Arbor Hills Landfill: the most serious compliance problems and warning signs, happening now

As of Nov. 16, 2026 · Arbor Hills Landfill, Salem Township (EGLE air SRN N2688; solid waste WDS 475946) · Operator: GFL Environmental since Oct. 30, 2020 · Every item traces to a public record (EGLE, Attorney General, YCUA, the operator or its consultants, ATSDR) or the Arbor Hills Monitor dataset

ISSUE	STARTED	STATUS	EVIDENCE
Underground methane over the explosive limit, east of Napier Rd Consent Judgment 2020-0593-CE ¶5.12; Rule 433 (R 299.4433)	Under GFL, since Nov. 2020 (also before GFL)	ONGOING 24 of 24 quarters under GFL	Boundary gas probes have read above the lower explosive limit (5% methane) in every quarter since GFL took over (Nov. 2020 to Sept. 2026). GFL's consultant SCS, Q3 2026 update (FOIA E700318): **GMW-15R2 over the limit in 13 of 14 readings, up to 73.8% methane on Sept. 25**, nearly 15 times the limit; **TGP-17D, installed Oct. 2020, went over the limit for the first time in Aug. 2026** (7.6% Aug. 27; 24.9% Sept. 29). Peak: TGP-18D, 92.9% methane (nearly 19 times the limit), Mar. 19, 2024. Attorney General, Nov. 6, 2026: *"EGLE is aware that Arbor Hills has not obtained compliance with Paragraph 5.12 and that methane concentration exceedances continue to be observed at the gas probes monitored under the consent judgment"*; *"Because Arbor Hills has been working cooperatively with EGLE to address the methane exceedances, EGLE has not assessed stipulated penalties."* GFL's Rule 433(4) notices of these exceedances, 2020 to 2024: *"do not exist"* (EGLE, FOIA E700318, Nov. 13, 2026). No record shows GFL told the Northville Twp fire department; Northville Twp's chief learned of it from residents in Nov. 2026.
Soil gas vented to the air east of Napier Rd, untested Monitoring gap, not a violation	Sept. 28, 2026	NO LAB TEST	Two passive vents, installed Sept. 28-29 beside GMW-15R2 and TGP-18D, tap the lower sand seam SCS says is *"believed to be the conduit for gas migration"* and release that soil gas to open air; SCS plans weekly monitoring but describes no treatment and no lab analysis of the vented gas. The only lab test of TGP-18D's gas on record (June 4, 2024) found **chloroform about 70 times** EPA's soil-gas screening level for homes (gas at the probe, not air in a home). In 2019, EGLE found the prior operator's last passive vent on the landfill *"non-compliant"* (*"passive vent emissions must be controlled"*); by June 2019 it was connected to gas collection.
Methane in the air at the fence line Consent Judgment 2020-0593-CE ¶5.5	2022 (network installed May 2022)	ONGOING 30 to 40% of days	EGLE Air Quality Division, Nov. 9, 2026: perimeter methane at or above the 40 ppm action level *"on 30 to 40 % of the days over the reporting period"* (2023 to Sept. 2026); *"A frequency at this level does not demonstrate effective capture."* EGLE violation notices, Oct. and Dec. 2022. GFL's consultant Barr, Oct. 15, 2026: H2S data from **three of six** perimeter monitors marked poor quality (*"AS"*), July 2025 through at least Sept. 2026; H2S now monitored at only four of six.
PFAS in leachate sent to the sewer YCUA Industrial User Permit AD 6-27, Outfall 002A	2025 (exceedances on record from Aug. 2025)	ONGOING NOV Sept. 2026	**Mar. 25, 2026: leachate, partly untreated for 4 hours, reached the sewer at PFOS 18,000 and PFOA 30,000 ng/L**. PFOS still over the limit in April, May, June and July 2026. YCUA Notice of Violation, Sept. 18, 2026: PFOS (May to July), PFOA (July 8), and ammonia 2,693 lb on June 18 vs. an 844 lb/day limit. Limits since July 1, 2025: PFOS 170 / PFOA 2,600 ng/L.
PFOS in stormwater headed for cold-water Johnson Creek Stormwater permit MIS210766	June 14, 2021 (violation notice; samples Apr. 2020, before GFL)	OPEN 5+ YRS	EGLE Violation Notice **VN-011821**: PFOS up to 400 ng/L (vs. 12) in landfill stormwater reaching a cold-water tributary of the Johnson Drain (Johnson Creek), the Rouge watershed's only cold-water trout stream (Friends of the Rouge). EGLE's notice: *"It is likely that other sources of PFAS are present at the Facility."* Still listed active on nSITE (Oct. 2026). Under GFL, Aug. 4, 2022: leachate mixed with stormwater entered the detention pond and drained to the tributary; *"the volume of leachate released is unknown"* (EGLE VN-013462). PFOS on Aug. 5: **1,300 ng/L** in the influent pond, **360** at the outfall (Rule 57 human-health value: 12). EGLE closed VN-013462 on Jan. 12, 2023.
PFAS in groundwater: GFL's twice-a-year sampling plan, pending since 2023 MMD Consent Order 115-05-2023	June 2019 (first sampled, before GFL; already over)	ONGOING Plan pending approval since July 2023; no results on file since Apr. 2023	South-perimeter well MPB-393, Apr. 2023: **PFHxS 216 ppt** (residential drinking-water criterion 51), **PFOS 60.7** (16), **PFOA 29.8** (8); above criteria in all 5 rounds, 2019 to 2023. GFL filed its consultant's plan on time (July 2023): sample four wells **twice a year** because PFAS exceeded drinking-water criteria, to start *"following EGLE's approval."* CEC traces the PFAS to a pathway along the well casing and/or the leachate manhole and sewer. **No groundwater PFAS results on file since April 2023**, and no approval on file (EGLE's FOIA release, certified complete).
Contaminated soil: no cap on amount or source Operating License 9709, Special Condition 20.a	Before and under GFL (current license June 29, 2023)	ONGOING 450,000 to 690,000 tons a year	GFL's license lists *"Contaminated Soils"* as approved daily cover with Source *"Variable"* and Monthly Volume *"Variable"*, and says the approval *"does not preclude the licensee from disposing of the material as waste."* Testing records for Class B and C materials stay in *"the facility operating record"* at the landfill. GFL's annual reports: **448,677 to 690,892 tons** of contaminated soil a year, state fiscal 2021 to 2025 (**24 to 31% of all tons received**), including 361,857 tons reported as daily cover in 2023. GFL's Operations Plan, dated March 2022, does not mention contaminated soil; no testing records for contaminated soil used as cover, 2023 to Sept. 2026, are on file at EGLE (*"does not exist as described,"* EGLE FOIA E700107).
Hot gas wells, run under waivers Warning sign. Federal landfill air rules (NESHAP); not a violation where a waiver applies	2019 or earlier (before GFL); continuing	ONGOING 16 waivers to 2028	Since 2021, 15 gas wells and a leachate sump have reached 145°F, the federal threshold that requires corrective action. **GFL holds higher-temperature waivers for 16 locations (14 gas wells and 2 leachate sumps) through May 1, 2028**: one to 180°F (AHW272R4, which read 177°F in Mar. 2025), three to 170°F, six to 160°F, and four wells plus the two sumps to 150°F. ATSDR: *"As a general rule, emissions of NMOCs double with every 18° F increase in temperature"* (NMOCs, non-methane organic compounds). No record shows routine NMOC air monitoring near the landfill or the two schools (monitors there measure methane and H2S).

Sources: GFL quarterly consent-judgment gas-probe reports and GFL's 2019-2023 probe report (EGLE FOIA E700131); SCS Engineers Q3 2026 status update (FOIA E700318); Attorney General letter, Nov. 6, 2026; EGLE AQD records review, Nov. 9, 2026, and violation notices N268864818 and N268865691 (2022); Barr Engineering perimeter update, Oct. 15, 2026; YCUA permit AD 6-27, report to EGLE on PFOS non-compliance (June 1, 2026), show-cause disposition (May 20, 2026) and Notice of Violation (Sept. 18, 2026); EGLE VN-011821 and VN-013462 (Aug. 31, 2022); GFL spill response data, Table 1 (MMD Consent Order 115-05-2023 packet); CEC PFAS monitoring plan for Arbor Hills, July 13, 2023; EGLE MMD Consent Order 115-05-2023; EGLE Operating License 9709 (June 29, 2023), Special Condition 20.a; GFL annual landfill reports, EGLE Waste Data System 475946 (2021-2025); EGLE FOIA responses E613160 and E700105 (certified) and E700107 (superseding response, Nov. 16, 2026); EGLE HOV waiver approval, Apr. 7, 2026; EGLE AQD inspection report, Jan. 2019, and June 4, 2019 evaluation (passive vent); SCS Engineers 2024 gas migration investigation, Table 3 (FOIA E701381; TGP-18D chloroform 59.3 ppbv vs EPA VISL 4.0 $\mu g/m^3$); GFL wellfield reports (Arbor Hills Monitor dataset); ATSDR Landfill Gas Primer (2001), ch. 2. Schools: Salem Elementary about 3,200 ft and Ridge Wood Elementary about 3,600 ft from the landfill property line to the edge of the school grounds. Records and data: arborhillsmonitor.org.