



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



AARON KEATLEY
ACTING DIRECTOR

June 12, 2023

VIA EMAIL ONLY

Ray Abro
Cameron Investments LLC
42262 Garfield Road
Clinton Township, Michigan 48038

Scott Hiller
Asbestos and Lead Abatement of Michigan LLC
2505 Precision Street
Jackson, Michigan 49202

SRN / ID: U382303494; Jackson County

Dear Ray Abro and Scott Hiller:

VIOLATION NOTICE

On May 25 and May 30, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 400 & 404 East Pearl Street, Jackson, Jackson County. The purpose of this investigation 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 investigation, Cameron Investments LLC owns the subject property and Asbestos and Lead Abatement of Michigan LLC performed the abatement 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 facility was undergoing built up roof removal. The building had an asbestos survey that identified the roofing as asbestos containing. Work practices and the condition of the roof had rendered it friable. This regulated asbestos containing material (RACM) roofing waste was identified in and around the dumpster uncontained at ground level. Water was not being used onsite and materials were dry. A 10-day planned renovation notification had not been submitted.

Process Description	Section Violated	Comments
On 5/25/23 and 5/30/23, staff performed a complaint investigation at 400 and 404 E. Pearl St., Jackson. During the inspection, staff observed friable roofing waste in and around a roll-off dumpster.	40 CFR 61.145 (b)(1)	Failure to provide 10 working day notification.
	40 CFR 61.145 (c)(4)	Failure to contain in leak-tight container.
	40 CFR 61.145 (c)(6)(i)	Failure to wet RACM that has been stripped.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by July 3, 2023, (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 Ivan Bell at EGLE, AQD, 301 East Louis Glick Highway, Jackson, Michigan 49201-1556 or scan and email as an attachment to me at Belli@michigan.gov and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or 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 phone and email 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; or EGLE, AQD, 301 East Louis Glick Highway, Jackson, Michigan 49201-1556.

Sincerely,



Ivan Bell
Senior Environmental Quality Analyst
Air Quality Division

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Scott Miller, EGLE
Jason Wolf, EGLE
Jeremy Howe, EGLE