

July 18, 2022

Michigan Department of Environment, Great Lakes and Energy (EGLE)
Air Quality Division – Detroit District
3058 West Grand Blvd., Suite 2-300
Detroit, MI 48202

Re: Notice of Violation Response Notification
Riverview Land Preserve
Facility Title V Permit No.: MI-ROP-M4469-2015a (Section 2)

On behalf of the City of Riverview, Cornerstone Environmental Group, LLC (a wholly owned subsidiary of Tetra Tech, Inc., hereafter referred to as Tetra Tech), respectfully submits this response to a Notice of Violation (NOV) issued by EGLE on June 30, 2022, for Riverview Land Preserve (RLP). The NOV pertained to an incident occurring on June 22, 2022, between approximately 5:10 p.m. and 6:20 p.m., during which EGLE reported alleged off-site odors in the vicinity of RLP.

Pursuant to the NOV issued by EGLE, RLP is required to initiate corrective actions and submit written response to the agency by July 21, 2022. The NOV states, “AQD staff detected moderate to strong, persistent garbage odors in residential areas downwind of Riverview Land Preserve which were determined to be attributable to the facility’s operations.”

The violation references general condition R 336.1901(b) of the RLP Title V Permit:

“A person shall not cause or permit the emission of an air contaminant in the quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property.”

EGLE staff contacted facility personnel after concluding their investigation on June 22, and informed RLP the odors originated in a residential area downwind of the landfill. Wayne County had been on-site at 4:20 PM prior that day and did not record or notice any odors. When RLP received the call from EGLE, a staff member was promptly sent to the site and arrived around 5:45 PM to apply additional perfume to reduce odors. The gas extraction system, flare and odor system were operational at the time of EGLE’s investigation. However, the landfill was still accepting waste.

REMEDIAL ACTION:

RLP employs several methods of odor control above the regulatory requirements for daily cover and landfill gas collection. The RLP uses alternate daily cover materials, including foam, tire chips, wood chips, and approved c-soil products daily. These materials are applied starting at mid-day to cover morning waste intake. At the end of each day, the remaining area uncovered by soil or chips is sprayed

EGLE – Air Quality Division
NOV Response Notification

with the Rusmar foam. The foam is reviewed weekly for performance, and the formula is adjusted periodically to improve performance. RLP applied daily cover on the date of incidence in accordance with the odor management plan and the additional measures outlined above.

The RLP also operates deodorizing systems which use chemical application to reduce odors. These systems are located at the top plateau (misting system), along the fence posts (granules in tubes), around the perimeter at the base of Cell 7 (vapor system) and a portable system for use where needed. This portable system was utilized by the staff member sent on-site on June 22 after receiving notice from EGLE as a corrective action to reduce odors.

RLP will continue taking active measures to control odors on site, so the facility is not a discomfort to residents. The City's desire remains to work collaboratively with EGLE, as demonstrated by past efforts to be proactive in addressing complaints.

We trust that this response is sufficient to address the concerns raised by the issuance of the NOV and will be accepted by EGLE.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC – A TETRA TECH COMPANY



Alex Schreiber
Project Scientist



Jennifer Bowyer, P.E.
Project Manager

Enclosure: EGLE Notice of Violation 6.22.2022 – Riverview Land Preserve

cc: Jeffrey Dobek, Erika Herrera, Kevin Sisk – Riverview Land Preserve
Randall Pentiuk, Douglas Drysdale, Andrew Swift – City of Riverview
Greg Morrow – EGLE - MMD
Jonathan Lamb, Jenine Camilleri – EGLE – AQD
Patrick Cullen – Wayne County Dept. of Public Services



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 30, 2022

Jeffery Dobek, Assistant City Manager
City of Riverview
14100 Civic Park Drive
Riverview, Michigan 49193-7600

SRN: M4469, Wayne County

Dear Jeff Dobek:

VIOLATION NOTICE

On June 22, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints of nuisance odors in the vicinity of Riverview Land Preserve, located at 20863 Grange Road, Riverview, Michigan. The purpose of the investigation was to determine Riverview Land Preserve's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-M4469-2015a.

AQD staff performed the investigation from approximately 5:10 PM to 6:20 PM on June 22, 2022. During this investigation, AQD staff observed the following violation:

Process Description	Rule/Permit Condition Violated	Comments
EULANDFILL	R 336.1901(b); ROP No. MI-ROP-M4469-2015a, Section 2 – General Condition 12(b)	Moderate to strong (Level 3 and 4), persistent garbage odors observed emitting from the facility and impacting nearby neighborhoods.

R 336.1901(b) states, in part:

“A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property.”

During the investigation of June 22, 2022, AQD staff detected moderate to strong, persistent garbage odors in residential areas downwind of Riverview Land Preserve which were determined to be attributable to the facility's operations. In the professional judgment of AQD staff, the odors observed were of sufficient intensity and duration so

Jeffrey Dobek
City of Riverview
Page 2
June 30, 2022

as to constitute a violation of R 336.1901(b) and Section 2, General Condition 12(b) of ROP No. MI-ROP-M4469-2015a.

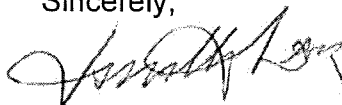
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 21, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Riverview Land Preserve believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below or at lambj1@michigan.gov.

Sincerely,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Patrick Cullen, Wayne County Dept. of Public Services
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Christopher Ethridge, EGLE
Jenine Camilleri, EGLE
Mary Carnagie, EGLE
Greg Morrow, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE