



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

February 6, 2018

**CERTIFIED MAIL – 7010 0290 0000 3734 2644**  
**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 January 25, 2018, the Michigan Department of Environmental Quality (MDEQ), 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. The most recent odor complaints DEQ received were from January 16-18.

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 odor.

During the investigation performed on January 25, 2018, AQD staff detected a distinct and definite objectionable landfill odor in the residential area on North 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.

During the months of December 2017 and January 2018, as of January 25th, MDEQ staff has received 71 odor complaints regarding Arbor Hills Landfill. In response to complaints MDEQ staff has conducted numerous on-site inspections and complaint investigations in the immediate area.

This recent observation of landfill odors in violation of Rule 901 and Rule 433(1)(c), appears to indicate the solid waste and compost handling or management are inadequate. While the MDEQ recognizes the efforts taken to date to resolve offsite odors, the ongoing complaints and recent observed odor violation indicate more work needs to be done to minimize landfill garbage and possibly compost odors from the facility.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 28, 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.

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](mailto:MillerS@michigan.gov), or [BeanL@michigan.gov](mailto: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  
517-780-7481



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. Lynn Fiedler, MDEQ  
Ms. Mary Ann Dolehanty, MDEQ  
Mr. Chris Ethridge, MDEQ  
Mr. Thomas Hess, MDEQ  
Ms. Diane Kavanaugh Vetort, MDEQ  
Mr. Steve Sliver, MDEQ  
Mr. Lonnie Lee, MDEQ