



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



GRETCHEN WHITMER
 GOVERNOR

LANSING

LIESL EICHLER CLARK
 DIRECTOR

August 19, 2019

UPS NEXT DAY DELIVERY

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: U381906455; Jackson County

Dear Mr. Taylor and Mr. Graham:

VIOLATION NOTICE

On August 8, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 222 East High Street, Jackson, Jackson 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, the City of Jackson owns the subject property and Adrian Environmental, LLC, performed the Planned Renovation activities. 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 property had been previously abated of plaster and duct insulation. However, duct insulation was observed on a register boot in the dining room and expansion fabric was noted on the furnace in the basement. The expansion fabric tested 40 percent chrysotile form asbestos. The expansion fabric was not identified in the asbestos report.

Process Description	Section Violated	Comments
On 8/8/19, staff performed a post planned renovation inspection at 222 East High Street, Jackson. Staff observed TSI and furnace expansion fabric.	40 CFR 61.145 (a)	Failure to thoroughly inspect.
	40 CFR 61.145 (c)(1)	Failure to remove all RACM.

VIOLATION NOTICE

Mr. Brian Taylor and Mr. David Graham

Page 2

August 19, 2019

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 9, 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 us during our 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 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. Scott Miller, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE