



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 25, 2019

Mr. Paul Korty
Ciena Healthcare
4000 Town Center, Suite 2000
Southfield, MI 48075

Mr. William Vasiliades
V-3 Industries, Inc.
PO Box 554
Mt. Clemens, MI 48046

SRN: U821908942, Wayne County

Dear Mr. Korty and Mr. Vasiliades:

VIOLATION NOTICE

On November 4, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Regency Heights Nursing Home located at 19100 West Seven Mile Road, Detroit, MI 48219. 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, Ciena Healthcare Management, Inc. owns the facility and V-3 Industries, Inc. performed the demolition 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 activities had disturbed suspect regulated asbestos containing (RACM). Upon sampling, the material tested positive for asbestos. The material, textured plaster ceiling was in a damaged, friable state and mixed in with general demolition debris.

Process Description	Section Violated	Comments
Demolition of a vacant wing of the facility. Friable RACM was discovered during the inspection.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.
	40 CFR 61.145(c)(1)	Failure to remove RACM.

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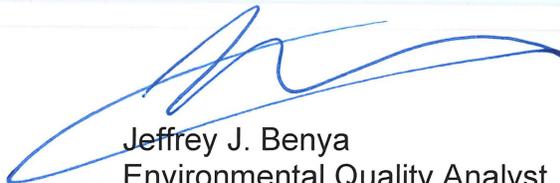
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 16, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of 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.

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 V-3 Industries, Inc./Ciena Healthcare 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 violations cited above and for the cooperation that was extended to me during my inspection of Regency Heights Nursing Home. If you have any questions regarding the violations 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
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
Mr. Jason Wolf, EGLE
Ms. Wilhemina McLemore, EGLE