



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

October 12, 2018

Mr. Brian Taylor
City of Jackson
161 West Michigan Avenue
Jackson, Michigan 49201

Mr. David Graham
Adrian Environmental, LLC
6330 Sutton Road
Britton, Michigan 49229

SRN / ID: U381807347; Jackson County

Dear Mr. Taylor and Mr. Graham:

VIOLATION NOTICE

On September 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of a vacant home located at 321-323 West Mason Street, Jackson. 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, the City of Jackson owns the facility and Adrian Environmental, LLC performed the abatement activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

Abatement activity had been done on the subject facility. However, during my post-abatement inspection, I observed regulated asbestos containing material (RACM) in the form of pipe insulation on the second floor, which contained 30% of chrysotile asbestos.

Process Description	Section Violated	Comments
	40 CFR 61.145 (a)	Failure to thoroughly inspect.
	40 CFR 61.145 (c)(1)	Failure to remove RACM

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Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by November 1, 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 Jong Yu at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at yuj@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 violations cited above and for the cooperation that was extended to me during inspection of the subject facility. 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 517-285-4201; yuj@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jong Yu
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Scott Miller, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ