



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

November 27, 2018

Mr. Wes McLucas
6173 Denton Hill Road
Fenton, Michigan 48430

Chief Adam Carroll
Hartland Deerfield Fire Authority
3205 Hartland Road
Hartland, Michigan 48353

SRN / ID: U471810310; Livingston County

Dear Mr. McLucas and Chief Carroll:

VIOLATION NOTICE

On November 20, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 6165 Denton Hill, Fenton, Livingston County. The purpose of this investigation 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 our investigation, Mr. Wes McLucas owns the subject facility and the Hartland Deerfield Fire Authority is the fire department (operator) which performed the intentional burn. 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 residential facility had been demolished with only some building debris and foundation remaining. A thorough asbestos inspection was not performed, and a Notification of Intent to Renovate/Demolish was not submitted to the administrator prior to the intentional burn activities.

Process Description	Section Violated	Comments
On 11/19/18, staff received a complaint regarding a fire training exercise at 6165 Denton Hill Road, Fenton. On 11/20/18, a site investigation was performed and upon arrival the subject residential facility was demolished by fire.	40 CFR 61.145 (a)	Failure to thoroughly inspect
	40 CFR 61.145 (b)(1)(3)(i)	Failure to provide the administrator with a 10-working day notification

Mr. Wes McLucas and Chief Adam Carroll
Page 2
November 27, 2018

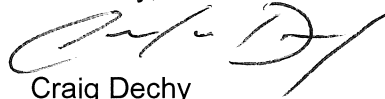
Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by December 18, 2018, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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.

Please submit the signed written response to Mr. Craig Dechy at DEQ, 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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@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 conversation. 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
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Brad Myott, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ