



WM
Woodland Meadows RDF
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VIA OVERNIGHT MAIL AND EMAIL

August 26, 2024

Mr. Jonathan Lamb
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

Re: Response to Notices of Violation – Dated July 25, 2025 and August 7, 2024
Woodland Meadows RDF – Van Buren

Dear Mr. Lamb:

Waste Management of Michigan, Inc. (“WMMI”) has prepared this response to the Violation Notices (“NOVs”) from the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”) dated July 25, 2024 and August 7, 2024. By email dated August 7, 2024, EGLE granted an extension until August 28, 2024 to respond to the July 25, 2024 NOV. The NOVs allege that odors were observed during EGLE inspections conducted on July 24, 2024 and July 30, 2024. By responding to the NOVs, WMMI does not make any admissions of fact or law, nor does it waive any potential defenses.

The July 25, 2024 NOV alleges that “Moderate to strong (Level 3 and 4), offensive garbage and wastewater treatment sludge – type odors observed emitting from the facility and impacting nearby residential areas.” The August 7, 2024 NOV alleges that “Moderate to strong (Level 3 and 4), offensive garbage odors observed emitting from the facility and impacting nearby residential areas.” As an immediate and temporary measure, WMMI is diverting the sludge loads that are believed to be problematic.

Last year, WMMI implemented a protocol for sludge load acceptance. Incoming sludge loads are randomly inspected at the active face by a landfill representative to check the odor level of the load, and highly odorous loads may be rejected and the customer is notified. WMMI continues to work with its sludge customers to ensure that the sludges are properly treated (including the use of the proper amount of odor control reagents and adequate mixing) and managed at the generation site, prior to shipping to Woodland Meadows RDF. WMMI is also engaging with non-sludge generators whose waste may be more prone to odors.

WMMI has installed two odor suppression systems at Woodland Meadows RDF, which operate 24 hours a day to distribute an odor control agent along portion of the eastern and southern perimeters of the landfill. One system operates from a fueled generator; the other system automatically restarts

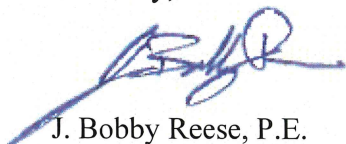
in the event of a power outage. The operation of the system is checked daily. Gas system construction, including the installation of more collectors and extraction piping, was completed in early summer to help control odors.

In addition, operational measures continue to be implemented and evaluated, such as:

- Covering sludge loads as quickly as possible;
- Reducing the active working face size;
- Increasing pre-screening scrutiny of loads containing sludge; and
- Evaluating the positioning of the odor suppression system.

Please contact me at jreese4@wm.com with any questions.

Sincerely,



J. Bobby Reese, P.E.
District Engineer

cc: Jenine Camillleri, EGLE - Enforcement Unit Supervisor (AQD, P.O. Box 30260, Lansing, MI 48909)
Matt Ball, WM
Patrick Cullen, Wayne County DPS Environmental Services Group
Jennifer DePaulis, Wayne County DPS Environmental Services Group
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