

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
**ACTIVITY REPORT: On-site Inspection**

N776266098

<b>FACILITY:</b> RICHFIELD LANDFILL INC		<b>SRN / ID:</b> N7762
<b>LOCATION:</b> 11145 East MT MORRIS RD, DAVISON		<b>DISTRICT:</b> Lansing
<b>CITY:</b> DAVISON		<b>COUNTY:</b> GENESEE
<b>CONTACT:</b> Bill Roberts , Operations and Engineering		<b>ACTIVITY DATE:</b> 12/07/2022
<b>STAFF:</b> Julie Brunner	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Scheduled inspection to determine compliance with ROP No. MI-ROP-N7762-2008, and as part of an FCE. Noncompliance with Section 1 of the ROP is on-going.		
<b>RESOLVED COMPLAINTS:</b>		

On December 7, 2022, I conducted a scheduled inspection of Richfield Landfill Inc. located in Davidson as part of a full compliance evaluation (FCE). This facility was last inspected on July 10, 2019. David Rauch, new inspector in the Lansing District, also attended.

#### Facility Contacts:

ROP Section 1 – No company contacts

ROP Section 2 – Mr. Bill Roberts, Blue Skies Energy, Vice President, Operations & Engineering, 810-631-4015, bsellc@frontier.com

#### Facility Description:

Richfield Landfill Inc. is classified as a Type II sanitary landfill, which is a Municipal Solid Waste (MSW) landfill. A “Municipal Solid Waste landfill” or a “Type II landfill” according to Act 451, Part 115, Solid Waste Management states: A landfill which receives household waste, incinerator ash or sewage sludge and which is not a land application unit, surface impoundment, injection well, or waste pile. A municipal solid waste landfill also may receive other types of solid waste, such as commercial waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial waste. Such a landfill may be publicly or privately owned.

Natural biological processes occurring in landfills transform the waste constituents producing leachate and landfill gas. Initially, decomposition is aerobic until the oxygen supply is exhausted. Anaerobic decomposition of buried refuse creates most of the landfill gas. Landfill gas consists mainly of methane (CH<sub>4</sub>), carbon dioxide (CO<sub>2</sub>), and nonmethane organic compounds (NMOC).

This landfill is located about six (6) miles north of Davison and just north of Holloway Reservoir. Numerous homes surround the reservoir, while the property surrounding the landfill is fairly rural with scattered homes and farms.

**Richfield Landfill Inc. filed for bankruptcy in December of 2012 and stopped accepting waste in early 2013. Prior to closing, the landfill accepted all types of solid waste and also accepted recyclable materials and compost.**

**The landfill property is about 300 acres in size and contains 4 different landfill cells; “Old Fill Cell” (a.k.a. Act 87 area), Cell 1, Cell 2, and Cell 3. Cell 4 was proposed and permitted but was never constructed. Cells 1, 2, and 3 are adjacent to the Old Fill Cell.**

**The Old Fill Cell is as the name depicts, the oldest cell and was installed without a leachate collection system per regulations at the time; the liner is entirely made of clay without any sort of synthetic or plastic. Due to the lack of a quality liner and leachate collection system, there is a shallow aquifer groundwater impact that is being mitigated by both institutional controls as well as a groundwater extraction system. The groundwater extraction system is located between the landfill and Holloway Reservoir. The system collects impacted groundwater and stores it in a 10,000-gallon tank. Approximately 2,000 gallons per day of impacted groundwater is produced at maximum and disposed of at the Montrose Wastewater Treatment Plant (WWTP). A citizen group (the Holloway Lake Association) is established in the area.**

**Cell 1 has a synthetic bottom liner and a clay cap; a leachate collection system is installed. Cells 2 and 3 have synthetic bottom liner and synthetic caps; leachate collection systems are installed for both cells. Cell 4 was proposed for construction on the west side of Cells 1, 2, and 3 at the time of bankruptcy but was not built. Leachate collection for Cells 1-3 is completed by a series of pumps and piping which transfers the leachate to a series of tanks on the west side of the landfill. The leachate is hauled by tanker truck to the Montrose WWTP for disposal. Approximately 6,000 gallons per day of leachate is collected. Due to the lack of nearby sanitary sewer lines (nearest being 8 miles), hauling the leachate by tanker truck is the only option at this time. Gas collection appears to be conducted on all of the cells, yet only a few wells exist on the Old Fill area.**

**Due to the bankruptcy and the lack of a responsible party, emergency landfill maintenance activities are being overseen by EGLE-Materials Management Division (MMD). A new contract with DTMB for maintenance services was issued in 2019. It includes gas probe monitoring to make sure gas is not migrating off-site and leachate collection. While MMD maintains the landfill with limited funding to minimize risk of public exposure, MMD is not responsible for the requirements in Section 1 of the ROP. Blue Skies Energy (BSE) collects the gas and fulfills the regulatory requirements in Section 2 of the ROP. Six (6) replacement gas wells were installed in June 2018 to allow better collection of landfill gas from the Cell 2 area where previously installed gas wells were no longer producing gas. BSE paid for well replacement because they want the gas. Should gas collection not be completed, the gas would be directly emitted to the air resulting in emissions of methane (CH<sub>4</sub>),**

carbon dioxide (CO<sub>2</sub>), hydrogen sulfide (H<sub>2</sub>S), hazardous air pollutants (HAP) and other air toxics, and potentially causing odor issues for the area.

The stationary source is not subject to Prevention of Significant Deterioration (PSD) of Title 40 of the Code of Federal Regulations (40 CFR), Part 52.21, regulations because the potential to emit of each criteria pollutant is less than 250 tons per year (tpy). The stationary source is not considered a major source of HAP emissions because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112 is less than 10 tpy and the potential to emit of all HAPs combined is less than 25 tpy.

The stationary source was subject to the federal plan requirements for MSW landfills promulgated in 40 CFR Part 62, Subpart GGG, which reference the requirements in 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. Subpart WWW requires that a Part 70, renewable operating permit (ROP), be submitted for all new and existing landfills with a design capacity equal to or exceeding 2.5 million megagrams and 2.5 million cubic meters.

ROP No. MI-ROP-N7762-2008 was issued in July of 2008. An ROP renewal application was submitted in 2012 prior to the landfill owner/operator entering bankruptcy. An application shield was received. The ROP renewal is currently on hold and in legal limbo.

#### **Applicable Regulations:**

**40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills - The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction or modification on or after May 30, 1991. The landfill gas collection and control system are subject to the requirements of Subpart WWW.**

**40 CFR 62 Subpart GGG, Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed Since May 30, 1991. Subpart GGG references Subpart WWW for compliance.**

**On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction on or Before July 17, 2014, and Have Not Been Modified or Reconstructed Since July 17, 2014, as specified in 40 CFR 62, Subpart OOO. Richfield is considered a legacy landfill under the Federal Plan. Michigan is not currently the authorized representative and is implementing and enforcing this regulation through the ROP. The requirements for**

40 CFR 62, Subpart OOO will be added in ROP renewal and requirements for 40 CFR 60, Subpart WWW will be removed. Until Subpart OOO requirements are added to the ROP, EPA has enforcement jurisdiction. BSE is required to continue complying with the requirements in Section 2 the ROP, which are for Subpart WWW/AAAA.

40 CFR 63 Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills - This subpart did require such landfills to meet the startup, shutdown, and malfunction (SSM) requirements of 40 CFR Part 63, Subpart A, General Provisions, but now the standard applies at all times. After September 28, 2021, the permittee must comply with all applicable provisions per 40 CFR 63.1930 (b). The permittee can opt to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a Municipal Solid Waste Landfill with a gas collection and control system used to comply with the provisions of 40 CFR 62.16714(b) and (c). The applicable provisions per 40 CFR 63.1930(b) for Subpart AAAA are not in the ROP but Richfield is required to comply. BSE needs to comply with the Subpart AAAA requirements for the open flare and the treatment system.

40 CFR 61, Subpart M, Standards of Performance for Asbestos – Any active or inactive asbestos disposal site.

#### Michigan Air Emission Reporting (MAERS)

Richfield Landfill Inc. is required to report to MAERS as it is a Category I major source. MAERS reporting has not been submitted since 2012. A bill is generated using the 2012 MAERS and BSE pays it. AQD sends a non-submitter letter for failure to submit a MAERS report but the bill is paid so VNs are not sent.

#### Recent Complaints

none

#### Inspection:

Arrived: 1:36 pm

Departed: 3:51 pm

Weather: 44°F, wind W 4 mph, UV Index 1 Low

No visible emissions were observed from any of the facility exhaust stacks upon arrival. Odors were identified to the northwest of the gas plant in the yard. After walking around the gas plant with Bill, it was identified as a waste gas odor coming from the process vent of the treatment plant. This stack vents 88 to 92% CO<sub>2</sub> and will

have some waste gas odor to it. The odor is unlikely to get off property due to the location of the gas plant in a lower lying area at the base of the landfill hill.

The inspection was conducted with Bill Roberts, BSE Gas Plant Operations & Engineering, and the facility operations were discussed. The inspection was announced and scheduled through Bill Roberts, who is the Responsible Official for Section 2 of the ROP. Gates to the facility are locked and it is not always manned so inspections have to be scheduled with Bill. On the day of the inspection, the gas plant was operating.

### ROP Section 1 – Richfield Landfill, Inc.

#### EMISSION UNITS – Landfill and Landfill Gas Collection

Emission Unit ID (Including Process Equipment & Control Device(s))	Emission Unit Description	Installation		Notes:
		Date/	Modification Date	
EULANDFILL	This emission unit represents the general Municipal Solid Waste (MSW) Landfill.	1/1/1974		Noncompliance
EUACTIVECOLL	This emission unit represents the active landfill gas collection system at the landfill that uses gas mover equipment to draw landfill gas from the wells and moves the gas to the control equipment.	5/6/2004		Noncompliance
EUASBESTOS	Any active or inactive asbestos disposal site.	1/1/1974		Noncompliance

The landfill owner/operator declared bankruptcy in 2012, and demonstrations of compliance with any of the requirements in Section 1 of the ROP is not happening. Monitoring, testing, recordkeeping, and ROP certification requirements have not been maintained for Section 1 since the bankruptcy.

**ROP Section 2 – Blue Skies Energy (BSE)****EMISSION UNITS – Landfill Gas Treatment System and the Flare**

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Notes:
EUTREATMENTSYS	Processing equipment that treats collected landfill gas for subsequent sale or use.	5/6/2004	Compliance with ROP requirements
EUOPENFLARE	Open flare is an open combustor without enclosure or shroud.	4/4/1974 2006	Compliance with ROP requirements

The treatment system consists of water knockout, sulfur compound removal, compression, and filtration. Collected landfill gas passes through a water knockout pot (underground tank) that separates moisture from the gas. The gas then passes through one of two multi-stage blowers which pressurize the gas. Hydrogen sulfide (H<sub>2</sub>S) and other light sulfur compounds are removed using a SULFATREAT single-vessel fixed bed reactor. Incoming landfill gas contains on average 85 ppm H<sub>2</sub>S. The gas is then compressed and cooled by passing through a chiller which reduces the temperature of the compressed gas. Next the gas passes through a series of coarse filters and coalescing filter which traps moisture before passing through a charcoal filter vessel and 0.5-micron particle filters.

The gas is then treated based on UOP Separex Membrane Technology™. This technology uses temperature and pressure differential across a semi-permeable membrane to separate the CH<sub>4</sub> in the landfill gas from the CO<sub>2</sub>. The processed landfill gas taken from the landfill is sold to TC Energy and put into a local pipeline as natural gas. In the event that pipeline quality gas is not produced, it is combusted in the flare. Also, if the treatment system is not operational, the collected landfill gas is routed to an open flare.

Gas quality and volume from the landfill has been declining in the last 5 years with the monthly average CH<sub>4</sub> content measuring 51.4% in October of 2022. AQD estimated the following annual average CH<sub>4</sub> content from BSE data:

Production Year	Annual Average CH <sub>4</sub> content
2017	57.3%
2018	56.6%
2019	56.8%
2020	55.8%
2021	54.8%
2022*	52.9%

\* January thru October of 2022.

Bill estimates that the landfill gas quality should be good enough to produce pipeline quality gas for about another two (2) years. The treatment system produces a high Btu content gas that meets the standards of pipeline quality natural gas. Part of the system monitoring is quality and quantity of gas to the pipeline. A spot reading of the flow monitor at the time of the inspection showed 0.7 mmcf/day to the pipeline. The gas plant is capable of processing up to 2.0 mmcf/day of landfill gas. The flow monitor to the pipeline is calibrated once per year. Also, a continuous measurement system is used to measure total sulfur (as H<sub>2</sub>S) in the gas going to the pipeline. The system is a SulfurGard 9200 which uses a lead acetate technique to measure sulfur concentration. Gas chromatography (GC) is used to measure the methane content.

The following is a short list of gas properties from the analyzer parameters screen collected at the last inspection:

Parameter	Plant Inlet	Plant Outlet (Sales)	Sales Specification
CO <sub>2</sub>	40.73%	1.61%	2.0%
CH <sub>4</sub>	58.39%	95.86%	--

Dry BTU	577	973	967
Total Sulfur (TS) --		1.88 gr/100 SCF	20 gr/100 SCF
H <sub>2</sub> S	--	0.15 gr/100 SCF	0.25 gr/100 SCF

For this inspection, the GC was awaiting repair and the SulfurGard 9200 is only measuring H<sub>2</sub>S because the part of the system needed for the total sulfur measure is awaiting a repair also. The SulfurGard 9200 was measuring 0.0 ppm H<sub>2</sub>S in the gas going to the pipeline. Bill showed that the GC measured 56% CH<sub>4</sub> following a system restart on December 3<sup>rd</sup> which was the last day the GC was operating.

**EUTREATMENTSYS**

The treatment system has had the following availability for the past 3 years: 92.5% in 2019, 78% in 2020, and 79% in 2021. In compliance with special condition (SC) III.1, the permittee operates the treatment system at all times when the collected gas is routed to the treatment system.

Records of production volumes were obtained and are summarized below:

Production Year	Total Volume Produced
2019	343.1 MMCF
2020	277.7 MMCF
2021	252.9 MMCF
2022*	236 MMCF

\* January thru November of 2022.

The records demonstrate decreasing production volumes since the last inspection.

The gas plant has had an increasing number of equipment malfunctions and downtime. This year there have been malfunctions due to the high stage compressor failure, and the high stage compressor oil pump failure and malfunction. When the treatment system was inoperable due to malfunctions, the open flare was manually switched on, turning on the blower. The blower draws gas from the hill, bypassing the treatment system, and the untreated landfill gas is combusted in the flare. There are electronic fail-safe alarms and auto shutoffs to assure no gas leaks in the system in the event of a shutdown event. This is all in compliance with SC III.2 and SC III.3.

The treatment system has not been modified since installation, and compliance is demonstrated with SC IV.1 since the treatment system design was approved.

A startup, shutdown, or malfunction (SSM) plan is implemented and maintained in compliance with SC IX.2. The SSM plan was received on January 10, 2008 and no changes have been made to it since. Although no longer required by federal regulation, BSE continues implementing the SSM plan to maintain compliance with the ROP. BSE operates the gas treatment system at Richfield in accordance with applicable regulatory requirements in Section 2 of the ROP. The malfunction and startup report forms for malfunction events are sent to the consultant and summarized in the semi-annual reporting. Procedures in the SSM plan are followed and there have been no known exceedance of any applicable emission limit in compliance with SC VI.1 and SC IX.1.

SC IX.3 requires a written preventative maintenance plan (PMP) for EUTREATMENTSYS. At a minimum, the plan shall include a schedule of maintenance activities consistent with manufactures recommendations, and the operating variables that will be monitored to detect a malfunction or failure. Bill has a basic list of maintenance items and timetables along with a checklist of items, parameters that are watched and notes of additional variables to check. Basically, a database of stored instrumentation data is used to monitor plant operation along with the HMI screens and physical instrument checks. A logbook is kept of maintenance performed. Copies of the PMP procedures and HMI screens with monitored operating parameters were obtained at the last inspection. Compliance with SC VI.3 by providing information on the operating parameters, and SC VI.2 and SC IX.3 for the PMP is demonstrated.

I discussed with Bill some of the new 40 CFR 63, Subpart AAAA requirements for the treatment system:

1. The permittee must develop a site-specific treatment system monitoring plan as required in 40 CFR 63.1983(b)(5)(ii). The plan must at a minimum contain the following: (40 CFR 63.1961(g))

- a. **Monitoring of filtration, de-watering, and compression parameters that ensure the treatment system is operating properly for each intended end use of the treated landfill gas. (40 CFR 63.1983(b)(5)(ii)(A))**
- b. **Monitoring methods, frequencies, and operating ranges for each monitored operating parameter based on manufacturer's recommendations or engineering analysis for each intended end use of the treated landfill gas. (40 CFR 63.1983(b)(5)(ii)(B))**
- c. **Documentation of the monitoring methods and ranges, along with justification for their use. (40 CFR 63.1983(b)(5)(ii)(C))**
- d. **List of responsible staff (by job title) for data collection. (40 CFR 63.1983(b)(5)(ii)(D))**
- e. **Processes and methods used to collect the necessary data. (40 CFR 63.1983(b)(5)(ii)(E))**
- f. **Description of the procedures and methods that are used for quality assurance, maintenance, and repair of all continuous monitoring systems (CMS). (40 CFR 63.1983(b)(5)(ii)(F))**

**2. The permittee must keep monthly records of all treatment system operating parameters specified to be monitored according to 40 CFR 63.1961. The records must include:**

- a. **Continuous records of the indication of flow and gas flow rate to the treatment system. (40 CFR 63.1983(c)(2))**
- b. **The indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines. (40 CFR 63.1983(c)(2))**
- c. **Maintenance and repair of the monitoring system. (40 CFR 63.1961(h))**

## **EUOPENFLARE**

**The open flare is a non-assisted, self-igniting, spark ignition flare designed and operated in accordance with 40 CFR 60.18. The flare is ignited using natural gas from a slipstream. The flare was actually installed in 2006 with the treatment plant. The ROP lists the flare as installed in 1974 which appears to be a typo when the ROP was written. The flare was installed as backup to combust untreated landfill gas when the gas plant was not in operation. When the gas plant is in operation, it is used as a process vent that vents CO<sub>2</sub> from the treatment system when producing gas for the pipeline. A second flare was installed in 2008 (to add additional flare capacity) but has been decommissioned as a flare. It is still used as a process vent.**

**EUOPENFLARE complies with the requirements of SC III.1-9 and SC IV.1. In accordance with SC III.3, the flare shall be operated with no visible emissions, as**

determined by the methods specified in 40 CFR 60.18(f). The flare was not operating at the time of the inspection so there were no visible emissions.

Per SC V.1, the permittee was required to evaluate visible emissions from EUOPENFLARE in accordance with 40 CFR 60, Subpart WWW requirements. Visible Emissions testing on the flare installed in 2006 was conducted in 2010 and 2011.

As required in SC V.2, the net heating value of the combusted landfill gas was determined as part of the flare testing in 2010, and the retest in 2011, which was conducted per the appropriate methods and regulatory requirements as indicated in the test review memo from AQD-TPU dated February 10, 2012.

For SC VI.1, a heat sensing device, thermocouple, is installed and indicates the presence of a flame when the flare is operating. A gas flow rate measuring device is installed to monitor gas flow to the flare in compliance with SC VI.1.b.i. For SC VI.1.b.ii, a secure bypass line is in place in the event gas has to be diverted from EUTREATMENTSYS to EUOPENFLARE. The valve is manual so if the treatment system goes down, no gas is being drawn from the landfill until the bypass line is manually opened and the blower to draw gas to the flare is turned on.

For SC VI.2 and SC VI.3, records are to be maintained for the life of the open flare including performance tests, the flare type (non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations; records of open flare flame monitoring and records of all periods of operations. The record showing the gas volumes that were flared during periods when the treatment plant was down and when the flare was in service combusting untreated landfill gas were obtained. The flare was in operation for 22 days in January 2022, 10 days in February 2022, 26 days in March 2022, and 20 days in May corresponding to reported malfunction events for the treatment plant.

Records of flared gas volumes were obtained and are summarized below:

Year	Total Volume Flared
2019	28.663 MMCF
2020	93.379 MMCF
2021	97.679 MMCF

2022	114.369 MMCF
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Appropriate records required by SC VI.4 and VI.5 are being kept on-site.

An SSM plan is implemented and maintained in compliance with SC IX.2. The SSM plan was received on January 10, 2008 and no changes have been made to it since.

**40 CFR Subpart AAAA record requirements for the flare (basically the same or similar to what is on the ROP):**

1. The permittee must maintain records regarding the flare type (i.e., steam-assisted, air-assisted, or non-assisted), all visible emission readings, heat content determination, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 63.11. (40 CFR 63.1983(b)(4))

2. The permittee must keep monthly records of the operating parameters specified to be monitored in 40 CFR 63.1961(c). The records must include:

a. Continuous records of the indication of flow and gas flow rate to the control device. (40 CFR 63.1983(b)(4))

b. Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism must be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line. (40 CFR 63.1961(c)(2)(ii))

c. Continuous records of the open flare pilot flame or open flare flame monitoring, and records of all periods of operations during which the pilot flame of the flare flame is absent. (40 CFR 63.1983(b)(4))

### **ROP Semi-Annual Monitoring and Deviation Reports:**

The last ROP report received was for the 1st 2022 Semi-Annual report for Section 2 - Gas Treatment & Flare compliance report (ROP No. MI-ROP-N7762-2008), Responsible Official: Bill Roberts, Dir. of Eng. & Op., BSE. It included the SSM report for the gas plant and downtime duration for the reporting period. There were thirteen (13) startup events, five (5) manual shutdown events, and eight (8) malfunction events. No landfill gas was collected and sent to the control device when the treatment plant and flare were down. All actions taken were consistent with the SSM plan. Downtime and malfunctions exceeded 1 hour for 12 events, the longest was 912 hours for a high stage compressor failure.

The 1<sup>st</sup> semi-annual reporting for 2022 included this statement: Regulatory references in the ROP to applicable NSPS rules are made to 40 CFR 60, Subpart WWW. These rules have since been replaced by rules under 40 CFR 62, Subpart OOO. BSE has chosen to continue complying with the requirements in Section 2 the ROP, which are essentially the same as the current NSPS rules.

Since my understanding is that they have to comply with OOO and the modified AAAA regardless of whether it is in the ROP, copies of the templates for both federal regulations were presented to Bill. I discussed the option of addressing compliance with Subparts OOO and the modified AAAA for the 2<sup>nd</sup> semi-annual reporting for 2022.

Records: All records obtained in the course of this compliance inspection are attached with the electronic file copy of the report.

**Summary:**

Noncompliance with the conditions of ROP No. MI-ROP- N7762-2008, Section 1 were identified during the inspection. No instances of noncompliance with the conditions of ROP No. N7762-2008, Section 2 were identified during the inspection. Compliance with the "revised" 40 CFR 63, Subpart AAAA was discussed. The option of addressing compliance with Subparts OOO and the modified AAAA for the 2<sup>nd</sup> semi-annual reporting for 2022 was presented.

Due to the lack of responsible parties to cite, a violation letter for the Section 1 conditions will not be sent.

NAME Julie L Brunner

DATE 1/17/2023

SUPERVISOR RB