



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

August 20, 2024

VIA E-MAIL

Mike Spitler  
City of Howell  
611 East Grand River Avenue  
Howell, Michigan 48843

SRN/ID: U472404906; Livingston County

Dear Mike Spitler:

**VIOLATION NOTICE**

On August 7, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint investigation at 404 Thompson Street, Howell, Livingston County (Scofield Park). 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, the City of Howell owned the facilities and performed the demolition activities. The National Emission Standard for Asbestos (NESHAP) may hold both the *owner and operator* liable for all violations.

During the inspection, EGLE, AQD staff observed the following:

The Scofield Park concession building, and a restroom were demolished, only concrete slab foundations remained. The City of Howell failed to have a thorough asbestos inspection on either of the facilities and failed to submit the Notice of Intent to Renovate/Demolish to the administrator prior to the demolition activities.

Process Description	Section Violated	Comments
On 7/29/2024, a complaint was received regarding a demolition at 404 Thompson St., Howell. On 8/7/2024, an investigation of the facilities was performed. Upon arrival, the facilities were demoed.	40 CFR §61.145(a)	Failed to thoroughly inspect the affected facility.
	40 CFR §61.145(b)(1)	Failed to provide the administrator with written notice of intention to demolish or renovate

## VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 13, 2024. 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 to this violation notice, may be submitted by mail and directed to Jeremy Howe 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 e-mailed to [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) and [WolfJ2@Michigan.gov](mailto: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 violations 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 517-749-2891; [DechyC@Michigan.gov](mailto:DechyC@Michigan.gov); or at 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