



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GRETHNER
DIRECTOR

September 12, 2018

***REVISED NOTICE TO CORRECT OWNER'S INFORMATION**

Mr. Demetrius Braddock
Braddock Demolition Cleaning & Hauling LLC
2213 Warwick
Saginaw, Michigan 48602

Mr. Tom Miller Sr.
Saginaw County Land Bank
111 South Michigan Avenue
Saginaw, Michigan 48602

SRN: U731805167 & U731805166, Saginaw County

Dear Mr. Braddock and Mr. Miller:

VIOLATION NOTICE

On Thursday (8/9/18), the Department of Environmental Quality (DEQ), Air Quality Division, was contacted by the Peoples Landfill Inc. located at 4143 East Rathbun Road, Birch Run, Michigan 48415. The purpose of this call 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, Braddock Demolition Cleaning & Hauling LLC had brought waste/debris from 800 Hoyt Avenue and 802 Hoyt Avenue, Saginaw, Michigan ordered demolition projects to the Peoples Landfill Inc. that had not been manifested as asbestos containing waste material. The Saginaw County Land Bank owned the residences and Braddock Demolition Cleaning & Hauling LLC performed the demolition activities at the residences. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, staff observed the following:

Process Description	Section Violated	Comments
800 & 802 Hoyt Avenue Ordered Demolition Project	40 CFR 61.150(d)(1)	Failure to maintain waste shipment records.
	40 CFR 61.150(d)(1)(viii)	A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport

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		by highway according to applicable international and government regulations.
	40 CFR 61.150(d)(2)	Failure to provide a copy of the waste shipment record to disposal site owners/operators at the same time as the asbestos containing waste material.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 3, 2018 (which coincides with 21 calendar days from the date of this letter). Please note, a response from Braddock Demolition Cleaning and Hauling has already been received by this office. 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 Matt Karl at DEQ, AQD 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or karlm@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

If Braddock Demolition Cleaning & Hauling LLC or Saginaw County Land Bank believe 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 investigation of this incident. If you have any questions regarding the violations or the actions necessary to bring these residences into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Mr. Terry Nichols, Peoples Landfill Inc
Mr. Scott Crofoot, City of Saginaw
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. Chris Hare, DEQ