



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



GRETCHEN WHITMER  
GOVERNOR

LIESL EICHLER CLARK  
DIRECTOR

January 15, 2019

Mr. Brett Eberhard  
HBC Specialized Contracting  
2170 Apollo Drive  
Lansing, Michigan 48906

Mr. Michael Erickson  
MidMichigan Medical Center  
4005 Orchard Drive  
Midland, Michigan 48670

SRN: U651808494, Ogemaw County

Dear Mr. Eberhard and Mr. Erickson:

**VIOLATION NOTICE**

On January 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the Medical Arts Center Building located at 335 East Houghton Street, West Branch, Michigan 48661. The purpose of this inspection was to determine HBC Specialized Contracting'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, MidMichigan Medical Center owns the facility and HBC Specialized Contracting performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

| Process Description   | Section Violated       | Comments             |
|---|------------------------|----------------------|
| 93 asbestos waste bags recovered from the southbound I-75 exit 215 ramp without generator labels. | 40 CFR 61.150(a)(1)(v) | No generator labels. |

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by February 5, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether

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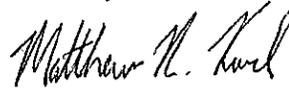
the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Matthew Karl at DEQ, AQD 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or [karlm@michigan.gov](mailto:karlm@michigan.gov) and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [CamilleriJ@michigan.gov](mailto:CamilleriJ@michigan.gov).

If HBC Specialized Contracting or MidMichigan Medical Center 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 Medical Arts Center Building. 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,



Matthew R. Karl  
Environmental Quality Analyst  
Air Quality Division  
989-439-3779  
[karlm@michigan.gov](mailto:karlm@michigan.gov)

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Mr. Chris Hare, DEQ