



December 6, 2019

Mr. Scott Miller
Jackson District Supervisor
Jackson District Coordinator
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy

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Mr. Lawrence Bean
Jackson District Supervisor
Waste Management Division
Michigan Department of Environment, Great Lakes, and Energy
301 East Louis Glick Highway
Jackson, MI 49201-1556

AIR QUALITY DIVISION

RE: Response to Notice of Violation Issued by Michigan Department of Environment, Great Lakes, and Energy Dated November 12, 2019 and November 26, 2019 – SRN N2688 Washtenaw County

Dear Mr. Miller and Mr. Bean,

This letter responds to the Notice of Violation (NOV) dated November 12, 2019 and November 26, 2019, issued to Advanced Disposal Services Arbor Hills Landfill, Inc. (AHLF).

The November 12, 2019 NOV states that during an investigation performed on November 3, 2019, the Air Quality Division (AQD) staff "detected a distinct and definite objectionable landfill gas odor along Napier Road before W. Six Mile Road and in the residential area on the southwest side of the Steeplechase Subdivision, specifically Briar Ridge Lane, and the north side of the Northville Ridge subdivision, specifically Carriage Way/Parkside Drive/Livingston Drive downwind of the facility."

The November 26, 2019 NOV states that during an investigation performed on November 19, 2019, the Air Quality Division (AQD) staff "detected a distinct and definite objectionable landfill gas odor along Napier Road approximately halfway between the railroad tracks and the facility entrance near Six Mile Road and in the residential area on the southwest side of the Northville Ridge subdivision, specifically S. Glacier Road/Westminister Road/Mulberry Way and Mulberry Court downwind of the facility."

The NOVs state that "the observed landfill odor is a violation of Rule 901(b)." Additionally, "the Rule 901(b) violation constitutes a violation of Rule 433(1)(c) since the landfill odor generated by the facility created a nuisance odor beyond the property boundary." Lastly, the November 12, 2019 NOV directs AHLF to initiate "actions necessary to correct the cited violation and submit a written response by



December 6, 2019." The November 26, 2019 NOV directs AHLF to initiate "actions necessary to correct the cited violation and submit a written response by December 19, 2019."

Explanation of the Causes and Duration of the Violation

AHLF acknowledges the presence of low level gas odors during the time of AQD's investigation.

Although the time and duration cannot be specifically determined, third-party odor surveillance, as well as AHLF site personnel, identified gas odors at several community locations within the Steeplechase Subdivision and Northville Ridge Subdivision. The third-party odor surveillance noted that the gas odors registered a less than two scent-o-meter reading during their inspections. Although the exact cause of the odors is undetermined, AHLF has identified an area on the north side of the landfill just south of the north temp cap area as the potential source due to increased SEM exceedances realized from 3rd Quarter to 4th Quarter.

Remedy and Corrective Actions

Immediate Remedies Taken

- On November 15, 2019, AHLF Staff was onsite until midnight conducting temporary corrective measures in Cell 4E that was believed to be the cause of the odors detected that evening and throughout the night. A well in Cell 4E was at reduced vacuum and the site staff reestablished vacuum to aid in mitigating odors from the well.
- On November 25, 2019, AHLF procured the services of Fox Contracting to place and grade the slopes at Arbor Hills Landfill, initially targeting areas of 4th Quarter SEM exceedances while progressing to other areas of the landfill to complete a through re-grading of the outside slopes.
- On-going Phase 2 GCCS Construction, consisting of 11 replacement vertical gas wells, 2 new vertical gas wells, 3 new horizontal gas wells, new air and forcemain, new lateral vacuum lines, and installation of new pumps where necessary.

Proposed Corrective Actions

- Upgraded gas infrastructure on the north side of the landfill immediately south of the north temp cap and in Cell 4E. Gas infrastructure upgrades may include horizontal wells, vertical wells, and/or improved lateral/header lines. AHLF and third party consultants are currently preparing design drawings to finalize the proposed corrective action.



- Identification and installation of pumps in wells that will benefit from dewatering to improve gas collection. Upgrades to air and forcemain may be necessary if the identified well(s) do not currently have the infrastructure in-place.

Conclusion

AHLF remains committed to minimizing off-site odor impacts and to assuring operational practices are maintained and designed to minimize odor impacts. In addition to operational personnel, AHLF has assigned a third party to perform recurring odor monitoring around the site and in the neighborhoods throughout the community to identify and diagnose odors in an attempt to mitigate or minimize the impact. Construction at the landfill may periodically expose garbage that may potentially cause odors, and AHLF will continue to do everything possible to minimize these effects.

We look forward to discussing this matter with you and will appreciate your feedback.

Sincerely,

ADVANCED DISPOSAL SERVICES ARBOR HILLS LANDFILL, INC.

for
Brian Sanders
Arbor Hills Landfill General Manager

cc (via email):

Mr. Jay Warzinski, AHLF
Mr. Todd Whittle, AHLF
Mr. Anthony Testa, AHLF
Mr. Randy Frank, AHLF
Mr. Nathan Frank, USEPA
Mr. Kenneth Ruffatto, USEPA
Ms. Mary Ann Dolehanty, EGLE
Mr. Jeff Rathbun, EGLE
Mr. Chris Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Lonnie Lee, EGLE
Ms. Alexandria Clark, EGLE
Ms. Diane Kavanaugh Vetort, EGLE
Ms. Melinda Shine, EGLE
Mr. Mike Kovalchick, EGLE