



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 14, 2020

Mr. David Seegert, General Manager
Arbor Hills Landfill, Inc., Advanced Disposal Services
10833 West Five Mile Road, Building B
Northville, Michigan 48168

SRN: N2688, Washtenaw County

Dear Mr. Seegert:

VIOLATION NOTICE

On September 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received verbal notification of an Abnormal Condition, Start-up Shutdown, or Malfunction from Arbor Hills Landfill, Inc. (AHLF), Advanced Disposal Services (ADS) located at 10690 West Six Mile Road, Northville, Michigan. The notification reported an abnormal condition and exceedance pursuant to the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rule, R 336.1912 (Rule 912); the conditions of Permit to Install (PTI) number 79-17; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2688-2011a; the federal New Source Performance Standard for Municipal Solid Waste Landfills, 40 CFR Part 60, Subpart WWW (WWW) and the National Emission Standard for Hazardous Air Pollutants 40 CFR Part 63, Subpart AAAA (AAAA).

Based on the ADS initial verbal notification and subsequent submittals, the AQD has identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUENCLOSEDFLARE1-S2 (Zink #392)	PTI No. 79-17 Condition III.5.a., WWW 40 CFR 60.752(b)(2)(iii)(B)(2), AAAA 40 CFR 63.1955 (a)	Operated flares outside of temperature range established during the most recent performance stack test.
EUENCLOSEDFLARE1-S2 (Zink #392)	PTI No. 79-17 Condition III.6., WWW 40 CFR 60.755(e), AAAA 40 CFR 63.1955(a)	Period of start-up, shutdown or malfunction duration exceeded 1 hour.
EUENCLOSEDFLARE1-S2 (Zink #392)	PTI No. 79-17 Condition VI.2. WWW 40 CFR 60.758(c), AAAA 40 CFR 63.1975	Exceedance of temperature minimum established during the last stack test for more than 1 hour.
EUENCLOSEDFLARE1-S2 (Zink #392)	R 336.1910 (Rule 910)	An air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing.

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Advanced Disposal Service reported that a review of the three-hour rolling enclosed flare temperature data for September 26, 2020, indicated that the enclosed flare EUENCLOSEDFLARE1-S2 (Zink #392) operated below the minimum WWW compliance testing temperature for a period exceeding 1-hour. This constitutes a low flare temperature exceedance from the tested minimum temperature three-hour rolling average. A follow-up email from ADS including the temperature report for Flare #392 was received on September 30, 2020. The ADS 10-day detailed written report was received on October 7, 2020.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2020, (which coincides with 21 calendar days from the date of this letter). This letter acknowledges that the ADS October 7, submittal included a detailed description of: 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.

Please submit the written response to EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, Air Quality Division, P.O. Box 30260, Lansing, Michigan 48909-7760.

If AHLF 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,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

cc: Mr. Anthony Testa, ADS
Ms. Suparna Chakladar, AHE, Fortistar
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE
Mr. Mike Kovalchick, EGLE