



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

May 11, 2018

Mr. Scott O'Laughlin  
City of Midland Utilities Division  
4311 East Ashman Street  
Midland, Michigan 48642

SRN: N6004, Midland County

Dear Mr. O'Laughlin:

**VIOLATION NOTICE**

On March 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a copy of the 2017 annual and semi-annual NSPS Reports for the City of Midland Utilities Division located at 4311 East Ashman Street, Midland, Michigan.

Based upon the review of the 2017 Annual and Semi-Annual NSPS Reports the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
EU-ACTIVECOLL	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.1	Required monthly, compliance, monitoring of gauge pressure for wells MLTCO-14 (June 2017), MLC-16A07 (February 2017), ML-VDW06 (August 2017), and MLC-16C06 (November 2017)
EU-ACTIVECOLL	MI-ROP-N6004-2014, EU-ACTIVECOLL, VI.3	Required monthly, compliance, monitoring of oxygen and temperature for wells MLTCO-14 (June 2017), MLC-16A07 (February 2017), ML-VDW06 (August 2017), and MLC-16C06 (November 2017)

For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with 40 CFR Part 60.752(b)(2)(ii)(A)(3), the City of Midland Utilities Division shall measure gauge pressure in the gas collection header at each individual well, monthly. For the purpose of identifying whether excess air infiltration into the landfill is occurring, the permittee shall monitor each well monthly for

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temperature and oxygen as provided in 40 CFR Part 60.753(c). The facility reported missing monthly monitoring on four separate wells, during four different months (specified above) in 2017.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 1, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are 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.

If City of Midland Utilities Division 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.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Gina L. McCann  
Senior Environmental Quality Analyst  
Air Quality Division  
989-439-2282

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ  
Mr. Chris Hare, DEQ