



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Re: Explosive Gas Sampling Field Survey  
Henry County Landfill  
Henry County

November 17, 2008

Henry County Board of Commissioners  
1853 Oakwood Avenue  
Napoleon, Ohio 43545

Dear Commissioners:

On October 31, 2008, Mary Wright and I from the Ohio Environmental Protection Agency (Ohio EPA) conducted an explosive gas sampling field survey at the Henry County Landfill (facility). Mike Imbrock, representing the facility, performed the sampling event.

The explosive gas sampling field survey was conducted to determine if the owner/operator is following the instrumentation, calibration and sampling requirements as outlined in the facility's approved Explosive Gas Monitoring Plan. The plan was approved on June 1, 1994.

The field survey consisted of a review of the following:

- Field instrumentation
- Field calibration
- Calibration gases
- Surficial construction of each monitoring probe
- Explosive gas sampling and water level measurement results for each probe

The field survey documentation consists of an inspection summary, Attachment I (instrumentation and calibration results) and Attachment II (surficial construction and sampling results). A copy of the survey documentation is enclosed with this letter

A compliance issue was noted during the field survey and with the explosive gas monitoring event letter, dated October 31, 2008. The description of this issue is listed below.

It was noted that the explosive gas monitoring equipment was not calibrated before sampling the first explosive gas well (MP-8). Mr. Imbrock returned to the scale house to calibrate the monitoring equipment.

The necessary equipment was not available to calibrate the monitoring equipment before sampling the wells. Mr. Imbrock proceeded to sample the wells. It was stated in the letter documenting the explosive gas sampling event, dated October 31, 2008, "an MSA Model 302L Combustible Gas Indicator (CGI) calibrated to Methane on the sampling date".

The Henry County's Landfill Explosive Gas Monitoring System Plan, approved September 1, 1994 (Plan) section 8.2.2 states, "Calibration of Monitoring Equipment Used to Measure Combustible Gases...All equipment will be calibrated the day of sampling according to procedures set forth in the manufacturer's operations manual or as required by good laboratory practice."

Ohio Administrative Code (OAC) 3745-27-19(B)(2) states, "The owner or operator shall conduct all construction and operation at a sanitary landfill facility in strict compliance with the applicable authorizing document, including permit to install, a plan approval, an operational report, an approved closure plan, an alteration concurred with in writing by Ohio EPA..."

The owner/operator of the Henry County Landfill is in violation of OAC Rule 3745-27-19(B)(2) and Section 8.2.2 of the Explosive Gas Monitoring System Plan for failure to calibrate the explosive gas monitoring equipment prior to sampling.

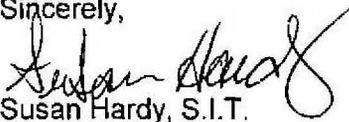
Also, please ensure the expiration date is checked on the calibration gas.

This correspondence addresses specific observations noted only for the areas of Henry County Landfill that were inspected. Nothing present in, or absent from this correspondence is intended to imply that no other violations existed at the property during the inspection.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve you from your obligations to comply with other applicable state and federal laws and regulations.

If you have any questions concerning this field survey, you may contact me at (419) 373-3043.

Sincerely,



Susan Hardy, S.I.T.

Environmental Specialist

Division of Solid and Infectious Waste Management

/llr

Enclosures

pc: Mike Imbrock, Henry County Landfill  
c:\DSIWM-NWDO File: Henry County, Henry County Landfill, Methane Correspondence  
ec: Ned O'Loughlin, DSIWM, NWDO  
Mike Reiser, DSIWM, NWDO

## Explosive Gas Monitoring Plan Verification Inspection Checklist

**Date of inspection:** October 31, 2008

**Facility name:** Henry County Landfill

**Facility address:** L-622 Twp. 11, Malinta, OH 43535

**Status (operating or closed, if closed give date):** Operating

**Facility contact name and title:** Mike Imbrock, Manager

**DSIWM inspector's name:** Susan Hardy, Mary Wright

**Company performing sampling:** self  
**Sampler's names:** Mike Imbrock

**Date of approved EGMP (if not approved, indicate status):** Approved June 1, 1994

**Ambient barometric pressure:** 30.36"  
**Relative humidity:** 67%

**Air temperature:** 45 degrees  
**Weather conditions:** Clear, SW 8mph winds

**# of permanent monitoring locations:** 8

**# of temporary monitoring locations:** 0

**# of explosive gas alarms:** 0

**Sampling frequency required:** Monthly  
**Contingency monitoring required:** None

**Any additional monitoring requirements (consent order, DFFO's):** None

**Do the actual depth, locations and number of monitoring locations correspond to that identified by the EGMP:** Yes

**Explosive Gas Monitoring Plan Verification Inspection Checklist  
Attachment II: Surficial Construction and Explosive Gas Sampling Results**

Monitoring Probe ID #	MP-1	MP-2	MP-3	MP-4	MP-5	MP-6	MP-7	MP-8
Correct Location	Yes	Yes	Yes	Yes	Yes			Yes
Properly Labeled	Yes	Yes	Yes	Yes	Yes			Yes
Protective Casing in Good Condition	Yes	Yes	Yes	Yes	Yes			Yes
Concrete Pad Intact	Yes	Yes	Yes	Yes	Yes			Yes
Padlock Functional, if Required	Yes	Yes	Yes	Yes	Yes			Yes
Ponded Water Near Well	No	No	No	No	No			No
Sampling Port in Good Condition	Yes	Yes	Yes	Yes	Yes			Yes
Inner Casing Properly Capped	Yes	Yes	Yes	Yes	Yes			Yes
Pressure Measurement Performed	Yes	Yes	Yes	Yes	Yes			Yes
Explosive Gas Reading Performed Facility Reading	Yes 0.0% LEL			Yes 0.0% LEL				
Water Level Measurement Performed level	Yes 8.99'	Yes 16.47'	Yes 7.67'	Yes 7.19'	Yes 9.6'			Yes 7.62'
Total Depth (From Top of Pipe)	20.26'	20.38'	20.18'	20.31'	19.72'	20.49'	20.81'	20.32'
Depth to Top of Screened Interval	10.26'	10.38'	10.18'	10.31'	9.72'	10.49'	10.81'	10.32'
Screened Interval Flooded ?	Yes	No	Yes	Yes	Yes			Yes
Punch Bar Performed, Result	No	No	No	No	No			No

Comments: Did not observe sampling at MP-6 and MP-7.

**Explosive Gas Monitoring Plan Verification Inspection Checklist  
Attachment I: Explosive Gas Calibration Procedure Results**

Equipment	Plan Required	Field Use	Comments
Type of CGI	MSA Gascope Model 302L or equivalent	Gascope	
Type of Pressure Gauge	Dwyer Magnehelic	Dwyer Pressure Gauge	
Type of Water Level Indicator	Slop Indicator Model 51453 or equivalent	Sinco Water level indicator	

Calibration Activities Required by Plan	Calibration Activities Performed in the Field	Comments
Zero LEL and % range	Zeroed LEL and % ranges	
Calibrate low range with span gas	none	Missing part prevented calibration

Item	Actual Concentration	Field Calibration Concentration	Expiration Date of Gas
High Range Span Gas	Did not use	Na	Na
Low Range Span Gas	Did not use	Na	Na
Other			

<b>Comments</b>	Please check expiration date on calibration gas
-----------------	---