



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 13, 2021

VIA E-MAIL and MAIL

Mr. Ken Hall  
Spartan Partners Services LLC  
888 West Big Beaver, Suite 870  
Troy, Michigan 48084

Mr. Josh Rich  
Thornapple Excavating Inc.  
4190 Thornapple River Drive SE  
Grand Rapids, Michigan 49512

SRN / ID: U392105548; Kalamazoo County

Dear Mr. Hall and Mr. Rich:

**VIOLATION NOTICE**

On October 5, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 3821 Stadium Drive, Kalamazoo, Kalamazoo 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, Spartan Partners Services, LLC, owns the subject property and Thornapple Excavating, Inc., performed the demolition 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:

The subject facility had been demolished and the site graded. Demolition activities had occurred on or around September 16, 2021. A notification of intent to demolish had not been submitted.

Process Description	Section Violated	Comments
On 10/5/21, staff performed a demolition inspection at 3821 Stadium Dr., Kalamazoo. During the inspection, staff observed a recently backfilled and graded lot where a gas station once stood.	40 CFR 61.145 (b)(1)	Failure to provide 10 working day notice of demolition

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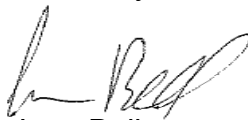
Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by November 3, 2021, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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 signed written response to Mr. Ivan Bell at EGLE, AQD, 301 Louis Glick Highway, Jackson, Michigan 49201-1566, or scan and email as an attachment to me at [Belli@michigan.gov](mailto:Belli@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](mailto:Wolfj2@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 and email 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 517-582-0535; [Belli@michigan.gov](mailto:Belli@michigan.gov); or EGLE, AQD, 301 East Louis Glick Highway, Jackson, Michigan 49201-1556.

Sincerely,



Ivan Bell  
Environmental Quality Analyst  
Air Quality Division

cc:

Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Rex Lane, EGLE  
Mr. Jason Wolf, EGLE  
Ms. Karen Kajiya-Mills, EGLE