



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 1, 2021

Ms. Crystal D. Callaway, BSN, RN, CHMM
Vice President, Property Management – Environmental Health and Safety
JPMorgan Chase & Co.
171 Kendrick Pines Blvd.
Spring, TX. 77389

Mr. George McIntosh
George McIntosh, Inc.
3040 Hilton Road
Ferndale, MI 48220

SRN: U822100553, Wayne County

Dear Ms. Calloway and Mr. McIntosh:

VIOLATION NOTICE

On February 8, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the vacant commercial property located at 2025 Rawsonville Road, Belleville, MI. 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, JPMorgan Chase & Co. owns the facility and George McIntosh, 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 vacant commercial building. Flood-cuts had been made on a majority of the drywall walls. On February 4, 2021, JPMorgan Chase & Co. (JPMC) contacted EGLE to self-report potential violations of the Asbestos NESHAP during renovation activities at the above address. In response to a water intrusion event, agents (George McIntosh, Inc.) of JPMC had disturbed asbestos containing material (ACM), specifically drywall joint compound, during renovation activities. This determination was not made until post event bulk sampling was conducted. EGLE staff sampled the drywall wall system and drywall, tape and joint compound tested none detected for asbestos.

Ms. Crystal D. Callaway and Mr. George McIntosh
JPMorgan Chase & Co./ George McIntosh, Inc.
Page 2
March 1, 2021

Process Description	Section Violated	Comments
Demolition/Renovation of a commercial property without a thorough asbestos survey.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials.

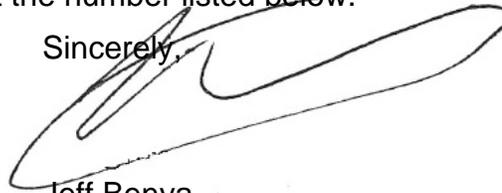
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 22, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes 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 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 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 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
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosures: Sample results, 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