



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

November 17, 2017

Mrs. Lucille James
Genesee County Land Bank
452 South Saginaw Street
Flint, Michigan 48502

Mr. Forrest Goyette
Qualified Abatement Services, Inc.
1935 McGraw Street
Detroit, Michigan 48208

SRN / ID: U251703600; Genesee County

Dear Mrs. James and Mr. Goyette:

VIOLATION NOTICE

On November 7, 2017, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 955 Hughes Avenue, Flint, Genesee 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 inspection, the Genesee County Land Bank owns the subject facility and Qualified Abatement Services, Inc. performed the abatement work. The abatement activities took place on or about June 16, 2017. The National Emission Standard for Asbestos holds both the owner and operator equally liable for any violations.

During the inspection, staff observed the following:

The contractor had failed to remove all regulated asbestos containing material (RACM) and asbestos containing waste from the subject facility. RACM in the form of thermal systems insulation (TSI) was observed on a duct register in the utility room, which was located on the main floor of the property.

November 17, 2017

Process Description	Section Violated	Comments
During the post-planned renovation inspection of the subject facility located at 955 Hughes Avenue, Flint, Genesee County, staff observed RACM in the form of TSI on a duct register located in the utility room.	40 CFR 61.145 (c)(1) Consent Order AQD No. 33-2014	Failure to remove all RACM from the facility being demolished.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by December 8, 2017, (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.

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 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. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Brad Myott, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ