



June 25, 2020

Christine Alexander
EGLE Water Resource Division
Industrial and Storm Water Permit Group
PO BOX 30458
Lansing, MI 48909-7958

Robert R. Nix II, *Supervisor*
Marjorie F. Banner, *Clerk*
Fred Shadko, *Treasurer*
Scott Frush, *Trustee*
Symantha Heath, *Trustee*
Mindy Herrmann, *Trustee*
Christopher Roosen, *Trustee*

Re: Advanced Disposal Services
NPDES Permit Applications

Ms. Alexander,

Northville Township recently learned that Advanced Disposal Services (ADS) has submitted two NPDES permit applications^{1,2} requesting permission to discharge leachate from the Arbor Hills East Landfill and from the Compost facility located north of the landfill into Johnson Creek. Johnson Creek is the only coldwater trout stream in Wayne County and is an irreplaceable resource for our community. The residents of Northville Township, and the leadership of the Township oppose the approval of these applications because any discharge by ADS will cause irreparable harm to Johnson Creek.

The ADS applications seek modifications to an existing permit (MIS210766) which expires April 4, 2021. Both permit applications represent new discharges and are not modifications to the existing Arbor Hills Remediation Area NPDES Permit (MIS210766). Northville Township has carefully reviewed the ADS applications and believe that they contain errors and omissions. Attached are detailed objections submitted on behalf of our residents and Township Trustees. Objections have also been submitted by The Conservancy Initiative (TCI), an environmental nonprofit 501c(3) corporation, by their letter dated June 23, 2020, which we reviewed and fully support.

Accordingly, Northville Township requests that **both permit applications be promptly "Denied"**. We also request notification if either of these permits move forward or are denied and copies of any correspondence, emails or comments between EGLE and ADS. We reserve our right to submit more detailed comments during this process.

Since 2015, Northville Township residents have suffered with noxious odors from the Arbor Hills Landfill in spite of multiple violation notices issued and enforcement actions taken by the EPA and EGLE. ADS has demonstrated a disregard for environmental regulatory compliance or sustainability. The permit requests by ADS are predicated entirely by financial gain over protecting the environment.

¹ [NPDES Permit Modification: Arbor Hills East Landfill](#), April 3, 2020, Environmental Resources Group, Prepared for Advanced Disposal Services

² [NPDES Permit Modification: Compost Pond - Arbor Hills Landfill](#), April 3, 2020, Environmental Resources Group, Prepared for Advanced Disposal Services

Johnson Creek is an irreplaceable asset for our community. With a history of repeated noncompliance with air and waste regulations, and no experience operating water treatment facilities, we simply cannot entrust the environmental health of this treasure to ADS. A single breakdown in the treatment system, for whatever reason, will cause irreparable harm to the trout stream. Discharge of landfill leachate and compost contaminated runoff to Johnson Creek is not the solution to the failure of ADS to properly manage and maintain the landfill and compost operations.

Northville Township objects to both permit requests by ADS. Please contact me to discuss this critical matter to our Township.

Regards,



Robert R. Nix II

Supervisor, Northville Township

cc: BuckmasterT@michigan.gov, MILLERS@michigan.gov, BROWNEE@michigan.gov, SLIVERS@michigan.gov, SCHINDERLEJ@michigan.gov, miag@michigan.gov, GordonN1@michigan.gov, ARGIROFFP@michigan.gov, BurnsR6@michigan.gov, dijakc@michigan.gov, DOLEHANTYM@michigan.gov, ethridgec@michigan.gov, leel@michigan.gov, RUSSELLJ@michigan.gov, seidelt@michigan.gov, shinkss@washtenaw.org, eggermontt@washtenaw.org, OlaguerJ@michigan.gov, pcullen@co.wayne.mi.us, pratte@washtenaw.org, sendpolehanki@senate.michigan.gov, MattKoleszar@house.mi.gov, fshadko@twp.northville.mi.us, mbanner@twp.northville.mi.us, croosen@twp.northville.mi.us, sheath@twp.northville.mi.us, mherrmann@twp.northville.mi.us, sfrush@twp.northville.mi.us, kheise@plymouthtwp.org, bturnbull@ci.northville.mi.us, ralph.g.lassel@gmail.com, ddrinan@theconservancyinitiative.org, davehoran@yahoo.com, treasurer@theconservancyinitiative.org, jennycordina@gmail.com, ademaria@allianceofrougecommunities.com, mmccormick@therouge.org, cyndy.jankowski@comcast.net, gallagma@northvilleschools.org