



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 24, 2019

Mr. Mark A. Johnson
Advanced Disposal Services Arbor Hills Landfill Inc.
10833 West Five Mile Road, Building B
Northville, Michigan 48167

Dear Mr. Johnson:

SUBJECT: Third Quarter Inspection FY 2019 – Violation Notice (VN)
Arbor Hills West Expanded Sanitary Landfill; Facility ID 475946

On May 9, 2019 staff of the Department of Environment, Great Lakes, and Energy (EGLE) Materials Management Division (MMD), conducted an inspection of Arbor Hills West Expanded Sanitary Landfill (Facility) located at 10690 Six Mile Road, Northville, Michigan. The purpose of this inspection was to determine compliance with the requirements of Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the administrative rules.

MMD staff have the following areas of concern based on evaluation of the Operating Record and discussions with Advanced Disposal Services (ADS) staff during the above referenced inspection:

1. As-built information was recently made available for the leachate collection system for each cell and it was determined that the leachate sumps in most cells have a different (lower) compliance level than what was previously reported.
2. Related to the item above, leachate control panels require modifications, such as adjusting pump on levels and high levels indicators, in order to correlate with the as-built sump depths, properly maintain the leachate control system, and ensure accurate records.
3. Leachate collection system recordkeeping forms need to be revised to include actual sump depth/compliance levels, daily precipitation information, and any relevant notes regarding equipment failure/maintenance.
4. It was observed that there is no direct measurement of leachate head on the Cell 1 primary liner and it is believed that leachate from Cell 1 flows via gravity into the Cells 2 and 3 leachate collection systems. The necessary as-built drawings to confirm the fate of the Cell 1 leachate flow/path/direction could not be located during the inspection, making it difficult to determine compliance.
5. The Facility needs to develop a schedule for regular inspection and cleaning of the leachate collection and transmission system, and to maintain records of these activities in the onsite Operating Record.
6. An average daily flow rate in the secondary collection system (SCS) for Cell 4 that exceeds the action flow rate (AFR) has been continuously identified each month since January 2018 (this issue was previously identified in the January 24, 2019 VN in conjunction with the requirements R 299.4432(3)(a)). Under R 299.4432(3)(d) action must be initiated, as specified in the rule, within 30 days of the end of the month in which the exceedance occurred. Therefore, for each month that the AFR exceedance continues, the Facility is required to evaluate and update the liquids management plan to reduce the flow in the secondary and to comply with the additional requirements of R 299.4437, including sampling and analysis of the liquids.

ADS have outstanding Part 115 violations as listed in Violation Notices dated January 24, 2019, March 14, 2019, and April 11, 2019. In addition, based on MMD's recent inspection, ADS is in violation of the following provision of Part 115 and the administrative rules:

Mr. Mark A. Johnson

Page 2

May 24, 2019

- Significant exceedances of leachate levels in Cell 3 over the months of January to mid-April, in addition to continued exceedances in Cell 4 contrary to R 299.4432(1).

During the inspection it appeared that primary liner head levels were reduced in the cells on that day, however, several months of data will be needed to confirm whether the underlying issues that caused the elevated head levels have been adequately resolved. In order to return to compliance, ADS must properly address the head levels of the leachate control system, determine the reason behind, and rectify, the AFR exceedance, and illustrate continuous compliance. Please provide monthly data that confirms continual compliance for our review.

MMD staff is requesting a status update regarding your proposed responses to these violations, specifically, Part 115 violations with respect to the elevated leachate levels in Cells 3 and 4 and the AFR exceedance in the Cell 4 SCS. Please provide a written response to this correspondence by June 18, 2019 that includes the following information:

1. A status update for ongoing corrective actions implemented to reduce leachate levels and attain/maintain compliance with the leachate head requirements of the Part 115 administrative rules.
2. An updated liquids management plan for the Cell 4 leak detection system that meets the requirements of Part 115 administrative rules.
3. Documentation that any necessary changes have been made at the leachate sump/pump control panels to accurately monitor and control leachate head levels based on the as-built sump depths.
4. A revised form for recordkeeping for leachate levels and volumes that includes updated compliance levels, precipitation data, and relevant notes.
5. A proposed schedule for inspecting and cleaning leachate collection/transmission system components to assure proper operation.
6. Documentation/confirmation based on as-built information as to the fate of leachate from the Cell 1 primary liner system.

If you have any questions, please contact me at EGLE-MMD, Jackson State Office Building, 301 East Louis Glick Highway, Jackson, Michigan 49201; by telephone at the number below; or by e-mail at Proctora4@michigan.gov.

Sincerely,



Steve White
for

Aubrey Proctor
Environmental Engineer
Materials Management Division
(517) 740-5500

Enclosure

cc: Mr. Jonathan Pelukas, Washtenaw County Division of Environmental Health
Ms. Diane Kavanaugh Vetort, EGLE
Mr. Lawrence Bean, EGLE