



COMMERCIAL INDUSTRIAL SERVICES INC

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June 14, 2024

VIA E-MAIL

Jeremy Howe

Technical Programs Unit at EGLE, AQD

PO Box 30260

Lansing, Michigan 48909-7760

SRN: N1089; WAYNE COUNTY

Dear Jeremy Howe,

I am in receipt of June 7, 2024, second violation notice and appreciate clarification. I understand that my initial response provided by Jesus Gomez on behalf of Commercial Industrial Services Inc (CISINCPRO) was determined inadequate. I apologize for the inconvenience. I appreciate the opportunity to submit the following information to clarify prior response and adequately explain why I, on behalf of CISINCPRO, believe observations resulting from April 2, 2024, inspection do not constitute violations, respectfully.

- Process Description – Renovation and demolition located at 3000 Miller Road, Dearborn. A partial asbestos survey was provided for the Chemical Storage Room area but did not include facility components that were demolished.
  - 40 CFR 61.145(a)(1) – Failure to thoroughly inspect for asbestos during demolition activities-facility components, including equipment at the site were not surveyed for asbestos.
    - Site inspection walk-through was led by Duane Jones; Jones possessed CISINCPRO air compliance and environmental compliance services information and reports but withheld that information at walkthrough



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- Preliminary review of Phase I and Phase II provided by V&C Gibraltar BWD LLC showed zero asbestos.
- I had secured services from Aces Air Compliance & Environmental Services to inspect the entire site and contents for asbestos; please see attached report – Aces Project No 22-115.
- 40 CFR 61.145(b)(1) – Failure to notify the administrator 10 days prior to demolition-removal of tanks and their load supporting structures, stacks and other equipment are considered demolition under the asbestos NESHAP.
  - Site inspection walk-through was led by Duane Jones; Jones possessed CISINCPRO air compliance and environmental compliance services information and reports but withheld that information at walkthrough
  - I had not obtained 10-day notification as of April 2, 2024, because project management indicated reclamation stage only; I had removed interior equipment and blower vent attachments only, without interrupting supporting structure; demo of chemical building is unable to begin until following milestones are achieved, as of today, June 14, 2024, milestones remain unresolved.
    - Removal of wastewater (V&C Gibraltar BWD LLC) – completion estimated at 30%, budget related delay
    - Decommission permit from City of Dearborn, water/gas (V&C Gibraltar BWD LLC) – completion estimated at 10%; last correspondence May 9, 2024, received from V&C Gibraltar BWD LLC's subcontractor DKS Facility Services (see attached email Chemical Building Demo/Renovation from DKS Facility Services) confirming decommission process had been initiated.
  - However, upon inspection on April 2, 2024, and our discussion with Tammy Bell, Environmental Quality Specialist Air Quality Division 313-330-0105 onsite, we immediately deferred to her senior experience/certification and



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complied with her instruction to obtain notification of intent to renovate/demolish; dated April 10, 2024, establishing project schedule 5/1/24 – 6/28/24; please see attached

- Project schedule is in delay due to dewatering and decommissioning; as a result of these delays we are unable to start demolishing

In closing, please accept my apologies for the additional workload. I appreciate and respect your time and effort to protect our wonderful state. I assure you that I understand the importance of environmental quality compliance and regulation, and I take the matter seriously. Prior to this project, I had zero violations. It is very important to myself, my family, my company and our team that we maintain that level of quality. Any assistance you are able to provide relating to further steps to compliance would be appreciated. I tried contacting you and upon your voicemail direction I followed up with a voice mail to Jenine Camilleri 517-643-2612.

Kind Regards,

Barbara Wierszewski – Director

CISINCPRO

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Attachments (3)

Ec: Greg Wierszewski, CISINCPRO

Jesus Gomez, CISINCPRO

Amy Maine, CISINCPRO

Jovan Paunovic, CISINCPRO

William Teasle, Service Environmental Engineering

Jeffrey Good, Aces Air Compliance & Environmental Services