



DEQ-AQD

JUN 04 2018

SAGINAW BAY

May 30, 2018

Ms. Gina McCann
Michigan Department of Environmental Quality
Air Quality Division
Saginaw Bay District Office
401 Ketchum Street, Suite B
Bay City, MI 48708

SUBJECT: Violation Notice Response
Midland Sanitary Landfill, Midland County
SRN: N6004, Midland County

Dear Ms. McCann:

This letter has been prepared in response to the Violation Notice sent to the City of Midland – Utilities Division (CML) dated May 11, 2018. Included in the letter were two separate (but related) violations resulting from routine monthly gas collection well monitoring during 2017. Specifically, CML was cited for missing a single monthly reading for each of four gas collection wells, as we noted in our 2017 annual and semi-annual NSPS reports submitted to you.

Each well and month missed are noted here:

- MLTCO-14, June 2017;
- MLC-16A07, February 2017;
- ML-VDW06, August 2017; and
- MLC-16C06, November 2017.

Furthermore, after receipt of your letter we performed evaluation of 2018 data and identified two additional readings that were not recorded, as follows:

- MLC-16B02, January 2018; and
- MLC-16C02, February 2018.

All wells were read in March, April, and May. While we believe each of these wells was actually monitored along with the rest of the gas collection system on these dates, we have no documentation to prove it. The technician follows the same path every month, and the gas meter has the wells in order of that path. We recognize our obligation to document these readings monthly. Our focus had been to verify proper operating parameters for oxygen, temperature, and pressure, but failed to include verification that 100% of wells had been documented each month.

Data evaluation each month now includes verification and tracking of all wells being recorded, in addition to compliance with oxygen, temperature, and pressure requirements, along with appropriate 5-day rechecks. Field technicians have been instructed to be intentional about consistency and thoroughness. Our consultant, CTI and Associates, has also been instructed to periodically double-check our entire data set for compliance and completeness.

Sincerely,

A handwritten signature in cursive script that reads "Scott O'Laughlin".

Scott O'Laughlin
City of Midland Landfill Superintendent

CC: Joseph Sova, City of Midland
Erin Berish, CTI and Associates, Inc.

