

FORTISTAR Methane Group

Arbor Hills Energy LLC
10611 West 5 Mile Road ♦ Northville, Michigan 48167
Tel. (248) 305-7774 ♦ Fax. (248) 305-7879

November 13, 2019

Mr. Mike Kovalchick
Senior Environmental Engineer
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division
Constitution Hall, 2nd Floor South
525 W Allegan Street
Lansing, MI 48933-1502

Subject: Response to Notice of Violation
Arbor Hills Energy LLC - MI-ROP-N2688-2011

Dear Mr. Kovalchick:

The Michigan Department of Environment, Great Lakes and Energy (the "EGLE") issued a Notice of Violation ("NOV") to Arbor Hills Energy LLC ("AHE") on October 22, 2019.

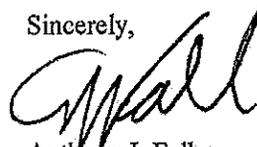
AHE conducts operation and maintenance (O&M) activities at the wellfield under the direction of the permit holder, Advanced Disposal Systems—Arbor Hills Landfill Inc. ("ADS"). AHE communicates necessary information so that ADS can comply with applicable legal requirements. All wellhead readings are documented in a 3rd party database; maintained and used by ADS. Meetings between ADS and AHE are held daily so AHE can receive direction from ADS and provide recommendations for effective wellfield O&M. As part of routine O&M, pumps are checked on a monthly basis and repairs conducted as needed to ensure these pumps are continuously operational. AHE and ADS are in close coordination regarding pump installation and maintenance. AHE will continue work as directed by ADS to ensure compliance with all applicable laws and regulations.

AHE reserves all rights, claims and defenses that it has, had or may have with respect to the alleged violation.

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Please direct all questions related to this response to me at (716) 439-1006 x116 or
Suparna Chakladar at (951) 833-4153.

Sincerely,



Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Arbor Hills Energy LLC

Attachment

cc (by e-mail): Annette Switzer, MDEQ
Melissa Byrnes, MDEQ
Mark Mitchell, MDEQ
Jenine Camilleri, MDEQ
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