



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 27, 2020

Mr. Don Kindig, General Manager
Arbor Hills Landfill, Inc. - Advanced Disposal Services
10833 West Five Mile Road - Building B
Northville, Michigan 48168

SRN: N2688, Washtenaw County

Dear Mr. Kindig:

VIOLATION NOTICE

On February 10, and February 19, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received verbal and written notification respectively, of an Abnormal Condition, Start-up, Shutdown, or Malfunction from Arbor Hills Landfill, Inc. -Advanced Disposal Service (ADS) located at 10690 West Six Mile Road, Northville, Michigan. The notification reported an abnormal condition and excess emissions pursuant to the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rule, R 336.1912 (Rule 912); the conditions of Permit to Install (PTI) number 79-17; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2688-2011a; the federal New Source Performance Standards for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW (WWW) and the National Emission Standard for Hazardous Air Pollutants 40 CFR Part 63, Subpart AAAA (AAAA). ADS' written notification is enclosed.

Advanced Disposal Services reported that on February 10, they discovered captured landfill gas (LFG) directed to one of the flares was instead released to the atmosphere. The atmospheric release of LFG occurred from February 7 to February 10, 2020. The emissions were the result of the LFG supply valve to the flare having been improperly set to partially open and left that way after a maintenance activity was conducted on February 6th to remedy a blocked/possibly frozen valve/gas line. Subsequent to the maintenance activity LFG was released into, and from the flare without being ignited.

Based on ADS' submittal, the AQD has identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUENCLOSEDFLARE1-S2 -An enclosed style flare rated at 2600 scfm capacity used to treat LFG.	PTI No. 79-17 Condition I.1. NMOC emission limit, WWW 40 CFR 60.752(b)(2)(iii)(B), WWW 40 CFR 60.754(d),	According to estimates provided by the company, 0.597 million cubic feet of collected LFG and an

	WWW 40 CFR 60.758(b)(2)	estimated 79.04 pounds of non-methane organic compound (NMOC) were emitted to the atmosphere.
EUENCLOSEDFLARE1-S2	PTI No. 79-17 Condition III. 3., WWW 40 CFR 60.753(f), AAAA 40 CFR 63.1955(a))	Failed to operate the flare when the collected gas was routed to it.
EUENCLOSEDFLARE1-S2	PTI No. 79-17 Condition III. 6., WWW 40 CFR 60.755(e), AAAA 40 CFR 63.1955(a))	Period of start-up, shutdown or malfunction duration exceeded 1 hour.
EUENCLOSEDFLARE1-S2	PTI No. 79-17 Condition III. 7.	Failed to operate flame detection system. Flare was operated without the non-continuous pilot flame ignited.
EUENCLOSEDFLARE1-S2	R 336.1910 (Rule 910)	An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.

The company failed to properly operate the landfill gas flare controls, resulting in LFG being directly emitted to the atmosphere. Failure to properly operate the landfill gas controls is a violation of the company’s Permit to Install (PTI) number 79-17; the federal New Source Performance Standards for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW (WWW) and the National Emission Standard for Hazardous Air Pollutants 40 CFR Part 63, Subpart AAAA (AAAA).

In addition, uncontrolled LFG emissions create odors. EGLE received 32 odor complaints from February 7-10, while the flare controls were not operated properly. Uncontrolled LFG emissions from the flare are likely to have contributed to offsite odors.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 20, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Hwy., Jackson, Michigan 49201-1556 and submit a copy to Ms. Jenine Camilleri,

Mr. Don Kindig, General Manager
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Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan
48909-7760.

If ADS believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the notification provided. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

ENCLOSURE

cc: Mr. Anthony Testa, ADS
Mr. Randy Frank, ADS
Mr. Todd Whittle, ADS
Ms. Suparna Chakladar, Fortistar Methane Group
Mr. Nathan Frank, U.S. EPA
Ms. Sarah Marshall, U.S. EPA
Mr. Ken Ruffatto, U.S. EPA
Mr. Neil Gordon, AG
Mr. Lonnie Lee, EGLE
Mr. Lawrence Bean, EGLE
Mr. Gary Schwerin, EGLE,
Mr. Greg Morrow, EGLE
Ms. Alex Clark, EGLE
Ms. Melinda Shine, EGLE
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Jeff Rathbun, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Annette Switzer, EGLE
Scott Miller, EGLE