



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

December 18, 2019

UPS NEXT DAY DELIVERY

Mr. William Vasiliades  
V-3 Industries, Inc.  
19709 15 Mile Road  
Clinton Township, Michigan 48035

Mr. William Vasiliades  
V-3 Industries, Inc.  
P.O. Box 554  
Mt. Clemens, Michigan 48046

ID: U821908942, Wayne County

Dear Mr. Vasiliades:

**SECOND VIOLATION NOTICE**

On November 4, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos inspection at 19100 West Seven Mile Road, Detroit, Michigan. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, 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.

On November 25, 2019, the AQD sent a Violation Notice (VN) citing violations discovered because of the inspection and requested a written response by December 16, 2019. A copy of this VN has been enclosed for your reference. As of the date of this letter, the AQD has not received the written response to the cited violations.

Please be advised that failure to respond in writing and identifying actions taken to resolve the cited violations may result in an escalated enforcement action by the AQD. Please provide the information requested in the VN dated November 25, 2019, by January 2, 2019, which corresponds to 15 days from the date of this letter.

The written response must be submitted to Mr. Jeffery Benya at EGLE, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202, and must include a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing,

Mr. William Vasiliades

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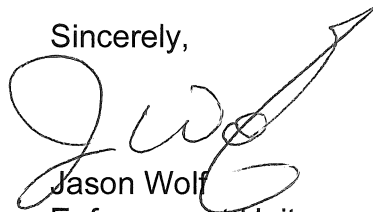
December 18, 2019

Michigan 48909-7760. Or the response may be scanned and sent to benyaj@michigan.gov and wolfj2@michigan.gov.

Be further advised that issuance of this VN does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding this matter or the actions necessary to come into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Wolf', with a long, sweeping flourish extending upwards and to the right.

Jason Wolf  
Enforcement Unit  
Air Quality Division  
517-284-6772

Enclosure

cc/via e-mail: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Jeffery Benya, EGLE



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



GRETCHEN WHITMER  
GOVERNOR

DETROIT DISTRICT OFFICE

LIESL EICHLER CLARK  
DIRECTOR

November 25, 2019

Mr. Paul Korty  
Ciena Healthcare  
4000 Town Center, Suite 2000  
Southfield, MI 48075

Mr. William Vasiliades  
V-3 Industries, Inc.  
PO Box 554  
Mt. Clemens, MI 48046

SRN: U821908942, Wayne County

Dear Mr. Korty and Mr. Vasiliades:

**VIOLATION NOTICE**

On November 4, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Regency Heights Nursing Home located at 19100 West Seven Mile Road, Detroit, MI 48219. 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, Ciena Healthcare Management, Inc. owns the facility and V-3 Industries, Inc. performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

Demolition activities had disturbed suspect regulated asbestos containing (RACM). Upon sampling, the material tested positive for asbestos. The material, textured plaster ceiling was in a damaged, friable state and mixed in with general demolition debris.

Process Description	Section Violated	Comments
Demolition of a vacant wing of the facility. Friable RACM was discovered during the inspection.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.
	40 CFR 61.145(c)(1)	Failure to remove RACM.

Mr. Paul Korty  
Mr. William Vasiliades  
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November 25, 2019

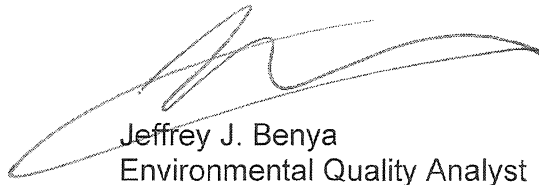
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 16, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of 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 3058 West Grand Boulevard; Suite 2-300, Detroit, Michigan 48202 or benyaj@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If V-3 Industries, Inc./Ciena Healthcare 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 that was extended to me during my inspection of Regency Heights Nursing Home. 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 J. Benya  
Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosure: Sample results  
cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Ms. Wilhemina McLemore, EGLE