



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

September 5, 2018

Mr. Brad Shedd
Marshall Public Schools
1418 Cooper Street
Albion, Michigan 49224

Mr. Phil Wood
Hoekstra Roofing Company
1963 Olmstead Road
Kalamazoo, Michigan, 49048

SRN / ID: U131806642; Calhoun County

Dear Mr. Shedd and Mr. Wood:

VIOLATION NOTICE

On August 28, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 1418 Cooper Street, Albion, Calhoun County. 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 my investigation, Marshall Public Schools own the subject facility and Hoekstra Roofing Company performed the 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:

Renovation activities on the roof and ceiling had taken place, and clean-up of the asbestos containing waste material was occurring.

Process Description	Section Violated	Comments
Received an email complaint regarding the handling of asbestos containing ceiling material and the use of proper personal protection by the employees of Hoekstra Roofing Company during the renovation activities at 1418 Cooper Street, Albion, Calhoun County.	40 CFR 61.145 (b)(1)	Failure to provide a 10-working day notification to the Administrator prior to renovation activities.
	40 CFR 61.145 (c)(1)	Failure to remove regulated asbestos containing material prior to renovation.
	40 CFR 61.145 (c)(3)	Failure to wet during removal.
	40 CFR 61.145 (c)(4)	Failure to contain in leak-tight containers.

Mr. Brad Shedd and Mr. Phil Wood

Page 2


September 5, 2018

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 26, 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. The signed written response to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and emailed as an attachment to me at; dechyc@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 violation cited above and for the cooperation that was extended to me during my site visit and 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 DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,

A handwritten signature in cursive script, appearing to read "Craig Dechy".

Craig Dechy
Environmental Quality Analyst
Air Quality Division

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