



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 6, 2022

Todd Granger, Chief Financial Officer & Secretary  
Granger Wood Street Landfill  
16980 Wood Road  
Lansing, Michigan 48906

SRN: N5997, Clinton County

Dear Todd Granger:

**VIOLATION NOTICE**

On August 19, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Granger Wood Street Landfill (Granger) located at 16980 Wood Road, Lansing, Michigan. The purpose of this inspection was to determine Granger's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 177-19A and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5997-2020a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUASBESTOS	MI-ROP-N5997-2020a, SC VI.1(a)(i), NESHAP Subpart M: 61.154(e)(1)(i)	Waste generator phone numbers were missing from asbestos waste manifest forms
EUASBESTOS	MI-ROP-N5997-2020a, SC VI.1(a)(ii), NESHAP Subpart M: 61.154(e)(1)(ii)	Transporter phone numbers were missing from asbestos waste manifest forms

EUASBESTOS is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos. These standards are found in 40 CFR Part 61, Subpart M. The NESHAP, as well as MI-ROP-N5997-2020a, require that waste shipment records contain the telephone numbers of both the waste generator and the transporter.

During review of the recordkeeping (waste manifests), it was found that generator telephone numbers were not included on the following forms for disposal of regulated asbestos:

- Pitsch Form 4209, 4206, 4204, 4203, 4201, and 4211

During this same review of waste manifests, it was found that transporter telephone numbers were not included on the following forms for disposal of regulated asbestos:

- Granger Forms 104262, 104259
- Alma College "Waste Shipment Record" dated by transporter August 10, 2022

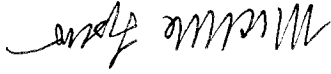
This is a violation of the Monitoring/Recordkeeping requirements specified in EUASBESTOS, Special Condition VI.1.a.i and ii of ROP No. MI-ROP-N5997-2020a.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 26, 2022, (which coincides with 21 calendar days from the date of this letter). The written 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 EGLE, AQD, Lansing District, at Constitution Hall, First Floor South, 525 West Allegan, Lansing, Michigan 48933 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. If Granger believes the above observations or statements are inaccurate or do not constitute violations 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 that was extended to me during my inspection of Granger. 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,



Michelle Luplow  
Environmental Quality Analyst  
Air Quality Division  
517-294-9294

cc: Steve Blayer, Granger Waste Services  
Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Bob Byrnes, EGLE  
Craig Dechy, EGLE