

N2688 - FCE - 2016 02/16/2016  
 2688  
 AHLF  
 Manula  
 Washtenaw

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

<b>Facility :</b> Advanced Disposal Services Arbor Hills Landfill Inc	<b>SRN :</b> N2688
<b>Location :</b> 10690 W. SIX MILE RD	<b>District :</b> Jackson
	<b>County :</b> WASHTENAW
<b>City :</b> NORTHVILLE <b>State:</b> MI <b>Zip Code :</b> 48168	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Diane Kavanaugh-Vetort
<b>FCE Begin Date :</b> 2/16/2015	<b>FCE Completion Date :</b> 2/16/2016
<b>Comments :</b> Title V Major ROP facility with three Sections: Advanced Disposal, Republic Services and Fortistar Methane Group. Note: an unusual amount of PCEs were conducted due to significant odor complaint situation that developed in early January 2016.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/16/2016	Self Initiated Inspection	Unknown	Unannounced facility inspection by US EPA region 5. DKV AQD, and Alex Whitlow (OWMRP) accompanied EPA during inspection. Other AQD staff (JK and SM) accompanied EPA staff in the GMAP (ambient air monitoring van) during the same inspection. EPA: Kenneth Ruffatto, Inspector; Scott Hamilton, Monitoring.
02/16/2016	Scheduled Inspection	Non Compliance	Summary of FY2016 Compliance related activities and inspection for Arbor Hills Landfill (under Advanced Disposal Services). This is a Title V Major Source PCEs and FCE. Compliance and complaint investigation took place over entire year beginning in January 2016.
02/14/2016	Odor Evaluation	Unknown	Conducted odor observation on Sunday, 2/14, in the area of the AHLF and neighboring subdivisions to the east in Wayne County. This is an ongoing odor complaint investigation. Landfill gas odor was only detected near landfill on 6 Mile. Distinct and definite.

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02/12/2016	Odor Evaluation	Unknown	Jerry Krawiec, AQD Detroit Office, was asked to assist Jackson DO with odor evaluation during monitoring with EPA week of February 15th. Jerry called to let me know that he drove by the AHLF site and surrounding neighborhoods this morning, @9:30 am to 10:30 am. He wanted to familiarize himself with the site and area. Jerry said he drove up wind and down wind around the site boundary roads and the neighborhoods known to be impacted to the East. He told me he only smelled odor on 6 mile. He identified it as landfill gas. There was a SW wind during this time.
02/10/2016	Odor Evaluation	Unknown	Due to an odor observed near Beck and US 14 Hwy. exits, Detroit Office staff, Nazaret Sandoval conducted an odor investigation of sources known to her in the area and an odor evaluation in the area around the Arbor Hills Landfill - subject of an ongoing widespread odor complaint situation (landfill gas primarily).
02/10/2016	Telephone Notes	Unknown	Received call from Christina to update me on current and past action items related to the ongoing odor complaint situation.
02/06/2016	Complaint Investigation	Unknown	Conducted odor observation and sample collection in area of Arbor Hills Landfill. Ongoing odor complaint investigation and evaluation.
02/05/2016	Odor Evaluation	Unknown	Conducted odor evaluation in the area surrounding AHLF and residential area, including local Ridge Wood Elementary school, 49775 6 Mile Rd. Northville, 48168 (248) 465-2200. This is an ongoing odor complaint investigation since @ 1/4/16.

Activity Date	Activity Type	Compliance Status	Comments
02/05/2016	Meeting Notes		Scott Miller & DKV Conference call with Region V EPA monitoring and compliance staff. District requested help in responding to complainant's health concerns/suspected health effects. AQD Toxics supervisor, Bob Sills contacted EPA related to potential use of GMAP (monitoring van). EPA proposed inspection along with use of Van in monitoring of the landfill and area. Possible dates week of Feb 8.
02/03/2016	Odor Evaluation	Unknown	Conducted odor evaluation in the area of landfill and residential area. Ongoing odor complaint situation.
02/02/2016	Telephone Notes		Received call from Tom, ADS AHLF providing update on his communications with the public and the action items in process.
01/29/2016	Odor Evaluation	Unknown	Conducted odor observation in area surrounding AHLF including nearby subdivisions. This is an ongoing odor complaint situation. Arrived in area @ 9:00 PM and conducted evaluation by driving with windows opening and periodically stopping. Left area @ 9:25 PM. Wind ESE and temperature 23 degrees F. Odor of landfill gas (distinct and definite) was detected along 6 Mile near NW corner of landfill property. Drove east and west directions on 6 Mile and odor was detected in same location. That was the only location. No odors were detected in residential subdivisions.
01/28/2016	Complaint Investigation	Non Compliance	Complaint inspection and odor observation. AQD accompanied OWMRP Alex Whitlow on compliance inspection. Other AQD present: Scott Miller and Zackary Durham. Met with Tom Flannagan, Dave Retell and others from Advanced. Ongoing odor complaint situation. Site inspection and meeting/discussion.

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01/28/2016	Odor Evaluation	Unknown	Ongoing complaint investigation. Conducted driving odor observation in surrounding residential area and around the facility boundary prior to conducting complaint investigation on-site. Arrived in area @9:00 AM conducted odor evaluation until entering AHLF site at 10:05 AM.
01/26/2016	Odor Evaluation	Unknown	Conducted brief odor observation in the area of Arbor Hills Landfill and subdivisions to the east. Travel occurred between 6 pm and 8 pm on this date. Weather data from internet site.
01/21/2016	Odor Evaluation	Unknown	Ongoing odor complaint situation. Conducting periodic odor observations in the area.
01/20/2016	Odor Evaluation	Unknown	Ongoing odor complaint situation. Conducting periodic odor observations in area.
01/15/2016	Odor Evaluation	Unknown	Conducted odor observation to assist DKV in response to ongoing odor complaint situation.
01/07/2016	Odor Evaluation	Unknown	7:30 AM to 8:00 AM drove around facility area and conducted odor observation. Ongoing complaint situation. Odors reported to be worse early morning and early evenings. Residential area is NE of Arbor Hills LF.
01/06/2016	Odor Evaluation	Unknown	4:30 PM to 6:00 PM drove around facility area and conducted odor observation. Ongoing complaint situation. Odors reported to be worse early morning and early evenings. Residential area is NE of Arbor Hills LF. Wind from SSW. Distinct pungent LFG odor was detected to north of LF on 6 Mile Rd. portion where LF is located; especially near active area. No odors were detected in complainant's residential area.
01/05/2016	Complaint Investigation	Unknown	Complaint investigation due to odor complaints received on January 2nd and 4th. Conducted odor observation in complainant residential area. Conducted odor observation around facility site and met with contact on site. Source is ROP Major Municipal Solid Waste LF with 3 Sections. Odors alleged from compost and/or LF operations.

Activity Date	Activity Type	Compliance Status	Comments
09/30/2015	ROP Semi 1 Cert	Compliance	ROP 1st Semi-annual Certification & Deviation Rept. Timely. Republic Services (BFI) is Sect 2 and operates Active gas system and Flare controls. Routine Well monitoring deviations reported. Other deviations: 1 event all controls down>1 hr; (LFG to energy plant S3 and flares S2); 1 event 1st Q surface monitoring exceedance. Corrective actions acceptable.
09/30/2015	ROP Other	Compliance	ROP Semi Annual Startup, Shutdown, and Malfunction Report. Republic (BFI) is Section 2. Operate Active gas collection system and 2 enclosed back up flares. 30 start-up and 29 shut-down events reported. 1 event was malfunction of flare, shut down for 9 min. Acceptable.
09/30/2015	ROP Semi 1 Cert	Compliance	ROP 1st Semi-annual Certification & Deviation report. Timely. ADS LF is Sect 1. No deviations. Acceptable.
09/30/2015	NSPS (Part 60)	Compliance	ROP 1st Semi-annual Cert & Dev report and Semi-Annual NSPS Report. ADS LF is Sect 1. No deviations. Acceptable.
09/30/2015	ROP Other	Compliance	ROP 1st Semi-Annual Startup, Shutdown, and Malfunction Report. ADS LF is Sect 1. Do not own or operate any of the control equipment. Acceptable.
09/30/2015	ROP Other	Compliance	ROP 1st Semi-Annual Startup, Shutdown, and Malfunction Report. Arbor Hills Energy S3 operates Treatment system and 4 LFG to energy Turbines. Report 5 malfunction events of gas skid for short duration. Acceptable.

Activity Date	Activity Type	Compliance Status	Comments
09/23/2015	Stack Test	Compliance	Emissions Compliance Report for O2, SO2, NOx, CO, VOC and HCl from stack testing of Landfill Gas Combustion EUTURBINE4-S3 (Solar Turbine). DKV and TPU observed test. Report indicates compliance and Tom Maza, TPU reviewed results report = acceptable. SO2 limit allows compliance with one of two. Test indicates slightly over one and met the other. (Memo filed). I requested process information for Treatment System & received it following test. Appears acceptable test.
08/27/2015	Telephone Notes		Received call from Dave requesting AQD thoughts/position for action on the Renewal application in-house. Also, verifying we received position letter from ADS on the issue.
08/06/2015	Telephone Notes		Conference call with Scott Miller, DKV and Dave, Advanced Disposal Services (ADS). AQD wanted to notify ADS that we received an amended ROP renewal application for Section 2 (BFI/Republic). Prior to call sent him a copy of application - ADS had not seen it. Asked for ADS update on contractual issue between the two parties. Dave said arbitration date has not been set. Nothing has been decided to his knowledge and he doesn't know how long it will take. I asked if Fortistar (Section 3) has been involved or if their position has been considered. He had no information regarding Fortistar.
07/16/2015	Stack Test Observation	Compliance	On site observation of EUTURBINE4-S3 performance testing at Arbor Hills Energy, Fortistar Methane Group. Section 3 of the Arbor Hills Landfill ROP.
06/24/2015	Telephone Notes		Received telephone call from Tom informing me that Christina Pearse, Republic notified him that they are coming to install the valves in the LFG active system tomorrow. This is a contractual legal matter that arose over the last month involving Republic's proposed splitting the LFG active system & areas.

Activity Date	Activity Type	Compliance Status	Comments
06/08/2015	Telephone Notes		Call from Christina Pearse on behalf of Republic, she was told about the letter from Advanced copying us and wanted to touch base and assure us they are not going to do anything to jeopardize the environment or community.
06/01/2015	Other		Email with letter from Advanced to Republic in response to situation proposed by Republic regarding contract and active gas collection system on the jointly operated LF. Teresa Seidel, Field Operations Sup. fwd to DS related to contact she received from Advanced with potential compliance concerns (see Attached to file). See also 5/29/15 telephone note entry.
05/29/2015	Telephone Notes		Dave Rettell, Advanced Disposal telephoned to inform us of correspondence they received from Republic stating they would be exercising a contractual option to cease operation of a large portion of the active gas system on the LF (jointly operated). This is one Stationary Source, sectioned ROP. AQD told him we had no prior knowledge or correspondence related to this situation. Pending further details.
03/18/2015	ROP Annual Cert	Compliance	7 total deviations reported in annual report. See comments for 9-12-14 for SEMI 1, and 3-18-15 for SEMI 2. Acceptable to AQD.
03/18/2015	ROP SEMI 2 CERT	Compliance	3 reported deviations on SEMI 2. (1) for various well field exceedances, all covered by alternate timeline/alternative scenario requests approved by AQD; (1) for 2 instances where all control down for more than 1 hour, due to plant shut down by utility-related events; (1) for historic flare temp. and/or flow records not recorded and not maintained, and therefore reported for the 5 year term of ROP issuance. Acceptable to AQD.
03/18/2015	ROP Other	Compliance	Semi Annual Startup, Shutdown, and Malfunction Report showed 0 malfunction events, and 42 start-up and 42 shut down events which were all responded to with actions consistent with SSM plan. Acceptable to AQD.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2015	ROP Annual Cert	Compliance	3 total deviations reported. See comments from SEMI 1 on 9-16-14 and from SEMI-2 on 3-18-15. Annual report includes previously unreported deviation from SEMI 1 for gas flow meter malfunction on EUTURBINE4-S3, which was offset by manual hourly readings for the 5 days the meter was down. Acceptable response program. Overall Annual Report is acceptable to AQD.
03/18/2015	ROP SEMI 2 CERT	Compliance	2 deviations reported for SEMI 2: (1) for EGT #1 stack test from September, 2014 not submitted as required in ROP w/ 60 days of test; and (1) for EGT #1 emissions of CO during September, 2014 stack test exceeded ROP emission limits for CO in lbs./hr. Both deviations were resolved through Escalated Enforcement and Consent Order, followed by re-test on 3-10-15. Acceptable to AQD.
03/18/2015	ROP Other	Compliance	Semi Annual Start-up, Shutdown, and Malfunction Report. 0 malfunctions. Any start-ups and /or shut downs were accompanied by actions consistent with SSM plan, and on record at facility. Acceptable to AQD.
03/18/2015	MAERS	Compliance	Responsible party form following MAERS submittal, hard copy, with supporting emissions data. Actual MAERS submittal not yet audited. Acceptable so far.
03/10/2015	ROP Annual Cert	Compliance	Annual deviation report. No deviations reported. Appears acceptable.
03/10/2015	ROP SEMI 2 CERT	Compliance	2nd semi-annual deviation report. No deviations reported. Appears acceptable.
03/10/2015	ROP Other	Compliance	ROP Section 2, Republic's notification of potential disturbance of asbestos containing waste previously buried in landfill that may occur as a result of their gas well installation activities this construction season from 4-15 through 12-15. Contingency measures outlined. Acceptable.



Activity Date	Activity Type	Compliance Status	Comments
03/10/2015	ROP Other	Compliance	NOV sent to company on 12-15-14 was acceptably responded to by company in letter postmarked 1-7-15.
03/05/2015	Stack Test	Compliance	Acceptable, timely notification of ROP stack testing at Fortistar, Section 3, on March 10-12, 2015.

Name: *OKelley* Date: 9/26/16 Supervisor: *[Signature]*  
Page 9 of 9