



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

July 16, 2018

Mr. Douglas Drysdale, City Manager
City of Riverview
14100 Civic Park Dr.
Riverview, Michigan 48193

SRN: M4469, Wayne County

Dear Mr. Drysdale:

VIOLATION NOTICE

On July 6, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated complaints regarding nuisance odors alleged to be the result of operations at Riverview Land Preserve, located at 20863 Grange Road, Riverview, Michigan. The purpose of these investigations 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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-M4469-2015a; and to investigate complaints of nuisance odors received on July 6, 2018 attributed to landfill operations.

Mr. Jonathan Lamb of the AQD performed two separate investigations on July 6, 2018, in response to complaints received that afternoon and evening; the first investigation was performed from approximately 3:20 PM to 5:15 PM and the second investigation was performed from approximately 9:45 PM to 10:30 PM. During each investigation, the following air pollution violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
EULANDFILL; EUALGCS	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 and landfill gas/hydrogen sulfide-type odors observed emitting from the facility and impacting nearby neighborhoods.

During the investigations performed on the afternoon and evening of July 6, 2018, moderate to strong (Level 3 and 4) and persistent garbage odors were detected in residential areas downwind of Riverview Land Preserve and were determined to be attributable to the facility's operations. In addition, moderate (Level 3) landfill gas/hydrogen sulfide-type odors were also observed during the investigation performed from 9:45 PM to 10:30 PM. Neither the garbage nor the landfill gas/hydrogen sulfide-type odors were observed upwind of the facility during either investigation.

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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.”

In AQD staff's professional judgment, the odors observed were of sufficient intensity and duration 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 August 6, 2018 (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 DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, 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 below.

Sincerely,



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

cc: Mr. Patrick Cullen, Wayne County Dept. of Public Services – Land Resource
Management Division
Mr. Greg Morrow, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ