



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



GRETCHEN WHITMER
GOVERNOR

LANSING

LIESL EICHLER CLARK
DIRECTOR

June 30, 2020

UPS NEXT DAY DELIVERY

Ms. Karen Jackson
Kalamazoo Public Schools
600 West Vine Street
Kalamazoo, Michigan 49008

Mr. Brad Skillman
Skillman Corporation
3834 South Emerson Avenue
Indianapolis, Indiana 46203

Mr. James Cripps
Cripps Fontaine Excavating, Inc.
7729 Douglas Avenue
Kalamazoo, Michigan 49009

SRN / ID: U392002071; Kalamazoo County

Dear Ms. Jackson, Mr. Skillman, and Mr. Cripps:

VIOLATION NOTICE

On June 22, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 606 East Kilgore Road, Kalamazoo, Kalamazoo 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, Kalamazoo Public Schools owns the subject property, Skillman Corporation performed general contracting oversight operations, and Cripps Fontaine Excavating, Inc. performed the demolition activities. The National Emission Standard for Asbestos holds both the *owner and operators* equally liable for any violations.

During the inspection, staff observed the following:

The subject facility (blue out building) had been recently demolished. A notification of intent to demolish was not submitted for this project.

VIOLATION NOTICE

Ms. Karen Jackson, Mr. Brad Skillman, and Mr. James Cripps

Page 2

June 30, 2020

Process Description	Section Violated	Comments
On 6/22/20, staff performed an inspection at 606 E. Kilgore Rd., Kalamazoo. During the inspection, staff observed an excavation at the site of the former outbuilding.	40 CFR 61.145 (b)(1) AQD Consent Order No. 2019-27	Failure to provide 10 working day notification

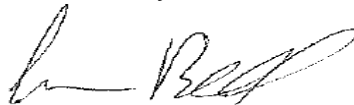
Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by July 21, 2020, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 signed written response to Mr. Ivan Bell at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at Belli@Michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or 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 that was extended to me during our phone and email conversations. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-582-0535; or email at Belli@Michigan.gov; or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Ivan Bell
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Rex Lane, EGLE
Mr. Jason Wolf, EGLE