



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 17, 2019

CERTIFIED MAIL – 7017 3380 0000 4105 8322
RETURN RECEIPT

Mr. Robert Walls
Advanced Disposal Services, Arbor Hills Landfill Inc.
10833 West Five Mile Road - Building B
Northville, MI 48168

SRN: N2688, Washtenaw County

Dear Mr. Walls:

VIOLATION NOTICE

On January 4, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an odor evaluation and complaint investigation as part of an ongoing investigation of longstanding periodic complaints regarding nuisance odors alleged to be the result of operations at the Advanced Disposal Services, Arbor Hills Landfill Inc. (ADS) located at 10690 West Six Mile Road, Northville, Michigan. The purpose of this investigation is to determine ADS 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; and to investigate recent complaints which we received on January 4, 2019, regarding foul odors attributed to ADS operations.

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 distinct, definite, objectionable landfill compost/ garbage/gas odor.

During the investigation performed on January 4, 2019, AQD staff detected a distinct and definite objectionable landfill compost/garbage/gas odor along Napier Road before W. Six Mile Road and in the residential area on the southwest side of the Steeplechase Subdivision, specifically Briar Ridge Lane, downwind of the facility. 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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 11, 2019. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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 the DEQ, AQD, Jackson District, at 301 E Louis Glick Hwy., Jackson, Michigan 49201-1556 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ADS 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 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,

Diane Kavanaugh Vetort for Lawrence Bean

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

Larry Bean
Jackson District Supervisor
Waste Management and Radiological
Protection Division
517-416-4375

cc: Mr. Jay Warzinski, ADS
Mr. Anthony Testa, ADS
Mr. Nathan Frank, USEPA
Mr. Kenneth Ruffatto, USEPA
Ms. Mary Ann Dolehanty, DEQ
Mr. Jay Olaguer, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camillari, DEQ
Ms. Diane Kavanaugh Vetort, DEQ
Mr. Jeff Rathbun, DEQ
Mr. Michael Kovalchick, DEQ
Mr. Lonnie Lee, DEQ
Ms. Alexandria Clark, DEQ
Ms. Melinda Shine, DEQ