



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION



PHILLIP D. ROOS
DIRECTOR

December 2, 2024

VIA E-MAIL

Scott Krall
Southeast Abatement, LLC
22728 Hoover Road
Warren, Michigan 48089

Travis Greer
St. Andre Bessette Catholic Parish
4250 West Jefferson Avenue
Ecorse, Michigan 48229

SRN/ID: U822404777; Wayne County

Dear Scott Krall and Travis Greer:

VIOLATION NOTICE

On November 8, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at the commercial property located at 27700 West Outer Drive, Ecorse, Wayne County. 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, St. Andre Bessette Catholic Parish owns the property and Southeast Abatement, 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 an active asbestos abatement project under negative pressure enclosure. Asbestos containing waste material (ACWM) within fiber drums staged for disposal was in a dry state. Additionally, several drums were unsealed, punctured or otherwise improperly sealed, and contained dry ACWM within them. AQD staff also identified several areas where ACM Aircel pipe insulation had been stripped in bulk and not immediately wetted and sealed as required by the NESHAP. Asbestos survey results and on-site sampling conducted by AQD staff indicated that the stripped material and the material staged for disposal was regulated asbestos containing material (RACM).

Process Description	Section Violated	Comments
Asbestos abatement activities at a subject commercial building.	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.

VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by December 23, 2024 (which coincides with 21 calendar days from the date of this letter). The response should include:

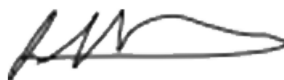
- The dates the violation occurred;
- An explanation of the causes and duration of the violation;
- Whether the violation is ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place.
- What steps are being taken to prevent a reoccurrence; and
- Acknowledgement of receipt, and understanding of, the attached "Understanding NESHAP" fact sheet.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeff Benya, Asbestos 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 BenyaJ@Michigan.gov and 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 cited. 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,



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

Attachment: Sample results

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Dr. April Wendling, EGLE
Tammy Bell, EGLE
Jason Wolf, EGLE