



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

August 14, 2023

VIA E-MAIL

Faith Finholm
Genesee County Land Bank
452 South Saginaw Street, 2nd Floor
Flint, Michigan 48502

Krystyl Kirby
Detroit Environmental Solutions, LLC
33360 Groesbeck Highway
Fraser, Michigan 48026

SRN/ID: U252301851; Genesee County

Dear Faith Finholm and Krystyl Kirby:

VIOLATION NOTICE

On August 8, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at 310 East Flint Park, Flint, Genesee County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to my investigation, Genesee County Land Bank (GCLB), owns the facility and Detroit Environmental Solutions, LLC (DES), performed the abatement activities. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

The facility was being prepped for demolition by North American Dismantling Corporation. Pieces of broken and crumbled Transite style siding were observed both on the ground around the facility and embedded in the black siding insulation paper, still on the home. The demolition contractor postponed starting their demolition activities and DES returned to the site and completed the removal and clean-up of the remaining Transite style siding. Photos of the clean-up were provided to the administrator.

Process Description	Section Violated	Comments
On 8/8/2023, an inspection was performed at 210 East Flint Park, Flint. Broken and crumbled pieces of Transite were observed on the ground and still on the siding's insulation.	40 CFR §61.145(c)(1)	Failure to remove all regulated asbestos containing material.

VIOLATION NOTICE

Faith Finholm and Krystyl Kirby

Page 2

August 14, 2023

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by September 4, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response from both the owner and operator to this violation notice, may be submitted by mail and directed to my attention at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@Michigan.gov and WolfJ2@Michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation 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 and for the cooperation extended to me during my site visit. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Senior Environmental Quality Analyst
Air Quality Division

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Robert Byrnes, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE