



GRETCHEN WHITMER
GOVERNOR

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

LANSING



DANIEL EICHINGER
ACTING DIRECTOR

April 19, 2023

Larry Gray
Commerce Township
2009 Township Drive West
Commerce Township, Michigan 48390

Bob Hoffman
RJ Hoffman Mgt., Inc.
d/b/a American Recycling
1255 South Hospital Road
Waterford, Michigan 48327

SRN/ID: U632302474; Oakland County

Dear Larry Gray and Bob Hoffman:

VIOLATION NOTICE

On April 13, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint investigation at 2552 Wixom Road, Commerce Township, Oakland 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 my investigation, Commerce Township, owns the facility which was demolished and RJ Hoffman Mgt., Inc., performed the demolition activities. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

The facility was being demolished, and the debris was being loaded out. The owner did have an asbestos survey done on the former Windmill Farm Riding Academy facility prior to its demolition, however, no Notification of Intent to Renovate/Demolish was submitted to the administrator for the demolition.

Process Description	Section Violated	Comments
On 4/13/2023, received a complaint regarding dust at a demolition. On 4/13/2023, an inspection was performed at 2552 Wixom Rd., Commerce Township. No Notification was submitted to the administrator for the demolition activities.	40 CFR §61.145(b)(1)	Failure to provide the Administrator with written notice of intent to demolish.

VIOLATION NOTICE

Larry Gray and Bob Hoffman

Page 2

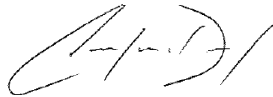
April 19, 2023

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by May 10, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) 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 my attention at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@Michigan.gov and WolfJ2@Michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation 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 above and for the cooperation extended to me during my site visit. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Senior Environmental Quality Analyst
Air Quality Division

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Joyce Zhu, EGLE
Regina Angellotti, EGLE
Jason Wolf, EGLE