



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

August 2, 2018

Mr. Jim Marcy
Genesee County Land Bank
452 South Saginaw Street
Flint, Michigan 48505

Mr. John Sears
SC Environmental Services, LLC
701 East South Street
Lansing, Michigan 48910-1281

SRN / ID: U251804380; Genesee County

Dear Mr. Marcy and Mr. Sears:

VIOLATION NOTICE

On July 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 1021 Mason Street, 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 investigation, the Genesee County Land Bank owns the subject facility and SC Environmental, LLC, 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 took place on the facility, which included, the removal of asbestos containing transite-style siding and Thermal Systems Insulation (TSI) in the form of duct wrap and tape. Pieces of this transite siding were left on the ground around the exterior of the home, on the home itself, and inside the home. TSI was found on a duct boot inside a bathroom on the main floor, and pieces of TSI were observed in various places throughout the basement.

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Process Description	Section Violated	Comments
Upon arrival to perform a post planned renovation inspection of the subject facility located at 1021 Mason St., Flint, Genesee County, staff observed RACM in the form of transite and TSI.	40 CFR 61.145 (c)(1)	Failure to remove all RACM.
	40 CFR 61.145 (c)(6)(i)	Failure to adequately wet the material and ensure that it remains wet until collected and contained.
	40 CFR 61.150 (a)(1)(iii)	Failure to seal all asbestos-containing waste material in leak-tight containers while wet.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by August 23, 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 violation cited above and for the cooperation that was extended to me during my site visit and 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
Mr. Brad Myott, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ