



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

November 20, 2023

VIA UPS NEXT DAY DELIVERY

Registered Agent  
Adveg, LLC  
100 Renaissance Center  
Suite 43062  
Detroit, Michigan 48243

Treyvon Johnson  
TJ's Luxury Lawnservice, LLC  
45780 Pebble Creek West  
Apartment 7  
Shelby Township, Michigan 48317

ID: U822307458; Wayne County

Dear Adveg, LLC and TJ's Luxury Lawnservice, LLC:

**VIOLATION NOTICE**

On November 1, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint inspection at the property located at 5252 South Clarendon Street, Detroit, Michigan. 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.

According to our investigation, Adveg, LLC owns the property and TJ's Luxury Lawnservice, LLC conducted the renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff noted a subject commercial building undergoing interior renovation. Debris from this activity (specifically, plaster debris) was in the yard, on the sidewalk and into the streets, as well as the dumpster. The upper floors of the building were gutted to the studs and a majority of the plaster had been removed. AQD staff also identified suspect asbestos containing pipe insulation that had sustained incidental damage from the plaster removal. The basement plaster and pipe insulation were still intact at the time of the inspection. Sampling conducted by AQD staff indicated that the pipe insulation was positive for asbestos. Plaster samples tested none detected for asbestos.

Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	§61.145(a)(1)	Failure to thoroughly inspect for asbestos prior to demolition/renovation

If the required thorough inspection for asbestos was not conducted by a licensed building inspector prior to renovation, the following violations may have also occurred:

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Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	§61.145(b)(2)	Failure to update notice
	§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
	§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	§61.145(c)(1)	Failure to remove RACM
	§61.145(c)(3)	Failure to wet during stripping
	§61.145(c)(3)(iii)	Failure to keep written approval on site
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
	§61.145(c)(8)	No contractor supervisor on site
	§61.145(c)(9)	Failure to wet RACM during demolition
	§61.145(c)(10)	Failure to remove RACM in building demolished by fire
	§61.150(a)	Visible emissions from asbestos containing waste material generated by source
	§61.150(a)(1)(ii)	Visible emissions from handling operations
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical
	§61.150(c)	No signs during loading and unloading

***Continuation of renovation activities without first conducting an asbestos survey will result in the issuance of additional violations.***

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 11, 2023 (which coincides with 21 calendar days from the date of this letter).

The response should include:

- A copy of the asbestos survey that was conducted prior to demolition;
- A copy of records pertaining to asbestos abatement conducted at the facility, including notification submitted for asbestos abatement and landfill disposal records, if applicable;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violation(s);

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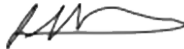
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and the dates by which these actions will take place; and
- What steps are being taken to prevent a reoccurrence.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) and [WolfJ2@Michigan.gov](mailto:WolfJ2@Michigan.gov).

If the listed parties believe the above observations or statements are inaccurate or do not constitute violation(s) of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation(s) cited for 5252 South Clarendon Street, Detroit. If you have any questions regarding the violation(s) or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey Benya  
Senior Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosures: Asbestos NESHAP fact sheet  
Sample results

cc: Hosam Hassanien, Detroit BSEED  
Marijuana Regulatory Agency  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Dr. April Wendling, EGLE  
Jeremy Howe, EGLE  
Jason Wolf, EGLE