



STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



GRETCHEN WHITMER
GOVERNOR

January 2, 2019

CERTIFIED MAIL – 7015 0920 0 3516 7819
RETURN RECEIPT

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

SRN: N2688, Washtenaw County

Dear Mr. Walls:

On December 19, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the Advanced Disposal Services, Arbor Hills Landfill (ADS) located at 10690 West Six Mile Road, Northville, Michigan. The purpose of this inspection was to determine ADS's compliance with 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 conditions of Renewable Operating Permit (ROP) number MI-ROP-N2688-2011; and the Federal New Source Performance Standard (NSPS) for Municipal Solid Waste Landfills 40 CFR Part 60, Subpart WWW.

During the inspection, AQD staff observed the following compliance concerns:

Process Description	Rule/Permit Condition Violated	Comments
New leachate seep site lagoon-Southside of Landfill.	NA	Significant leachate odors detected which measured between 4 to 7 air dilutions using a Nasal Ranger odor device.
Landfill gas well # 206R3.	NA	Large area of dead vegetation surrounding well head. Methane gas emissions suspected.
Landfill gas well # 322.	NA	Some H2S type odors coming from top of well head; leak suspected.
South road leachate pump area.	NA	Leachate odors. Also, area of dead vegetation surrounding leachate collection pit.


Portable/temporary leachate tanks area.	NA	Strong odors detected which measured between 4 to 7 air dilutions using a Nasal Ranger odor device.
Landfill gas well # L4B.	NA	Some H2S type odors inside the enclosure surrounding well head. – Leak suspected.
Landfill gas well # L-14.	NA	Trash inside well head enclosure. Related well head equipment appeared to be in disarray.

At this time, I am requesting that ADS respond to the above concerns, in writing, by January 16, 2019. The written response should include: a summary of the actions that have been taken and are proposed to be taken to correct the areas of concern and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Company believes the above observations or statements are inaccurate, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the issue cited above and for the cooperation that was extended to me during my inspection of your Company. If you have any questions regarding this issue or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mike Kovalchick
 Senior Environmental Engineer
 Air Quality Division
 517-416-5025

- cc: Mr. Scott Miller, DEQ
- cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
- Mr. Jay Olaguer, DEQ
- Mr. Chris Ethridge, DEQ
- Ms. Jenine Camilleri, DEQ
- Mr. Jeff Rathburn, DEQ
- Ms. Diane Kavanaugh Vetort, DEQ
- Mr. Larry Bean, DEQ
- Mr. Greg Morrow, DEQ
- Ms. Alexandra Clark, DEQ