



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



PHILLIP D. ROOS  
DIRECTOR

April 16, 2024

VIA USPS

Greg Wierszewski  
Commercial Industrial Services, Inc.  
31895 32 Mile Road  
Richmond, Michigan 48062

Registered Agent  
V&C Gibraltar BWD, LLC  
c/o The Corporation Company  
40600 Ann Arbor Road East  
Suite 201  
Plymouth, Michigan 48170

SRN: N1089; Wayne County

Dear Greg Wierszewski and Registered Agent:

**VIOLATION NOTICE**

On April 2, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the industrial property located at 3000 Miller Road, Dearborn, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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 facility is owned by V&C Gibraltar BWD, LLC. The building is leased by BWD Technologies, LLC. Demolition and renovation activities were conducted at the site by Commercial Industrial Site Services, Inc.

On April 2, 2024, it was noted that demolition had been conducted at the site without submittal of the required 10-day Notice of Intent to Renovate/Demolish. Upon review of the asbestos survey, it was noted that the equipment on the exterior of the building was not surveyed for asbestos.

Process Description	Section Violated	Comments
Renovation and demolition located at 3000 Miller Road, Dearborn. A partial asbestos survey was provided for the Chemical Storage Room area but did not include facility components that were demolished.	40 CFR 61.145(a)(1)	Failure to thoroughly inspect for asbestos during demolition activities-facility components, including equipment at the site were not surveyed for asbestos.
	40 CFR 61.145(b)(1)	Failure to notify the administrator 10 days prior to demolition-removal of tanks and their load supporting structures, stacks and other equipment are considered demolition under the asbestos NESHAP.

## VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by May 10, 2024. 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.

The signed written response from the operators to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@Michigan.gov.

If Commercial Industrial Services, Inc. and/or V&C Gibraltar BWD, 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 EGLE, AQD during our inspection of 3000 Miller Road, Dearborn. 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  
Environmental Quality Specialist  
Air Quality Division  
313-330-0105

Enclosure: Asbestos NESHAP Fact Sheet

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jeremy Howe, EGLE  
Dr. April Wendling, EGLE  
Jason Wolf, EGLE