



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

October 12, 2018

CERTIFIED MAIL-7017 3380 0000 4105 8971
RETURN RECEIPT

Mr. Robert Walls, General Manager
Advanced Disposal Services, Arbor Hills Landfill Inc.
10690 Six Mile Road
Northville, Michigan 48168

SRN: N2688, Washtenaw County

Dear Mr. Walls:

SECOND VIOLATION NOTICE

On August 23, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an odor evaluation as part of an ongoing investigation of longstanding periodic complaints regarding nuisance odors alleged to be the result of operations at the Arbor Hills Landfill located at 10690 Six Mile Road, Northville, Michigan. The purpose of the investigation was to determine if this facility was in compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, and Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the administrative rules promulgated pursuant to these parts. Odor complaints had been received by DEQ on August 23, 2018.

On August 31, 2018, the AQD and Waste Management and Radiological Protection Division (WMRPD) sent Advanced Disposal Services, Arbor Hills Landfill (AHLF) a Violation Notice citing a violation discovered as a result of the odor evaluation and requested your written response by September 24, 2018. The VN stated that additional measures are needed to reduce odors from the landfill.

On September 24, 2018, AQD and WMRPD received a response letter from AHLF. AQD and WMRPD determined that the response received does not constitute an acceptable response to the cited violations for the following reasons:

- Did not include an adequate explanation of the causes and duration of the violations.
- Did not include an adequate summary of the actions proposed to be taken to correct the violations.
- Did not adequately include the dates that these actions will take place.
- Did not adequately include necessary steps that need to be taken to prevent a reoccurrence.

The response contained no new or significant Waste or Compost related operational improvements, or actions implemented or proposed to reduce or eliminate recent odors identified in the subject VN.

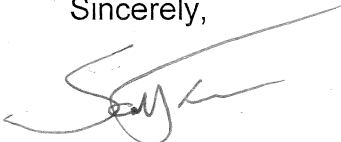
Please be advised that failure to respond in writing and identifying actions AHLF will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested in our August 31 letter by October 26, 2018.

Please submit the written response to the DEQ, AQD, Jackson District, at 301 E. Louis Glick Hwy., Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring AHLF into compliance, please contact me at the number listed below.

Sincerely,



Scott Miller
Jackson District Supervisor /
District Coordinator
Air Quality Division
517-416-5992



Lawrence E. Bean
Jackson District Supervisor
Waste Management and
Radiological Protection Division
517-416-4375

cc: Mr. Jay Warzinski, Vice President LF Operations, ADS
Mr. Anthony Testa, Advanced Disposal Services
Mr. Nathan Frank, USEPA
Mr. Kenneth Ruffatto, USEPA
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Diane Kavanaugh Vetort, DEQ
Mr. Jack Schinderle, DEQ
Mr. Lonnie Lee, DEQ
Ms. Alex Clark, DEQ