

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



RICK SNYDER
GOVERNOR

C. HEIDI GREYER
DIRECTOR

November 8, 2016

Mr. Anthony Testa
Advanced Disposal Services Arbor Hills Landfill Inc.
10690 Six Mile Road
Northville, Michigan 48167

Dear Mr. Testa

SUBJECT: Violation Notice
Arbor Hills West Expanded Sanitary Landfill
First Quarter Inspection FY 2017

On October 4, 2016, staff of the Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP) conducted an inspection of Arbor Hills West Expanded Sanitary Landfill located at 10690 Six Mile Road, Northville, Michigan. The purpose of this inspection was to determine compliance with the requirements of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the administrative rules.

As a result of the inspection, staff determined that the facility was in compliance with the operational requirements of Part 115 that were evaluated on that day, as shown on the enclosed inspection sheet, except for the continuing violation of the following rule promulgated under Part 115:

Rule 433(1) The owner and operator of a type II landfill will ensure all of the following:

(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.

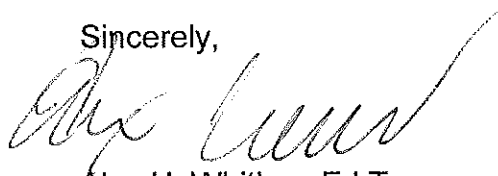
The violation is the result of staff observing odors relating to distinct garbage odors being identified at a location 0.75 miles downwind of the active face of Cell 4. The odor survey conducted on the day of the inspection is enclosed for reference.

In order to return to compliance, Advanced Disposal must continue to address offsite odors originating from the active faces of the landfill until the odors are no longer a nuisance for the surrounding neighborhoods.

If you have any questions, please contact me at DEQ-OWMRP, Jackson State Office Building, 301 East Louis Glick Highway, Jackson, Michigan 49201; by telephone at the number below; or by e-mail at WhitlowA@michigan.gov.

Mr. Anthony Testa
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Sincerely,

A handwritten signature in black ink, appearing to read "Alex Whitlow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alex H. Whitlow, E.I.T.
Environmental Engineer
Office of Waste Management
and Radiological Protection
517-614-9712

Enclosure

cc: Mr. David Rettell, Advanced Disposal Systems, Arbor Hills Landfill Inc.
Mr. Daniel Moody, Washtenaw County Division of Environmental Health
Ms. Diane Kavanaugh Vetort, DEQ
Mr. Lawrence E. Bean, DEQ

**Michigan Department of Environmental Quality
Part 115 - Landfill Evaluation Report**

Name of Facility Advanced Disposal Services Arbor Hills Landfill Inc.		Facility Number 475946	License # and Expiration Date 9371 5/13/19
Facility Address 10690 West Six Mile Road, Northville, MI 48131		Facility Contact : Name -- Phone Number Bob Walls (567)644-5959	
LEGEND: (C) = Compliance (V) = Violation (NE) = Not Evaluated (*) = See Note (--) = Does not Apply			
General Operations		Leachate / Stormwater Management	
C	A. Miscellaneous Operational Issues	C	J. Surface Water Drainage
V	B. Blowing Debris, Dust, Odor & Vector Control	C	K. Protection of Surface Waters
*	C. Gas Monitoring & Migration	*	L. Leachate Control / Management
YES	D. Are there any exceedances of the LEL?	C	M. Leachate Volume / Head Records
Prohibited Waste Restrictions		C	N. Secondary Volume / ARF/ RFR Records
C	E. Hazardous Waste / Liquids / Yard Waste / Other Materials Prohibited for Disposal	Daily / Interim / Final Cover	
C	F. Random / Suspicious Load Records	C	O. Adequacy of Daily Cover
C	G. Load Inspection During Evaluation	YES	P. Are Alternate Daily Cover Materials Used?
3 # of Loads Inspected 85 yds. Volume of Loads		YES	Q. Is the Use in Compliance with Approved Plan?
Permit and License Compliance		C	R. Period and Adequacy of Interim Cover
C	H. Operations Conform to Permit, License, Order Conditions & Construction Certifications	YES	S. Are all lifts exposed for 90 days covered with interim cover?
C	I. Operations Conform to Approved Hydrogeo, Monitoring, Engineering and Operational Plans	C	T. Completion of Area / Final Cover
REMARKS: -The depth of daily cover is calculated using GPS on the equipment. -They had a pile of concrete that contained de minimus other C&D. I informed them that it was not necessary to cover this pile with daily cover as concrete is inert and does not have odor. -Temporary cap was in place during the inspection. I observed no bubbles in the cap and the Gas probes appeared to be active. The (V) specified for category B in the above table is the result of an Odor Survey conducted at the same time as the inspection. A distinct active face odor was identified 0.75 miles downwind. The (*) specified in category C in the above table is the result of perimeter gas probe data submitted to the department on October 18, 2016. It showed probe 18 over the 100% LEL for methane. Subsequent information provided by Advanced Disposal on October 20, 2016 showed that public health was not in danger due to the location of probe 18 as well as the passive vents in the area. The (*) specified in Category L of the above table is the result of the secondary liner of Cell 1 showing 12.56 feet of head on the date of the inspection. Subsequent data submitted to the department on October 11, 2016 by email showed that the leachate levels returned to normal levels in an adequate amount of time			
Person Interviewed Bob Walls, Anthony Testa		Date of Inspection 10/4/16	Time of Inspection 7:30 AM
Inspected By Alex Whitlow		Representing DEQ Office of Waste Mgmt & Radiological Protection	

DEFINITIONS

- A. The landfill shall control public access and shall supervise the unloading of all solid waste. [Rule 315(3&4), 427, 430(1)]
On-site roads shall be constructed and operated to allow unrestricted traffic flow and prevent fugitive dust nuisance. [Rule 315(5&10), 426(5)] The burning of solid waste is prohibited (certain exceptions). The burning is to be in designated areas only and with the permission of the Solid Waste Control Agency. Suitable measures shall be available to extinguish accidental fires. [Rule 315(9), 434(2&3)] The facility shall maintain adequate equipment to operate the landfill. [Rule 315(1), 426(1)] Landfill operation shall not result in excessive or objectionable noise. [Rule 315(14), 431] The facility may separate recyclable materials. The operation must be consistent with the requirements for processing plants. The salvaging must not interfere with waste disposal. Scavenging is prohibited. [Rule 315(11), 428] (For Type III) Facilities that do not contain liners in compliance with Rule 307 shall test representative samples of waste on an annual basis and submit the results of those tests to the director. [Rule 311]
- B. The facility shall take measures to control dust, blowing litter, odors, and disease vectors. The entire area shall be kept clean and orderly. [Rule 315(5&12), 426(3), 429(9)]
- C. The facility shall ensure that the concentration of methane gas is not > 25% of the Lower Explosive Limit (LEL) in structures and the leachate collection system. The concentration of methane shall not be more than the LEL at the property boundaries and gases shall not create a nuisance or a violation of Part 55. The facility must implement a routine methane monitoring program. [Rule 315(5) 433(1-3)]
- D. In the facility operating record are monitoring results indicative of the compliance since the last inspection date. [YES / NO]
- E. The facility shall supervise the unloading of all waste and not accept regulated hazardous waste, PCB's, bulk liquid waste, liquid waste containers, sewage, materials that would adversely effect the liner, asbestos waste (unless approved), empty drums, lead acid batteries, or more than a deminimus quantity of whole tires, beverage containers or yard wastes as specified in Part 115. [Rule 315(4&8), 430(1&2)]
- F. In the facility operating record, are records of random/suspicious load inspections available since the last inspection? Do those records demonstrate compliance?
- G. During the inspection document the number of loads inspected, quantity of waste inspected, and compliance status.
- H. Landfill operations must conform to conditions in the construction permit and operating license and comply with final orders and compliance plans contained in final orders.
- I. The landfill must be operated in accordance with previously approved hydrogeologic, engineering, and operational plans. [Rule 904, 905, 906, 907, 910, 911]
- J. The active work area must be sloped, graded, and provided with drainage facilities to prevent the collection of standing water. A surface water monitoring plan must be implemented for any water that may receive runoff from the active face. [Rule 315(13), 426(6), 436(2)]
- K. The facility shall not discharge pollutants into waters of the United States in violation of Part 31 or NPDES permit. [Rule 306(2), 436(1)]
- L. The facility shall remove leachate to ensure that the leachate head is not more than 1' on the liner (excluding the collection sump), remove liquids from the secondary collection system to minimize head on the liner, and inspect the system to assure proper operation. The leachate must be disposed of in compliance with Part 31. [Rule 308, 315(16&17), 432]
- M. In the facility operating record, are leachate volume available since the last inspection. Do those records demonstrate compliance?
- N. In the facility operating record, are secondary collection volumes and flow rates available since the last inspection. Do those records demonstrate compliance?
- O. At least 6" of earthen daily cover must be placed at the end of each operating day. If alternative daily cover is used, it must be approved by the director. If the daily cover is low permeability soil, it must be scraped back daily. If daily cover does not meet the performance standards, it must be modified. [Rule 316(1), 429(1-5, 8)]
- P. Are alternate daily cover materials (ADCM's) utilized at the facility? [YES / NO]
- Q. Is the use of the ADCM's in compliance with the approved plan? [YES / NO]
- R. Any lift that will be exposed for 3 or more months must have 1' of compacted cover that can include the 6" daily cover. Runoff must be handled as leachate unless the area has received approved interim cover. [Rule 316(2), 429(6&7)]
- S. Are all lifts that will not receive addition waste within 90 days covered with at least 1' of soil? [YES / NO]
- T. The landfill must be brought up to final grade as soon as possible. The final cover must be repaired to correct the effects of settling, subsidence, erosion, and other events. The slopes of the final cover must be sufficient to prevent the ponding of water and excess erosion. The final cover must be stabilized with appropriate vegetation. [Rule 317, 448, 449(1), 425(7-9)]

ODOR SURVEY FORM

Source Name: Arbor Hills Landfill, WDS #475946			Inspector: Alex Whitlow	
Source Address: 10690 W 6 Mile Road, Northville MI, 48168			Date: 10/04/2016	
Sky Conditions: Cloudy, fog present			Temperature: 55-60 degrees Fahrenheit	
Wind Speed: 2-3 MPH		Wind Direction: From East		Source of Meteorological Data: Weather.com
Location (attach map, if available)	Time	Odor Scale (See below)	Characteristic (See below)	Comments (Observations that will aid in the determination of the source & properties of the odor.)
1	7:20 AM	2	Lime based(EQ)	
2	7:50 AM	2	Lime based(EQ)	
3	7:51 AM	3	Garbage	On the active face of cell 4
4	7:55 AM	3	Garbage	
5	7:56 AM	3	Garbage	
6	7:59 AM	3	Garbage	
7	8:01 AM	2	Lime based (EQ)	
8	8:04 AM	0		
9	8:49 AM	1	Garbage	
10	8:55 AM	1	Garbage	
11	9:00 AM	2	Garbage	
12	9:20 AM	1	Garbage	
13	9:22 AM	1	Garbage	
14	9:24 AM	0		
15	9:30 AM	0		
<u>Odor Scale</u> 0 - Non-Detect 1 - Just barely detectable 2 - Distinct and definite odor 3 - Distinct and definite objectionable odor 4 - Odor strong enough to cause a person to attempt to avoid it completely 5 - Odor so strong as to be overpowering and intolerable for any length of time				<u>Odor characteristic examples:</u> Paint-like Musty, moldy Burnt, smoky Tar-like, asphalt Cut grass Citrus fruit

ODOR SURVEY FORM

