

N2688- R/VN- 20190211



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AIR QUALITY DIVISION

February 11, 2019

Mr. Scott Miller
Jackson & Lansing District Supervisor
Jackson District Coordinator
Air Quality Division
Michigan Department of Environmental Quality

Mr. Lawrence Bean
Jackson & Lansing District Supervisor
Waste Management and Radiological Protection Division
Michigan Department of Environmental Quality
301 East Louis Glick Highway
Jackson, MI 49201-1556

**RE: Response to Notice of Violation Issued by Michigan Department of Environmental Quality
Dated January 17, 2019 – SRN N2688 Washtenaw County**

Dear Mr. Miller and Mr. Bean,

This letter responds to the Notice of Violation (NOV) dated January 17, 2019, issued to Advanced Disposal Services Arbor Hills Landfill, Inc (AHLF).

The NOV states that during an investigation performed on January 4, 2019, the Air Quality Division (AQD) staff "detected a distinct and definite objectionable landfill compost/garbage/gas odor along Napier Road before W. Six Mile Road and in the residential area on the southwest side of the Steeplechase Subdivision, specifically Briar Ridge Lane, downwind of the facility." The NOV states that "the observed landfill odor is a violation of Rule 901(b)." Additionally, "the Rule 901(b) violation constitutes a violation of Rule 433(1)(c) since the landfill odor generated by the facility created a nuisance odor beyond the property boundary." Lastly, the NOV directs AHLF to initiate "actions necessary to correct the cited violation and submit a written response by February 11, 2019."

Explanation of the Causes and Duration of the Violation

AHLF acknowledges the presence of low level yard waste compost odors during the time of AQD's investigation.

Although the time and duration cannot be specifically determined, third-party odor surveillance, appointed AHLF odor monitor, as well as AHLF site personnel, identified yard waste compost odors at several community locations within the Steeplechase Subdivision between the hours of 5 PM-8 PM. The third-party odor surveillance noted that the compost odors registered a less than two scent-o-meter reading



during their inspection. The cause of the odors was due to yard waste compost processing activity conducted during the morning and afternoon hours of January 4, 2019.

In accordance with our Best Management Practices AHLF utilized favorable wind conditions to grind yard waste and place this material into windrows. Activity was purposely initiated during an east wind to minimize compost related odor from impacting landfill neighbors in the Steeplechase community.

Toward the end of the operating day, weather and wind conditions changed, leading to odors drifting off-site to the east.

Remedy and Corrective Actions

Immediate Remedies Taken

- As wind conditions changed and compost personnel detected the potential for off site odors, AHLF compost management immediately placed wood chips and odor suppressant to the windrow piles to mitigate the odors. Although the full duration of the odors is unknown, detection of off-site compost odors was negligible by the morning of January 5, 2019.

Corrective Actions

- On an hourly basis throughout each day, AHLF reviews the weather forecast to assure that optimal weather conditions are present prior to and while conducting yard waste composting operations.
- AHLF has assigned a full-time compost manager to oversee the yard waste compost operations and to assure that Best Management Practices are being utilized. The MDEQ has received documentation of AHLF' Best Management Practices.
- AHLF has added additional yard waste compost personnel to ensure timely and consistent yard waste compost processing activities and when weather conditions are most favorable to minimizing off site odors that can result from natural processes that occur from this operation.
- Although AHLF makes every attempt to manage yard waste when wind directions are favorable. Unfortunately with the prevailing wind direction out of the west this provides only small windows of opportunity to manage the material. AHLF must take advantage of favorable wind direction whenever possible to prevent yard waste windrows from going anaerobic. Should wind



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conditions change earlier than anticipated, low level yard waste compost odors may be distinguishable until the windrows stabilize.

- AHLF will require the new operator attend the USCC Compost Operators Training Course (COTC) in 2019 to earn Certified Compost Operator credentials, ensuring that AHLF has two CCOs on its Arbor Hills staff. All future operators will be required to complete the COTC training.

Conclusion

AHLF remains committed to minimizing off-site odor impacts and to assuring operational practices outlined above are maintained and designed to minimize odor impacts. In addition to operational personnel, AHLF has assigned one individual to perform recurring odor monitoring around the site and in the neighborhoods throughout the community to identify and diagnose odors in an attempt to mitigate or minimize the impact. Construction at the landfill may periodically expose garbage that may potentially cause odors, and AHLF will continue to do everything possible to minimize these effects.

We look forward to discussing this matter with you and will appreciate your feedback.

Sincerely,

ADVANCED DISPOSAL SERVICES ARBOR HILLS LANDFILL, INC.

Bob Walls
Arbor Hills Landfill General Manager

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