



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 13, 2020

Mr. Glenn Prentice
The Woodland Initiative, LLC
535 Griswold, Suite 1420
Detroit, MI 48226

Mr. Brad Byarski
Premier Group Associates, LLC
535 Griswold, Suite 1420
Detroit, MI 48226

SRN: Various, Wayne County

Dear Mr. Byarski and Mr. Prentice:

VIOLATION NOTICE

On January 16, 2020 and January 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted inspections of the vacant residential properties located at:

- 2659 Harding, Detroit, MI 48214 – SRN# U822000248; January 16, 2020
- 2116 Harding, Detroit, MI 48214 – SRN# U822000555; January 30, 2020

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, The Woodland Initiative, LLC owns the facility and Premier Group Associates, LLC performed the renovation 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:
Vacant residential properties undergoing debris clean-up and renovation activities while suspect asbestos containing materials were present. Activities were occurring prior to a thorough asbestos survey being conducted. Both companies were advised to cease operations and await survey results after the first incident on January 16, 2020 but continued work until January 30, 2020.

Process Description	Section Violated	Comments
Debris clean-up and renovation activities in vacant residential buildings without a thorough asbestos survey. Houses being renovated as part of a 31 home renovation project in the neighborhood.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.

Mr. Glenn Prentice
Mr. Brad Byarski
Page 2
February 13, 2020

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by March 5, 2020 (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 Mr. 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 Woodland Initiative, LLC and Premier Group Associates, LLC 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 the Woodland Initiative, LLC properties. 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

Enclosures

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
Mr. Jeffrey Korniski, EGLE