



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

July 11, 2023

Michael Gagnon
Frank Rewold & Sons, Inc.
303 E. 3rd Street, Suite 300
Rochester, MI 48307

Wes Goodman
Lake Orion Community Schools
455 E. Scripps Rd.
Lake Orion, MI 48360

David Gillespie
Detroit Environmental Solutions LLC
14215 W. McNichols
Detroit, MI 48235

Scott Krall
Blue Star, Inc.
21950 Hoover Road
Warren, MI 48089

SRN: U632301931, Oakland County

Dear Mike Gagnon, Wes Goodman, David Gillespie, and Scott Krall:

VIOLATION NOTICE

On June 22, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the vacant school building located at 465 E. Jackson, Lake Orion. 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, Lake Orion Community Schools (LOCS) owns the facility, Frank Rewold & Sons Inc. (FRS) was overseeing the project, Blue Star, Inc. performed the demolition activities and Detroit Environmental Solutions LLC conducted the asbestos removal activities at the facility. The NESHAP for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, staff observed the following: A subject property undergoing complete demolition. Within the building debris EGLE staff identified regulated asbestos containing material (RACM), rope gasket, that had previously been identified as ACM in

Mike Gagnon, Frank Rewold & Sons, Inc.
Wes Goodman, Lake Orion Community Schools
David Gillespie, Detroit Environmental Solutions LLC
Scott Krall, Blue Star, Inc.
Page 2
July 11, 2023

the asbestos survey report. The same material was sampled by EGLE staff at the time of inspection and tested positive for asbestos.

| Process Description | Section Violated | Comments |
|------------------------------------------------------------------|------------------------|---------------------------------------------|
| Demolition activities at a subject building with RACM remaining. | 40 CFR 61.145(c)(1) | Failure to remove RACM prior to demolition. |
| | 40 CFR 61.145(c)(4) | Failure to contain in leak tight container. |
| | 40 CFR 61.150(a)(1)(v) | No generator labels. |

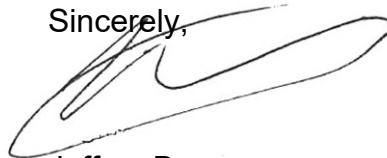
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by August 1, 2023 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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 will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Jeffrey Benya at EGLE, AQD Detroit District Office, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or benyaj@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 any 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 violations cited above and for the cooperation. 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,



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

Enclosures: Asbestos sample results

Mike Gagnon, Frank Rewold & Sons, Inc.
Wes Goodman, Lake Orion Community Schools
David Gillespie, Detroit Environmental Solutions LLC
Scott Krall, Blue Star, Inc.
Page 3
July 11, 2023

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Jeremy Howe, EGLE
Joyce Zhu, EGLE
Jason Wolf, EGLE