



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 9, 2019

Ms. Donna Pleso
4497 High Street
Ecorse, Michigan, 48229

SRN: U821904691, Wayne County

Dear Ms. Pleso:

VIOLATION NOTICE

On May 1, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted a referral inspection of the building located at 4468 W. Jefferson, Ecorse. The purpose of this inspection was to determine the owner's and contractor's 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, you own the building. The operator (contractor) that demolished the building is unknown as they were not on site during our inspection. They were also not identified on the demolition permit. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, it was noted that the building had been demolished without the submittal of a 10-day notice of intent to demolish to the Air Quality Division.

Process Description	Section Violated	Comments
Demolition of the building located at 4468 W. Jefferson, Ecorse.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

A thorough inspection for asbestos is required prior to demolition of an asbestos-NESHAP subject facility. If the facility was not inspected for asbestos by a State of Michigan licensed building inspector, the following violations may have also occurred:

Process Description	Section Violated	Comments
Demolition of the building located at 4468 W. Jefferson, Ecorse.	40 CFR 61.145(b)(2)	Failure to update notice.
	40 CFR 61.145(b)(3)(i)	Failure to provide 10-day notice prior to asbestos work.

	40 CFR 61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(c)(3)	Failure to wet during stripping
	40 CFR 61.145(c)(3)(iii)	Failure to keep written approval on site.
	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 61.145(c)(9)	Failure to wet RACM during demolition.
	40 CFR 61.145(c)(10)	Failure to remove RACM in building demolished by fire.
	40 CFR 61.150(a)	Visible emissions from asbestos containing waste material generated by source.
	40 CFR 61.150(a)(1)(ii)	Visible emissions from handling operations.
	40 CFR 61.150(a)(1)(iii)	Failure to seal while wet.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical.
	40 CFR 61.150(c)	No signs during loading and unloading.

Please initiate actions necessary to correct the cited violation(s) and submit a signed written response to this Violation Notice by May 30, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include:

- Name and contact information for the contractor that demolished the building;
- a copy of the asbestos survey for the building;
- the dates the violation(s) occurred;
- an explanation of the causes and duration of the violation(s) whether the violation(s) are ongoing;
- a summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and the dates by which these actions will take place; and
- and what steps are being taken to prevent a reoccurrence.

Ms. Donna Pleso

Page 3

May 9, 2019

Please initiate actions necessary to correct the cited violation(s) and submit a signed written response to this Violation Notice by May 30, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation(s) occurred; an explanation of the causes and duration of the violation(s); whether the violation(s) are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Ms. Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@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 or the contractor 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 violation(s) cited. If you have any questions regarding the violation(s) or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Fact Sheet

cc: Mr. Carl Brown, City of Ecorse Building Official

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. Wilhemina McLemore, EGLE