



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 8, 2020

Mr. John Hardiman  
LGC Global, Inc.  
7310 Woodward Ave., Suite 500  
Detroit, MI 48202

Ms. Tuesday Redmond  
Wayne County Land Bank  
500 Griswold, Suite 2800  
Detroit, Michigan, 48226

SRN: U822002472, Wayne County

Dear Mr. Hardiman and Ms. Redmond:

**VIOLATION NOTICE**

On September 9, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of a vacant residence located at 19 Myrtle St., River Rouge, MI, 48218. 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, the Wayne County Land Bank owns the facility and LGC Global, 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:

During a notified abatement of plaster within the home, friable plaster debris was observed remaining on the floor, and the plaster debris was dry at the time of inspection. Upon checking the dumpster, none of the waste bags had the proper labelling affixed and many had holes/tears in them. Plaster was observed on the floor of the dumpster in a dry state.

Process Description	Section Violated	Comments
Regulated asbestos abatement activities at a vacant residential property.	40 CFR 61.145(c)(4)	Failure to contain RACM in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.150(a)(1)(v)	No generator labels on waste bags.

Mr. John Hardiman  
Ms. Tuesday Redmond  
Page 2  
October 8, 2020

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 29, 2020 (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 Mr. Jeffrey Benya at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, 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 LGC Global, Inc. and/or the Wayne County Land Bank 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 19 Myrtle Street, River Rouge. 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: NESHAP Fact Sheet  
cc: Mr. Paul Max, City of Detroit BSEED  
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  
Dr. April Wendling, EGLE