

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY



DETROIT DISTRICT OFFICE

March 23, 2023

Ronnie Dishow, Registered Agent R & N Investments, LLC 54226 Tiverton Lane Shelby Township, MI 48315

Michael Gildersleeve, Registered Agent Quality Spec Construction and Rehab LLC 3088 N. Grove Drive Monroe, MI 48162

SRN: U822301631, Wayne County

Dear Ronnie Dishow and Michael Gildersleeve,

VIOLATION NOTICE

On March 17, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial building located at 24354 Ecorse Road in Taylor. The purpose of this inspection was to determine the owner's/operator's 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, R & N Investments, LLC owns the facility. According to building permit records, Quality Spec Construction and Rehab LLC performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that the building had been demolished without the required notification to EGLE AQD.

Process Description	Section Violated	Comments
Demolition of the commercial building located at 24354 Ecorse; Parcel: 60-012-02-0401-300	40 CFR Part 61.145(b)(1)	Failure to provide the EGLE AQD with written notice of intention to demolish 10-days prior to demolition.

Ronnie Dishow and Michael Gildersleeve R & N Investments, LLC and Quality Spec Construction and Rehab LLC Page 2 March 23, 2023

The asbestos NESHAP requires that a thorough inspection for asbestos be conducted prior to renovation/demolition. If an asbestos survey was not conducted prior to demolition, the following violations may also apply:

Process Description	Section Violated	Comments
Demolition of the commercial building located at 24354 Ecorse. Parcel: 60-012-02-0401-300	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos prior to demolition
	40 CFR 61.145(b)(3)(I)	Failure to provide notice prior to asbestos work.
	40 CFR 61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(c)(3)	Failure to wet during stripping
	40 CFR 61.145(c)(3)(iii)	Failure to keep written approval on site.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(I)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	No contractor supervisor on site.
	40 CFR 61.150(a)	Visible emissions from asbestos containing waste material generated by source.
	40 CFR 61.150(a)(1)(ii)	Visible emissions from handling operations.
	40 CFR 61.150(a)(1)(iii)	Failure to seal while wet.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical.
	40 CFR 61.150(c)	No signs during loading and unloading.

Both parties please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by April 13, 2023 (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

Ronnie Dishow and Michael Gildersleeve R & N Investments, LLC and Quality Spec Construction and Rehab LLC Page 3 March 23, 2023

will take place; and what steps are being taken to prevent a reoccurrence. Please attach a copy of the asbestos survey to your response.

Please submit the written response to Tammy Bell at EGLE, AQD 3058 West Grand Blvd, Suite 2-300, Detroit, Michigan 48202 or bellt4@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.

If R & N Investments LLC and/or Quality Spec Construction and Rehab, LLC 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 the facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Tammy Bell

Environmental Quality Specialist

Air Quality Division 313-330-0105

Enclosures: Asbestos NESHAP fact sheet and sample results

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Regina Angellotti, EGLE
Jason Wolf, EGLE