



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

February 5, 2018

Mr. Michael Evanoff
DNR Parks and Recreation Division
P.O. Box 30257
Lansing, Michigan 48909

Mr. Keith Cheli
DNR Parks and Recreation Division
Cheboygan Field Office
120 A. Street
Cheboygan, Michigan 49721

Mr. Brendan Tully
MKC Group Inc
103 Deens Lane
Bay City, Michigan 48706

SRN/ID: U481704188, Luce County

Dear Mr. Evanoff, Mr. Cheli and Mr. Tully:

VIOLATION NOTICE

The Department of Environmental Quality (DEQ), Air Quality Division, was informed by the Department of Natural Resource (DNR) staff that a violation 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, had occurred during the completion of a DNR project located at Muskallonge Lake State Park.

According to our investigation, the DNR owns the facility and MKC Group Inc performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, AQD asbestos staff became aware of the following:

Process Description	Section Violated	Comments
Structure was abated with proper notification to DEQ Asbestos Program, however the building was demolished without proper notification prior to work beginning.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification

February 5, 2018

Please submit a written response to this Violation Notice by February 26, 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; 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.

If the DNR or MKC Group Inc believes the above observations or statements are inaccurate or do not constitute violations 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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joseph Scanlan
NESHAP Asbestos Inspector
Air Quality Division
906-458-6405

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. Ed Lancaster, DEQ