



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



LIESL EICHLER CLARK
DIRECTOR

January 22, 2019

Mr. Charlie Martin
21st Century Salvage
Next Generation Environmental, Inc.
10750 Martz Road
Ypsilanti, Michigan 48197

Mr. Michael Samhat
Crown Enterprises Inc.
MSC Land Company, LLC
12225 Stephens Road
Warren, Michigan 48089

SRN/ID: U821810662, Wayne County

Dear Mr. Martin and Mr. Samhat:

VIOLATION NOTICE

On January 11, 2019, the Department of Environmental Quality (DEQ), Air Quality Division, (AQD) performed an asbestos inspection located at 1491 West Jefferson Avenue, Trenton, Wayne County, Michigan. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, 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 (Act 451).

According to our investigation, 21st Century Salvage & Next Generation Environmental was the operator who conducted the demolition and abatement activities, and Crown Enterprises, Inc. & MSC Land Company, LLC is the property owner of the address mentioned above. The National Emission Standard for Asbestos holds the owner and operator liable for all violations.

During the investigation staff observed the following:

Upon arrival, we saw Next Generation Environmental, Inc. and 21st Century Salvage, Inc. removing the galvanized metal siding that is coated in galbestos on building #4A (mill building south end). The removal method was causing the non-friable galbestos to become friable. There was no water being used to keep the galbestos wet during abatement. Upon examination of one of the dumpsters, we discover that that the galbestos was also made to become friable.

We continued our inspection to building #10 (maintenance and spare parts warehouse). This building was mostly demolished except for the galbestos roof, which was at ground level and to the East of where the building once stood. Although the galbestos was mostly in a non-friable condition, we noted areas where the material was in poor condition. In the northwest corner of the foundation for building 10, we found several pieces of tar roofing material in several piles and in several locations on the ground. The tar dry and in a friable state. We also found pieces of galvanized metal siding that was left behind and still coated

in galbestos, which was dry and friable. While examining one of the debris piles from #10, we noticed a copper pipe coil that was coated/wrapped in a white cloth and it was dry. Samples were collected during the inspection, and the materials all tested positive for asbestos.

Process Description	Section Violated	Comments
Failure to add galbestos as a friable material.	§61.145(b)(2)	Failure to update notice
Copper pipe coil coved in asbestos wrap	§61.145(c)(1)	Failure to remove RACM prior to demolition.
Galbestos that was made friable during removal	§61.145(c)(3)	Failure to wet during stripping
Pieces of roofing and Galbestos found after abatement of building #10	§61.145(b)(1)	Visible Emissions from handling operations

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by February 12, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

The signed written response from the owner and operator to this violation notice, may be submitted by mail and directed to my attention at: DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at: DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to brownj9@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.

Mr. Charlie Martin and Mr. Michael Samhat

Page 3

January 22, 2019

Thank you for your attention to resolving the violation cited above and for the cooperation extended to me during our conversation. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremiah Brown', with a long horizontal flourish extending to the right.

Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jason Wolf, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Tammy Bell, DEQ
Ms. Carrie Geyer, DEQ