



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 31, 2018

CERTIFIED MAIL – 7015 0920 0002 3516 7871
RETURN RECEIPT REQUESTED

Mr. Robert Walls, General Manager
Advanced Disposal Services, Arbor Hills Landfill Inc.
10690 Six Mile Road
Northville, Michigan 48168

SRN: N2688, Washtenaw County

Dear Mr. Walls:

VIOLATION NOTICE

On August 23, 2018, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an odor evaluation as part of an ongoing investigation of longstanding periodic complaints regarding nuisance odors alleged to be the result of operations at the Arbor Hills Landfill located at 10690 Six Mile Road, Northville, Michigan. The purpose of these investigations is to determine if this facility is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, and Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules promulgated pursuant to these parts. Odor complaints had been received by DEQ on August 23, 2018.

The staff of the AQD performed the investigation and observed the following air pollution and solid waste violation:

Process Description	Rule/Permit Condition Violated	Comments
Municipal solid waste landfill and a landfill gas collection and control system owned and operated by Advanced Disposal Services; and a gas to energy plant owned by Fortistar Methane Group.	R 336.1901(b), R 299.4433(1)(c)	AQD staff observed Level 3 landfill garbage odor.

During the investigation performed on August 23, 2018, AQD staff detected a distinct and definite objectionable landfill garbage odor in the residential area on the south side of Napier Road downwind of the facility. This is a Level 3 on the MDEQ-AQD Odor Scale. The observed landfill odor is a violation of Rule 901(b). The Rule 901(b) violation also constitutes a violation of Rule 433(1)(c) since the landfill odor generated by the facility created a nuisance odor beyond the property boundary.

Since January 1, 2018 to August 23, 2018, the DEQ staff has received nearly 900 odor complaints regarding Arbor Hills Landfill. In response to complaints, DEQ staff has conducted numerous on-site inspections and complaint investigations in the immediate area.

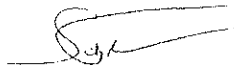
This recent observation of landfill garbage odors in violation of Rule 901 and Rule 433(1)(c), indicates additional measures are needed to reduce odors from the landfill.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 24, 2018. The written response should include: an explanation of the causes and duration of the violation; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

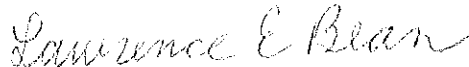
Please submit the written response to Scott Miller and Lawrence Bean, DEQ, AQD and WMRPD, Jackson District at 301 East Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, PO Box 30260, Lansing, Michigan 48909-7760.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact us by e-mail at MillerS@michigan.gov, or BeanL@michigan.gov; by telephone at the numbers below; or MDEQ, 301 East Louis Glick Highway, Jackson, Michigan, 49201.

Sincerely,



Scott Miller
Jackson District Supervisor
Air Quality Division
517-416-5992



Lawrence E. Bean
Jackson District Supervisor
Waste Management
and Radiological Protection Division
517-416-4375

cc/via e-mail: Mr. Jay Warzinski, Vice President LF Operations, ADS
Mr. Anthony Testa, Advanced Disposal Services
Mr. Nathan Frank, USEPA
Mr. Kenneth Ruffatto, USEPA
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camillari, DEQ
Ms. Diane Kavanaugh Vetort, DEQ
Mr. Jack Schinderle, DEQ
Mr. Lonnie Lee, DEQ
Ms. Alex Clark, DEQ