

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Advanced Disposal Services Arbor Hills Landfill Inc	SRN : N2688
Location : 10690 W. SIX MILE RD	District : Jackson
	County : WASHTENAW
City : NORTHVILLE State: MI Zip Code : 48168	Compliance Status : Compliance
Source Class : MAJOR	Staff : Glen Erickson
FCE Begin Date : 10/1/2013	FCE Completion Date : 9/19/2014
Comments : Company is in compliance with all applicable air regulations at this time.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/18/2014	Scheduled Inspection	Compliance	Inspection centered on following up on recent compost odor complaints, and well field improvements.
09/16/2014	ROP Other	Compliance	Semi-annual Startup, Shutdown and Malfunction (SSM) Repor. No events for Section 1 in ROP. Appears accurate. Acceptable.
09/16/2014	ROP Semi 1 Cert	Compliance	No deviations for Section 1 of ROP. Appears accurate. Acceptable.
09/16/2014	Malfunction Abatement Plan	Compliance	Start-up, Shutdown, and Malfunction Report reports 5 malfunction events for which actions taken were consistent with SSM procedures. Appears accurate. Acceptable.
09/16/2014	ROP Semi 1 Cert	Compliance	No deviations for Section 3 of ROP. Appears accurate. Acceptable.
09/16/2014	Malfunction Abatement Plan	Compliance	Semi annual report of SSM reported 89 start-up and 83 shut-down events occurring that were acted upon in manners consistent with the procedures listed in the SSM Plan. Acceptable.

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09/16/2014	ROP Semi 1 Cert	Compliance	1 deviation = wellhead exceedances all covered by approved alternative timeline/scenario requests. Acceptable. 1 dev. = control equipment down for more than 1 hour on 3 occasions due to utility shutdown of plant and delay in starting flare by contractor for Republic. Will FU with Republic at next inspection to see if shorter response time is possible. Acceptable at this time. 1 dev. = flare temperature and /or flow records not recorded for 1 hour for unknown reasons on March 25, 2014. Will FU during next inspection. No indication that an emission problem existed at that time. Acceptable at this time. 1 dev. = On going reporting of historical loss of records at various times in the past when power was lost. Acceptable. No accompanying information that any of these losses were accompanied by emission problems.
09/11/2014	Malfunction Abatement Plan	Compliance	SSM, MAP report appears accurate and complete. No deviations.
09/11/2014	ROP Other	Compliance	Semi-Annual Startup, Shutdown, and Malfunction Report appears accurate and complete. No deviations.
09/10/2014	ROP Annual Cert	Compliance	Annual certification is acceptable, with 7 deviations acceptably remediated/responded to/reported. See Semi 1 and Semi 2 reports for evaluation
09/10/2014	NSPS (Part 60)	Compliance	NSPS, Subpart WWW reports included in semi and annual deviation reports. Acceptable.
09/10/2014	Scheduled Inspection	Compliance	Scheduled inspection of Fortistar gas plant; ROP Section 3.

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09/09/2014	ROP SEMI 2 CERT	Compliance	1 = alt. requests for wellhead exceedances all approved; 1 = flare maintenance when power off/temp. not recorded, not operated; 1 = 1-time when flares not operative for > 1-hour when turbines not operating during plant maintenance when flare start-up needed re-start. 1 = 1 surface methane exceedance not remediated within time parameters; requiring alt. request to install new wells. Approved. All deviations are acceptable as appropriate actions taken.
09/04/2014	Scheduled Inspection	Compliance	Scheduled inspection in conjunction with stack testing of 2 turbines.
08/15/2014	Self Initiated Inspection	Compliance	Inspection to monitor, primarily, the compost operations which have been the source of odor complaints this summer.
08/13/2014	Stack Test	Compliance	Test Protocol of one solar gas turbine. Spoke with TRC's Scott Miller to answer questions about turbine operating conditions. Sent my approval comments to AQD's Tom Maza. Protocol looks fine.
07/29/2014	Complaint Investigation	Compliance	Complaint FU to C-14-01099.
07/15/2014	Complaint Investigation	Compliance	FU to complaint No. C-14-011028.
07/15/2014	Complaint Investigation	Compliance	Odor and dust complaint FU to C-14-01031.
07/10/2014	Scheduled Inspection	Compliance	Inspection to follow-up on company efforts to correct conditions at compost operations which generated recent off-site foul odor impacts.
06/25/2014	Complaint Investigation	Compliance	Complaint investigation. Met with Tom Flannagan, General Manager, to discuss compost operations which caused the recent complaints from residents in Northville Ridge subdivision.
06/19/2014	Complaint Investigation	Compliance	Complaint investigation: C-14-00867 from Rekha Rarendra-Kumar, and C-14-00868 from Anu Kattethota concerning foul odors for 3 days: Thursday, 6-12-14, Friday, 6-13-14, and Saturday, 6-14-14. Resolved as of 9-18-14.

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06/17/2014	Complaint Investigation	Compliance	After speaking with complainants (Narendra-Kumar, and Kattethota) I called Tom Flannagan, General Manager, Arbor Hills Landfill.
06/05/2014	Self Initiated Inspection	Compliance	Inspection of landfill and composting operation.
03/27/2014	Scheduled Inspection	Compliance	Inspection in morning with Fortistar gas plant manager Carlos Wilson, ROP Section 3; followed by inspection in afternoon with Christina Pearse, Republic, ROP Section 2, and her consultant, Jennifer Baker, AQSI; and Tom Flannagan, Advanced Disposal, General Manager Section 1.
03/14/2014	MAERS	Compliance	MAERS audit completed. Appears accurate.
03/05/2014	ROP Other	Compliance	No SSM events during 2nd semi-period. Appears accurate.
03/05/2014	ROP SEMI 2 CERT	Compliance	No deviations reported for 2nd semi-period. Appears accurate.
03/05/2014	NSPS (Part 60)	Compliance	Semi-annual ROP report meets NSPS reporting requirements.
03/05/2014	ROP Annual Cert	Compliance	No deviations reported for annual reporting period. Appears accurate.
03/05/2014	Stack Test	Compliance	Performance Source Testing Turbine #4 report shows compliance with NSPS limits, ROP limits for NOx and SO2. Appears accurate.
03/04/2014	ROP SEMI 2 CERT	Compliance	No deviations reported for 2nd semi-annual period. Appears accurate.
03/04/2014	ROP Other	Compliance	Start-up, Shutdown, and Malfunction Report shows 4 malfunctions of the gas skid caused by utility trip. The actions taken at facility due to these events were consistent with th procedures listed in the SSM Plan at the facility, according to report. Appears accurate.

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03/04/2014	ROP Annual Cert	Compliance	Annual report includes 1st semi-annual report with 1 deviation : electronic gas flow meter to Turbine 4 malfunctioned, thereby not being entered as record in data acquisition system. Was replaced by manual recording of flow hourly until electronic meter fixed. Acceptable. 2nd semi-annual report show no deviations for 7-1-13 to 12-31-13. Appears accurate.
03/04/2014	NESHAP (Part 61)	Compliance	Copy of NESHAP Notification of Excavation/Disturbance Asbestos Containing Waste sent to AQD, TPU, Asbestos Program. They decided to send notice for entire construction season during which numerous wells, horizontals, and laterals will be installed with possible disturbance of asbestos-containing buried waste. District has no objections. TPU may have comment, however.
02/27/2014	Scheduled Inspection	Compliance	Drove around perimeter roads surrounding landfill to observe any off-site odors.
12/12/2013	Self Initiated Inspection	Compliance	Inspection to monitor off-site odor impacts, if any.
11/12/2013	Self Initiated Inspection	Compliance	Odor observation around landfill.
10/17/2013	Scheduled Inspection	Compliance	Scheduled inspection with new General Manager of Advanced Disposal--Tom Flannagan.
10/10/2013	Self Initiated Inspection	Compliance	Attempted to meet with Gen. Mgr. Tom Flannagan, and conduct odor observations around landfill.

Name: GLEN ERICKSON Date: 2-19-14

Supervisor: 