



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 19, 2021

Mr. Anthony Randazzo
Trowbridge Land Holdings LLC
2617 Beacon Hill Drive
Auburn Hills, MI 48326

Mr. Anthony Randazzo
Devonshire of Lyon II LLC
2617 Beacon Hill Drive
Auburn Hills, MI 48326

SRN: U632002511, Oakland County

Mr. Randazzo:

VIOLATION NOTICE

On February 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the two (2) vacant residential properties located at 21405 Napier and 51860 8 Mile Road, Lyon Township. 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, Devonshire of Lyon LLC owns the facility and Trowbridge Land Holdings LLC was responsible for the demolition activities at the properties. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following: Records indicate that two (2) single family residences were demolished as part of this project to build a multi-unit subdivision. A 10-day notification of intent was not submitted prior to demolition of the structures. The owner/operator of the properties was made aware of the NESHAP 10-day notification requirements by EGLE staff in an email dated July 24, 2020.

Process Description	Section Violated	Comments
Demolition of one or more residential buildings located at the same site as part of a project to construct the Devonshire of Lyon II subdivision.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by April 9, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. **If there was a third party that conducted the actual demolitions, please provide the appropriate contact information.**

Please submit the written response to Jeff 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 either party 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 listed properties. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeff Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: NESHAP Fact Sheet
cc: 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. Joyce Zhu, EGLE