Michigan Department of Environmental Quality
Office of Waste Management and Radiological Protection
Part 115 - Corrective Action Monitoring and Maintenance Checklist
CIF12-FY18

1.0 General Information

A. Site Information:

Facility/Site Name: Arbor Hills Landfill Date 12/20/18

Current Owner/Operator: Advanced Disposal

Address: 1090 W. 6 mile Road, Northville, MI 48168

WDS ID: 475946

WMRPD Staff: Brett W. Coulter

Date the RAP was Approved: 6/1990

For any item include attachments if they are useful in explaining the answer.

B. Summary of Contamination and Response Activities

Provide a brief description of the following 6 items including any historical events unique to this site:

1. Nature and extent of contamination (including any contamination discovered since RAP approval): *metals and VOCs contamination identified on the NNE portion of the landfill when known as Arbor Hills East. The contaminant plume extended across Napier Road to the east approximately 100 feet. Contamination was relatively shallow due to natural clay at approximately 20 feet bgs.*

2. Engineering controls, such as barriers and caps, and their maintenance: A slurry wall was installed in as part of the RAP along with gradient control wells and piezometers to monitor the gradient.

3. Remediation system(s) including their operation and maintenance (O & M): *A pump and treat system with carbon was installed to remove vocs and inorganics. Once the groundwater concentrations were below Part 201 criteria the system was decommissioned, groundwater continues to be monitored for vocs and inorganics. No exceedances of Part 201 concentrations have been detected since the system was shut down.*

4. Monitoring requirements and their effectiveness: *Continued monitoring of the groundwater east of Napier road as part of the HMP. No exceedances of Part 201 concentrations have been detected since the system was shut down.*

5. Other:

6. ☐ Yes ☐ No ☒ NA Have any additional soil removal activities implemented been in compliance with soil relocation procedures per Part 201 of Act 451?

7. ☐ Yes ☐ No ☒ NA Have any contaminated areas been disturbed by site activities that could exacerbate the contamination, hamper the effectiveness of O & M or, otherwise, negatively affect the ongoing remediation?

8. ☐ Yes ☒ No ☐ NA Has the contamination resulted in any exposures to humans, flora, or fauna (including during utility repairs)?

9. ☐ Yes ☒ No ☐NA Have there been any health advisories implemented due to the contamination?

10. ☒ Yes ☐ No ☐ NA Has the site had any analyses for constituents beyond those required by Part 115 of Act 451 such as diethyl ether?

11. ☒ Yes ☐ No ☐ NA Are there upgradient and downgradient wells in place and in working condition?

C. Land Use Category/Cleanup Criteria RAP Was Approved Under (check all that apply):

☒	Commercial	☐	Limited Recreational
☐	Recreational	☐	Limited Industrial
☐	Industrial	☐	Site-Specific
☐	Limited Residential	☐	Other (Specify)
☐	Limited Commercial	☐	Not Applicable (explain)

2.0 Institutional and Administrative Controls

A. Type of Institutional Control Implemented:

☐	Notice of Approved Environmental Remediation (NAER)	☐	Local Ordinance
☒	Restrictive Covenant (RC)	☐	Other (explain)
☐	Notice of Aesthetic Impact (NAI)	☐	None (explain)

B. Type of Administrative Control in Operation at the Site:

☐	Legally Enforceable Agreement	☐	Other (specify)
☐	Consent Agreement	☒	None (explain) *Conditions of the original order have been met.*
☐	Court Order or Judgment		

C. Have there been any changes in zoning, property conditions and/or land use since RAP approval that might affect either the Land-Use Category/Cleanup Criteria Exposure Assumptions or the Administrative Controls?

☐ Not Applicable
☒ No
☐ Yes

D. Have any variances, conditional permits, easements or other legal nonconforming uses of the property been implemented since the Administrative Control was approved, or, that might otherwise affect the contaminated area?

☐ Not Applicable
☒ No
☐ Yes

E. Are the appropriate Land- and Resource-Use Restrictions recorded and readily accessible to the public? (check all that apply)

☐ Not applicable
☒ Restrictive Covenant properly recorded with the county Register of Deeds within 30 days of RAP approval
☐ Land-use restrictions required by the RAP have been reported to the zoning authority within 30 days of RAP approval.

☐ Restrictive Covenant or other Land-Use Restrictions are still effective and readily accessible to the public.
☐ Procedures are in place to notify land title companies of the need for long-term identification of relevant deed restrictions.

F. Was a surface water mixing zone approved as part of the RAP? ☐ Yes ☒ No
If yes, date of approval
If mixing zone was approved, what is the date that a new mixing zone request is required? *N/A*
Are the mixing zone limits being met? ☐ Yes ☐ No N/A

3.0 Engineering Controls and Monitoring

A. Contingency and O & M Procedures:

1. ☒ Yes ☐ No ☐ NA Are contingency procedures still in place for O & M of the remedial action as described in the approved RAP? *The system components are still on location.*

2. ☐ Yes ☒ No ☐ NA Have the contingency procedures been required to be implemented?

3. ☐ Yes ☐ No ☒ NA If yes to A.2. above, are any of the required contingency procedures still in place and effective?

4. ☒ Yes ☐ No ☐ NA Are O & M procedures current and still being followed? (Note: if Landfill Cap Inspection required, use Post-Closure Cap Inspection Procedures. If Groundwater Monitoring Program review required, use O & M/CME Procedures.) *These have been included as part of the revised HMP.*

B. Other Considerations

1. ☒ Yes ☐ No ☐ NA Are all permanent markers, fencing, or security systems used to delineate restricted areas still in place and effective?

2. ☒ Yes ☐ No ☐ NA Are all required (monitoring, O & M, oversight, etc.) financial assurance mechanisms in place and effective?

3. ☒ Yes ☐ No ☐ NA Are there procedures in place to track the following on-site activities as well as notifying the appropriate personnel prior to being conducted on-site: groundwater well installation, soil sample collection, building and construction permits, and utility work?

4. ☒ Yes ☐ No ☐ NA If sold or offered for sale, have potential or new owners of the property been notified by the seller of environmental conditions and liabilities at the site per

Part 111 of Act 451. Administrative Rule R 299.9525? *The AHE property was sold to AD in 2017. They were aware of all environmental conditions associated with the property, and the ongoing O&M.*

5. ☐ Yes ☐ No ☒ NA Has the MDEQ received notice of the facility owner's or operator's intent to transfer ownership or operational control of a facility within 90 days before the scheduled change in ownership or operational control as required? (Part 111, R299.9525)

Additional Notes: