



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 9, 2022

UPS NEXT DAY DELIVERY

Mr. Mike Spitler
Deputy Director
City of Howell
611 East Grand River Avenue
Howell, Michigan 48843

Ms. Tracey Walter
Director of Field Operations
Regal Rigging and Demolition
2440 West Highland Road
Howell, Michigan 48855

SRN/ID: U472201312; Livingston County

Dear Mr. Spitler and Ms. Walter:

VIOLATION NOTICE

On March 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) investigated the abatement of ceiling tile at 611 East Grand River Ave., Howell, Livingston County. The purpose of this investigation 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.

According to my inspection, the City of Howell owns the facility being renovated and Regal Rigging and Demolition, performed the renovation (abatement) activities. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the investigation, EGLE staff observed the following:

A WHMI.com article reported that Regal Demolition was hired by the City of Howell to remove approximately 6,000 sq. ft. of asbestos-containing ceiling tile. The City of Howell confirmed that Regal Demolition was hired to remove and properly dispose of asbestos-containing ceiling tiles. Neither the owner nor the contractor submitted the 10-working day Notification of Intent to Renovate/Demolish to the administrator prior to the renovation (abatement) activities.

Process Description	Section Violated	Comments
On 2/23/22, observed an online article regarding the abatement of asbestos containing ceiling tiles at the City of Howell offices. After review of the asbestos notification system, it was determined that no Notification of Intent to Renovate/Demolish was submitted to the administrator.	40 CFR §61.145(b)(1)	Failure to Notify the administrator.

VIOLATION NOTICE

Mr. Mike Spitler and Ms. Tracey Walter

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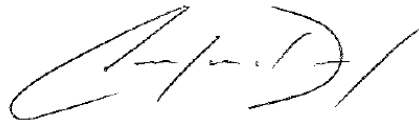
March 9, 2022

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by March 30, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response from the *owner and operator* to this violation notice, may be submitted by mail and directed to my attention at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@Michigan.gov and 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 extended to me during our phone conversation. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Senior Environmental Quality Analyst
Air Quality Division

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