



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 29, 2019

UPS NEXT DAY DELIVERY

Mr. Alan Ostlund
Ostlund A Service Company, LLC
2710 East Grand River Avenue
Howell, Michigan 48843

SRN/ID: U471907802; Livingston County

Dear Mr. Ostlund:

VIOLATION NOTICE

On August 28, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division performed a follow-up asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 2700 East Grand River Avenue, 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, Ostlund A Service Company, LLC owns the subject property and has performed the renovation 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 commercial property was in the process of being renovated. The owner/operator failed to have a thorough asbestos inspection done prior to renovation activities that could disturb asbestos containing materials. Although Ostlund staff was previously informed that the cementitious wallboard and exterior caulk contained asbestos and were asked to have the wallboard removed prior to any additional renovation activities that could cause the material to become friable, Ostlund staff proceeded to renovate. The additional renovation activities caused the Category II, non-friable material to become Regulated Asbestos Containing Material (RACM). The RACM was found dry, broken and crumbled on the ground outside and inside of the facility.

Process Description	Section Violated	Comments
Staff observed Transite style wallboard dry, broken and crumbled on the ground inside and outside of the facility.	40 CFR 61.145 (6)(i)	Failure to adequately wet and ensure that it remained wet.
	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 September 19, 2019, (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 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 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 my site visits. 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