPA that details any necessary construction or process changes to the treatment process to achieve compliance with the final effluent limits for ammonia. The compliance schedule requires the Facility to implement the specific plan within 12 months of the effective date of the permit. At the time of the inspection, the Facility had not submitted nor implemented the plan.</p> | <p>Citations NPDES permit OH0135038 Part I, C.</p> |
| <p>AH2-OB-001</p> | |
| <p>The AgriDrain water level control structure at the start of Cell One was flooded at the time of the inspection and there was water pooling around it.</p> | |

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The Region 5 Lead inspector held a closing conference with Facility personnel at 10:30 AM (ET) on 02/17/2022 for the inspection. During the closing conference, 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.

EPA conducted the closing conference at the Meigs County Highway Department. EPA discussed the areas of concern with Mr. Triplett, specifically the ammonia effluent limit violations and the submission and implementation of a plan to comply with the ammonia effluent limits. Mr. Triplett informed EPA that the inspection report should be addressed to the Meigs County Commissioners.

SECTION VII – LIST OF APPENDICES

- 1. Photo Log
- 2. Document Log

APPENDIX 1: PHOTOLOG

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| <p>Discharge from Cell Two of the treatment wetland</p> | |
| <p>RIMG2473.JPG</p> | |
| <p>02/17/2022 08:50 AM (ET)</p> | |
| <p>Andi Hodaj</p> | |
| <p>Landfill</p> | |
| <p>No CBI</p> | |
| <p>No PII</p> | |
| <p>Discharge from Cell Two of the treatment wetland. This is where the facility takes the samples required by the NPDES permit. Camera looking East.</p> | |
| <p>Discharge to tributary of Thomas Fork</p> | |
| <p>RIMG2474.JPG</p> | |
| <p>02/17/2022 08:51 AM (ET)</p> | |
| <p>Andi Hodaj</p> | |
| <p>Landfill</p> | |
| <p>No CBI</p> | |
| <p>No PII</p> | |
| <p>Pipe discharging to the tributary of Thomas Fork. Camera looking West.</p> | |

Wetland Cell One
 RIMG2478.JPG
 02/17/2022 09:07 AM (ET)
 Andi Hodaj
 Landfill
 No CBI
 No PII
 Wetland Cell One had some vegetation in it. The discharge from Cell One to Cell Two was controlled by an AgriDrain structure. Camera looking East.








Capped landfill
 RIMG2481.JPG
 02/17/2022 09:18 AM (ET)
 Andi Hodaj
 Landfill
 No CBI
 No PII
 Capped landfill area. Camera looking South.



Wetland Cell Two
 RIMG2475.JPG
 02/17/2022 08:53 AM (ET)
 Andi Hodaj
 Landfill
 No CBI
 No PII
 Cell Two of the wetland. Camera looking East.



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| <p>BioDiffuser</p> |  |
| <p>RIMG2476.JPG</p> | |
| <p>02/17/2022 08:58 AM (ET)</p> | |
| <p>Andi Hodaj</p> | |
| <p>Landfill</p> | |
| <p>No CBI</p> | |
| <p>No PII Bubbling on the surface of Cell Two where the BioDiffuser was installed. EPA also observed an oil sheen on the pooling water at Cell Two. Camera looking down.</p> | |
| <p>Oil sheen</p> |  |
| <p>RIMG2477.JPG</p> | |
| <p>02/17/2022 08:59 AM (ET)</p> | |
| <p>Andi Hodaj</p> | |
| <p>Landfill</p> | |
| <p>No CBI</p> | |
| <p>No PII EPA also observed an oil sheen on the pooling water at Cell Two. Camera looking down.</p> | |
| <p>Wetland Cell One</p> |  |
| <p>RIMG2479.JPG</p> | |
| <p>02/17/2022 09:08 AM (ET)</p> | |
| <p>Andi Hodaj</p> | |
| <p>Landfill</p> | |
| <p>No CBI</p> | |
| <p>No PII Water pooling and vegetation are visible in Cell One. Camera looking West.</p> | |

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| Flooded water level control structure |  |
| RIMG2480.JPG | |
| 02/17/2022 09:11 AM (ET) | |
| Andi Hodaj | |
| Landfill | |
| No CBI | |
| No PII | |
| The AgriDrain water level control structure where the landfill leachate enters the wetland, was flooded at the time of the inspection. Camera looking South. | |
| Wetlands Cell One and Two |  |
| RIMG2482.JPG | |
| 02/17/2022 09:25 AM (ET) | |
| Andi Hodaj | |
| Landfill | |
| No CBI | |
| No PII | |
| View of the wetland from the landfill area. Camera looking west. | |

APPENDIX 2: DOCUMENT LOG

| Document Type | Document Name | Contains CBI | Contains PII | Uploaded By | Date Received |
|---------------|---------------------------------------|--------------|--------------|-------------|---------------|
| DMR Reports | Effluent Limit Exceedances Report.pdf | No | No | Andi Hodaj | 03/28/2022 |

| Effluent Limit Exceedances Report | | | | | | |
|--------------------------------------------------------|---------|------------------------------------|------------|------------------|--------------------|--------------|
| OH0135038: MEIGS CO LANDFILL, POMEROY, OH 45769 | | | | | | |
| Monitoring Period Date Range: 01/01/2017 to 02/28/2022 | | | | | | |
| Exceedance Details | | | | | | |
| Monitoring Period Date | Outfall | Parameter Description | Limit Type | DMR Value (mg/L) | Limit Value (mg/L) | % Exceedance |
| 2/28/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 14.2 | 13 | 9 |
| 2/28/2017 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 14.2 | 13 | 9 |
| 3/31/2017 | 1 | Oil and grease, hexane extr method | DAILY MX | 11 | 10 | 10 |
| 3/31/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 35.9 | 13 | 176 |
| 3/31/2017 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 35.9 | 13 | 176 |
| 4/30/2017 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 23.2 | 13 | 78 |
| 4/30/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 23.2 | 13 | 78 |
| 5/31/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 23.8 | 1.6 | 1388 |
| 5/31/2017 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 23.8 | 13 | 83 |
| 7/31/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 6.83 | 1.6 | 327 |
| 12/31/2017 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 20.8 | 13 | 60 |
| 12/31/2017 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 20.8 | 13 | 60 |
| 3/31/2018 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 51.8 | 13 | 298 |
| 3/31/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 51.8 | 13 | 298 |
| 4/30/2018 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 20.9 | 13 | 61 |
| 4/30/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 20.9 | 13 | 61 |
| 5/31/2018 | 1 | Oil and grease, hexane extr method | DAILY MX | 24.6 | 10 | 146 |
| 5/31/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 3.32 | 1.6 | 108 |

| | | | | | | |
|------------|---|--------------------------------|----------|------|-----|------|
| 9/30/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 2.4 | 1.6 | 50 |
| 10/31/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 10.6 | 1.6 | 563 |
| 11/30/2018 | 1 | pH | DAILY MN | 6.48 | 6.5 | |
| 12/31/2018 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 15.2 | 13 | 17 |
| 12/31/2018 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 15.2 | 13 | 17 |
| 1/31/2019 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 16 | 13 | 23 |
| 1/31/2019 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 16 | 13 | 23 |
| 2/28/2019 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 15.1 | 13 | 16 |
| 2/28/2019 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 15.1 | 13 | 16 |
| 3/31/2019 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 17.6 | 13 | 35 |
| 3/31/2019 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 17.6 | 13 | 35 |
| 5/31/2019 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 12.2 | 1.6 | 663 |
| 6/30/2019 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 2.88 | 1.6 | 80 |
| 2/29/2020 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 14.6 | 13 | 12 |
| 2/29/2020 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 14.6 | 13 | 12 |
| 5/31/2020 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 15.5 | 13 | 19 |
| 5/31/2020 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 15.5 | 1.6 | 869 |
| 6/30/2020 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 20.7 | 1.6 | 1194 |
| 6/30/2020 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 20.7 | 13 | 59 |
| 2/28/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 14.7 | 13 | 13 |
| 2/28/2021 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 14.7 | 13 | 13 |
| 3/31/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 19.1 | 13 | 47 |
| 3/31/2021 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 19.1 | 13 | 47 |

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|------------|---|--------------------------------|----------|------|-----|-----|
| 4/30/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 22.3 | 13 | 72 |
| 4/30/2021 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 22.3 | 13 | 72 |
| 5/31/2021 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 17.4 | 13 | 34 |
| 5/31/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 17.4 | 1.6 | 988 |
| 6/30/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 9.35 | 1.6 | 484 |
| 8/31/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 6.47 | 1.6 | 304 |
| 9/30/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 8.1 | 1.6 | 406 |
| 12/31/2021 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 21.3 | 13 | 64 |
| 12/31/2021 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 21.3 | 13 | 64 |
| 1/31/2022 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 25.3 | 13 | 95 |
| 1/31/2022 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 25.3 | 13 | 95 |
| 2/28/2022 | 1 | Nitrogen, ammonia total (as N) | DAILY MX | 17.3 | 13 | 33 |
| 2/28/2022 | 1 | Nitrogen, ammonia total (as N) | MO AVG | 17.3 | 13 | 33 |