



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 29, 2019

Mr. Michael A. Cenit
Applied Partners, Inc. (aka AP Sag, LLC)
1325 Century Road
Ravenswood, West Virginia 26164

Mr. Doug Adams
RJ Industrial, LLC
5061 Energy Drive
Flint, Michigan 48505

SRN: B1993, Saginaw County

Dear Mr. Cenit and Mr. Adams:

VIOLATION NOTICE

On October 21, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted an inspection of the former TRW Integrated Chassis Systems (TRW) facility located at 2328 East Genesee Avenue, Saginaw, Michigan. The purpose of this inspection was to determine the former TRW facility's 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, Applied Partners, Inc. (aka AP Sag, LLC) owns the facility and RJ Industrial, LLC performed the demolition 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
Working in the debris piles from the demolition of the Western Manufacturing Building (aka Plant 2, 3, 4), working in and around the partially demolished Power Plant (aka Powerhouse) and debris piles from the partial demolition of the Administration Building.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.
	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(c)(3)	Failure to wet during stripping.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	No contractor supervisor on site.
	40 CFR 61.145(c)(9)	Failure to wet RACM during demolition.
	40 CFR 61.150(a)(1)(ii)	Visible emissions from handling operations.

Mr. Michael A. Cenit / Mr. Doug Adams
Applied Partners, Inc. / RJ Industrial, LLC
Page 2
October 29, 2019

	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical.
--	---------------------	---

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by November 19, 2019 (which coincides with 21 calendar days from the date of this letter). 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 EGLE, AQD Bay City District Office, 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or karlm@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 Applied Partners, Inc. (aka AP Sag, LLC) or RJ Industrial LLC 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 violations cited above and for the cooperation that was extended to me during my inspection of the former TRW facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

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