



October 20, 2023

Gary Schwerin, Lansing and Jackson District Supervisor
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Materials Management Division
Jackson District Office
301 East Louis Glick Highway
Jackson, MI 49201-1556

Sent via email

Re: 7-Day Update to MMD October 10, 2023 Violation Notice Response (SRN: N2688)

Dear Mr. Schwerin:

Arbor Hills Landfill, Inc. (Arbor Hills) provides this letter in accordance with Paragraph 5.17(E) of the Consent Judgment and as an update to the Violation Notice (VN) response dated October 13, 2023. As stated in the October 13, 2023 VN response, Arbor Hills detailed the remedial efforts the site had completed up to that point. Moreover, the letter promised to submit documentation of the completion of the remedial actions seven days from the date the initial response was submitted.

Remedial Measures Conducted from September 7, 2023 through October 11, 2023

Detailed below is a refresher of the progress made from September 7, 2023 to October 11, 2023. Details of the work completed during the September 7, 2023 through October 11, 2023 timeframe can be found as part of the October 13, 2023, VN response submitted by Arbor Hills to EGLE.

- On September 7, 2023, Arbor Hills staff placed an approximate one-foot layer of clay along the low-lying area adjacent to Cell 6A at the northeast corner of the site the surface to help limit landfill gas (LFG) emissions in the area.
- On September 11, 2023, Arbor Hills contracted Sniffer Robotics to conduct a non-routine surface scan. Sniffer identified 2 areas: the eastern and southern edge of Cell 6A.

- Arbor Hills placed approximately 5,000 – 7,000 square feet of geosynthetic clay liner (GCL) and compacted clay cover over the pea gravel portions and the extends over the anchor trench areas of the slope north of the waste boundary on the east side of Cell 6A.
- On September 15, 2023, Arbor Hills installed approximately 200-feet of 6-inch perforated horizontal gas collection pipe along the eastern toe of the Cell 6 slope to capture landfill gas in this area.
- On September 20, 2023, *Arbor Hills submitted a 120-day extension request to EGLE, until January 18, 2024, to complete a design, procure a third-party contractor, and install vacuum lines to the caisson wells currently installed in Cell 6A. EGLE approved the extension request on September 28, 2023 and this design work is in progress.*
- On September 21, 2023, Arbor Hills identified another potential source of the odors. The leachate cleanout risers located on the east side of Cell 6A revealed that landfill gas was coming to the surface following the pipe path from the bottom of the cell. Arbor Hills spoke with EGLE staff and informed them that Arbor Hills staff is constructing pipe and a temporary vacuum line that will be connected to cleanouts as soon as possible.
- On September 28, 2023, Arbor Hills installed a 3-inch transmission piping to the leachate cleanout risers located on the east side of Cell 6A.
- On October 9, 2023, Arbor Hills upgraded the 3-inch transmission lines to 6-inch transmission lines to allow for increased available vacuum and increased gas collection.
- On October 11, 2023, to address the penetrations around the cleanout riser, Arbor Hills placed a large sheet of liner over the entire leachate cleanout collection area and installed a 3-inch vacuum line to maintain negative pressure.

Remedial Measures - Seven Day Update

- On October 12, 2023, Arbor Hills commenced welding 6-inch lateral piping in preparation for installation to caisson wells installed in Cell 6A.
- On October 17, 2023 Arbor Hills installed a 6-inch valve and approximately 1000-feet of temporary 6-inch lateral piping to the nearest caisson well located at the northeast corner of Cell 6A, AHWW0539.
- On October 18, 2023 Arbor Hills installed approximately 300-feet of temporary 6-inch lateral piping to caisson well AHWW0540 located west of AHWW0539 in Cell 6A.

We appreciate your assistance with this matter. In preparing this response, we have attempted to track the elements of Section 5.17 of the Consent Judgment. If you require additional information or have any questions, please contact me at (567) 230-7373.

Sincerely

Arbor Hills Landfill, Inc.



David Seegert
General Manager

Attachments: Attachment 1 – Photo Log
Attachment 2 – ISCO Material Order Confirmation

cc: Jenine Camilleri, Enforcement Unit Manager, Air Quality Division
Scott Miller, EGLE Air Quality Division
Diane Kavanaugh-Vetort, EGLE Air Quality Division
Anthony Pelletier, GFL Environmental
Fernando Camargo, GFL Environmental
Anthony Testa, GFL Environmental
Tami Craig, GFL Environmental
John Collins, GFL Environmental
Mindy Gilbert, GFL Environmental
Melissa Bachhuber, GFL Environmental

Attachment 1





Photo #1 – 6-inch pipe and vacuum line connections made to 3 leachate clean-out risers prior to installation of liner cover installation.

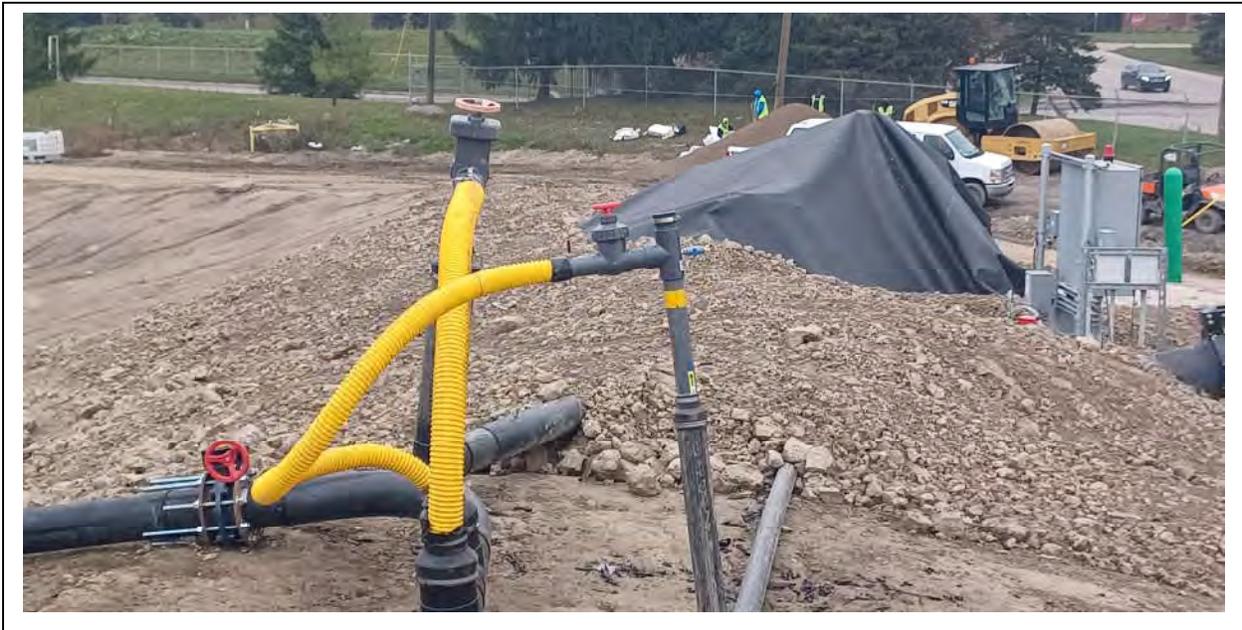


Photo #2 – Liner installed over the leachate cleanout risers to address the penetrations. 3-inch vacuum line installed under liner to maintain negative pressure.



Photo #3 – View looking from the southeast of the liner covered cleanout risers.



Photo #4 – View looking from the northwest showing 6-inch vacuum lines installed to wells AHWW0539 and AHWW0540

Attachment 2





Bill To:
 125540
 GFL - ARBOR HILLS LANDFILL INC
 10599 WEST FIVE MILE ROAD
 NORTHVILLE, MI 48168

Ship To:
 ARBOR HILLS LANDFILL
 10655 WEST SIX MILE RD
 NORTHVILLE, MI 48168
 ANTONIO TESTA 734-718-4262

Order Confirmation

Order Number	01100028
Order Date	10/06/23
Page	1 of 1

Ship Via Best Way	Payment Terms NET 30	P/O Number 4670002592
Freight Terms PREPAID AND ADD	Order Entered And Approved By JOSH KOVACH	Job Number ARBOR
Freight Collect Account #	PO Contact ANTHONY PELLETIER 216-570-4826	

#	Qty	UM	Product	Description	Each	Extended
(1)	10000	FT	10061716	6" DR 17 IPS PIPE HDPE AWWA F714 40' LENGTHS	4.54	45,400.00
(2)	10	EA	50061126	6" DR 11 IPS TEE MOLDED HDPE	55.54	555.40
(3)	10	EA	50061128	6" DR 11 IPS SWEEP 90 DEG BEND FORGED HDPE SEAMLESS	174.87	1,748.70
(4)	1	EA	50121141*	12" X 6" DR 11 IPS CONCENTRIC REDUCER MOLDED	132.76	132.76

* Denotes Non-Stocking Item

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Merchandise Total	Tax(1)	Freight(2)	Order Total
47,836.86	2,870.21	0.00	US \$ 50,707.07
1 Sales tax will be charged based on the ship-to address at the time of invoice if there is no tax certificate on file. 2 Actual shipping/handling charges will be determined at the time of shipment.		Accepted By: _____ Printed Name: _____ Date: _____	

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