



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 25, 2019

UPS NEXT DAY DELIVERY

Mr. Dana Davenport
ALAM Incorporated
2505 Precision Street
Jackson, Michigan 49202

Ms. Amy Robinson
Calhoun County Land Bank
315 West Green Street
Marshall, Michigan 49068

SRN/ID: U131903363; Calhoun County
SRN/ID: U131905572; Calhoun County
SRN/ID: U131904488; Calhoun County

Dear Mr. Davenport and Ms. Robinson:

VIOLATION NOTICE

On July 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of 68 Margaret Street; 246 Lathrope Avenue; and 15 Wabash Avenue; Battle Creek, Calhoun County, Michigan.

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 our investigation, ALAM Incorporated was the abatement contractor who conducted the asbestos abatement activities and Calhoun County Land Bank owns the facility. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the investigation staff observed the following:

The subject structures had been abated and the notification was closed/expired. During my inspection of the structures I found regulated asbestos containing material (RACM) in the form of Thermal Systems Insulation (TSI) that was not removed in each of the locations mentioned above.

VIOLATION NOTICE

Mr. Davenport & Ms. Robinson

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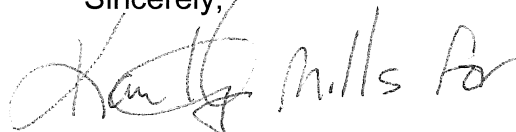
Process Description	Section Violated	Comments
Failure to remove all TSI from the subject structure(s) during abatement.	40 CFR §61.145(c)(1)	Failure to remove RACM.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 15, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response from the *owner and operator* to this Violation Notice, may be submitted by mail and directed to my attention at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to brownj9@michigan.gov and 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 violation cited above and for the cooperation extended to me during our conversation. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE