



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

September 18, 2019

Mr. Eric Moore
Capital Construction Group
P.O. Box 1702
Brighton, Michigan 48116

SRN/ID: 471802094; Livingston County

Dear Mr. Moore:

VIOLATION NOTICE

On September 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 2255 Pinckney Road, Howell, Livingston County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), 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, Capital Construction Group owns the subject property and has performed the demolition activities as well. 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 was in the process of being demolished. The submitted Notification of Intent to Renovate/Demolish (document #0000169587) has the project schedule with a start date of 8-20-18 and an end date of 9-30-2018. The owner/operator failed to update the notification to reflect the new project schedule.

Process Description	Section Violated	Comments
On 9-12-19, staff performed an inspection of a demolition at 2255 Pinckney Road, Howell. Owner/operator's notification had expired, and the facility was being demolished outside of the notification's project schedule.	40 CFR 61.145 (b)(2)	Failure to update notice.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by October 9, 2019, which coincides with 21 calendar days from the date of this letter. The written response should include: 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 or are proposed to be taken to correct the

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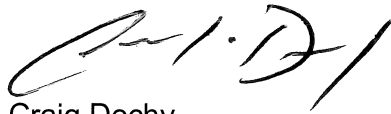
violation, and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the signed written response to Mr. Craig Dechy at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760; or scan and email as an attachment to me at Dechyc@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at the same P.O. Box address or 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 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE