



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

August 29, 2016

Mr. Richard Meixner  
Superior Wrecking  
4300 Beech Road  
Ecorse, Michigan 48219

Mr. Kevin Woods  
BBEK Environmental  
24808 Thomas Street  
Warren, Michigan 48091

Mr. John Carmody  
Wayne Metro Community Action Agency  
2121 Biddle Avenue  
Wyandotte, Michigan 48192

SRN / ID: U821609221

Dear Mr. Meixner, Mr. Woods, and Mr. Carmody:

### **VIOLATION NOTICE**

On August 24, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed a drive-by inspection on a demolition occurring at 222 Frazier Street, Ecorse, Wayne County, Michigan. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, the Wayne Metro Community Action Agency owns the property, BBK Environmental performed the abatement activities, and Superior Wrecking was doing the demolition activities on the property. The National Emission Standard for Asbestos holds both the owner and operator(s) equally liable for violations.

During the investigation, DEQ AQD staff, Mr. Craig Dechy and Ms. Karen Kajiya-Mills observed the following:

The subject property was in the process of being demolished upon arrival. The property had been abated on July 8, 2016. However, regulated asbestos-containing material (RACM) in the form of pipe wrap insulation was discovered on a section of pipe in the construction debris pile. Enclosed are the photographs and analytical test results.

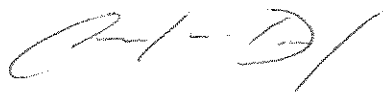
Process Description	Section Violated	Comments
Failure to remove RACM in the form of pipe wrap insulation at 222 Frazier Street. Pipe wrap was not indicated on the asbestos survey.	§61.145(a)	Failure to thoroughly inspect for the presence of asbestos
	§61.145(c)(1)	Failure to remove RACM

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 19, 2016, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) the violations 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The signed written response from both the owner and the operator to this violation notice may be submitted by mail and directed to my attention at: DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and sent as an email attachment to [dechyc@michigan.gov](mailto:dechyc@michigan.gov).

If Superior Wrecking, BBEK Environmental, and/or Wayne Metro Community Action Agency believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation extended to us during our site visit and our conversations. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; [dechyc@michigan.gov](mailto:dechyc@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig W. Dechy  
Environmental Quality Analyst  
Air Quality Division

- cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Tom Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ



# BULK SAMPLE ANALYTICAL REPORT

Fibertec IHS Project # 39050-1  
NVLAP Accreditation #101510-0

Client Name: State of Michigan Department of Environmental Quality, Air Quality  
Project Name: 222 Frazier  
Summary: 1 Submitted Bulk Sample, 1 Sample Layer Analyzed.

Date Sampled: 8/24/2016 Client P.O. #: N/A  
Date Submitted: 8/25/2016 C.O.C. #: N/A  
Date Analyzed: 8/25/2016

Fibertec Sample No.	Client I.D. No.	Description / Location	Asbestos Type	Non-Asbestos Containing Portion	Analyst
222-1	222-1	Gray fibrous material, pipe insulation.	Chrysotile 45%	Non-fibrous material 50% Cellulose fibers 5%	CT

Comments

Bulk samples are analyzed using the USEPA Test Method EPA/600/R-93/116. The constituent percent reported represents an estimate of the area percent of the component. The test report relates only to items tested. This report is not intended to be used as a product endorsement by NVLAP or any agency of the U.S. Government. Fine fibers like those in floor tile may not be discernible by this method. This report shall not be reproduced, except in full, without the written approval of the laboratory. Individual sample layers are homogeneous, unless otherwise noted. Test items were received in acceptable condition. Revision 4.0 dated 12/8/2010.

If no asbestos was/were detected in the sample/samples the acronym NAD (no asbestos detected) will appear in the Asbestos Type column of the report.

Approved Signatory: Phillip G. R. to  
Date: 08/25/16



Analytical Laboratory

1914 Holloway Drive  
Holt, MI 48842  
Phone: 517 699 0345  
Fax: 517 699 0388  
email: lab@fibertec.us

8660 S. Mackinaw Trail  
Cadillac, MI 49601  
Phone: 231 775 8368  
Fax: 231 775 8584

Industrial Hygiene Services, Inc.

1914 Holloway Drive  
Holt, MI 48842  
Phone: 517 699 0345  
Fax: 517 699 0382  
email: asbestos@fibertecihs.com

Geoprobe

11766 E. Grand River Rd.  
Brighton, MI 48116  
Phone: 810 220 3300  
Fax: 810 220 3311

Chain of Custody #

PAGE 1 of 1

39050-1

Client Name: <u>SOM-MDEQ - AIR QUALITY</u>			PARAMETERS												Matrix Code			Deliverables										
Contact Person: <u>CRAIG W. DECKY</u>			MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	AS BEST PRACTICE (4000) PER EPA/600/7-93/116	HOLD SAMPLE	S Soil		GW	Ground Water		<input type="checkbox"/>	Level 2															
Project Name/ Number: <u>222 FRAZIER</u>							A Air		SW	Surface Water		<input type="checkbox"/>	Level 3															
Email distribution list: <u>DECKYC@MACKINAC.N.GOV</u>							O Oil		ww	Waste Water		<input type="checkbox"/>	Level 4															
Quote# <u>0</u>							P Wipe		X	Other: Specify		<input type="checkbox"/>	EDD															
Purchase Order# <u>07886600005</u>							Remarks:																					
Date	Time	Sample #					Client Sample Descriptor	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>																		
<u>8-24-16</u>	<u>1350</u>	<u>222-1</u>					<u>PIPE INSULATION</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>																		
Comments: <u>* PLEASE KEEP ALL SOM/MDEQ SAMPLES POST ANALYSIS - WE WILL PICK THEM UP.</u>																												
Sampled/Relinquished By: <u>CRAIG W. DECKY / CRD</u>							Date/ Time: <u>8-25-16 / 7:54 AM</u>				Received By: <u>[Signature]</u>																	
Relinquished By:							Date/ Time:				Received By: <u>[Signature]</u> <u>8/25/16 8:12</u>																	
Relinquished By: <u>[Signature]</u> <u>8/26/16 8:12</u>				Date/ Time:				Received By Laboratory: <u>[Signature]</u> <u>8-29-16 8:45 am</u>																				
<p>Turnaround Time ALL RESULTS WILL BE SENT BY THE END OF THE BUSINESS DAY</p> <p><input checked="" type="checkbox"/> 1 bus. day    <input type="checkbox"/> 2 bus. days    <input type="checkbox"/> 3 bus. days    <input type="checkbox"/> 4 bus. days</p> <p><input type="checkbox"/> 5-7 bus. days (standard)    Other (specify time/date requirement): _____</p>																	<p><b>LAB USE ONLY</b></p> <p>Fibertec project number:</p> <p>Temperature upon receipt at Lab:</p>											
Please see back for terms and conditions																												







