



City of Mount Clemens

*City Manager's Office
One Crocker Boulevard
Mount Clemens, Michigan 48043*

April 26, 2011

**VIA E-MAIL KARL.RICHARD@EPA.GOV
VIA FIRST CLASS MAIL**

Mr. Richard Karl
U.S. Environmental Protection Agency ("USEPA")
Region 5
77 West Jackson Boulevard
Mail Code: S-6J
Chicago, Illinois 60604-3507

**Re: Request for Assistance to Address Methane Issues at Former Mount Clemens,
Michigan Landfill Site**

Dear Mr. Karl:

The purpose of this letter is to request that USEPA provide limited assistance to the City of Mount Clemens (the "City") to address methane issues at the former Mount Clemens landfill. As you may know, the City operated the 54.5 acre landfill from approximately 1945 through the early 1960s. Landfilling activities ceased and the current commercial and residential buildings were constructed on and adjacent to the landfill in the late 1960s and early 1970s.

In 2005, the City became aware of elevated levels of methane in the soil and groundwater at and adjacent to the former landfill site. Since that time, the City has taken various actions including installation of a passive ventilation trench in the area of greatest concern, Park Place Towers. After a year of monitoring the effectiveness of the trench, it was determined that the trench would need to be converted to an active system to have a significant effect on lowering the methane levels in the vicinity of Park Place Towers. Other areas of the landfill have significant levels of methane in the soils and groundwater and the City has been assessing/monitoring those areas as well.

Since last fall, a number of additional local, state, and federal agencies (e.g. Housing and Urban Development, Air Toxics Substances and Disease Registry, Michigan Department of Community Health, Macomb County Health Department, etc.) have joined the Michigan Department of Environmental Quality ("MDEQ") and have formed a technical team to monitor and provide assistance to address site issues. Mr. Jon Gulch, of your office, is also part of the technical team.

On January 25 and 26, 2011, the City's consultant, AKT Peerless ("AKT"), conducted pilot studies at two locations. The pilot study evaluated two methods to extract landfill gas: (1) from a trench located on Park Place property and (2) from a vertical ventilation stack near Clinton Place Apartments. The pilot study was successful and provided valuable information to design specifications to enable the system to be converted from a passive to an active ventilation system. Due to the fact that public housing complexes and other residences are located on or adjacent to the landfill, the MDEQ has asked the City to set forth a schedule to convert the system and address all the landfill gas issues as soon as possible.

While the City would like to be able to convert to an active system quickly and address the other areas of the site that need attention, it is facing, like many municipalities, financial challenges. The City is currently facing an estimated \$960,000 budget deficit at the end of this fiscal year and an additional \$1.5 million dollar deficit during the 2011/2012 fiscal year. Obviously, deficits of this level in a smaller community are difficult to overcome. While we work steadfastly toward balancing our current budgets responsibly; we must constantly think toward our future and make decisions that try to keep the City out of receivership.

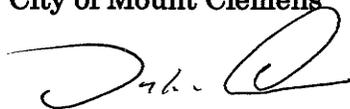
Consequently, the City is requesting that the USEPA provide limited assistance to convert the Park Place trench to an active ventilation system. The City requests that USEPA provide intrinsically safe equipment including (1) the regenerative blower capable of creating a flow rate of 280 cubic feet per minute ("CFM"), (2) a security shed to house the blower, and (3) related equipment (i.e., fittings, flow meters, temperature gauges, control valves, etc.) necessary to convert the system. The City will provide the electrical connection to the blower and operate and maintain the system going forward.

This equipment will be used as an interim measure, which will be designed by AKT based on the results of AKT's pilot study. The City understands that USEPA is merely providing the equipment necessary to convert the passive trench to an active system and has not been involved in the pilot study or design of this interim measure. Therefore, the City will not hold the USEPA liable for any adverse condition that could occur below ground as a result of the use of this equipment. The City will maintain the equipment. The City anticipates this interim measure will operate until a more permanent site wide system can be designed, approved, and installed, which the City anticipates will take approximately 12-18 months.

We appreciate your attention to this request. Because we are required to provide a schedule to MDEQ by April 29, 2011, we would appreciate a response as soon as possible. If you have any additional questions, please contact the City's Public Service Director, Jeff Wood, at 586.469.6818, x901. Thank you.

Very truly yours,

City of Mount Clemens



Douglas C. Anderson
City Manager

smc

c: Mr. John Gulch, EPA
Mr. Paul Ruesch, EPA
Mr. Jim Sygo, Michigan Department of Environmental Quality
Ms. Cheryl Wilson, Michigan Department of Environmental Quality
Mr. Ernest Ndukwe, Michigan Department of Environmental Quality
Mr. Jeff Wood, City of Mount Clemens
Ms. Anna Maiuri, Miller Canfield