



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

May 1, 2019

Mr. Keith Markstrom  
Bay Area Veterans Foundation  
PO Box 1513  
Bay City, Michigan 48706

Mr. Kevin Wolfe  
Quality Environmental Services, Inc.  
PO Box 558  
Gladwin, Michigan 48624

SRN: U091904548, Bay County

Dear Mr. Markstrom and Mr. Wolfe:

**VIOLATION NOTICE**

On April 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted an inspection of the former Wings and Things located at 1009 North Madison Avenue, Bay City, Michigan 48708. 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, the Bay Area Veterans Foundation owns the facility and Quality Environmental Services, Inc. performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

Process Description	Section Violated	Comments
The category I nonfriable mastic (10% CHR) in areas FS-9 and FS-23 (~762 SF) was made friable regulated asbestos containing material (RACM) through grinding.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by May 22, 2019 (which coincides with 21

Mr. Keith Markstrom  
Mr. Kevin Wolfe

2

May 1, 2019

calendar days from the date of this letter). The response should include: the dates 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 Matthew Karl at EGLE, AQD, Bay City District Office, 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or [karlm@michigan.gov](mailto:karlm@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](mailto:wolfj2@michigan.gov).

If the Bay Area Veterans Foundation or Quality Environmental Services, Inc. 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 violation cited above and for the cooperation that was extended to me during my inspection of the former Wings and Things. 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,



Matthew Karl  
Environmental Quality Analyst  
Air Quality Division  
989-439-3779

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Mr. Chris Hare, EGLE