



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

January 2, 2019

Ms. Kelly Main
W. L. Molding Company, Inc.
8212 Shaver Road
Portage, Michigan 49024

SRN / ID: U391900031; Kalamazoo County

Dear Ms. Main:

VIOLATION NOTICE

On December 20, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 8212 Shaver Road, Portage, Kalamazoo 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, W.L. Molding Company, Inc., owns the subject facility and performed the renovation 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:

Renovation activities had taken place in two separate areas of the facility. The renovation activities had been completed prior to my arrival. The owner did not have a thorough asbestos inspection performed prior to either of the renovations.

Process Description	Section Violated	Comments
On 12/20/18, staff received a complaint regarding renovation activities that may have disturbed asbestos containing materials. Arrived on site on 12/20/18 and confirmed that renovation activities had taken place without an asbestos inspection being performed prior to the renovation work.	40 CFR 61.145 (a)	Failure to thoroughly inspect for the presence of asbestos prior to the commencement of renovation activities

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by January 23, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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, the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the signed written response to Mr. Craig Dechy at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email an attachment to me at Dechyc@michigan.gov. Also, submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@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 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 my site visit. 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 517-749-2891; 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. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Rex Lane, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ