



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

June 19, 2019

Mr. David Hughes
 Vanston/O'Brien, Inc.
 8150 Jackson Road
 Ann Arbor, Michigan 48103

SRN / ID: U471906118; Livingston County

Dear Mr. Hughes:

VIOLATION NOTICE

On June 11, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 2440 West Grand River Avenue, Howell, Michigan, Livingston County. 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 (Act 451).

According to my investigation, Vanston/O'Brien, Inc., is the owner's representative and the contractor performing the renovation activities on the subject facility. 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 of a commercial facility was occurring. Various building materials had been disturbed and or removed as part of these renovation activities. The contractor and owner's representative failed to have a thorough asbestos inspection performed on the property prior to the renovation.

Process Description	Section Violated	Comments
On 6/11/19, staff performed an inspection at 2440 West Grand River Avenue, Howell. During the inspection of the ongoing renovation activities, staff determined that an asbestos inspection was not performed.	40 CFR 61.145 (a)	Failure to thoroughly inspect

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by July 10, 2019, (which coincides with 21 calendar

Mr. David Hughes

Page 2

June 19, 2019

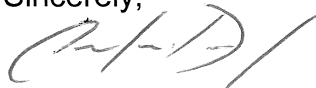
days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation, 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 EGLE, 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 Mr. 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 violation cited above and for the cooperation that was extended to me during our 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division
517-749-2891

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE