



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 24, 2019

Mr. Scott Krugielka
Rightway Remediation, LLC
4407 Center St.
Saginaw, MI 48604

SRN: Various, Saginaw County

Dear Mr. Krugielka:

VIOLATION NOTICE

On July 3, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of asbestos-containing waste materials disposed at Citizen’s Disposal Landfill, 2361 W Grand Blanc Rd., Grand Blanc. The waste material came from abatement projects located at the following residential properties located in Saginaw:

- 218 Tittabawassee Road (SRN: U731906037)
- 1313 E. Holland Avenue (SRN: U731905914)
- 2317 Hammel Street (SRN: U731905903)
- 1905 S. Washington Avenue (SRN: U731905898)
- 2527 E. Remington Street (SRN: U731905909)

The purpose of this inspection was to determine the Saginaw County Landbank Authority’s / Rightway Remediation, LLC’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 Saginaw County Land Bank Authority owns the subject residential properties and Rightway Remediation, LLC performed asbestos abatement activities at the residential properties. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, EGLE staff Craig Dechy and Tammy Bell noted the following violations:

| Process Description | Section Violated | Comments |
|---|---|---|
| Inspection of asbestos containing waste material at Citizen’s Disposal Landfill | 40 CFR 61.145(c)(4); AQD Consent Order AQD-2018-11 | Failure to contain in leak tight container-rips and tears were noted in some of the bags. |
| | 40 CFR 61.145(c)(6)(i); AQD Consent Order AQD-2018-11 | Failure to wet RACM that has been stripped-the material in bags inspected was dry. |
| | 40 CFR 61.150(a)(1)(v); AQD Consent Order AQD-2018-11 | No generator labels were noted on the waste bags. |

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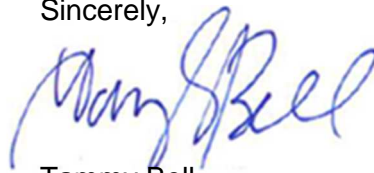
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by August 14, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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 Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@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 Rightway Remediation, LLC believes 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 violations cited above and for the cooperation that was extended to us during our inspection of the waste materials. 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,



Tammy Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

cc: Mr. Tom Miller, Saginaw County Land Bank Authority
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Jason Wolf, EGLE
Mr. Chris Hare, EGLE
Mr. Matthew Karl, EGLE