



GRETCHEN WHITMER  
GOVERNOR

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



AARON B. KEATLEY  
ACTING DIRECTOR

May 10, 2023

Kim Siclari  
Devon Self Storage LLC  
2000 Powel St., Suite 1240  
Emeryville, CA 94608

Pat Roussey  
Devon Self Storage LLC  
700 S. Angola Rd.  
Coldwater, MI 49036

Scott Krall  
Blue Star, Inc.  
21950 Hoover Road  
Warren, MI 48089

SRN: U632302768, Oakland County

Dear Kim Siclari, Pat Roussey & Scott Krall:

**VIOLATION NOTICE**

On April 18, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial property located at 27400 Northwestern Highway, Southfield. 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, Devon Self Storage LLC owns the facility and Blue Star, Inc. 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: A commercial property undergoing interior renovations. The required thorough inspection for asbestos was not conducted prior to said renovation activities.

Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to renovation/demolition.

Kim Siclari/Pat Roussey, Devon Self Storage LLC  
Scott Krall, Blue Star Inc.  
May 10, 2023

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by May 31, 2023 (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 include a copy of the asbestos survey that was completed if it wasn't previously forwarded.

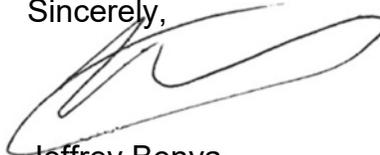
**Performing any additional renovation work within the subject building prior to conducting a thorough survey could result in additional violations.**

Please submit the written response to Jeffrey Benya at EGLE, AQD Detroit District Office, 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 violation cited above and for the cooperation. 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,



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

Enclosure: Asbestos NESHAP Fact Sheet

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE  
Jason Wolf, EGLE