DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N268849080

FACILITY: Advanced DisposalServices Arbor Hills Landfill Inc		**SRN / ID:** N2688
LOCATION: 10690 W. SIX MILE RD, NORTHVILLE		**DISTRICT:** Jackson
CITY: NORTHVILLE		**COUNTY:** WASHTENAW
CONTACT:		**ACTIVITY DATE:** 06/07/2019
STAFF: Mike Kovalchick	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Landfill visit observations.		
RESOLVED COMPLAINTS:		

On June 7, 2019, we conducted unannounced compliance inspection of Advanced Disposal Services (ADS) Arbor Hills landfill located in Northville, Michigan (Washtenaw County) at 10690 6 Mile Road. The purpose of this inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules, conditions of the ADS's Renewable Operating Permit (ROP) number MI-ROP-N2688-2011a and Permit to Install (PTI) permits 19-17B and 79-17. The inspection was also conducted to support on-going EGLE efforts at negotiating a proposed Consent Order with ADS to resolve previously identified violations.

Observations from our landfill visit on Friday. (Myself, Diane, Jay, Emma. Scott/Stephanie were there but didn't go on the tour.) Lots of gas noted at the landfill but the continued unfavorable wind direction and lofting/mixing conditions were continuing to prevent the gas being detected off site or otherwise toward the residential areas.

TS-01 pump seemed to be functioning this time with little over spill liquid into the adjacent retention ponds. No gas was coming out of the ground at the adjacent valve shutoff pole like the last time but instead had moved back directly next to TS-01 itself. (Methane meter showed only a few ppm lingering at the shutoff pole.) This time, 2 ground hog size holes had opened up creating intense odors downwind(this time towards the SW). (See attached pics of both holes that likely are a single hole that Y's out at the surface.) They had the characteristic black sulfide staining and were by far the largest gas holes that I've seen. (These holes may have been present before but would have been flooded with liquid so would have not been unable to see them.) I attempted to sample it using the Jerome meter approaching the hole from upwind direction. However, disconcertingly the likely very high levels of gas saturated the sensor so I was unable to obtain a H2S reading. Methane was in excess of the methane sensor maximum of 10,000 ppm. Construction to re-engineer TS-01 has yet to commence. They are putting out to bid shortly for the installation of new force main that will run from a new lift station that will be associated with TS-01 to the leachate tank farm. Anthony would not hazard a guess on when this project would be completed.

Moderate amounts of gas noted in a sizeable area of the NW portion of the landfill in the problematic drain tile area next to the haul road. Odors were very easy to detect from the truck and appeared to be much higher than recent visits. Construction to address this area has yet to commence. Also noted a small new leachate seep (had that dark brown leachate look to it) just above a storm water ditch (2/3 of the way down from the top) but wasn't enough liquid to flow anywhere. (See attached pic.) This means that the elevated temperature area has had leachate seeps now on 3 of its 4 sides. Anthony noted that trash is very close to the surface in that location and that he would have some clay applied to it.

Moderate amounts of gas noted on the north slope just below the subsidence area despite the recent application of large amounts of dirt that appeared to more 10 feet thick in places. It appears the gas is likely coming from an area just below the newly applied pile of dirt or where it thins out. The gas did not have the burned smell as some previous visits. One of the wells just below the subsidence area had a brand new pump and I could hear the liquid pumping out of it and draining away into new liquid line. The gas well head and all the pipes were hot to the touch. Anthony seemed surprised/disappointed that gas is still a problem in this area. He said the recent methane surface survey did not find anything in that area.

A new haul road is being construction from the current north active to the top active face. They are placing a layer/line of trash where the road will be. They have started to deposit municipal waste at the top of hill instead of only the north active face as been the case in recent months. They area also removed a large storage pile of dirt at the top of the hill to make way for the municipal waste. Anthony noted that currently there are no asbestos disposal pits. The practice of continuing to place new C&D waste and now municipal waste at the top of the hill in the elevated temperature area is a rather questionable practice and will need to be an issue that EPA looks at in more detail.

Fugitive dust was again a problem on all the haul roads despite the constant presence of a water truck. We discussed this issue with Anthony that they need a second water truck, more gravel and dust suppressants need to be applied such as calcium chloride based solution especially on the portion of the haul roads near 6-mile road but didn't get a commitment out of him and sounds like they are having trouble getting a second water truck approved for funding reasons. I mentioned that we were hoping to keep the fugitive dust issue out of the enforcement process but will take appropriate action if the problem isn't resolved.

Image 1(TS-01 Gas hole) : TS-01. Note gas hole at base.

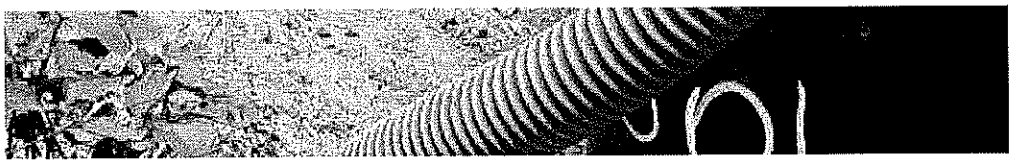

Image 3(Small leachate seep) : Small leachate seep along West haul road ditch.

NAME M. Kovalchick DATE 10/14/19 SUPERVISOR