



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

November 21, 2017

Mr. Scott Krugielka  
Rightway Remediation, LLC  
4407 Center Street  
Saginaw, Michigan 48604

Mr. David DeVelder  
Kent County Land Bank  
347 South Division Avenue  
Grand Rapids, Michigan 49503

SRN / ID: U411707965; Kent County

Dear Mr. Krugielka and Mr. DeVelder

**VIOLATION NOTICE**

On November 17, 2017, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), performed an asbestos inspection at 940 Pannell Street NW, Grand Rapids, Kent County, Michigan. 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, Kent County Land Bank owns the property and Rightway Remediation, LLC performed the abatement activities. The National Emission Standard for Asbestos holds both the owner and the operator liable for all violations.

During the inspection, staff observed the following:

The asbestos in the structure was abated and the notification for the abatement indicated the abatement was finished, however, two HVAC ducts from the basement to the second floor had thermal systems insulation (TSI) left on them. Also in the basement, we found a wooden support post had TSI attached to it. The estimated total of regulated asbestos containing material (RACM) left behind was 47 sq/ft.

Process Description	Section Violated	Comments
TSI was left in the structure after abatement was finished, but before demolition.	§61.145(a)	Failure to thoroughly inspect.
	§61.145(c)(1)	Failure to remove RACM

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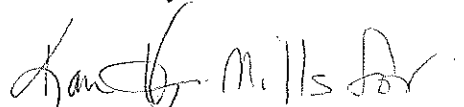
Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by December 12, 2017, (which coincides with 21 calendar days from the date of this letter).

The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The signed written response from the owner (Kent County Land Bank) and operator (Rightway Remediation LLC) 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 sent as an email attachment to brownj9@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 the appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation extended to me during our meeting and emails. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Lynn Fiedler, MDEQ  
Ms. Mary Ann Dolehanty, MDEQ  
Mr. Christopher Ethridge, MDEQ  
Ms. Heidi Hollenbach, MDEQ  
Mr. Thomas Hess, MDEQ  
Ms. Karen Kajiya-Mills, MDEQ