

N2688-LLC-20190429 (I)

FORTISTAR Methane Group

Arbor Hills Energy LLC
10611 West 5 Mile Road ♦ Northville, Michigan 48167
Tel. (248) 305-7774 ♦ Fax. (248) 305-7879

April 25, 2019

Mike Kovalchick
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
Jackson District Office
301 East Louis B. Glick Highway
Jackson, MI 49201

RECEIVED
MDEQ - JACKSON

APR 29 2019

AIR QUALITY DIVISION

Subject: Response to Violation Notice, April 11, 2019
Arbor Hills Energy LLC ("AHE") - MI-ROP-N2688-2011

Dear Mr. Kovalchick:

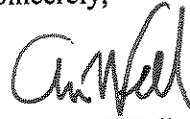
I am writing in response to the above-referenced NOV, which in turn was based on inspections conducted by the Michigan Department of Environmental Quality ("MDEQ") Air Quality Division ("AQD").

We understand that MDEQ has had discussions with Advanced Disposal Services, Arbor Hills Landfill Inc. ("ADS") related to the Elevated Temperature Landfill ("ETLF") event cited in the NOV. As documented in the attached letter dated March 28, 2019, ADS explained to MDEQ that the elevated temperatures were related to the non-methanogenic degradation process of a special waste stream accepted at the landfill. ADS provided MDEQ with proposed corrective action and requested Higher Operating Variances ("HOVs") based on a compilation of data that demonstrated the lack of CO (typically linked to subsurface oxidation events). We understand further, pursuant to a letter from MDEQ to ADS dated April 11, 2019, that MDEQ did not approve the HOVs.

Fortistar performs operation and maintenance activities at the wellfield as directed by ADS and will implement, in close coordination with ADS, any practice approved by MDEQ. However, we reiterate that a higher operation temperature is required for these wells as that would optimize gas collection and release the temperature of chemical reaction occurring within the waste mass.

Please direct all questions related to this response to me at (716) 439-1006 x116 or Suparna Chakladar at (951) 833-4153.

Sincerely,



Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Arbor Hills Energy LLC

Attachment(s)

cc (by e-mail): Annette Switzer, MDEQ
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