



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 11, 2019

**CERTIFIED MAIL- 7017 3380 0000 4105 8377**  
**RETURN RECEIPT**

Mr. Mark Johnson  
Advanced Disposal Services, Arbor Hills Landfill Inc.  
10833 West Five Mile Road - Building B  
Northville, MI 48168

SRN: N2688, Washtenaw County

Dear Mr. Johnson:

**VIOLATION NOTICE**

On April 2, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Advanced Disposal Services, Arbor Hills Landfill Inc. (Company) located at 10690 West Six Mile Road, Northville Michigan. The purpose of this inspection was to determine the Company's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, and Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the associated Air Pollution Control Rules, the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2688-2011a; and Permit to Install (PTI) permits 19-17B & 79-17.

During the inspection and subsequent records review, AQD staff observed the following

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Municipal solid waste landfill (MSWL), Gas Collection and Control System (GCCS)	40 CFR Part 60 – Standards of Performance for New Stationary Sources 40 CFR 60.11(d); 40 CFR Part 60 Standards of Performance for New Stationary Sources-Subpart WWW- MSWL; 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories 40 CFR 63.6(e)(1)(i); Rule 299.4433 (7) (a) and (e) of Part 115 - Type II landfill operation, explosive gas control and monitoring; Rule	An Elevated Temperature Landfill (ETLF) event is negatively impacting the GCCS system and exacerbating the odor problem at the landfill. The Company failed to timely diagnose the problem and has yet to fully implement appropriate corrective actions that are required to contain the event.

	299.4434 (1) of Part 115 – Type II landfill operation air criteria.	
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The DEQ became aware of an ongoing ETLF event that is occurring at the landfill after meeting with the Company and in association with site visits that occurred on March 28 and April 2, 2019 and subsequent review of specific gas well information provided by the Company at that time.

Based on this well data, the ETLF event likely has been ongoing for more than a year and has become significant enough that it has begun to degrade the GCCS system at the landfill.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 25, 2019. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B. Glick Highway Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate information to explain your position.

Please also note that the Company is advised that Administrative Order EPA-5-17-113(a)-MI-04 issued May 4, 2017, Paragraph 27 states "Respondent must demonstrate and maintain compliance with the Landfill NSPS, the Landfill NESHAP, the NSPS and NESHAP General Provisions and the facility ROP at the Landfill facility."

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of this Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

cc: Mr. Scott Miller, DEQ  
cc/via e-mail: Mr. Jay Warzinski, ADS  
Mr. Anthony Testa, ADS  
Mr. Nathan Frank, USEPA  
Ms. Sarah Marshall, USEPA  
Mr. Kenneth Ruffatto, USEPA  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Ms. Jenine Camillari, DEQ  
Mr. Jeff Rathbun, DEQ  
Ms. Diane Kavanaugh Vetort, DEQ  
Mr. Lonnie Lee, DEQ  
Mr. Larry Bean, DEQ  
Mr. Greg Morrow, DEQ  
Ms. Alexandria Clark, DEQ  
Ms. Melinda Shine, DEQ