



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

September 20, 2016

Mr. Ron Crawford
Polar Inc.
2297 N. Moraine Drive
Dayton, OH 45439-1507

Mr. Jim Hewines
Huntington Machinery
PO Box 221
Bloomfield Hills, MI 48303

SRN: M3445, Oakland County

Dear Messrs. Crawford and Hewines:

VIOLATION NOTICE

On September 13, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the industrial facility located at 707 E. Lewiston, Ferndale, MI. The purpose of this inspection was to determine Polar Inc.'s and Huntington Machinery's 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.

According to our investigation, Polar Inc. owns the facility and Huntington Machinery performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that oil storage tanks from the site had been demolished without the required submission of a 10 day notification of intent to demolish to the AQD.

Process Description	Section Violated	Comments
Demolition activities located at 707 E. Lewiston, Ferndale.	§61.145(b)(1)	Failure to provide 10 working day notification

Please note that if an asbestos survey conducted by a certified asbestos inspector of the structures was not obtained prior to the initiation of demolition activities, on or more of the following violations may have also occurred:

Section Violated	Comments
§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
§61.145(c)(1)	Failure to remove RACM

§61.145(c)(3)	Failure to wet during stripping
§61.145(c)(4)	Failure to contain in leak tight container
§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
§61.145(c)(8)	No contractor supervisor on site
§61.150(a)	Visible emissions from asbestos containing waste material generated by source
§61.150(a)(1)(ii)	Visible emissions from handling operations
§61.150(a)(1)(iii)	Failure to seal while wet
§61.150(a)(1)(v)	No generator labels
§61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical
§61.150(c)	No signs during loading and unloading

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include:

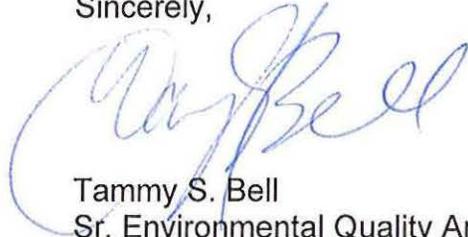
- A copy of the asbestos survey conducted prior to the demolition;
- Submit a copy of the Notification of Intent to Renovate/Demolish for activities associated with the referenced violation;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violations(s);
- Whether the violation(s) are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and the dates by which these actions will take place; and
- What steps are being taken to prevent a reoccurrence.

If Polar Inc. and/or Huntington Machinery believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Mr. Ron Crawford
Mr. Jim Hewines
Page 3
September 20, 2016

Thank you for your attention to resolving the violation. 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,



Tammy S. Bell
Sr. Environmental Quality Analyst
Air Quality Division
313-330-0105

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Joyce Zhu, DEQ