



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 16, 2018

Ms. Amy Pethers  
Demolition Contractors, Inc. DBA Pitsch Wrecking, Inc.  
675 Richmond NW  
Grand Rapids, Michigan 49504

Mr. Jeffery Lawson  
County of Cheboygan  
P.O. Box 70  
Cheboygan, Michigan 49721

SRN: U161802897, Cheboygan County

Dear Ms. Pethers and Mr. Lawson:

**VIOLATION NOTICE**

On Thursday (July 12, 2018), the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the former Gold Front building located at 417 North Main Street and 418 North Huron Street, Cheboygan, Michigan. The purpose of this inspection was to determine 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, the County of Cheboygan owns the facility and Pitsch Wrecking, Inc. performed the renovation and demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

That the Pitsch Wrecking, Inc. demolition crew was unable to provide the roof sample results requested by AQD staff on Tuesday, June 26, 2018, when renovation was being undertaken in the facility by Pitsch Wrecking, Inc. The Asbestos & Paint Survey prepared by Mackinac Environmental Technology, Inc. (MET Project No. M17-2792) dated January 8, 2018, indicated that the roofing material samples had not been collected.

Process Description	Section Violated	Comments
Roofing samples were not collected/tested for asbestos prior to demo	40 CFR 61.145(a)	Failure to thoroughly inspect.

Ms. Amy Pethers / Mr. Jeffery Lawson

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by August 6, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Mr. Matthew Karl at DEQ, AQD 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or [karlm@michigan.gov](mailto:karlm@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](mailto:camillerij@michigan.gov).

If Pitsch Wrecking, Inc. or the County of Cheboygan 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 violation cited above and for the cooperation that was extended to me during my inspections. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Mr. Shane Nixon, DEQ