



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 LANSING



GRETCHEN  
 WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

April 10, 2019

Mr. Jon Brush  
 Great Lakes Environmental LLC  
 1376 Harwood Road  
 Sault Sainte Marie, Michigan 49783

SRN/ID: U291803460, Gratiot County

Dear Mr. Brush:

**VIOLATION NOTICE**

In January 2019, the Department of Environmental Quality (DEQ), Air Quality Division, (AQD) was working to receive copies of the waste manifest for work done at Luce Road Elementary School located at 6265 North Luce Road, Alma, Gratiot County, Michigan. The purpose of this inspection was to determine compliance with the requirements 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 (Act 451).

According to our investigation, Great Lakes Environmental LLC conducted the abatement work at the location mentioned above. The National Emission Standard for Asbestos holds the operator liable for all violations.

During the investigation, AQD staff observed the following:

In late January 2019, I contacted Great Lakes Environmental LLC to request a copy of the manifest for Regulated Asbestos Containing Material (RACM) that was abated on March 26, 2018 from Luce Road Elementary in Alma. They indicated that they would look to see if they could find it and provide a copy of it. As of today, AQD and Granger have not received a copy, which is in violation of the asbestos NESHAP.

| Process Description   | Section Violated | Comments  |
|---|------------------|---|
| Failure to provide manifest for abatement of RACM at 6265 North Luce Rd | §61.150(d)(1)    | Failure to maintain waste shipment records.   |
|   | §61.150(d)(2)    | Failure to provide a copy of the waste shipment record to waste disposal site owners. |

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by May 1, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) the violations

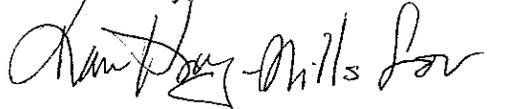
Mr. Brush  
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occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; and the date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response to this violation notice from the *operator*, may be submitted by mail and directed to my attention at: DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at the same mailing address. The response may be scanned and emailed to brownj9@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 conversation. If you have any questions regarding this violation notice or the actions necessary to bring the property into compliance, please contact me at 517-599-7825; brownj9@michigan.gov or the post office box address provided in the paragraph above.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremiah Brown". The signature is fluid and cursive, with a small flourish at the end.

Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Donalynn Ingersoll, Alma Public Schools Superintendent  
Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Brad Myott, DEQ  
Mr. Jason Wolf, DEQ  
Ms. Karen Kajiya-Mills, DEQ