



GRETCHEN WHITMER  
GOVERNOR

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

LANSGING  
LIESL EICHLER CLARK  
DIRECTOR

May 11, 2021

UPS NEXT DAY DELIVERY

Mr. Sam Edye  
Sam Edye Management Company  
2800 Byron Circle  
Lansing, Michigan 48912

Mr. Michael Suty  
Asbestos Abatement, Inc.  
2420 North Grand River Avenue  
Lansing, Michigan 48906

SRN/ID: U332101638; U332004260; and U332004259; Ingham County

Dear Mr. Edye and Mr. Suty:

**VIOLATION NOTICE**

On April 12, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at 913 West Allegan Street; 915 West Allegan Street; and 917 West Allegan Street, Lansing, Ingham 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.

According to our investigation, Sam Edye Management Company is the owner of the properties and Asbestos Abatement International performed the asbestos abatement activities at the sites. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the investigation staff observed the following:

The structures located at the addresses mentioned above had undergone asbestos abatement to remove all friable and non-friable (that may become friable during demolition) asbestos prior to demolition activities. While inspecting these structures, friable asbestos in the form of Thermal Systems Insulation (TSI) was found in all three locations. Samples were collected, and all of them came back positive for containing asbestos above 1 percent.

| Process Description   | Section Violated     | Comments   |
|---|----------------------|--|
| Failure to remove TSI on ducts in all three subject structures. | 40 CFR §61.145(c)(1) | Failure to remove all RACM during abatement activities |
| Failure to inspect all areas for RACM.                          | 40 CFR §61.145(a)    | Failure to thoroughly inspect for asbestos.            |

## VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by June 1, 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 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 violations 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; e-mail at 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. Brad Myott, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Mr. Jason Wolf, EGLE