



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

March 19, 2024

VIA E-MAIL / VIA USPS

6565 Woodward Holdings, LLC C/O Registered Agents, Inc. 2222 West Grand River Avenue Suite A Okemos, Michigan 48864		Guardian Construction, LLC C/O Registered Agents, Inc. 2222 West Grand River Avenue Suite A Okemos, Michigan 48864
Richard Cedroni Cedroni Associates, Inc. 5639 Auburn Road Utica, Michigan 48317		Chris Benning Chris & Adrian Residential Environmental Services, LLC 16575 Washington Square Apartment C Clinton Township, Michigan 48035

SRN/ID: U822307855; Wayne County

Dear Registered Agents, Richard Cedroni and Chris Benning:

VIOLATION NOTICE

On February 26, 2024 and March 6, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division conducted an inspection at the property located at 6565 Woodward Avenue, Detroit, Wayne 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 our investigation, 6565 Woodward Holdings, LLC owns the property and Chris & Adrian Residential Environmental Services, LLC conducted the renovation activities. Guardian Construction, LLC and Cedroni Associates, Inc. are overseeing renovation activities. The National Emission Standard for Asbestos holds both the *owner and operators* equally liable for violations.

During the inspection, AQD staff noted a subject commercial building undergoing interior renovation. Work appeared to be proceeding past the end date identified on the most recently revised asbestos notification. Large amounts of suspect regulated asbestos containing material (RACM) from this activity was piled within the building in a dry state. In addition, suspect RACM was identified protruding from broken windows into public areas as well as on the sidewalk on the exterior of the building, this material was also in a dry state. Sampling conducted by AQD staff indicated that several of these

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materials tested positive for asbestos. AQD staff was denied access to the interior by the general contractor on-site, Rick Cedroni; all observations were made from the street and sampling was conducted from public areas. It is not clear if employees of CARES were on-site and working at the time of inspection. The following violations were noted:

Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	§61.145(b)(3)(i)	Failure to update notice.
	§61.145(c)(1)	Failure to remove RACM.
	§61.145(c)(4)	Failure to contain in leak tight container.
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	§61.150(a)(1)(iii)	Failure to seal while wet.

On March 6, 2024, the AQD conducted an inspection of the 40-yard asbestos waste dumpster, GFL Environmental #4980, which was hauled by GFL Environmental to Arbor Hills Landfill. The inspection was conducted by AQD staff while the dumpster was on-site at the landfill. Dry, friable asbestos (pipe insulation) was found in waste bags that had holes and were not leak tight. No generator labels were noted on the bags inspected. The following violations were noted:

Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	§61.145(a)(1)(i)	Failure to wet ACWM - pipe insulation observed inside and outside of bags was dry.
	40 CFR 61.150(a)(1)(v)	No generator labels were observed on the waste bags.
	40 CFR 61.145(c)(4)	Failure to contain in a leak tight container - holes were observed in waste bags.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by April 12, 2024. 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;
- What steps are being taken to prevent a reoccurrence; and
- Acknowledgement of receipt, and understanding, of the attached "Understanding NESHAP" fact sheet.

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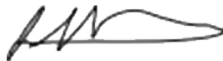
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The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@Michigan.gov.

If the listed parties believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited for 6565 Woodward Avenue, Detroit. 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

Enclosure: Asbestos NESHAP fact sheet
Sample results

cc: Crystal Rogers, Detroit BSEED
Mark Baron, Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Dr. April Wendling, EGLE
Jeremy Howe, EGLE
Jenine Camilleri, EGLE
Jason Wolf, EGLE