



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 25, 2020

Mr. Andrew Casazza
Holcomb Development Company, LLC
656 Saint Clair Street, Second Floor
Grosse Pointe, MI 48230

GW5 624 LLC
402 S. Lafayette, Suite 103
Royal Oak, MI 48067

SRN: U821800287, Wayne County

Dear Mr. Andrew Casazza and To Whom It May Concern at GW5 624 LLC:

VIOLATION NOTICE

On February 28, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the vacant apartment building at 624 Charlotte, Detroit, MI 48201. 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, GW5 624, LLC owns the facility and Holcomb Development Company, LLC performed the demolition/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:
Demolition/renovation activities within a subject property. A thorough asbestos survey had not been completed prior to work activities.

Process Description	Section Violated	Comments
Demolition/renovation activities without a prior thorough asbestos survey.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.

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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 15 (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 violation is 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 recurrence.

Please submit the written response to 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 GW5 624, LLC/Holcomb Development Company 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 violation cited above and for the cooperation that was extended to me during my inspection of listed property. 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,



Jeffrey J. Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: Sample Results
NESHAP Fact Sheet

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
Dr. April Wendling, EGLE
Mr. Jason Wolf, EGLE