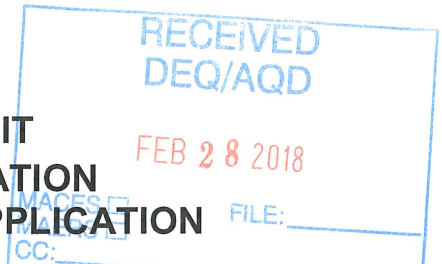




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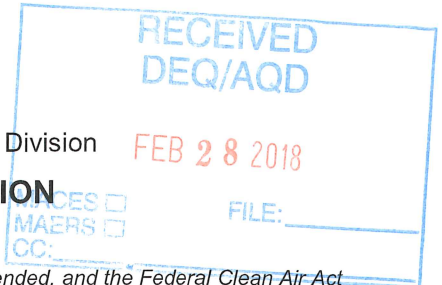


# RENEWABLE OPERATING PERMIT M-001: RULE 215 CHANGE NOTIFICATION RULE 216 AMENDMENT/MODIFICATION APPLICATION

This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.

1. SRN N2688	2. ROP Number MI-ROP-N2688-2011	3. County Washtenaw
4. Stationary Source Name Advanced Disposal Services Arbor Hills Landfill, Inc.		
5. Location Address 10690 West Six Mile Road	6. City Northville	
<p>7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i></p> <p><input type="checkbox"/> Rule 215(1) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(2) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 215(3) Notification of change. <i>Complete Items 8 – 11 and 14</i></p> <p><input type="checkbox"/> Rule 215(5) Notification of change. <i>Complete Items 8 – 10 and 14</i></p> <p><input checked="" type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. <i>Complete Items 8 – 10 and 14</i></p> <p><input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. <i>Complete Items 8 – 14. Results of testing, monitoring &amp; recordkeeping must be submitted. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(2) Minor Modification. <i>Complete Items 8 – 12 and 14</i></p> <p><input type="checkbox"/> Rule 216(3) Significant Modification. <i>Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions.</i></p> <p><input type="checkbox"/> Rule 216(4) State-Only Modification. <i>Complete Items 8 – 12 and 14</i></p>		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> <u>2/01/2017</u>	9. Change in emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i></p> <p>Pursuant to an asset purchase agreement, Advanced Disposal Services Arbor Hills Landfill, Inc.(Advanced) has assumed ownership and control from BFI Waste Systems of North America, LLC (BFI) of all the processes and equipment addressed within Section 2 of MI-ROP-N2688-2011. Advanced previously submitted to the Department documentation of the agreement with BFI.</p>		
<p>11. New Source Review Permit(s) to Install (PTI) associated with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, enter the PTI Number(s) _____ - _____ - _____ - _____ - _____</p>		
<p>12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i></p> <p>a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p>13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i> <b>AI</b></p>		
14. Contact Name Robert D. Walls	Telephone No. 248-412-0704	E-mail Address bob.walls@advanceddisposal.com
<p>15. This submittal also updates the ROP renewal application submitted on <u>04/23/2015</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i></p>		

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Michigan Department Of Environmental Quality - Air Quality Division

RENEWABLE OPERATING PERMIT APPLICATION
C-001: CERTIFICATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.

This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.

Form Type C-001 SRN N2688

Stationary Source Name: Advanced Disposal Services Arbor Hills Landfill, Inc.
City: Northville County: Washtenaw

SUBMITTAL CERTIFICATION INFORMATION
1. Type of Submittal: [X] Notification / Administrative Amendment / Modification (Rules 215/216)
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to
3. Submittal Media: [X] Paper
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal.
AI

CONTACT INFORMATION
Contact Name: Robert D. Walls Title: General Manager
Phone number: 248-412-0704 E-mail address: bob.walls@advanceddisposal.com

This form must be signed and dated by a Responsible Official.
Responsible Official Name: Robert D. Walls Title: General Manager
Mailing address: 10690 West Six Mile Road
City: Northville State: MI ZIP Code: 48168 County: Washtenaw Country: USA
As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.
Signature of Responsible Official: [Signature] Date: 2-26-18

201800030



STEVEN C. KOHL

248.784.5141  
FAX 248.603.9741

skohl@wnj.com

February 22, 2018

*Via Email*

Ms. Caryn Owens  
Michigan Department of Environmental Quality  
Air Quality Division - Cadillac District Office  
Cadillac District Office  
120 W. Chapin Street  
Cadillac, Michigan 49601-2158

Re: **MI-ROP-N2688-2011 - Arbor Hills Landfill, Salem Twp, Washtenaw County**

Dear Ms. Owens:

As you are aware, the above-reference ROP was issued in 2011 in three sections reflecting the separate ownership and operation of segments of the facility by Arbor Hills Energy LLC, Advanced Disposal Services Arbor Hills Landfill, Inc. ("Advanced"), and BFI Waste Systems of North America, Inc. ("BFI"). An administratively complete application for renewal of the ROP was submitted in 2014. On or about February 1, 2017, Advanced acquired the interests of BFI at the landfill and in March of 2017 Advanced submitted MDEQ form M-001 to administratively amend the ROP to reflect that Advanced had succeeded to BFI's ownership and operation under the ROP at the landfill. As of the date of this letter, the MDEQ has not acted on the request to administratively amend the ROP.

BFI has requested that Advanced inquire regarding status of the request to amend the ROP and remove BFI as an owner and operator of the landfill gas collection and treatment system. As BFI no longer has any ownership or operational interest in the landfill, they appropriately desire to have the ROP reflect this reality. While we understand the reluctance to amend the current ROP and the desire to await issuance of a renewed ROP, it is difficult at this time to project when the ROP will be renewed. We understand the ROP cannot be renewed until all emission units are in compliance or there is a compliance plan in place to bring any non-compliant emission unit into compliance. As of the date of this letter, the emission units operated by Arbor Hills Energy, LLC apparently remain in violation of their respective SO2 emission limitations and Arbor Hills Energy LLC has not yet submitted a permit application that has been accepted by the MDEQ to address this non-compliance. Given that permitting changes related to the SO2 emissions may be subject to PSD requirements, it is safe to assume any permit which will allow Arbor Hills Energy to

operate in compliance will not issue until late 2018 and the earliest date by which an ROP renewal might issue would be in 2019 or 2020, potentially three years after BFI ceased to have any responsibility under the ROP. According, Advanced believes it would be appropriate to now amend the ROP to reflect the 2017 change in ownership.

Thank you for your attention to this matter.

Sincerely,

*Steven C. Kohl*

Steven C. Kohl

SCK/sck

Cc: Diane Kavanaugh Vetort -MDEQ  
Scott Miller – MDEQ  
Phillip Comella, Esq.  
Susan Johnson, Esq.