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June 5, 2023

Mr. Jonathan Lamb
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

Re:

Response to Violation Notice – May 9, 2023

Woodland Meadows RDF - Van Buren

Dear Mr. Lamb:

Waste Management of Michigan, Inc. ("WMMI") has prepared this response to the Violation Notice ("NOV") from the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") dated May 9, 2023. The NOV alleges that odors were observed during an EGLE inspection conducted on Sunday, May 7, 2023. By responding to the NOV, WMMI does not make any admissions of fact or law, nor does it waive any potential defenses.

A potential source of any offsite odors may be wastewater treatment sludges from publicly owned treatment works ("POTWs"). These loads are covered as quickly as possible upon being deposited at the working face of the landfill to minimize odors. WMMI believes that the duration of any odors was limited to the weekend of May 6-7. Offsite odors were not detected by landfill personnel upon leaving the facility Saturday afternoon.

WMMI has implemented an interim protocol for sludge loads. Incoming sludge loads are inspected at the active face by a landfill representative to check the odor level of the load, and odorous loads are rejected. This is intended to be a short-term protocol to emphasize the need to minimize odors in the loads shipped to the landfill.

In addition, WMMI has visited several of our sludge customers and scheduled visits to additional facilities to discuss the proper amount of, and adequate mixing of, reagents that are added to the wastes, as well as the need to avoid overnight storage at the POTW prior to shipping to Woodland Meadows RDF. When loads must be stored overnight at the POTW, we will evaluate options for diverting those loads to an alternative site. We are also limiting the number of loads accepted for disposal on Saturday and re-emphasizing daily cover methods to control potential odor sources.

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WMMI installed an odor suppression system last fall at Woodland Meadows RDF, which distributes an odor control agent along the eastern perimeter of the landfill. WMMI has reviewed the operational schedule of this system and has made adjustments to improve its effectiveness and ensure it is operating as often as needed.

Please contact me at 734-231-8162 with any questions.

Sincerely,

Paul Mazanec, P.E. District Engineer

Cc: Jenine Camilleri, EGLE

PIMM

Greg Morrow, EGLE

Patrick Cullen, Wayne County

Joe Read, WM