



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

June 17, 2022

Chad Carson  
Carson Site Prep LLC  
PO Box 748  
Goodrich, MI 48438

Tyler Dirks  
18333 Preston Road, Suite 500  
Dallas, TX 75252

James Dally  
Mavcon Inc.  
1919 Kilgore Service Road  
Kalamazoo, MI 49001

SRN: U632202584, Oakland County

Dear Chad Carson, Tyler Dirks, James Dally:

**VIOLATION NOTICE**

On May 23, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial property located at 3245 Elizabeth Lake Road, Waterford. 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, Tyler Dirks owns the facility and Carson Site Prep LLC performed the demolition activities. Mavcon Inc. is the general contractor for the site. The NESHAP for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, staff observed the following: A vacant commercial building undergoing demolition. A 10-day notification of intent to renovate/demolish was not submitted prior to demolition of the structure.

Process Description	Section Violated	Comments
Demolition of a commercial structure without a Notification of Intent to Demolish.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

Chad Carson, Carson Site Prep LLC  
Tyler Dirks  
James Dally, Mavcon Inc.  
Page 2  
June 17, 2022

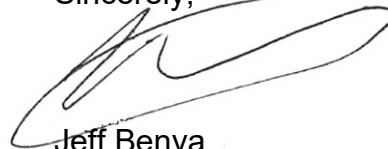
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 8, 2022 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether 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 Jeff Benya at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto:benyaj@michigan.gov) and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [wolfj2@michigan.gov](mailto:wolfj2@michigan.gov).

If either party 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 the listed property. 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,



Jeff Benya  
Senior Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosures: NESHAP Fact Sheet, Bulk sample results

cc: Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Tammy Bell, EGLE  
Jason Wolf, EGLE  
Joyce Zhu, EGLE