



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

October 13, 2022

**CERTIFIED MAIL-RETURN RECEIPT**

David Seegert  
Arbor Hills Landfill Inc.  
10599 West Five Mile Road  
Northville, MI 48168

SRN: N2688, Washtenaw County

Dear David Seegert:

**VIOLATION NOTICE**

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), recently reviewed Perimeter Monitoring System data provided by Arbor Hills Landfill, Inc. (Company) located at 10690 West Six Mile Road, Northville, Michigan. The purpose of this review was to determine the Company's compliance with the requirements of Consent Judgment No. 2020-0593-CE (CJ), regarding perimeter monitor exceedances, and timely analysis and corrective actions.

The Company operates six air monitors at the perimeter of the landfill that sample for hydrogen sulfide and methane. The "Perimeter Methane Action Level" is defined in paragraph 4.2(U) of the CJ as a methane concentration of 40 parts per million measured as a rolling average over a 15-minute period. Paragraph 5.5 of the CJ outlines the steps that must be taken if any of the six air monitors collect data indicating any exceedance of the Perimeter Methane Action Level, including performing a root cause analysis, and taking steps as needed to correct the exceedance(s) and prevent future exceedance(s) from recurring.

AQD staff reviewed Action Level exceedance logs submitted by the Company on September 12, 2022, and October 5, 2022, for the period from June 11 to September 20, 2022. The September 12<sup>th</sup> log noted that there were exceedances of the Perimeter Methane Action Level on several consecutive days in August that were thought to have been caused by a cell liner tie in problem between newly constructed waste disposal Cells 6A and existing Cell 4E, which was subsequently repaired on August 29, 2022. However; Perimeter Methane Action Level exceedances continued into September. The October 5, 2022, log noted there were exceedances of the Perimeter Methane Action Level on several consecutive days in September, but after conducting a root

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cause analysis, the Company could not identify the cause of the methane exceedances.

After reviewing the exceedances data, AQD met with the Company on September 20, 2022, to discuss these exceedances, and the Company's attempts to identify the source of the methane. The September 20, 2022, meeting was on-site, allowing AQD staff and the Company to jointly inspect an area near Monitor Nos. 4 and 5. During the inspection, AQD staff observed a north/south oriented band of elevated methane approximately 650 feet long, passing as close as 20 feet from the monitors. As indicated to the Company at the time of the inspection, this area was suspected to be one of the main causes of the exceedances of the Perimeter Methane Action level.

Based on a review of the Perimeter Methane Action Level exceedance logs and observations made on-site, AQD staff identified the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Type II sanitary landfill.	Consent Judgement No. 2020-0593-CE Paragraph 5.5 E.	The Perimeter Methane Action Level has been exceeded on 34 separate days from June 10, 2022, through September 20, 2022. The Company failed to identify and correct the cause(s) of the exceedances within 48 hours and prevent reoccurrences.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 31, 2022. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

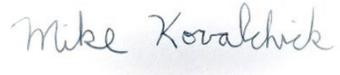
Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B Glick Highway Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

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 factual information to explain your position.

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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,

A handwritten signature in blue ink that reads "Mike Kovalchick".

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

cc: Anthony Pelletier, GFL  
Anthony Testa, GFL  
Sarah Marshall, USEPA  
Elizabeth Morrisseau, Dept. of Attorney General  
Mary Ann Dolehanty, EGLE  
Chris Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Jeff Rathbun, EGLE  
Scott Miller, EGLE  
Diane Kavanaugh Vetort, EGLE