



MWV Environmental Services, Inc.
18407 Weaver St.
Detroit, MI 48228
+1 3136462523
kat@mwvenvironmental.com
www.mwvenvironmental.com

INVOICE

BILL TO

Gayanga Co.
7700 Second
Ste 419
Detroit, MI 48202

INVOICE # 03202024
DATE 03/20/2024
DUE DATE 04/19/2024
TERMS Net 30

ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
Asbestos Abatement	Floor Tile Clean Up at 12155 Grand River	1	1,500.00	1,500.00

BALANCE DUE

\$1,500.00

ARBOR HILLS LANDFILL
 10559 W FIVE MILE RD
 NORTHVILLE, MI 48168
 2487935610

004660
 Metro Waste - Runco
 P.O. Box 37379
 OAK PARK, MI 48237

INVOICE
 INBOUND

SITE		CELL	OPERATOR	TICKET #	
01			AJARMOLINS	2642651	
TRUCK		CONTAINER		LICENSE	
RUN112C42					
REFERENCE				IN	OUT
22825, 22863, 22871, 24053 24066, 24070-71, 24073, 24090 24093-94, 24100				3/12/24 12:41 pm	3/12/24 12:41 pm

CONTRACT: AH5266 - VARIOUS
 BOL:

GROSS 55,660.00 LBS Scale In
 TARE 42,740.00 LBS Tare Out
 NET 12,920.00 LBS

QTY	UNIT	DESCRIPTION	ORIGIN	%	RATE	TAX	TOTAL
6.46	TN	Asbestos-Friable FY 42.00	WY	100.00			
1.00		FUEL SURCHARGE 0.00		0.00			
1.00		COMPLIANCE AND BUSI 0.00		0.00			

12690 WYOMING
 15445 LAHSER
 15011 BEAVERLAND
 12155 GRAND RIVER
 13516 STEEL
 13501 HEYDEN
 7752 AUBURN
 8630 FAUST
 16709 DOLPHIN

EGLE Surcharge per ton
 Salem Township Fee
 Washtenaw County Fee

Tax Total
 Total Paid
 Change
 Check#
 Recpt #

SIGNATURE: _____

8231 LEANDER
 7327 HEYDEN
 15459 GRAYFIELD

14031 TERRY

FACILITY COPY



2570

ASBESTOS & SPECIAL WASTE MANIFEST

1. Generator ID Number

2. Page 1 of 1

3. Emergency Response Phone

4. Waste Tracking Number

(313) 549-0067 ASW 24053

5. Generator's Name and Mailing Address

Owner: City of Detroit
2 Woodward Ave.
Detroit, MI 48226

Generator's Site Address (if different than mailing address)

12155 Grand River Ave
Det, MI 48204

Generator's Phone:

6. Transporter 1 Company Name

Metro Waste - Runco
PO Box 37379
Oak Park, MI 48237

U.S. EPA ID Number

313.336.2333

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address

Arbor Hills Landfill, Inc.
10690 W. 6 Mile Road
Northville, MI 48168
248-793-5610

U.S. EPA ID Number

Facility's Phone:

9. Waste Shipping Name and Description

10. Containers

11. Total Quantity

12. Unit Wt./Vol.

No.

Type

1. RQ, NA2212, Asbestos, 9, PGIII, ERG 171

1 CM * 25 CYD

2.

3.

13. Special Handling Instructions and Additional Information

AH5266- Asbestos Friable Non Friable
MI EGLE-NESHAP Asbestos Program
PO BOX 30260
Lansing MI 48909

Operator: MWV Env. Solutions
18407 Weaver Street
Detroit MI 48228
313.646.2523

ASBESTOS COORDINATES
Easting:
Northing:
Elevation:

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offoror's Printed/Typed Name

Signature

Month Day Year
2 27 24

Katrenia B. Moncrief

Signature

15. International Shipments

Import to U.S.

Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Signature

Month Day Year
3 12 24

Diane Page

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space

Quantity

Type

Residue

Partial Rejection

Full Rejection

Manifest Reference Number:

U.S. EPA ID Number

17b. Alternate Facility (or Generator)

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

2642651

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name

Signature

Month Day Year
3 12 24

April Jarmolinski

April Janner

DESTINATION RETAIN



1301 Third Street, Suite 606
Detroit, Michigan 48226
(313) 224-4737
Demo-info@detroitmi.gov
www.detroitmi.gov/demolition

March 22, 2024

VIA E-MAIL ONLY: howej1@michigan.gov

Jeremy Howe, Supervisor, Technical Programs Unit
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
525 West Allegan Street
Lansing, Michigan 48933

Re: SRN: U822303929, Wayne County

Dear Mr. Howe:

This letter is in response to the Violation Notice, dated February 23, 2024, received by the City of Detroit's Demolition Department ("City") regarding the demolition activities performed by Gayanga Co. ("Gayanga") at a commercial building located at 12155 Grand River Avenue, Detroit.

The Violation Notice states that the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") issued a violation notice (SRN: U822303929) on August 29, 2023 to the City for failing to remove asbestos containing waste material from the site. Subsequently, EGLE provided the City with additional time to respond in order to seek regulatory guidance from the U.S. EPA regarding ordered demolitions.¹ Thereafter, on January 12, 2024, the City submitted a request for regulatory interpretation to the U.S. EPA regarding the City's demolition program practices and specifically the violation notice (SRN: U822303929) received for 12155 Grand River. The U.S. EPA's response remains pending.

The Violation Notice states that EGLE revisited the site on February 8, 2024, and that the temporary fencing that was surrounding the site during the prior inspection was removed which allowed for a more in-depth inspection of the site. The Violation Notice further alleges that the ACWM concrete slab with Category II non-friable floor tile on it was still in place and dry, and upon closer inspection and field testing, it was determined that the floor tile was in friable condition. The Violation Notice states that floor tile was also observed on the soil surrounding the ACWM concrete slab and this was also in friable condition; and that a sample of the floor tile was collected, and the lab determined that it was positive for asbestos. After a point count was

¹ In an email dated October 27, 2023 from the EGLE Air Quality Division/Technical Programs Unit to the City of Detroit, EGLE confirmed and it was mutually understood that, "21 days once the response is received from EPA is acceptable." The response seeking regulatory guidance from the U.S. EPA remains pending.



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conducted, the final lab results were 4.5 percent Chrysotile asbestos. The Violation Notice alleged failure to adequately wet ACWM at all times after demolition pursuant to 40 CFR 61.150(a)(3), AQD Consent Judgment 18-862, Section 5.2; and failure to deposit ACWM as soon as practical pursuant to 40 CFR 61.150(b), AQD Consent Judgment 18-862, Section 5.2.

As stated above, EGLE provided the City with additional time to respond in order to seek regulatory interpretation from the U.S. EPA regarding the City's demolition program practices and specifically the demolition at 12155 Grand River, and the response from the U.S. EPA remains pending. However, EGLE did not allow for the additional time pending the U.S. EPA regulatory interpretation but rather reinspected the site. In order to address the violations, the City sent our licensed demolition contractor, Gayanga, back to the site. On February 27, 2024, Gayanga removed 0.25 cubic yards of floor tile containing ACWM at the site.² Please see attached waste manifest and load ticket (Exhibit A).

The City takes these allegations seriously and is committed to participating in their prompt resolution. We anticipate that EGLE will acknowledge the steps taken by the City demonstrate the necessary actions to address the alleged violations as we await the regulatory interpretation from the U.S. EPA. With the tremendous number of blighted structures being demolished within the City, all alleged violations are taken seriously to prevent any deficiencies effecting the demolition program. We appreciate your assistance and look forward to continuing our relationship with EGLE to complete this important work. Please let us know if you have any further questions with respect to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "LaJuan Counts".

LaJuan Counts, Director
Detroit Demolition Department

cc: Mr. Jason Wolf, EGLE Enforcement Unit (wolfj2@michigan.gov)

² In accordance with Understanding the Asbestos NESHAP Fact Sheet, "NESHAP specifically requires a revision if the amount of asbestos reported changes by 20%...." The original waste manifest shows that 40 cubic yards was removed on July 24, 2023. The floor tile material that was removed on February 27, 2024 was 0.25 cubic yards. Therefore, the floor tile amount removed on February 27, 2024 did not exceed the threshold level of 15 square meters (160 square feet).