



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

August 13, 2024

VIA E-MAIL

Dalen Hanna  
Audrey Luxury Lofts  
33717 Woodward Avenue  
Suite 560  
Birmingham, Michigan 48009-0913

Dalen Hanna  
Loft Holding, LLC c/o Blackacre  
Management, LLC  
24681 Northwestern Highway  
Suite 4000  
Southfield, Michigan 48075

SRN/ID: U632401405; Oakland County

## SECOND VIOLATION NOTICE

On April 18, 2024; June 6, 2024; and June 13, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the commercial building located at 28 North Saginaw Street, Pontiac, Oakland County. The purpose of this inspection was to determine the Owner's and Operator's compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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.

On July 3, 2024, the AQD sent a Violation Notice (VN) citing violations discovered as a result of the inspections and requested a written response by July 26, 2024. A copy of the violation notice has been enclosed for your reference.

The AQD has reviewed your submitted response to the violation notice. However, the response to the violation is inadequate. Theft by scrapping and illegal dumping does not appear to sufficiently explain removal of the asbestos floor tile and asbestos pipe insulation from the building. If you have evidence to support illegal scrapping and dumping, such as police reports, please provide a copy to EGLE, AQD.

Please be advised that failure to respond in writing and identifying actions taken to resolve the cited violation may result in an escalated enforcement action by EGLE, AQD. Please provide the information requested in the VN dated July 3, 2024, by August 30, 2024.

The written response must be submitted to Jeremy Howe, Technical Programs Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760, and must

**SECOND VIOLATION NOTICE**

Audrey Luxury Lofts and Loft Holding, LLC c/o Blackacre Management, LLC

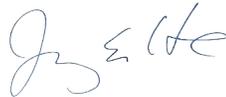
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include a copy to Jason Wolf, Enforcement Unit at the same address. Or the response may be scanned and sent to [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) and [WolfJ2@Michigan.gov](mailto:WolfJ2@Michigan.gov). Be further advised that issuance of this VN does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding this matter or the actions necessary to come into compliance, please contact me at the number listed below.

Sincerely,



Jeremy Howe  
Supervisor, Technical Programs Unit  
Air Quality Division  
231-878-6687

Attachment

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Joyce Zhu EGLE  
Jason Wolf, EGLE  
Tammy Bell, EGLE