



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

December 7, 2016

Ms. Kathy Finger, Property Manager  
Cavanaugh Investments  
140 West Middle Street  
Chelsea, Michigan 48118

SRN / ID: U811612393; Washtenaw County

Dear Ms. Kathy Finger:

**VIOLATION NOTICE**

On November 22, 2016, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 106 West Middle Street, Chelsea, Washtenaw County. 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 my investigation, Ms. Kathy Finger is the responsible party acting on behalf of the property's owner, Cavanaugh Investments. The renovation activities taking place at the subject property occurred on or about November 22, 2016. The National Emission Standard for Asbestos holds both the owner and the operator equally liable for any and all violations.

During the inspection, staff observed the following: The owner had failed to have a thorough survey performed on the property prior to the renovation activities.

Process Description	Section Violated	Comments
Failed to perform a thorough asbestos survey prior to renovation activities to determine if asbestos-containing materials are present in the building located at 106 West Middle Street, located in Chelsea, Washtenaw County	40 CFR 61.145 (a)	Failure to thoroughly inspect the facility for the presence of asbestos.

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Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by December 28, 2016, (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. The signed written response to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and emailed as an attachment to me at; [dechyc@michigan.gov](mailto:dechyc@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(s) cited above and for the cooperation that was extended to me during my site visit and our phone 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 517-749-2891; [dechyc@michigan.gov](mailto:dechyc@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Lynn Fiedler, MDEQ  
Ms. Mary Ann Dolehanty, MDEQ  
Mr. Christopher Ethridge, MDEQ  
Mr. Scott Miller, MDEQ  
Mr. Thomas Hess, MDEQ  
Ms. Karen Kajiya-Mills, MDEQ