



City Hall • 333 West Ellsworth Street • Midland, Michigan 48640 • 517.837.3300 • 517.835.2717-Fax

August 6, 2015

Ms. Gina McCann  
Michigan Department of Environmental Quality  
Air Quality Division  
401 Ketchum Street, Suite B  
Bay City, Michigan 48708

DEQ-AQD

AUG 05 2015

SAGINAW BAY

Re: Response to the July 17, 2015 Violation Notice  
City of Midland Landfill

Ms. McCann:

On July 17, 2015 you sent the City of Midland a Violation Notice related to an inspection on June 16, 2015. The two primary issues centered on having gas wells out of compliance for extended periods, and using an uncalibrated sampling meter.

While researching the extended periods, we discovered a communication problem. City staff had not sent several sampling data sets to CTI and Associates to include in the database. This led to apparent two- to three-week gaps between sampling when regular sampling had actually occurred.

The issue of using an uncalibrated sampling meter has been resolved. Every six months our meter must be mailed to California for service and calibration. Due to extended delays in completing the repairs, we were unable to perform the next round of sampling using our own meter. We used an uncalibrated meter for performance sampling while our meter was being calibrated, and compliance sampling was eventually performed due to slow return of our meter. Since this event in December, we had service performed on our sampling meter, and rented a calibrated meter from the service company to ensure proper sampling performance and compliance.

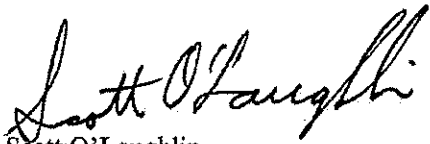
Specifically you noted 10 process violations in your letter.

- Items #1 and #2 are related to MLGW-19. The data have now been included in the database, showing actual compliance. A modified ROP Deviation Report is attached, along with the data points for MLGW-19.
- Items #3 and #4 are related to MLGW-22. The data have now been included in the database, showing actual compliance. A modified ROP Deviation Report is attached, along with the data points for MLGW-22.
- Items #5, #6, #7, and #8 are related to MLGW-22 and MLC16A06. While there was a compliant reading for each in November and December, there was a 26 day gap of data from an uncalibrated sampling meter. We have resolved this going forward by renting a calibrated meter during our meter's service.

- Items #9 and #10 are related to MLGW-83. The data have now been included in the database, showing actual compliance. A modified ROP Deviation Report is attached, along with the data points for MLGW-83.

The City of Midland is working with CTI and Associates to ensure all data is shared and evaluated, to keep the system compliant. We will update the Semi-Annual Report and certification page related to these issues. If you have any questions concerning the enclosed information, please feel free to contact me at (989) 837-6989.

Sincerely,



Scott O'Laughlin  
City of Midland Landfill Superintendent

Cc: Beth Benoit, CTI and Associates; Noel Bush, City of Midland Utilities Director