



GRETCHEN WHITMER
GOVERNOR

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



LANSING
LIESL EICHLER CLARK
DIRECTOR

October 15, 2021

UPS NEXT DAY DELIVERY

Mr. Mitchell Ziman
SOZO Companies, Inc.
23751 Hoover Road
Warren, Michigan 48089

Mr. Scott Krugielka
Rightway Remediation, LLC
4407 Center Street
Saginaw, Michigan 48604

SRN/ID: U252105090; Genesee County

Dear Mr. Ziman and Mr. Krugielka:

VIOLATION NOTICE

On October 11, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of 1101 Robert T Longway, Flint, Genesee 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, SOZO Companies, Inc., owns the facility and Rightway Remediation, LLC, performed the abatement work. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

Plaster ceiling texture dry and loose on the floor of the waste container. A torn waste bag with exposed dry ceiling texture. Waste bags without generator labels. The observed ceiling texture was sampled for testing. Both samples collected tested positive for asbestos.

Process Description	Section Violated	Comments
During the planned renovation inspection, regulated asbestos containing waste was observed loose and dry outside of containment. Waste bags did not have waste generator labels affixed to them.	40 CFR §61.145(c)(6)(i) Consent AQD No. 2018-11 40 CFR §61.150(a)(1)(iii) Consent AQD No. 2018-11 40 CFR §61.150(a)(1)(v) Consent AQD No. 2018-11	Failure to adequately wet the material and ensure that it remained wet until collected and contained. Failed to seal all asbestos containing waste material in leak-tight containers while wet. Failed to label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.

VIOLATION NOTICE

Mr. Ziman and Mr. Krugielka

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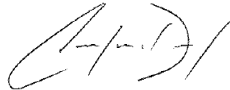
October 15, 2021

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by November 5, 2021, (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 DechyC@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 violations cited above and for the cooperation extended to me during my site inspection. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
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. Brad Myott, EGLE
Mr. Jason Wolf, EGLE