



May 24, 2016 .

Mr. Alex Whitlow
Environmental Engineer
Michigan Department of Environmental Quality
Office of Waste Management and Radiological Protection
301 East Louis Glick Highway
Jackson, MI 49201

RE: Notice of Violation April 29, 2016
Advanced Disposal Arbor Hills West Expanded Sanitary Landfill,
Northville, Washtenaw County, Michigan

Dear Mr. Whitlow:

Advanced Disposal Arbor Hills West Expanded Sanitary Landfill received a Notice of Violation (NOV) dated April 29, 2016 from the Michigan Department of Environmental Quality Office of Waste Management and Radiological Protection (MDEQ). The NOV was issued to both Advanced Disposal Services (Advanced) and Republic Services, Inc. (Republic). The notice states that the inspection found the facility to be in compliance with operational requirements of Part 115, except for the alleged continuing violation of Rule 433(1) which states:

(c) That gases generated by the facility do not create a nuisance and are not otherwise in violation of part 55 of the act at the property boundary.

The notice stated for the landfill to return to compliance the landfill gas collection and control system must continue to be adjusted and improved system until the odor nuisance has been resolved. As the DEQ is aware Republic is the party responsible under the Renewable Operating Permit issued to the facility for the Gas Collection and Control System and responsible for adjusting and improving the system to control odors. Therefore, Advanced is providing this response addressing the additional items of concern noted in the notice. Advanced is cooperatively working with Republic, as we understand it is in the process of installing new gas extraction wells, re-drilling existing extraction wells, correcting vacuum losses with new or repaired header pipes, and updating condensate management systems. Advanced is working with Republic to add additional cover to areas disturbed by the gas system construction.

In addition to the violation being addressed by Republic, two other items of concern were identified during the MDEQ inspection on April 11, 2016. The first item of concern was leachate (contact water) observed on the west slope in the Cell 2 area where active waste filling was occurring on the side slope. This condition was addressed the same day and photographs were provided to MDEQ to document the corrective action. Since the time of this corrective action waste placement on this west facing slope in this area was completed, 2 feet of intermediate cover placed, and the area was seeded.



The second issue sighted was identified on the south slope of the landfill. Landfill gas was observed permeating through areas of interim cover causing the vegetation to distress. In response to this condition, Republic installed three additional wells and repaired a landfill gas header line in the vicinity of this area to address the surface emission of landfill gas. Advanced installed additional intermediate cover after the gas improvements were completed in this area. It is our opinion that the combination of the landfill gas system repairs and improvements along with the additional interim cover will permanently address this condition.

Advanced appreciates MDEQ's attention to this matter. Advanced takes this situation very seriously and will continue to work with MDEQ and Republic in a team effort to address these conditions. Please contact me at (248) 412-0684 at your convenience with any questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Flannagan', with the initials 'map' written below it.

Advanced Disposal Arbor Hills West Expanded Sanitary Landfill
Tom Flannagan
General Manager

Cc: Jay Warzinski, Dave Rettell, Dan Fleshour – Advanced Disposal Services
Jeff Kecmarik – Washtenaw County Division of Environmental Health
Diane Kavanaugh – MDEQ
Mr. Lawrence Bean - MDEQ