



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 1, 2022

Dennis Kefallinos
Clark Street Enterprises LLC
1600 Clay Street
Detroit, MI 48211

SRN: U822205803, Wayne County

Dear Dennis Kefallinos:

VIOLATION NOTICE

On November 14, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint inspection of the commercial property located at 1601 Clark Street, Detroit. 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, Clark Street Enterprises LLC owns the facility and performed the 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:
A vacant commercial property undergoing renovations. The required thorough asbestos survey was not completed prior to these activities.

Process Description	Section Violated	Comments
Renovation of a commercial structure.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to demolition/renovation activities.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by December 22, 2022 (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 reoccurrence.

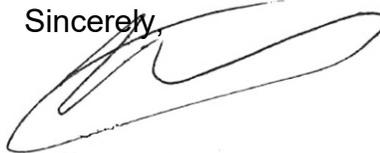
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Please submit the written response to Jeffrey Benya at EGLE, AQD Detroit District Office, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or benyaj@michigan.gov and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If Clark Street Enterprises 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 violation cited above and for the cooperation that was extended to me during my inspection of the subject 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
Senior Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: NESHAP fact sheet

cc: Hosam Hassanien, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Jeremy Brown, EGLE
Dr. April Wendling, EGLE
Jason Wolf, EGLE