



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 21, 2021

Mr. Joe Gilstorf
Housing Specialist Inc.
2633 Post Road
Newport, MI 48166

SRN: U582101894, Monroe County

Dear Mr. Gilstorf:

VIOLATION NOTICE

On April 15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation of the commercial property located at 10200 Telegraph Road, Carleton. 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, Housing Specialist Inc. (HSI) owns the property and performed the renovation activities at the property. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following: A commercial building undergoing renovations. Suspect regulated asbestos containing material (RACM) was identified in the dumpster and EGLE staff witnessed HSI staff actively removing additional material from the interior of the building. The area was not regulated, the material was not properly wetted or sealed in leak tight containers and there were no asbestos trained staff on site. Approximately 300 sq. ft. of the material was disturbed in this fashion. EGLE staff sampled the material, duct insulation, which tested positive for asbestos.

Process Description	Section Violated	Comments
Renovation activities in a commercial building.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to demolition/renovation.
Friable RACM (duct insulation) was removed and disposed of improperly by improperly trained and equipped personnel.	40 CFR 61.145(c)(3)	Failure to wet during stripping
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	No contractor supervisor on site.
	40 CFR 61.150(a)(1)(iii)	Failure to seal while wet.

Mr. Joe Gilstorf, Housing Specialist Inc.

Page 2

May 21, 2021

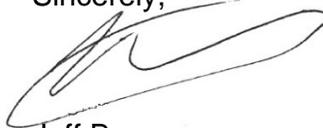
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by June 11, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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. **If a thorough asbestos survey and/or abatement activities were subsequently conducted at this property, please provide corroborating documentation in your response.**

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 you believe 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 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,



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

Enclosures: NESHAP Fact Sheet & Asbestos Sample results

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
Mr. Scott Miller, EGLE