



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

July 18, 2018

Ms. Amy Rose Robinson
Calhoun County Land Bank Authority
315 West Green Street
Marshall, Michigan 49068

Mr. Dana Davenport
ALAM, Inc.
2505 Precision Street
Jackson, Michigan 49202

SRN / ID: U131415368; Calhoun County

Dear Ms. Robinson and Mr. Davenport:

VIOLATION NOTICE

On July 17, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 99 Walter Street, Battle Creek, Calhoun 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, the Calhoun County Land Bank Authority owns the subject facility and ALAM, Inc., is the contractor who performed the planned renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for any violations.

During the inspection, staff observed the following:

Planned renovation activities had taken place on the residential facility, which included the removal of asbestos containing transite style siding. The category II, asbestos containing material was: dry, broken, crumbled and lying on the ground, the front porch and the interior of the home, as well as still on the home itself.

Ms. Amy Rose Robinson
Mr. Dana Davenport
Page 2
July 18, 2018

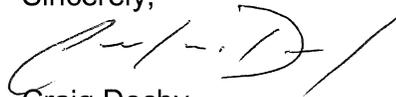
Process Description	Section Violated	Comments
Upon arrival to perform a planned renovation inspection of the subject facility located at 99 Walter St., Battle Creek, Calhoun County, staff observed the post abatement of asbestos containing siding. Asbestos containing siding material remained on the site and was not properly contained.	40 CFR 61.145 (c)(1)	Failure to remove all regulated asbestos containing material.
	40 CFR 61.150 (a)(1)(iii)	Failed to seal all asbestos containing waste material in leak-tight containers.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by August 8, 2018, (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. 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.

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 that was extended to me during 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; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Mary Douglas, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajjiya-Mills, DEQ