



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYHER
DIRECTOR

June 14, 2017

Ms. Lucille James
Genesee County Land Bank
452 South Saginaw Street, 2nd Floor
Flint, Michigan 48502

Mr. Dave Baldwin, Jr.
Trust Thermal Abatement, Inc.
210 South Water Street
Owosso, Michigan 48867

SRN / ID: U251612628 Genesee County

Dear Ms. James and Mr. Baldwin:

VIOLATION NOTICE

On June 8, 2017, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 1330 Earlmoor Street, Flint, Genesee County. The purpose of this inspection 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 inspection, the Genesee County Land Bank owns the subject residential property and Trust Thermal Abatement, Inc., performed the planned renovation activities at this site. The National Emission Standard for Asbestos holds both the owner and the operator equally liable for the violations.

During the inspection, MDEQ-AQD staff Craig Dechy, observed the following:

Regulated Asbestos Containing Material (RACM) in the form of vermiculite insulation was observed in the demolition debris, in the southwest portion of the structure. The liable parties failed to remove the RACM.

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Process Description	Section Violated	Comments
Planned Renovation submitted on 12-14-16 by Trust Thermal for vermiculite removal. Demolition contractor stopped work on 6-7-17 after observing vermiculite insulation in the demolition debris at 1330 Earlmoor Street, Flint, Genesee County. An Emergency Renovation was filed.	40 CFR 61.145 (c)(1) Consent Order No. 21-2016	Failure to Remove RACM.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by July 5, 2017, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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. 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 our phone conversation. If you have any questions regarding this 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,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Lynn Fiedler, MDEQ
Ms. Mary Ann Dolehanty, MDEQ
Mr. Christopher Ethridge, MDEQ
Mr. Brad Myott, MDEQ
Mr. Thomas Hess, MDEQ
Ms. Karen Kajiya-Mills, MDEQ