



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 9, 2020

UPS NEXT DAY DELIVERY

Mr. Dan Harnum  
Impact Communities  
1267 Avenue A  
Springfield, Michigan 49037

Mr. Bryant Burdick  
Bryant's Trucking and Excavating  
7200 Huff Road  
Bellevue, Michigan 49021

SRN/ID: U132000981; Calhoun County

Dear Mr. Harnum and Mr. Burdick:

**VIOLATION NOTICE**

On March 4, 2020, 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 1267 Avenue A, Springfield, Calhoun 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.

According to my investigation, Impact Communities owns the subject properties and Bryant's Trucking and Excavating performed the demolition 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 installation of mobile homes on lots 96,108,126,133, and 159 were demolished without a notification of intent to demolish submitted to EGLE. Thorough asbestos inspections were not conducted prior to demolition activities.

Mr. Dan Harnum and Mr. Bryant Burdick

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| Process Description  | Section Violated     | Comments  |
|--|----------------------|---|
| On 3/4/20, staff performed an inspection at 1267 Avenue A, Springfield. During the inspection, staff observed evidence of a recent demolition. No thorough asbestos inspection was performed, and no notification was submitted. | 40 CFR 61.145 (a)    | Failure to thoroughly inspect for asbestos.     |
|  | 40 CFR 61.145 (b)(1) | Failure to provide 10 working day notification. |

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by March 30, 2020 (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. Ivan Bell at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at [BellI@Michigan.gov](mailto:BellI@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](mailto: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 me during our meetings and phone conversations. 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 517-582-0535; [BellI@Michigan.gov](mailto:BellI@Michigan.gov); or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Ivan Bell  
Environmental Quality Analyst  
Air Quality Division

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