



Orchard Hill Sanitary Landfill

3290 Hennessey Rd. Watervliet, MI 49098 • (269)463-5588

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May 15, 2024

Chance Collins
Environmental Quality Analyst
Michigan EGLE - Air Quality Division
Sent via email to: Collinsc21@michigan.gov
Subject: Orchard Hill Sanitary Landfill (SRN: N5719)
MI EGLE Notice of Violation
May 1, 2024

This correspondence is in response to the MI EGLE Notice of Violation received on May 6, 2024. The NOV alleges a violation of Rule R.336.1901 (Rule 901) general condition 12.b, Section 1 of MI-ROP-N5719-2023.

Due to the timing of receipt of the notification of the alleged violation (five days after the investigation), Orchard Hill Sanitary Landfill (OHSL) personnel were unable to verify or determine the source of the odors experienced by MI EGLE staff.

Following receipt of the NOV, facility staff reviewed operations conducted on May 1st. Outlined below is a summary of activities on the day in question:

- The landfill was actively accepting waste; daily operations typically occur between 6:00 am and 4:30 pm.
- Our energy partner, Energy Development Ltd. (EDL), was shut down for routine maintenance and our on-site flare was being used as the landfill gas destruction device.
- Cell construction, involving contiguous boundaries along three active cells, is ongoing. New cell construction requires temporarily impacting the side slope of the existing cells. Installation of a stormwater diversion berm occurred on the day in question.
- The farm land adjacent to the landfill, comprising over 1,300 acres, had been actively receiving liquid manure as part of field revitalization efforts.

As you know, OHSL implements a number of measures to minimize the potential for odorous emissions consistent with our necessary operations, including the use of daily cover and maintaining the landfill gas collection and control system, as required by applicable regulations. However, because we received

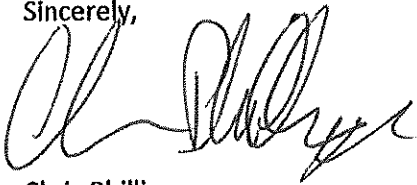
the NOV five days after the MI EGLE investigation, OHSL personnel were not afforded an opportunity to identify potential source(s) of the odors or take any corrective actions.

If similar complaints are received in the future, we request that MI EGLE staff notify OHSL as soon as possible so we can evaluate our operations and take appropriate measures. In addition, we ask that you encourage concerned residents to contact us directly at our Community Relations hotline – (269) 254.5796 – to report their concerns. This number is monitored 24/7 by on-site OHSL personnel.

We also request to be involved in any future MI EGLE odor investigations. We will provide you with additional cell phone numbers that you can use to contact OHSL site management at any time. We hope that by improving these channels of communication, we will be better able to evaluate the situation and respond accordingly.

Should you have any questions regarding the landfill operations or this response, please contact me at (269) 463.5588 or via email at cphillips@landfillmanagement.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Phillips', written over a horizontal line.

Chris Phillips
Assistant General Manager