



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 12, 2019

UPS NEXT DAY DELIVERY

Ms. Tien Park
19199 Gudith Road
Brownstown, Michigan 48183

Mr. Eric Evans
Technical Environmental Services, Inc.
775 North 2nd Street
Brighton, Michigan 48116

SRN/ID: U821910201; Wayne County

Dear Ms. Park and Mr. Evans:

VIOLATION NOTICE

On November 7, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 15025 Dix Toledo Road, Southgate, 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, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

According to my investigation, Ms. Tien Park owns the subject property and Technical Environmental Services, Inc. performed the demolition activities. The National Emission Standard for Asbestos holds both the *owner and operator* equally liable for any violations.

During the inspection, staff observed the following:

The subject facility previously had a notification in for the abatement of window glazing prior to demolition. However, the subject facility did not have a notification in for demolition which was actively occurring during the inspection.

Ms. Tien Park and Mr. Eric Evans

Page 2

November 12, 2019

Process Description	Section Violated	Comments
On 11/7/19, staff performed an inspection at 15025 Dix Toledo Road, Southgate. During the inspection, staff observed demolition activities. Upon further investigation, no scheduled demolition notice was in place.	40 CFR 61.145 (b)(1)	Failure to provide 10 working day notification.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by December 3, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 signed written response to Mr. Ivan Bell at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at belli@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 you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate 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 our phone conversations. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-582-0535; belli@michigan.gov; or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Ivan Bell
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE