



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 28, 2020

UPS NEXT DAY DELIVERY

Ms. Adrienne Ziegler
City of Pontiac
47450 Woodward Avenue
Pontiac, Michigan 48342

SRN/ID: U632002012; Oakland County

Dear Ms. Ziegler:

VIOLATION NOTICE

On August 13, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at 810 Scottwood Street, Pontiac, Oakland County, Michigan. 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.

According to our investigation, the City of Pontiac either owns or is the controlling entity of the subject facility being demolished. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed suspect RACM (Regulated Asbestos Containing Material) in the form of window glaze. The window glaze was not identified or tested in the asbestos inspection report, which was performed by the JACX Group, LLC. The window glaze was sampled and tested for quality assurance purposes. The EGLE sample test results indicated that the window glaze contained asbestos.

Process Description	Section Violated	Comments
The Notification of Intent to Renovate/Demolish stated that the facility did not contain asbestos. The asbestos inspection report did not identify or test the window glaze. The window glaze tested positive for asbestos.	40 CFR §61.145(a)	Failure to thoroughly inspect the facility.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by September 18, 2020, (which coincides with 21

VIOLATION NOTICE

Ms. Adrienne Ziegler

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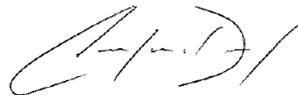
August 28, 2020

calendar days from the date of this letter). The written response should include: the date(s) 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 and are proposed to be taken to correct the violation, 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 and operator* to this violation notice, may be submitted by mail and directed to my attention at: EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at: EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@Michigan.gov and 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 violation cited above. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; e-mail at DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Environmental Quality Analyst
Air Quality Division

Enclosure

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