



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

May 6, 2019  
Revised May 30, 2019

Mr. Darrin Jerome  
City of Saginaw  
1315 South Washington Avenue  
Saginaw, Michigan 48601

Mr. Kevin Wolfe  
Quality Environmental Services, Inc.  
P.O. Box 558  
Gladwin, Michigan 48624

Mr. Tom Miller  
Saginaw County Land Bank  
111 South Michigan Avenue  
Saginaw, Michigan 48602

SRN: U731903119, Saginaw County

Dear Sirs:

**VIOLATION NOTICE**

On April 30, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the former hotel located at 1014 East Genesee Avenue, Saginaw, Michigan. The purpose of this inspection was to determine the former hotel's compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, the City of Saginaw and the Saginaw County Land Bank own the facility and Quality Environmental Services, Inc. performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owners and operator equally liable for violations.

During the inspection, staff observed the following:

Process Description	Section Violated	Comments
Popcorn Ceiling Materials (1.75% chrysotile, Point Count analysis) were left within the work area past the notified end date of the renovation project.	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(b)(2)	Failure to update notice.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by June 20, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Matthew Karl at EGLE, AQD Bay City District Office, 401 Ketchum Street, Suite B, Michigan 48708 or [karlm@michigan.gov](mailto:karlm@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](mailto:wolfj2@michigan.gov).

If Quality Environmental Services, Inc., the City of Saginaw, or Saginaw County Land Bank believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide 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 inspection of the former hotel located at 1014 East Genesee Avenue, Saginaw, Michigan. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Matthew R. Karl  
Environmental Quality Analyst  
Air Quality Division  
989-439-3779

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Karen Kajjiya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Mr. Chris Hare, EGLE