



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 16, 2019

Mr. Ken Lawler
Building Decommission Services, LLC
13845 East Nine Mile
Warren, MI 48089

Mr. Bart Trombly
BES Group, LLC
4777 Point Tremble
Algonac, MI 48001

SRN: U501908479, Macomb County

Dear Mr. Lawler and Mr. Trombly:

VIOLATION NOTICE

On October 7, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted an inspection of the former foundry located at 22522 Hoover Road, Warren, MI, 48089. The purpose of this inspection was to determine 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, BES Group, LLC owns the facility and Building Decommission Services, LLC 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:

During abatement of transite window panels, many friable pieces of transite were observed and no water was present on site at the time of inspection. There was no evidence that any water had been used during the course of the abatement. Upon checking the dumpster, several of the bags/wraps had holes in them and transite panels were penetrating the plastic in a dry state.

Process Description	Section Violated	Comments
Abatement activities at a former industrial facility	40 CFR 61.145(c)(3)	Failure to wet during stripping.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.

Mr. Ken Lawler
Mr. Bart Trombly
Page 2
October 16, 2019

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by November 6, 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 Jeffrey Benya at EGLE, AQD 3058 West Grand Boulevard, Detroit, Michigan 48202 or benyaj@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 BES Group, LLC or Building Decommission Services, 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 me during my inspection of 22522 Hoover Road. If you have any questions regarding violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey J. Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: Sample results
cc: 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
Ms. Joyce Zhu, EGLE