



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

June 24, 2024

VIA USPS

Katrenia Moncrief
MWV Environmental Services, Inc.
18407 Weaver Street
Detroit, Michigan 48228

John George
Manchester Mt. Clemens, LLC
45511 Market Street
Shelby Township, Michigan 48315

SRN/ID: U502304302; Macomb County

Dear Katrenia Moncrief and John George:

VIOLATION NOTICE

On May 22, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the former Victory Inn Hotel located at 1 North River Road, Mt. Clemens, Macomb County. The purpose of this inspection was to determine the Owner's and Operator's compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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, Manchester Mt. Clemens, LLC owns the facility and MWV Environmental Services, Inc. conducted asbestos abatement activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff observed areas on the ceiling where ACM textured material was still present, such as under the light fixtures, some electrical hardware and partition walls. Residual material from the abatement was observed on some of the first-floor walls. Dry debris was noted on the floor and other horizontal surfaces.

Samples were collected during the inspection and identified cementitious asbestos board near the entrance to the kitchen area, as well as vermiculite insulation that tested positive for asbestos. The following violations were noted during the inspection:

Process Description	Section Violated	Comments
Asbestos abatement activities conducted prior to demolition.	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.150(a)(1)	Failure to adequately wet.

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 19, 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; and what steps are being taken to prevent a reoccurrence.

The signed written response from the operators 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 MVW Environmental Services, Inc. and/or Manchester Mt. Clemens, 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 former Victory Hotel. 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,



Tammy Bell
Environmental Quality Specialist
Air Quality Division
313-330-010

Enclosures: Asbestos NESHAP fact sheet and sample results

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Joyce Zhu, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE