



Peoples Landfill, Inc.  
4143 East Rathbun Road  
Birch Run, Michigan 48449

March 29, 2024

Gina L. McCann  
Air Quality Division, Bay City District Office  
Michigan Department of Environment, Great Lakes, and Energy  
401 Ketchum Street, Suite B,  
Bay City, Michigan 48708

**Re: Peoples Landfill – Violation Notice**

Dear Ms. McCann:

Peoples Landfill, Inc. (Peoples) received an email with a violation notice letter from Environmental, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), on February 26, 2024 for self-reported non-compliance with portions of the permit to install (permit number 106-23). This violation notice required a written response to be submitted by March 18, 2024, but due overlooking the email, Peoples is responding to this violation on March 29, 2024.

The violation notice identified Peoples as being out of compliance for not submitting a preventative maintenance/malfunction abatement plan (PM/MAP) within 60 days of permit issuance, not collecting hydrogen sulfide or total reduced sulfur samples for November 2023, December 2023, or January 2024, and not notifying EGLE of the flare completion within 30 days of completion.

The violation letter requested that the following items be included in the response letter. Peoples has addressed each item in italic letters below the reporting requirement.

- Dates the violation occurred and duration of the violations.
  - *The violation for the PM/MAP occurred on October 31, 2023, which is 60 days after permit issuance. The PM/MAP was submitted to EGLE on February 27, 2024, making the duration 119 days. The violation for collecting hydrogen sulfide or total reduced sulfur samples occurred in November 2023, December 2023 and January 2024, which are the months the samples were required to be taken. The duration of this violation was 3 months. Lastly, the violation for failure to notify EGLE within 30 days of completion occurred on December 15, 2023, which is 30 days after the installation of the flare. EGLE was formally informed of the installation on February 27, 2024 making the duration 74 days.*
- Explanation of the causes
  - *The violations occurred due to an oversight of these permit requirements, however as soon as Peoples identified the incomplete permit conditions, Peoples immediately implemented a plan to complete them. This including notifying AQD of the oversight and submitting the required information and sampling as soon as practicable.*
- Whether the violations are ongoing
  - *The violations are not ongoing. As mentioned above, on February 27, 2024 Peoples notified EGLE/AQD of the installation of the flare and submitted the PM/MAP, and Peoples collected a total reduced sulfur sample on February 26, 2024.*
- Summary of the action that have been taken and are proposed to be taken to correct the

violations and the dates by which these actions will take place

- *As mentioned above, Peoples notified EGLE/AQD of the installation of the flare, submitted the PM/MAP on February 27, 2024 and Peoples collected a total reduced sulfur sample on February 26, 2024.*
- And what steps are being taken to prevent a reoccurrence
  - *Peoples has developed a better method to promptly analyze and track all permit conditions upon permit issuance. This includes asking the technical consultant supporting the permitting to review and identify all permit conditions and deadlines.*

Should you have any further questions, please contact me at (989) 721-9982 or via email at ngreen2@wm.com

Sincerely,

*Nicole Dennis*

Nicole Dennis  
Engineer  
Peoples Landfill, Inc.

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Chris Hare, EGLE  
John Gall, Peoples  
Rich Paajanen, Peoples