



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

March 16, 2018

Reverend George Lewis
First United Methodist Church
1230 Bower Street
Howell, Michigan 48843

Mr. John Stewart
John Stewart Associates
1645 North Milford Road
Milford, Michigan 48381

SRN / ID: U471801493; Livingston County

Dear Reverend Lewis and Mr. Stewart:

VIOLATION NOTICE

On March 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 1230 Bower Street, Howell, Livingston County. The purpose of this inspection 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 inspection, the First United Methodist Church owns the subject facility and John Stewart Associates is the general contractor performing the renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for any violations.

During the investigation, staff observed the following:

Renovation activities were taking place and suspect building materials, along with mechanical components containing thermal systems insulation had been disturbed due to these renovation activities. Neither the owner nor the operator had a thorough asbestos inspection performed prior to the commencement of these activities.

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Process Description	Section Violated	Comments
During the complaint investigation of the subject facility located at 1230 Bower Street, Howell, Livingston County, staff observed renovation activities taking place. No thorough inspection had been performed prior to the commencement of these renovation activities.	40 CFR 61.145 (a)	Failure to thoroughly inspect for the presence of asbestos.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by April 6, 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. The signed written response to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and emailed as an attachment to me at; dechyc@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. 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
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Brad Myott, DEQ
Mr. Thomas E. Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ