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AIR QUALITY DIVISION

February 4, 2019

Ms. Diane Kavanaugh Vetort  
Michigan Department of Environmental Quality  
Air Quality Division  
Jackson District Office  
Jackson State Office Building  
301 East Louis Glick Highway  
Jackson, Michigan 49201-1556

Subject: **Advanced Disposal Services – Arbor Hills Landfill, Inc.**  
Response to Violation Notice Dated January 14, 2019

Dear Ms. Kavanaugh Vetort:

This letter responds to the Violation Notice (VN) dated January 14, 2019 and issued by the Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) to the Arbor Hills facility. The VN states that based on AQD's review of pertinent sections of Arbor Hills 3<sup>rd</sup> Quarter Compliance Report and its review of Arbor Hills' follow-up December 7, 2018 response, 19 wells were in non-compliance. The following chart summarizes the 19 wells identified in the VN:

Process Description	Rule/Permit Condition Violated	Comments
EUACTIVECOLL-S2	MI-ROP-N2688-2011 EUACTIVECOLL-S2.VI.1. and 3 ; NSPS Subpart WWW, 40 CFR 60.755(a)(3) and (5)	Numerous landfill gas Wells exceed or did exceed at least one operating parameter over 15 days. No alternative compliance timeline (ACT)
		was requested and the GCCS was not expanded within 120 days of initial exceedance. *

\*The non-compliant wells are: AHEW0044, AHEW00AA, AHEW00ABR, AHW0264R, AHW0262, AHW0290, AHW0299, AHW0301, AHW0312, AHW0302, AHW0323, AHW0329, AHW0423, AHW0500, AHW0507, AHW0285R, AHW0286R, and AHW011. One well, AHEW046R that was not identified in AQD's initial Table has been added here

The VN also states that per Administrative Order EPA-5-17-113(a)-MI-04 issued May 4, 2017, "Respondent must demonstrate and maintain compliance with the Landfill NSPS,



the Landfill NESHAP, the NSPS and NESHAP General Provisions and the facility ROP at the Landfill facility.”

The attached table provides a summary of the monitoring data for the 19 wells identified in the VN by AQD. This table, as requested in the VN, provides the dates when wells initially exceeded NSPS operating parameters; the duration of exceedances ; an explanation of the suspected cause(s) of the exceedance(s) and summary of the actions taken or proposed to be taken to correct the exceedance(s); and the dates by which proposed actions will be taken for any ongoing exceedances.

The attached table also identifies those wells that Arbor Hills believes are not in violation of the applicable conditions as stated in the VN because of actions already taken by Arbor Hills or because of completed upgrades to the landfill gas collection system. . Arbor Hills acknowledges that not all the below listed work served to correct the exceedances identified in the table. Overall, however, the upgrades to the landfill gas collection and control system completed in 2018 do show a significant commitment by Arbor Hills to expand and improve the landfill gas collection efficiency and flare destruction capacity at the landfill.

The 2018 landfill gas collection and control system expansion work included the following:

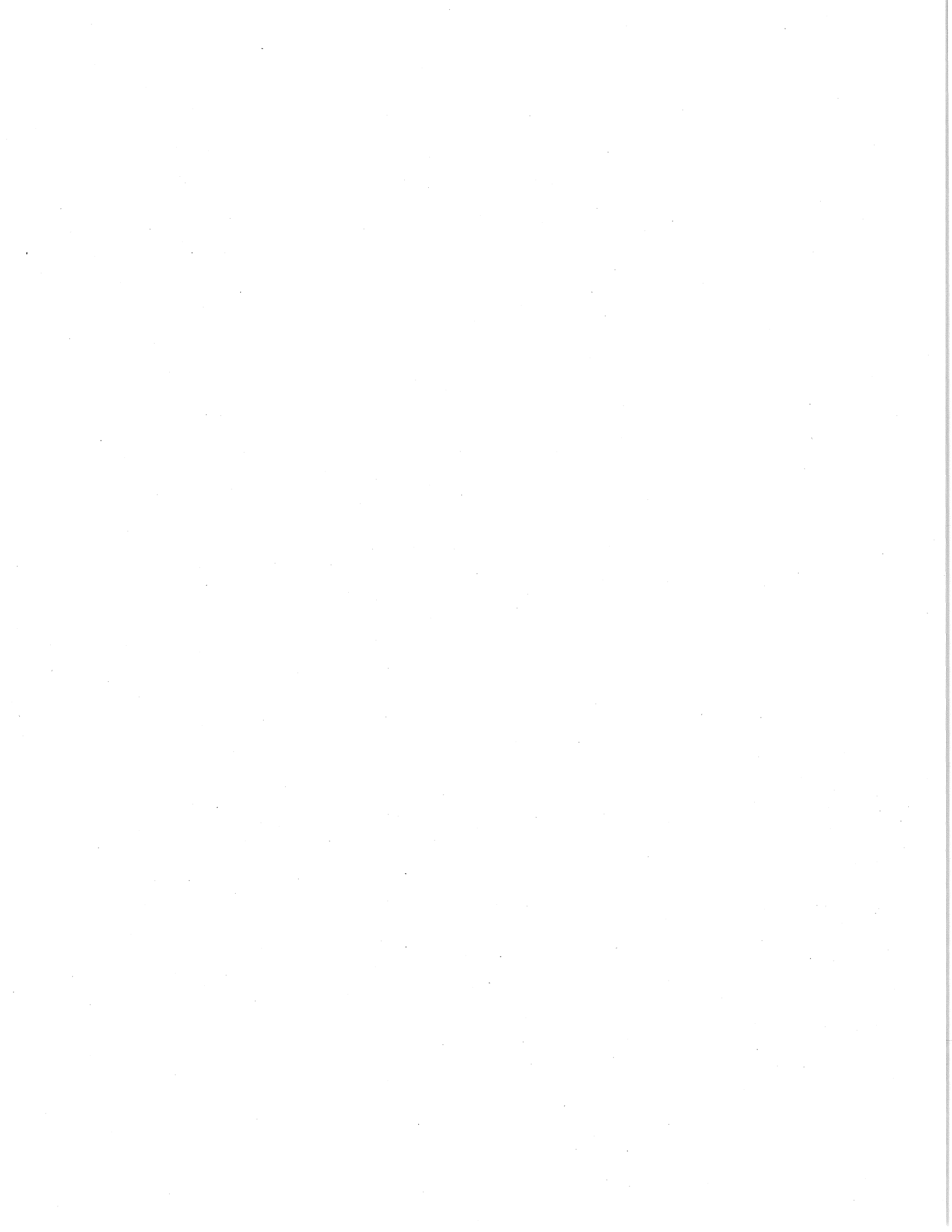
- April 26 through May 12, 2018 – Completed construction of 13 new gas wells (WW-146B, WW-176, WW-177, WW-208, WW-209, WW-273A, WW-274A, WW-429, WW-503, WW-504, WW-505, WW-507, WW-508) and 16 replacement gas wells (WW-16R5, WW-158R3, WW-168R2, WW-170R3, WW-173R6, WW-195R4, WW-216R3, WW-223R4, WW-236R4, WW-251R2, WW-272R2, WW-285R, WW-286R, WW-310R, WW-320R, WW-321R) and associated lateral piping to improve gas collection in these areas.
- April 27, 2018 – Completed installation of the 42-inch diameter steel casing beneath the railroad tracks and installation of the new 36-inch diameter HDPE header pipe from the south of railroad gas plant facility to the north landfill side to reduce vacuum loss and improve available header vacuum to the wellfield.
- May 25, 2018 – Completed installation of caisson foundation for new 5,000 candlestick flare.
- June 7, 2018 – Completed connection of 24-inch diameter perimeter header to 36-inch diameter header pipe crossing to the gas plant facility to reduce vacuum loss and improve available header vacuum to the wellfield.
- July 13, 2018 – Installed western sump CS-1B at crossing to improve condensate removal within the gas system piping.
- July 25, 2018 – Installed 36-inch diameter header from CS-1B to eastern header access riser and transition to future sump CS-1A. Pumps set in CS-1B. These improvements reduce vacuum loss and improve available header vacuum to the wellfield and improve condensate removal within the gas system piping.



- July 26, 2018 – set new 5,000 candlestick flare.
- August 2018 completed installation of the following new wells: (WW-146B, WW-176, WW-177, WW-208, WW-209, WW-273A, WW-274A, WW-429, WW-503, WW-504, WW-505, WW-507, WW-508) to improve gas collection in these areas.
- August 2, 2018 – completed installation of 18-inch diameter by-pass pipes from the existing 18-inch and 24-inch header crossings. Also completed connection of 36-inch header to gas plant tie-ins. These improvements reduce vacuum loss / improve available header vacuum to the wellfield.
- August 16, 2018 – Completed abandonment of by-passed header infrastructure on the north side of the blower facility. Included the removal of the by-passed valves, sumps, knock-out pot, and all associated above and underground piping. This was all removed to make room for future gas header piping supplying the blowers and flares.
- September 1, 2018 – revised header piping to the flares (including the 5,000 candlestick) completed.
- October 22, 2018 - AEG began removal of interior blower building infrastructure.
- November 2, 2018 – removal of existing blowers and piping for flares completed.
- November 16, 2018 – installation of new blowers, controls, and piping completed. Troubleshooting of new blowers and remaining header infrastructure at CS-1A ongoing.

In terms of preventing reoccurrence, with the departure of the Advanced Disposal Regional Landfill Gas Manager, Arbor Hills has re-assigned responsibility for air and landfill gas system management and compliance to Anthony Testa. Anthony Testa, as well as Arbor Hills' air quality consultant (AQSI), and wellfield operation and maintenance contractor (Fortistar) have been provided additional training and direction with regard to utilization of Advanced Disposal's landfill gas database, gas system data review, permit conditions, and compliance responsibilities. Advanced Disposal's Lead Region Landfill Gas Manager, Randy Frank, will also be more involved until the vacated Region LFG Manager position is filled.

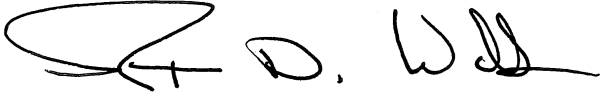
In addition, to further demonstrate Arbor Hills' commitment to compliance, Arbor Hills will be submitting a follow-up letter and table identifying additional exceedances with durations greater than 15 days and other deviations subsequent to the 3<sup>rd</sup> Quarter reporting period and/or not captured by AQD's review of the 3<sup>rd</sup> quarter data. Consistent with this VN response, the follow-up table will include: the dates when wells initially exceeded NSPS operating parameters; the duration of exceedances and/or if they are ongoing; an explanation of the suspected cause(s) of the exceedance(s) and summary of the actions taken and/or are proposed to be taken to correct the exceedance(s); and the dates by which proposed actions will be taken for any ongoing exceedances. Arbor Hills intends to submit this follow-up letter and table to AQD on or before February 28, 2019.



Arbor Hills considers environmental compliance to be non-negotiable and will diligently pursue resolution of identified exceedances/deviations and work to avoid any reoccurrence. If you have additional questions, please contact me at 248-412-0704, Anthony Testa at 734-718-4262, or Randy Frank at 414-422-9075 ext. 102.

Sincerely,

**ADVANCED DISPOSAL SERVICES ARBOR HILLS LANDFILL, INC.**

A handwritten signature in black ink, appearing to read "Bob Walls". The signature is stylized with a large initial "B" and "W".

Bob Walls  
General Manager

cc: Ms. Jenine Camilleri – DEQ Enforcement Unit Supervisor  
Michigan Department of Environmental Quality  
Air Quality Department  
P.O. Box 30260  
Lansing, MI 48909-7760

D. Oleniacz-AQSI  
Anthony Testa – Advanced Disposal  
Randy Frank – Advanced Disposal