



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

November 26, 2018

Mr. Jason Miller
Great Lakes Aerial Maintenance &
Construction Company
8065 Ida Road
Ida, Michigan 48140

Mr. Richard Roe
Roe Brothers Bulldozing and Excavating
12552 North Adrian Highway
Clinton, Michigan 49236-9722

SRN / ID: U461700171; Lenawee County

Dear Mr. Miller and Mr. Roe:

VIOLATION NOTICE

On November 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 100 East Patterson Street, Tecumseh, Lenawee 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, Great Lakes Aerial Maintenance & Construction Company owns the subject facility and Roe Brothers Bulldozing and Excavating is the contractor who is performing the demolition 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:

Demolition of the former industrial facility was taking place and load-out of demolition debris was occurring. The Notification of Intent to Renovate/Demolish, which was submitted to the administrator, expired on July 31, 2018. The owner and the contractor had failed to update their notification and/or inform the administrator of the new project schedule's end date. Project scheduling is imperative for regulators to perform a compliance inspection.

Process Description	Section Violated	Comments
On 11/20/18, staff received a complaint. Upon arrival, the subject facility was in the process of being demolished. Notification of Intent to Renovate/Demolish had expired on 7/31/18.	40 CFR 61.145 (b)(2)	Failure to update notification

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by December 17, 2018, (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, 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 Mr. Craig Dechy at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at Dechyc@michigan.gov and 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 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 my site visit and phone conversation. 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. Scott Miller, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ