



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 27, 2020

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

Mr. Lucius Anthony
Wayne County Community Development Division
500 Griswold St., Suite 2800
Detroit, MI 48226

Ms. Peggy Madden
City of River Rouge
10600 W. Jefferson Ave.
River Rouge, MI 48218

SRN: U822002472, Wayne County

This letter of violation supersedes the letter of violation dated October 8, 2020. This violation letter was revised to add the City of River Rouge as the owner of the subject property and to revise the role of the Wayne County Community Development Division in the project. Please disregard the violation letter dated October 8, 2020.

Dear Mr. Hardiman, Mr. Anthony and Ms. Madden:

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 City of River Rouge owns the facility and LGC Global, Inc. performed the renovation activities at the facility. The Wayne County Community Development Division is overseeing the demolition. The NESHAP for Asbestos holds both the owner and operator(s) equally liable for violations.

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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.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by November 17, 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 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 any 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.

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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,

A handwritten signature in black ink, appearing to read 'Jeffrey J. Benya', written over a large, light-colored oval shape.

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

Enclosure: NESHAP Fact Sheet
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
Dr. April Wendling, EGLE