

IB

U382300893
Mr

Founded in 1852
by Sidney Davy Miller

MILLER CANFIELD

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March 9, 2023

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MAR 15 2023

VIA EMAIL

Ivan Bell
Environmental Quality Analyst, AQD
Michigan Department of Environment, Great Lakes, and Energy
301 East Louis Glick Highway
Jackson, Michigan 49201-1556

AIR QUALITY DIVISION

Re: Violation Notice ID U382300893

Dear Mr. Bell:

I represent Prism Ventures, LLC ("Prism") in relation to the February 16, 2023 Notice of Violation, SRN/ID U382300893 (the "VN"). The VN alleges that Prism violated 40 CFR 61.145 (a) for a failure to thoroughly inspect for asbestos containing materials prior to demolition activities. Prism neither admits nor denies the allegation detailed in this VN.

On February 13, 2023, Ivan Bell with the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") performed an onsite inspection wherein he observed active renovation/demolition activities. At the time of the inspection, Mr. Bell collected two bulk samples of demolition waste and submitted those samples to a laboratory; analysis of the two bulk samples did not identify the presence of asbestos containing building materials.

The activities described in the VN occurred on February 13, 2023. In subsequent discussion and email correspondence with Mr. Bell, Prism verified that it was unaware of an asbestos inspection requirement due to the relatively recent construction of the building. The activities described in the VN are not ongoing. Prism is establishing an internal Standard Operating Procedure ("SOP") intended to ensure future compliance with 40 CFR 61.145(a) and any related requirements. This SOP will be provided to all Prism staff responsible for building renovation activities. Prism anticipates that the SOP will be established and implemented by April 15, 2023.

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Ivan Bell

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March 9, 2023

Sincerely,

Miller, Canfield, Paddock and Stone, P.L.C.

By: 

Paul Michael Collins

MJG

CC: Jason Wolf, EGLE
James Stajos, Prism Ventures, LLC.

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