



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 31, 2022

Mr. Dennis Kefallinos
Boydell Development Company, Inc.
Elizabeth Street Lofts, Inc.
1600 Clay Street
Detroit, MI 48211

SRN: U822201202, Wayne County

Dear Mr. Kefallinos:

VIOLATION NOTICE

On March 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation at the commercial property located at 1448 Wabash 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, Elizabeth Street Lofts, Inc. owns the facility and Boydell Development Company, Inc. performed the renovation activities at the site. The NESHAP for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, staff observed the following: A vacant commercial property undergoing renovations. The pre-renovation asbestos survey for the building did not meet the requirements of a thorough asbestos survey under the asbestos NESHAP.

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.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by April 21, 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

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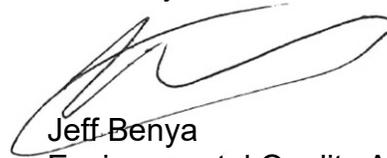
proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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 either party 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 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: Sample results, NESHAP Fact Sheet
cc: Mr. Hosam N. Hassanien, City of Detroit BSEED
Ms. Crystal Rogers, 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
Dr. April Wendling, EGLE