



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 5, 2019

Mr. Robert Hunter, Fire Chief
Charlton Township Fire Department
P.O. Box 367
Johannesburg, Michigan 49751

Mr. Aaron Kassuba
12509 Heatherton Road
Johannesburg, Michigan 49751

SRN: U691905711, Otsego County

Dear Mr. Hunter and Mr. Kassuba:

VIOLATION NOTICE

On June 4, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, investigated an alleged intentional burn of a mobile home located at 12509 Heatherton Road, Johannesburg, Michigan. The purpose of this inspection was to determine the intentional burn project's compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, Aaron Kassuba owns the facility and the Charlton Township Fire Department performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, staff observed the following:

Process Description	Section Violated	Comments
Intentional burn of a mobile home for fire suppression training.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.
	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.
	40 CFR 61.145(c)(10)	Failure to remove RACM in building demolished by fire.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by June 26, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether

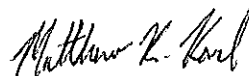
the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Matthew Karl at EGLE, AQD, 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or karlm@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 the Charlton Township Fire Department or Mr. Aaron Kassuba believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide 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 investigation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Matthew Karl
Environmental Quality Analyst
Air Quality Division
989-439-3779

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