



GRETCHEN WHITMER
GOVERNOR

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

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 19, 2022

Jon Brush
Mid-Michigan Management, LLC
4245 Okemos Road, Suite 203
Okemos, MI 48864

Alan Olsen
Catholic Diocese of Lansing
228 N. Walnut Street
Lansing, MI 48933

SRN: U382201348, Jackson County

Dear John Brush and Alan Olsen:

VIOLATION NOTICE

On May 2, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted an inspection at the commercial property located at 717 Waterloo Street, Jackson, MI. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, Mid-Michigan Management, LLC performed the abatement activities at the facility and the Catholic Diocese of Lansing owns the property. The NESHAP for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, AQD staff observed the following: Removal of regulated asbestos containing materials (RACM), specifically, asbestos containing plaster walls and ceilings from a negative pressure enclosure (NPE) on the first floor. Plaster debris was observed on the ground of the basement level. The material had fallen through holes in the floor from the active abatement area above in several locations. The plaster was in a dry state at the time of inspection; EGLE staff sampled the material and the plaster samples tested greater than 1% asbestos.

Process Description	Section Violated	Comments
Asbestos plaster removal at a subject facility resulting in visual emissions.	40 CFR 61.150(a)	Discharge no visible emissions to the outside air during the collection, processing, packaging, or on-site transporting of any

		asbestos-containing waste material - dry plaster was found outside of the containment on the basement level.
	40 CFR 61.150(a)(1)(i)	Failure to adequately wet asbestos-containing waste material (ACWM) - the plaster debris found on the basement level was dry.

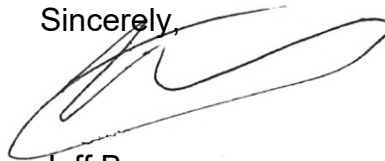
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by June 9, 2022 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Jeff Benya at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or benyaj@michigan.gov and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

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

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the listed property. 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.

Sincerely,



Jeff Benya
Senior Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: Bulk sample results

Jon Brush, Mid-Michigan Management, LLC
Alan Olsen, Catholic Diocese of Lansing
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cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Tammy Bell, EGLE
Jason Wolf, EGLE
Scott Miller, EGLE