



October 28, 2023

Gary Schwerin, Lansing and Jackson District Supervisor
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Jackson District Office
301 East Louis Glick Highway
Jackson, MI 49201-1556

Sent via email

Re:Response to MMD October 25, 2023, Violation Notice (SRN: N2688)

Dear Mr. Schwerin:

Arbor Hills Landfill, Inc. (Arbor Hills) provides this letter in accordance with Section 5.17 of the Consent Judgment and in response to the Violation Notice dated October 25, 2023, which was issued by the Michigan Department of Environment, Great Lakes, and Energy, (EGLE) Material Management Division (MMD). This response is being made within 72 hours after Arbor Hills received the notice of violation (VN).

The VN alleges:

During the odor inspection on October 20, 2023, MMD staff identified nuisance odors near the northeast corner of the landfill, at 50937 Briar Ridge Lane, and at 17369 Briar Ridge Lane.

Commencement of Investigation and Root Cause Analysis

Upon receiving the odor complaints during the morning hours of October 20, 2023, the Arbor Hills management team went to the areas where complaints were made, primarily the Steeplechase subdivision to conduct odor surveillance. Arbor Hills personnel detected working face garbage odor near the addresses listed in the VN.

Report on Results of Investigation, Evidence Obtained, and Remedial Measures Taken

Arbor Hills did not receive any perimeter alarms or alerts that would indicate that gas odors were evident during the morning hours of October 20, 2023. Arbor Hills staff identified garbage odors in the Steeplechase subdivision at approximately 8:30 AM EST. In general, garbage odors are common during the morning hours as the landfill operation team must remove the previous day's daily cover to tie in the new incoming waste to the older waste. Uncovering older waste provides the opportunity for garbage odors to surface for a short period of time but odors generally dissipate by mid-morning. Again, pulling back the daily cover to tie-in the new incoming waste is a general best management landfill operational practice. Below is a summary of Arbor Hills' investigation efforts, findings and remedial efforts associated with each event.

- On October 20, 2023, at approximately 8:30 AM, Arbor Hills staff drove through the Steeplechase subdivision, specifically in the areas where odor complaints originated. Arbor Hills identified a garbage odor near the addresses listed in the VN.
 - Arbor Hills was filling in the area at the farthest point east in Cell 6A, approximately 1,800-feet from the addresses listed in this VN.
 - Garbage odors were no longer detected beyond facility boundaries by 10:30 AM.
 - During the 72-hour review period AHL reviewed the onsite weather station data. In general, between the hours of 6:00 AM and 10:30 AM, the wind direction was out of the southwest at 5 -7 mph. Additionally, the site experienced approximately 0.35 inches of rain the night prior on October 19, 2023.

Plan to Remediate the Identified Site Condition(s) that Caused the Alleged Violation

Our investigation indicates that the odors detected came from a disposal area in Cell 6 that is fairly close to the locations reporting odors. To minimize the impact upon these residents, Arbor Hills will implement use odor mitigating fans as waste filling progresses in Cell 6, as needed.

It should be noted that the garbage odors detected by the Arbor Hills team on October 20, 2023 are commonly associated with the routine operation of a landfill. As an additional step to minimize potential impacts, Arbor Hills will use odor mitigating fans prior to and during the removal of daily cover materials. We are closely monitoring odorous conditions and the type of odor being generated, and we will deploy any reasonable means necessary to mitigate any future odor concerns.

We appreciate your assistance with this matter and Arbor Hills will continue to work diligently to address odor concerns. In preparing this response, we have tracked the elements of Section 5.17 of the Consent Judgment. If EGLE requires additional information, or has any questions, please contact me at (567) 230-7373.



Sincerely

Arbor Hills Landfill, Inc.

David Seegert
General Manager

cc: Jenine Camilleri, Enforcement Unit Manager, Air Quality Division
Scott Miller, EGLE Air Quality Division
Diane Kavanaugh-Vetort, EGLE Air Quality Division
Anthony Pelletier, GFL Environmental
Fernando Camargo, GFL Environmental
Anthony Testa, GFL Environmental
Tami Craig, GFL Environmental
John Collins, GFL Environmental
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