

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Arbor Hills Landfill, Inc.	<b>SRN :</b> N2688
<b>Location :</b> 10690 W. SIX MILE RD	<b>District :</b> Jackson
	<b>County :</b> WASHTENAW
<b>City :</b> NORTHVILLE <b>State:</b> MI <b>Zip Code :</b> 48168	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Diane Kavanaugh Vetort
<b>FCE Begin Date :</b> 9/24/2020	<b>FCE Completion Date :</b> 9/24/2021
<b>Comments :</b> T5 Major Stationary Source FCE/PCE. Covers two inspection dates 9/14 (Section 1	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/24/2021	On-site Inspection	Compliance	FCE/PCE Major Source. Conducted complete compliance inspection of Arbor Hills Energy (Fortistar) Section 3. See also 9/14/21 inspection of Section 1 & 2.
09/24/2021	Complaint Investigation	Compliance	Numerous odor complaints received this morning. Odor observation in response to complaints conducted in area of AHL and complainant's addresses. Follow up with GFL.
09/20/2021	Other		Methane survey as part of MOOSE. Sent SEM results to company via email 9/22/21, sent updated email out to company on 9/24/21
09/14/2021	On-site Inspection	Compliance	FCE/PCE Major Source. Conducted complete compliance inspection ROP Section 1 and 2. See also PCE 9/14/21 On-site inspection Mike Kovalchick for SEM Survey conducted. See also 9/24/21 On-site inspection of Arbor Hills Energy Section 3.
09/14/2021	On-site Inspection	Compliance	SEM Inspection

Activity Date	Activity Type	Compliance Status	Comments
09/10/2021	Stack Test	Compliance	EUTURBINE4-S3 (Solar Taurus) Test Protocol for required by ROP MI-ROP-N2688-2011a to conduct annual testing of SO2 and NOx. Arbor Hills Energy (Fortistar) is owner/operator of Section 3 landfill gas to energy plant. Testing will be conducted by Impact Compliance & Testing Inc.. Proposed date is November 10, 2021.
09/09/2021	Other		Diane Kavanaugh Vetort, sent response to AHL's request - (AHL), requesting AQD approval of an alternative compliance timeline (ACT) to correct oxygen exceedances on Wells AHW263R3 and AHW0177, and to abandon well AHW16
09/08/2021	Other		Perimeter Methane Survey in support of MOOSE study.
09/08/2021	Other		Sent email response to request for HOV for Wells AHW281R and AHW312R.
09/08/2021	Other		Sent out response to request for HOV and ACT. Request was received in July
08/12/2021	Other	Compliance	Email notice of Gas Plant outage. Notification from Anthony said: Arbor Hills received notification from Fortistar that DTE has asked them to halt operations until further notice. The estimated downtime is wide-ranging and can be anywhere from 8 hours to 2 days. All flares onsite will be in operation to accommodate gas during this period. If you have any questions please contact David Seegert (David.seegert@gflenv.com ) or myself (Anthony.testa@gflenv.com).
08/10/2021	Other		MOOSE Study Field Observations
07/20/2021	Other		MOOSE Study-perimeter walk of east side of landfill to sample for Methane to assist with MOOSE study/drone emission survey.
07/19/2021	Other		MOOSE Study-Perimeter walk using SEM 5000 to sample for Methane

Activity Date	Activity Type	Compliance Status	Comments
07/15/2021	Other Non ROP	Compliance	<p>GLF (Section 1 &amp; 2) WOI Report MAY/JUNE 2021. Required to submit Bimonthly Status Report by HOV approval letters starting 5/6/19. Most recent issued 6/2/21 for another year. WOI Report is the 16th Elevated Temperature Landfill Status Report (ETLF). AQD required monthly report by 15th of the following month. Report every 2 months as of Jan 15, 2020. Report Wells of Interest (WOI) includes wells (now 22) with HOV for Temperature GFL req'd due to ETLF event. Reports Filed. Covers: well gas data, pump data, downhole temperatures, construction, plant data. REPORT MAY/JUN: Well 312 still hot w/high CO @300 ppm. Prior drill found charred material No other subsurface fire indicators to date. WOI area has min 36 inches interim cover and remains unchanged. State no significant changes in gas quality/quantity at plant. 2nd Q liq levels completed. 4 Wells increased liq: 237R3, 258R, 264R2, 272R3. Pumps will be pulled/ck'd. 9 Wells unchanged; 9 Wells decreased. State 2021 GCCS construction plan: replace W207R, W0312, W0286; connect vac network to 12 in, 18 in header east side of AHW. Dataloggers only. Took over from Fortistar for WOI only; May June 2021 monthly LFG data as well as pump data requested for wells of Interest. Attachments 2 and 3 provide the monthly and quarterly carbon monoxide and hydrogen/nitrogen data for WOI.</p>
07/07/2021	Other		Sent response to Alternative Compliance Timeline - AHWWT01
06/22/2021	Other		Sent response to appended Alternative Timeline Request
06/22/2021	Other		Sent response to appended Alternative Timeline Request for Diane Kavanaugh Vetort

Activity Date	Activity Type	Compliance Status	Comments
06/17/2021	Other	Compliance	Email notice of power loss at the Arbor Hills Energy plant. Reported to citizen group & EGLE. Power loss today at 2:00 AM and continuing per DTE estimate until 12 noon today. Caused loss of power to Flare compound shutting it down. GFL was able to get technician to site to hook up generator and are back up and running per AT. AQD notes 3 Odor complaints were received @8:30 AM this morning.
06/15/2021	Other		Sent reply from Diane Kavanaugh Vetort to Anthony via email today for Request for Alternative Compliance Timeline request sent to us on June 11, 2021
06/15/2021	Other		Sent out Response to Request for HOV Extension, sent by Ms. Diane Kavanaugh Vetort
06/04/2021	Complaint Investigation	Compliance	Received numerous complaints 6/3, 6/4 and then also on 6/5. On 6/4 conducted odor observation in the area of AHLF and surrounding neighborhoods.
06/01/2021	Other		Sent email from Diane Kavanaugh Vetort for Higher Operating Value Temperature Waivers response letter. May 2021 WOI HOV waiver extension until May 2022.
05/26/2021	Other		Sent out Request for Alternative timeline response and Request to decommission response from Diane Kavanaugh Vetort

Activity Date	Activity Type	Compliance Status	Comments
05/26/2021	Other Non ROP	Compliance	<p>GFL AHL is Section 1 &amp; 2 submitted ETLF WOI HOV Waiver Extension request letter for AQD approval (yearly extension due May). Summary: The existing HOV waiver approvals lapsed on May 6, 2021. On May 14, 2021 AQD received AHL's request of a one-year extension of the HOVs for twenty-two wells and one leachate collection sump (TS01R). Two of the wells, AHW284R and AHW310R2, do not currently have an approved HOV. Also, in their letter AHL is requesting an Alternate Operating Temperature, HOV, and the removal of the WOI designation for wells AHW206R3 and AHW251R2. AHL proposes to conduct downhole temperature profiles utilizing data loggers (new) spaced approximately evenly throughout the extent of the well (i.e., 100-foot well; four (4) data loggers spaced 20-feet apart) on a quarterly basis for each WOI location. AHW206R3 will continue to be exempt from downhole temperature profiles per EGLE correspondence dated February 25, 2020 and May 6, 2020 WOI HOV waiver extension. AHL included a WOI Management Plan section in their letter referencing heat extraction, installing a new bentonite or foam seal around the base of the affected wells that will also include a 5'x5' geomembrane curtain, and other actions to manage the WOI wells. AHL states their intent is to work with Fortistar (Arbor Hills Energy) to move operation &amp; maintenance (O &amp; M) control of all WOI locations to the Arbor Hills (Landfill) team. This move is anticipated to occur on or around June 1, 2021. Bi Monthly reports will continue to be submitted. AQD letter dated 6/1/2021 approved all requests for 1 year.</p>

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05/21/2021	Other Non ROP	Compliance	<p>GLF (Section 1 &amp; 2) WOI Report MAR/APR 2021. Required to submit Bimonthly Status Report by HOV approval letters starting 5/6/19. WOI Report is the 16th Elevated Temperature Landfill Status Report (ETLF). AQD required monthly report by 15th of the following month. Report every 2 months as of Jan 15, 2020. Report Wells of Interest (WOI) includes wells with HOV for Temperature GFL req'd due to ETLF event. Reports Filed. Covers: well gas data, pump data, construction, plant data. REPORT MAR/APR: Exploratory drill found evidence of charring, etc..near Well 312. WOI area has min 36 inches interim cover and remains unchanged. State no significant changes in gas quality/quantity at plant. 1st Q liq levels completed. State 2021 GCCS construction: W207R, W0312 replacements; new vac lateral W264R2. Vertical Temp profile done 2/8-9. Dataloggers vs. MCC downhole temps (last MCC will be in June). Taking over from Fortistar for WOI only; March and April 2021 monthly LFG data as well as pump data requested for wells of Interest. Attachments 2 and 3 provide the monthly and quarterly carbon monoxide and hydrogen/nitrogen data for WOI.</p>
05/07/2021	Other Non ROP	Compliance	<p>DRAFT ETLF WOI HOV Ext - report is for the annual renewal of the ETLF WOI waivers (May 2021). GFL mediation involved draft to EGLE for initial review. GLF (Section 1 &amp; 2). AQD reviewed &amp; Jenine sent email w/comments. SEE ENTRY 5/14/21 FINAL REQ REC'D reviewed and approval sent 6/1/21.</p>

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04/30/2021	Other Non ROP	Unknown	GFL LFG Migration Remedial Action Plan 12-month Monitoring Report (Probe Report). EIL consultant. Addressed to MMD Larry Bean. dkv cc'd fwd to Brett & Gary, MMD, AQD & Enf. DKV note: "Probe AHMP015R has exhibited zero methane concentration for extended periods, with increases in the late summer. The site converted the existing probe AHMP015R to a perimeter gas collector and installed a new gas probe, AHMP15R2, on the east side of Napier Road. Since installation of AHMP15R2, elevated concentrations of methane have been observed. The site is currently working on a plan to install an out of waste collection system to address the exceedances detected at this probe."
04/30/2021	Other		Sent Request for Alternative Operating Standard response from Diane Kavanaugh Vetort to company for AHECW001
04/28/2021	Meeting Notes	Compliance	Rachel Burns, Water Resources Div set up TEAMS call w/GFL's AT, Dave Siegert, Clark Lundell, to follow up on their request to use Compost leachate as dust suppressant on the landfill interior haul roads. Internal EGLE discussion last wk generated about 6 Questions Rachel sent to GFL w/mtg notice. Overall GFL says has been done at other LFs, not odor source. Use Water tanker w/float on top of pond. Use only on interior roads. Use clean storm water in other Tanker for other roads. Rachel to follow w/summary to all & DKV will update this w/report entry incl questions. Pending GFL to sample the Compost leachate for BOD & others (Rachel to determine). Last sample was yrs ago of the combined leachate/stormwater (violation) at that time.
04/27/2021	Other		sent out letter to Mr. Testa for DKV, in response to their request for Alternative Operating Standard.

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04/06/2021	Complaint Investigation	Compliance	Complaints 4/2 and 4/4-5 follow up w/company. DKV requested response/info re:odors. AT reported well near active face had settled. MK requested additional information in email 4/6. AT replied: The annual H2S concentration for the well in question (AHWW146B) is 127ppm for 2021, down from 319 ppm recorded in 2020. I have attached the last 6 months of gas wellhead data, as requested. Lastly, the noted well was located within an hour or less upon arrival on Saturday morning and the issue was corrected immediately.
04/02/2021	MAERS	Compliance	MAERS submitted via paper. Submitted electronically 3/12/21. Arbor Hills GFL is Section 1 & 2; Separate entry for Section 3 Arbor Hills Energy. LF support docs attached. Flares CO error in emissions reported -email Dana O. Verified error & correct lbs. FACILITY WIDE TOTALS: CO 122 tons; NMOC 61 tons; NOx 109 tons; PM 10F 113 tons; SO2 134 tons; VOC 2.36. (See also S3 MAERS)
04/02/2021	MAERS	Compliance	MAERS submitted via paper. Arbor Hills Energy, FORTISTAR Methane Group is Section 3. Submit HARD COPY of their MAERS thrupt/emissions and AQD has to manually enter it into the DB of the LF (Arbor Hills-GFL). FACILITY WIDE TOTALS: CO 122 tons; NMOC 61 tons; NOx 109 tons; PM 10F 113 tons; SO2 134 tons; VOC 2.36.
03/25/2021	On-site Inspection	Compliance	Methane SEM survey and H2S survey of the north side of landfill.  Letter sent to company with results of SEM on 3/31/21

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03/22/2021	MACT (Part 63)	Compliance	ROP 2020 2nd Semi-annual startup, shutdown and malfunction report. NESHAP Subpart AAAA. Section 3 Arbor Hills Energy (Fortistar) operates the primary control equipment, LFG Treatment, and treated LFG to energy plant (4 turbines, 3 ductburners). Report consistent operation with SSM, no malfunctions, and no revisions to the plan.
03/22/2021	ROP Annual Cert	Non Compliance	ROP 2020 Annual Cert & Dev Reports. Report usual ongoing 3 deviations of SO2 exceedances and failed performance test for SO2. EPA DOJ/AG in escalated enforcement with Fortistar Methane Group at this time.
03/22/2021	ROP SEMI 2 CERT	Non Compliance	ROP 2020 2nd Semi Annual Cert & Dev Reports. Report usual ongoing 3 deviations of SO2 exceedances and failed performance test for SO2. EPA DOJ/AG in escalated enforcement with Fortistar Methane Group at this time.
03/22/2021	ROP Other	Compliance	4th Quarter 2020 SEM Report. Received per request during enforcement negotiations. Sniffer Robotics conducted survey. 7 exceedances were reported and cleared during the period.
03/22/2021	ROP Other	Compliance	Monthly Cover Reports for Dec 2020, Jan & Feb 2021. Reports requested during enforcement negotiations. Minimal cover issues reported. Corrective actions listed.
03/18/2021	NSPS (Part 60)	Compliance	Section 3 Fortistar operates Treatment System as NSPS control. No deviations reported. (Other ROP reports Semi & Annual, report deviations of ROP for Turbines).

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03/15/2021	ROP SEMI 2 CERT	Compliance	2nd Semi-annual 2020 ROP Certification & Deviation Report. ADS AHLF Sections 1 & 2. Report 3 deviations: 1) Wells that have positive pressure, oxygen >5%, or temperature above 131 degrees F for >15-days; 2) 391 McGill and 392 Zink, FGENCLOSEDFLARES-S2, 9/29 & 10/6 (R912 reported to AQD) combustion temp below tested temp for 3 hrs. 3) One not previously reported 10/19 28 minutes no temp or flow record recorded >15 minutes (power loss 28 minutes) therefore not maintained for 5 yrs. Corrective action/resolved. No times when all controls off >1 hr. No time entire collection system not in operation >5 days. 3rd Q 11 exceedances; 4th Q 7 exceedances. All cleared. Construction April - Dec: 14 redrills, 9 new wells, 4 trench wells, 5 horizontal wells. 8 wells are listed as installed to correct SEM exceedances (expanding wellfield). 18 pumps were installed Nov/Dec 2020.
03/15/2021	ROP Annual Cert	Compliance	2020 Annual ROP Cert & Dev Reports. 1st Semi (2) deviations; 2nd Semi (3) deviations. All information was provided timely. Acceptable.
03/15/2021	NSPS (Part 60)	Compliance	2nd Semi annual 2020 NSPS Subpart WWW report. Combined with 2nd Semi Dev & Cert report (see that entry for details).
03/15/2021	MACT (Part 63)	Compliance	2nd Semi-annual 2020 Startup Shutdown Malfunction Report. NESHAP Subpart AAAA. AHLF is Section 1 & 2. Report 46 start-up and 41 shutdown events. Report for Wells & 3 flares. Report 6 Malfunction events (all flares). 392 9/9 3hrs 27 min; 391/392 9/23-25 44 hrs 22 min; 391/392/393 10/19 2 hrs 35 min

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03/12/2021	Other Non ROP	Compliance	<p>GLF (Section 1 &amp; 2) WOI Report Jan/Feb 2021. Required to submit Bimonthly Status Report by HOV approval letters 5/6/19, 10/17/19, 5/5/20 and 9/1/20. WOI Report is the 15th Elevated Temperature Landfill Status Report (ETLF). AQD required monthly report by 15th of the following month. Report every 2 months as of Jan 15, 2020. Report Wells of Interest (WOI) includes wells with HOV for Temperature GFL req'd due to ETLF event. Reports Filed. Covers: well gas data, pump data, construction, plant data. REPORT JAN/FEB: Increased CO conc at AHWW0312 suggestive of a subsurface oxidation event. Shut down 12/16/20. Samples incl canister 260 ppmv CO. Scheduled drill contractor to conduct exploratory drill to obs material nearest well for evidence of charring, etc.. WOI area has min 36 inches interim cover and remains unchanged. State no significant changes in gas quality/quantity at plant. 1st Q liq levels completed 2/26 will be in May report. Installed new air/FM to Well W264R. State 2021 GCCS construction: W207R, W0312 replacements; new vac lateral W264R2. Vertical Temp profile done 2/8-9. Dataloggers vs. MCC downhole temps; data loggers appear more consistent. Further comparison will evaluate 4 wells W259R4, W284R, W285R, W299R in May report.</p>
02/26/2021	Other		<p>Sent out letter in response to their request for Alternative Operating Standard Renewal - AHEW0040, Request for Decommissioning - AHWWHW13</p>

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02/18/2021	Telephone Notes	Compliance	Called AT to follow up on PEAS complaint 2/17 PM. He did not receive the complaint. Notified Scott regarding PEAS process may need to be updated w/new Company name & contact email (s). He said he was not aware of anything unusual occurring the prior night. DKV ck weather w/MK and was calm / NE. Another source in area of "rotten egg" is Consumer's Compressor Station at 7 Mile/Napier. No widespread complaints were rec'd however and not aware of any release reports (due to mercaptans or line cleanings). Sent email to complainant.
02/12/2021	Reg. Applicability Determination	Compliance	On behalf of GFL-Arbor Hills, consultant Dana Oleniacz, EIL is submitting this Permit to Install (PTI) exemption demonstration for a proposed 1-million gallon leachate tank. Propose R285(2) (aa) and include emission estimates. Not Kb subject due to vapor pressure of VOCs.

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01/20/2021	Other Non ROP	Compliance	<p>GLF (Section 1 &amp; 2) WOI Report Nov/Dec 2020. Required to submit Bimonthly Status Report by the HOV approval letters dated 5/6/19, 10/17/19, 5/5/20 and 9/1/20. WOI Report 14th Elevated Temperature Landfill Status Report (ETLF). AQD required monthly report by 15th of the following month. Report every 2 months by the 15th of the following month as of Jan 15, 2020. Report Wells of Interest (WOI) includes wells with HOV for Temperature GFL req'd due to ETLF event. Reports Filed. Covers: well gas data, pump data, construction, plant data. REPORT NOV/DEC: Increased CO conc at AHW0312 suggestive of a subsurface oxidation event. Shut down 12/16/20. WOI area has min 36 inches interim cover and remains unchanged. O2 at plant continues stable. State 11 wells decrease in liquid level. Unable to measure 207R due to obstruction (plan replace 2021). 3 Wells increase 251R2, 297, 306R (say pump malfunct 251R2 and 297 replaced in Dec; 306 new for remain 4th Q). 9 unchanged. 4th Q Temperature profiles done 11/5-6 will be in Jan 2021 Report. Wells still high (gas temp listed at bottom of column) Wells 312* (171.6 F), 286R(131), 300 (151), 290 (152.9), 279 (154), 503* (140), 264R2 (104). 312: looks like 200 ppm CO, same as last report.</p>
12/08/2020	Other		<p>Request for HOV Temperature Waiver response sent as response to GFL letter dated 11/23/20, requesting an HOV temperature approval for AHW272R3 which was installed in May 2020, to replace well AHW272R2. Wellfield monitoring data was submitted.</p>
12/04/2020	Odor Evaluation	Compliance	<p>Brief odor observation, off site perimeter roads and downwind residential areas. Weather conducive to downwind impact to Northville Ridge subdivision.</p>
11/29/2020	Off-site Inspection	Compliance	<p>Methane Survey along 6-Mile road just North of the landfill fence line.</p>

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11/28/2020	Odor Evaluation	Compliance	Conducted odor observation in the area. One complaint received in the morning. Weather conducive to downwind impact to Steeplechase subdivision.
11/25/2020	Stack Test	Non Compliance	<p>AHE Test Results report for the verification of CO, SO<sub>2</sub>, VOC, and HCl emissions from one (1) LFG fueled turbine identified as EUTURBINE4-S3 in MI-ROP-N2688-2011a. Impact Compliance &amp; Testing, Inc. was tester. Conditions: 4.93 MW-hr, 2423 scfm, 44.2% CH<sub>4</sub>, 79.1 vac to plant. Results (LIMIT): CO 7.67 (13.2); SO<sub>2</sub> 2.02 OR 0.16 (0.9 OR 0.15)*; VOC 0.13 0.80; 0.32 (0.6). NOTE: A VN will be issued for exceedance of SO<sub>2</sub> permit emission limit.</p> <p>H<sub>2</sub>S and CH<sub>4</sub> were also sampled: 350 to 370 ppm H<sub>2</sub>S ranged 8 samples. Tedlar Bag was 400 ppm and TRS 434 ppm. Methane 43.4 and heat content 433 Btu/scf. TPU Memo 1/25/21 confirms failed SO<sub>2</sub> emissions test. Review docs placed in plant testing file.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/19/2020	Other Non ROP	Compliance	<p>WOI Report 13th Elevated Temperature Landfill Status Report (ETLF). AQD required submittal of monthly report by 15th of the following month. Report every 2 months by the 15th of the following month as of Jan 15, 2020. Report Wells of Interest (WOI) includes wells with HOV for Temperature ADS req'd due to ETLF event. Reports Filed.</p> <p>Covers: well gas data, pump data, construction, plant data. REPORT SEPT/OCT: Request to add one WOI Well AHWW207R 9/23/20. Wells within 250 ft of well then included for monitoring. WOI area has min 36 inches interim cover and remains unchanged. O2 at plant continues stable after Phase 1 2020 construction ended 9/28 at 2-2.4% and CH4 44-46%. Due to waste grades in active area, didn't install permanent vac header/lateral to AHW264R2 as planned in Phase 1 and will not in 4th Quarter due to grades still down. Proposed for 2021 construction season. Phase 2 2020 starts in mid-Nov until the end of the year and say doing air/forcemains, esp. AHW306R. 4th Q Temperature profiles done 11/5-6 will be in Jan 2021 Report. Wells still high (gas temp listed at bottom of column) Wells 312* (171.6 F), 286R(131), 300 (151), 290 (152.9), 279 (154), 503* (140), 264R2 (104). 312: looks like 200 ppm CO, same as last report.</p>
10/28/2020	On-site Inspection	Non Compliance	SEM Survey conducted with 33 exceedances found.
10/28/2020	Other		SEM Results Letter sent out for the Self Initiated Inspection of 10/28/20
10/21/2020	Odor Evaluation	Compliance	Conducted odor observation in response to complaints. Ongoing odor complaint situation.

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10/20/2020	ROP Other	Compliance	Documents receipt of an Email with 4 separate reports related to ROP NSPS requirements, and follow up to the Surface Emission Monitoring compliance letter following AQD SEM survey. DRAFT AH Gas As Built PH1_101620; DRAFT well schedule and logs; 2020 Q2 Arbor Hills EGLE Final Report _Corrective Actions; October 2019 -September 2020 Cover Integrity Reports.
10/13/2020	NSPS (Part 60)	Compliance	2nd Quarter 2020 Surface Emission Monitoring (SEM) Report. Sniffer Robots conducted surveys. 19 locations had exceedances (>500 ppm). No exceedances 3x within the quarter. Were a few very high readings especially one near 278 of 101,354.9 ppm.
10/13/2020	Odor Evaluation	Compliance	Conducted odor observation due to recent complaints. In area 7:10 AM to 9:20 AM. Today 6 complaints were received this morning.
10/09/2020	ROP Semi 1 Cert	Compliance	1st Semi-annual ROP Certification & Deviation Report. ADS AHLF Sections 1 & 2. Report 2 deviations: Wells that have positive pressure, oxygen >5%, or temperature above 131 degrees F for >15-days, EUENCLOSEDFLARE2-S2, FGENCLOSEDFLARES-S2, 2/6-10/20 R912 estimate @79.04 lbs uncombusted landfill gas was released from Flare 391 (a.k.a McGill Flare, West Flare). VN issued. Corrective action/resolved.
10/09/2020	NSPS (Part 60)	Compliance	1st Semi-annual NSPS report submitted with Deviation report. AHLF ADS Section 1 & 2. Deviations: well monitoring & enclosed flare malfunction (2/6-10/20). Two instances all controls not in operation >1 hr 1/14/20 (1 hr 38 min) and 5/19/20 (3hrs 30 mins) not deviations. SEMs 1stQ 10 hits; 2nd Q 28 hits all cleared. 25 Wells were new or redrilled during the period.

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10/09/2020	MACT (Part 63)	Compliance	1st Semi-Annual Startup, Shutdown, and Malfunction Report (SSM). ADS AHLF Section 1 & 2. For the reporting period, 42 start-up, 42 shut-down and 12 malfunction events occurred. 1 of 11 Malfunctions was #391 valve issue w/emission exceedance (95.9hrs VN issued); other 11 were #393 auto shutdown due to protective device. State actions taken for all SSM during the reporting period were consistent with the procedures listed in the facility's SSM plan. AQD req'd ADS revise SSMP 3/17/20 due to valve malfunction event.
10/09/2020	ROP Semi 1 Cert	Non Compliance	1st Semi-annual ROP Certification & Deviation Report. Arbor Hills Energy -Fortistar Section 2. Reports ongoing violation of increased H2S concentrations in landfill gas that resulted in exceeding their Turbine permit limits. AHE is in escalated enforcement. They submitted an incomplete PTI application to EGLE to address the alleged permit violations. Most recent test 12/20/19, results indicated non-compliance with SO2 lb/pounds per megawatt-hour, lb/MW/hr.
10/09/2020	MACT (Part 63)	Non Compliance	1st Semi-annual Startup Shutdown Malfunction (SSM) report. AHE-Fortistar reports no malfunction events occurred. Report actions taken at the facility for all SSM events during the reporting period were consistent with the procedures listed in the SSM Plan at the facility.
10/08/2020	Other	Compliance	Document Email from Larry Bean, MMD D.S. regarding recent odor complaints received: I talked to Anthony Tests this morning about the Arbor Hills Landfill odors between 9:26 to 10:20. He verified that the odor at this time was from the Toledo sludge. He and Dave are working to get rid of this sludge. They are also working to determine from their waste characterization person what this is. They do not know if it is sewage sludge.

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10/07/2020	Other	Compliance	<p>To Document Email rec'd from Larry Bean, MMD D.S. regarding recent large number of complaints /follow up: "I talked to Anthony Testa and Dave Seeger? 567-230-7373 the new manager about odors yesterday. Dave said an odorous sludge waste from Toledo came in yesterday. The odors were probably a combination of this sludge and the gas that continues to be emitted from the landfill. He said something about GFL being involved with that waste. He plans to bury it quickly today and the next few days and ordered that it be delivered later in the morning so the truck is not waiting in line in the early morning like yesterday. He is working with management to cut out this waste ASAP. They indicated that GFL is scheduled to take over operations in 4 days. Anthony stated that phase 1 of the gas system upgrade has been completed with I think it was over 20 some wells that were new and replacement wells. They plan to start phase 2 soon which will be running air supply and leachate collection lines to wells that need pumps."</p>
09/30/2020	Telephone Notes	Non Compliance	<p>Rec'd Telephone call from AT and consultant, Laura Niemann, EIL LLC. Then an email: As a follow-up to the notification phone call this morning (9/30/20) at 11:30 AM, ADS will prepare a 10-day report detailing the 3-hr. temperature rolling average excursion we discussed for Flare 392. As requested, ADS will include the flare data associated with the time period on 9/26/20 (also appended to this email) that is in question along with the findings of the cause of the issue.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2020	Stack Test Observation	Unknown	Scheduled Solar 4 Turbine annual testing. Carlos is Fortistar contact on-site. Tyler Wilson, IMPACT conducted testing. Mark Dziadosz, TPU and DKV, District observed. One day, three runs with H2S and Methane canisters (1 CH4, 1 H2S) samples prior to Run 1 starting due to issue plant had with an FG6 valve. Caused late start and it was necessary to drive sample to lab in Traverse City. At same time as canisters, 2 Draeger tubes (H2S) were pulled. Impact said they plan to grab 2 Draeger tubes per each run, for a total of 8 today.
09/25/2020	Odor Evaluation	Compliance	Conducted an odor observation and complaint investigation due to large number of recent complaints (9/22 -24). Was also scheduled to observe Stack Testing at Fortistar, Arbor Hills Energy this morning.
09/24/2020	Other		Documents communication from Dave Drinan, The Conservancy Initiative, related to the Odor Report database.
09/24/2020	Complaint Investigation	Non Compliance	Document AQD investigation of the recent complaints received and communication from ADS regarding the same. Odor complaints received 9/24 for the period of 9/22-24 due to an issue with The Conservancy Initiative's odor reporting system. AQD learned the AHE Plant was forced off line by DTE on the 23-24. The ADS Flare compound did not come on line as called for by procedure and operations plan.

Activity Date	Activity Type	Compliance Status	Comments
09/24/2020	Telephone Notes	Unknown	<p>AQD contacted due to recent complaints. Approximately 48 complaints from 9/23 PM to today 2:30 PM.</p> <p>AT most significant thing he reported is that he received notice at around 2:47 PM yesterday that the Energy plant was tripped off line by DTE. He said they ran all three flares until the plant came back online starting, about 9:00 PM, and one of the three flares was still operating at midnight. I asked that he send me the Flare information for yesterday and today.</p> <p>The plant is scheduled to test one turbine tomorrow morning so I will ask Fortistar for their information tomorrow.</p> <p>Anthony said the formal Phase 1 construction at the landfill has ended and the only work that is going on today is on one Well and that will be completed today. He said to his knowledge nothing unusual occurred in the solid waste, leachate or compost areas.</p> <p>I provided this update to Dave Drinan, Citizen group, and that ADS has a new General Manager, name is David Seegert, David.Seegert@advanceddisposal.com</p>

Name: *Mariane Kavanaugh Vertort*

Date: 9/24/2021

Supervisor: 