



September 28, 2023

Mr. Jonathan Lamb
Senior Environmental Quality Analyst
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-M4469-2023 (Section 2)

Dear Mr. Lamb:

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 September 7, 2023, for Riverview Land Preserve (RLP). The NOV pertained to an incident occurring on August 30, 2023, between approximately 7:45 a.m. and 8:40 a.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 September 28, 2023. 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 on August 30 at approximately 2:00 pm, and informed RLP that odors were detected in a residential area downwind of the landfill. When RLP received the call from EGLE, a RLP staff member was promptly sent to apply additional deodorizer in the active disposal area to reduce odors. The gas extraction system, flare and odor system were operational at the time of EGLE's investigation. However, during the time of the alleged violation, there was a temporary construction operation occurring for installation of a horizontal collector to the gas collection and control system (GCCS) on the Southern portion of the active area of the landfill. The installation of this horizontal collector will increase RLP's ability to collect landfill gas before the area is required to install permanent landfill gas collection wells, and subsequently reduce offsite migration of landfill gas from the facility. RLP believes movement and excavation of the existing waste during this brief

EGLE – Air Quality Division
NOV Response Notification

construction activity may have contributed to offsite migration of the odors. Installation of the horizontal collector was completed the same day, and thus the potential source of the odor was mitigated.

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, such as 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 uncovered areas are covered by soil or chips. 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 periodically operates deodorizing systems which use chemical application to reduce odors. These systems are located at the top plateau (mistig system), 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 on August 30 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



Adam Marshall
Project Engineer



Jennifer Bower, P.E.
Project Manager

Enclosure: EGLE Notice of Violation 9.7.2023 – Riverview Land Preserve

cc: Kevin Sisk, Erika Herrera – Riverview Land Preserve
Randall Pentluk, Jeffrey Dobek, Andrew Swift – City of Riverview
Mary Carnagle, Greg Morrow – EGLE - MMD
Annette Switzer, Christopher Ehridge, Brad Myott, Jenine Camilleri, Dr. April Wendling, Jeff Komiski –
EGLE – AQD
Patrick Cullen, Jennifer DePaulis – Wayne County Dept. of Public Services



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 7, 2023

Kevin Sisk, Director of Solid Waste
Riverview Land Preserve
20863 Grange Rd.
Riverview, Michigan 49193

SRN: M4469, Wayne County

Dear Kevin Sisk:

VIOLATION NOTICE

On August 30, 2023, 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-M4469-2023.

AQD staff performed the investigation from approximately 7:45 AM to 8:40 AM on August 30, 2023. 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-M4469-2023, 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 August 30, 2023, 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 as to constitute a violation of R 336.1901(b) and Section 2, General Condition 12(b) of ROP No. MI-ROP-M4469-2023.

Kevin Sisk
Riverview Land Preserve
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 28, 2023 (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
313-348-2527

cc: Patrick Cullen, Wayne County DPS Environmental Services Group
Jennifer DePaulis, Wayne County DPS Environmental Services Group
Mary Carnagie, EGLE
Greg Morrow, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE