



UNIVERSAL CONSOLIDATED ENTERPRISES, INC.

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SEP 30 2024

EGLE - Mailroom

A DIVERSIFIED COMPANY WITH MULTIPLE INTERESTS

September 25, 2024

VIA: USPS & email addresses provided by Recipient(s)

State of Michigan, Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD)

Attn: Jeremy Howe, Technical Programs Unit Supervisor

P. O. Box 30260

Lansing, Michigan 48909-7760

HoweJ1@Michigan.gov

State of Michigan, EGLE, AQD – Enforcement Unit

Attn: Jason Wolf, Enforcement Unit Supervisor

P. O. Box 30260

Lansing, Michigan 48909-7760

WolfJ2@Michigan.gov

State of Michigan, EGLE, AQD

Attn: Joseph Goeddeke, Senior Environmental Quality Analyst

3058 W. Grand Boulevard

Suite 2 – 300

Detroit, Michigan 48202

GoeddekeJ@Michigan.gov

RE: SRN/ID U821906577; Wayne County - Requested/Required “....signed written response...” to your Correspondence dated September 3, 2024 “VIOLATION NOTICE” regarding Long’s Trailer Park at 26530 Plymouth Road, Redford Township, Wayne County, Michigan 48239 (August 13, 2024 EGLE, AQD Inspection).

Gentlemen,

Universal Consolidated Enterprises, Inc. (UCE) responds as follows to your letter/notice dated September 3, 2024 which references an inspection conducted on August 13, 2024:

UCE shall stipulate to the following facts as TRUE and indisputable:

- Prior to August 13, 2024 UCE had entered into a Contract with the Charter Township of Redford (Township) to effectuate the removal of trailers from the aforementioned location.
- On August 13th, 2024 UCE was engaged in trailer removal activities at the aforementioned location.

- The State of Michigan recognizes trailers/mobile homes as "Vehicles" for purposes of titling (see attached/enclosed SAMPLE TITLE).

In regards to your alleged Violations of "40 CFR 61.145(b)(1)" and "40 CFR 61.145(a)," by UCE and the Township I respectfully request that said alleged violations be **retracted/dismissed** as I believe that the alleged violations have been misapplied and are **NOT applicable in this particular instance**.

Prior to contracting with the Township, based on information provided by the EPA which directly related to "mobile homes," UCE concluded that the trailers were NOT subject to the NESHAP requirements. On Page 3 of "EPA Publication Air And Radiation (EN-341), EPA 340/1-90-021 December 1990 Common Questions On The Asbestos NESHAP" it clearly states that "Mobile homes used as single-family dwellings are not subject to asbestos NESHAP." This information is currently posted on the EPA website (see attached/enclosed publication). UCE had also presumed the trailers to be "vehicles" and NOT any type of structure as defined under the NESHAP.

UCE did NOT intentionally evade, nor willfully attempt to defy any rules or regulations in regards to this matter. On the contrary, UCE researched this matter prior to engagement of any activities at the aforementioned location.

If UCE has inadvertently misinterpreted or misunderstood the application of NESHAP as it applies to this particular matter we apologize, would request clarification, and ask for clemency regarding the alleged violations.

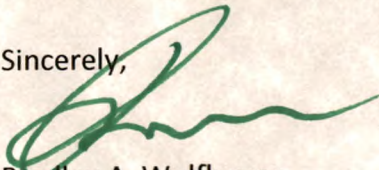
UCE and the Township have agreed to conduct the remaining trailer removal activities at this location as if they are "demolitions" as defined by the NESHAP. Yesterday, September 24, 2024 the Township had ETC Environmental conduct inspections & collect samples of materials from the remaining trailers proposed to be removed. ETC will provide the Township and UCE with Pre-Removal HAZMAT Surveys on each trailer. UCE will submit 10 Day Notifications to the State prior to any additional trailer removal activities. The Township Building Official has agreed to issue permits for the removal of the trailers. As in any past activities, if any SUSPECT materials are encountered they will be abated accordingly.

If any additional requirements/requests are sought by the State of Michigan EGLE, AQD, in regards to moving forward with trailer removal activities at this location, please notify UCE and the Township.

By submitting this response/reply UCE makes **NO** admissions of **ANY** wrong doing. UCE reserves the right to assert ANY legal and/or factual issues in its defense should the State seek to adjudicate this matter.

I am most easily reached via email at: universalconsolidated@yahoo.com and/or please address any physical correspondence to: P. O. Box 80850, Rochester, MI 48308.

Thank you for your cooperation and assistance regarding the resolution of this matter.

Sincerely,

Bradley A. Wolfbauer

CC: Michael Dennis
Enc.: 9-3-24 letter (copy)
Sample Title (copy)
EPA Publication





GRETCHEN WHITMER
GOVERNOR

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

EGLE
PHILLIP D. ROOS
DIRECTOR

September 3, 2024

VIA USPS

Michael Dennis
Director, Public Services Department
Charter Township of Redford
12200 Beech Daly Road
Redford, Michigan 48239

Brad Wolfbauer
Universal Consolidated Enterprises
17625 East Ten Mile Road
Roseville, Michigan 48066

SRN/ID: U821906577; Wayne County

Dear Michael Dennis and Brad Wolfbauer:

VIOLATION NOTICE

On August 13, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of Longs Trailer Park located at 26530 Plymouth Road, Redford, Wayne 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.

According to our investigation, the Charter Township of Redford had control of the facility and supervised the demolition. Universal Consolidated Enterprises performed the demolition activities at the facility. The NESHAP for Asbestos holds all operators equally liable for violations.

During the inspection, staff observed the following:

Several trailers had been demolished, and workers were loading debris into roll-off containers. Thorough inspection for asbestos prior to demolition had not been performed and notice of intent to demolish was not submitted.

Process Description	Section Violated	Comments
Demolition of several mobile homes	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.
	40 CFR 61.145(a)	Failure to thoroughly inspect.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by September 27, 2024. The response should include: the dates the violations occurred; an explanation of the causes and duration of

VIOLATION NOTICE

Michael Dennis and Brad Wolfbauer

Page 2

September 3, 2024

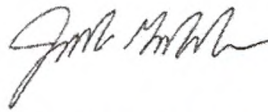
the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response by mail and directed to the attention of Jeremy Howe, Technical Programs Unit Supervisor, at EGLE, AQD P.O. Box 30260 Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to HoweJ1@Michigan.gov or WolfJ2@Michigan.gov.

If the listed parties 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 for 26530 Plymouth Road, Redford, Wayne County. 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,



Joseph Goeddeke
Senior Environmental Quality Analyst
Air Quality Division
517-331-7906

Enclosure: Asbestos NESHAP Fact Sheet

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Joyce Zhu, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE

Mobile Home Title Record

All mobile homes in Michigan are subject to the titling requirements provided under Public Act 96 of 1987. The only exception is a mobile home owned by a manufacturer, a mobile home being held for resale by a licensed mobile home dealer, or a mobile home permanently affixed to land owned by the mobile homeowner. For information on mobile homes contact the Department of State Information Center at 1-888-SOS-MICH (1-888-767-6424).

Sample Mobile Home Record



STATE OF MICHIGAN
DEPARTMENT OF STATE
LANSING

Date Processed: 03-09-2021

Title Information

1	2	3	4
Year/Make/Model	Body Style	Vehicle Type	VIN
1982 CHAMPION HOMES	Mobile Home	Mobile Home	1259874MYT
Transaction Type	Issued Date	Title Number	
Transfer	03-09-2021	MI0008410646	
Odometer	Odometer Code	Brands	
0			

Owner Information

5	Name	Address	DLN
	MICHIGAN TEST RECORD	7064 CROWNER DR LANSING MI 48980-0001 INGHAM COUNTY	R-263-603-789-002

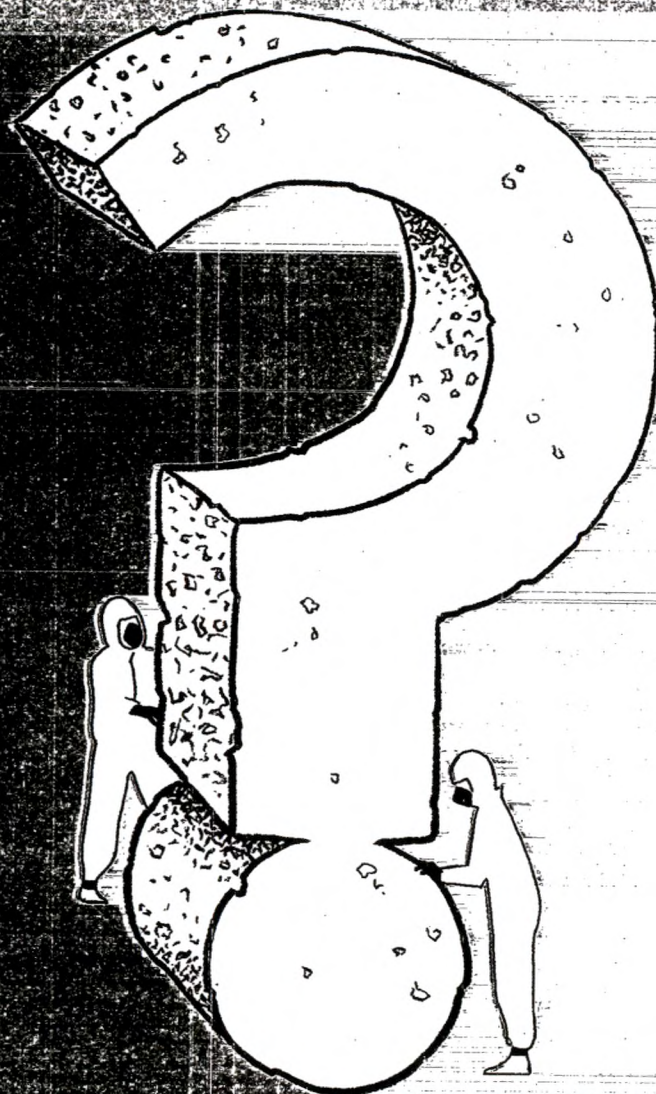
Secured Party

6	First Secured Party Name	Address	Date Posted
	BANK AND LOAN	PO BOX 8118 ROCKEYSVILLE MD 21038	03-09-2021

Electronically certified in compliance with MCL 257.204A as of 03-09-2021



Common Questions On The Asbestos NESHAP



Common Questions On The Asbestos NESHAP

United States
Environmental Protection Agency
Office Of Air Quality Planning and Standards
Stationary Source Compliance Division

December 1990

DISCLAIMER

This manual was prepared by Entropy Environmentalist, Inc. for the Stationary Source Compliance Division of the U.S. Environmental Protection Agency. It has been completed in accordance with EPA Contract No. 68-02-4462, Work Assignment No. 90-123. This document is intended for information purposes **ONLY**, and may not in any way be interpreted to alter or replace the coverage or requirements of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M. Any mention of product names does not constitute endorsement by the U.S. Environmental Protection Agency.

Common Questions on the Asbestos NESHAP

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Common Questions on the Asbestos NESHAP

Introduction

The Clean Air Act (CAA) requires the U. S. Environmental Protection Agency (EPA) to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, EPA established National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under Section 112. On March 31, 1971, EPA identified asbestos as a hazardous pollutant, and on April 6, 1973, EPA first promulgated the Asbestos NESHAP in 40 CFR Part 61.

In 1990, a revised NESHAP regulation was promulgated by EPA. Information contained in this pamphlet is consistent with the amended regulation.

This pamphlet answers the most commonly asked questions about the Asbestos NESHAP for demolitions and renovations. Many of the questions included in this pamphlet have been raised by demolition and renovation contractors in recent years. Most questions relate to how a demolition or renovation contractor or building owner can best comply with the regulation. The responses assume that the questioner has a basic understanding of the Asbestos NESHAP and demolition and renovation practices. A brief glossary of terms is also included at the back of the pamphlet.

The Asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the Asbestos NESHAP specifies work practices to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). In addition, the regulations require the owner of the building and/or the contractor to notify applicable State and local agencies and/or EPA Regional Offices before all demolitions, or before renovations of buildings that contain a certain threshold amount of asbestos.

For more information about the Asbestos NESHAP or for answers to questions not covered in this pamphlet, contact the delegated State or local agency or the appropriate EPA Regional Office listed on page 24.

**General
Information**

What is the purpose of the Asbestos NESHAP regulation?

The purpose is to protect the public health by minimizing the release of asbestos when facilities which contain asbestos-containing materials (ACMs) are demolished or renovated.

How much regulated asbestos-containing material (RACM) is disposed of annually from demolition/renovation operations?

Approximately 5.7 million cubic feet of RACM is disposed of annually. In accordance with the regulation, most RACM is taken to landfills, where it is covered by soil or other debris in order to keep it from releasing asbestos fibers.

What is the difference between demolishing a facility and renovating it?

"Demolition" and "renovation" are defined in the regulation. You "demolish" a facility when you remove or wreck any load-supporting structural member of that facility or perform any related operations; you also "demolish" a facility when you burn it. You "renovate" a facility when you alter any part of that facility in any other manner. Renovation includes stripping or removing asbestos from the facility.

What percentage of asbestos related activities involve demolitions?

Demolitions comprise approximately 10% of all reported asbestos-related activities.

Is there a numeric emission limit for the release of asbestos fibers during renovations or demolitions in the asbestos NESHAP regulation?

No, the Asbestos NESHAP relating to demolitions or renovations is a work practice standard. This means that it does not place specific numerical emission limitations for asbestos fibers on asbestos demolitions and removals. Instead, it requires specific actions be taken to control emissions. However, the Asbestos NESHAP does specify zero visible emissions to the outside air from activity relating to the transport and disposal of asbestos waste.

Who is responsible for enforcing the Asbestos NESHAP standards?

Under Section 112 of the Clean Air Act, Congress gave EPA the responsibility for enforcing regulations relating to asbestos renovations and demolitions. The CAA allows EPA to delegate this authority to State and local agencies. Even after EPA delegates responsibility to a State or local agency, EPA retains the authority to oversee agency performance and to enforce NESHAP regulations as appropriate.

How many States have primary responsibility for implementing the Asbestos NESHAP regulations?

As of October 1990, approximately 45 states.

**NESHAP
Jurisdiction**

What is a "facility?"

As defined in the regulation, a "facility" is any institutional, commercial, public, industrial or residential structure, installation or building (including any structure, installation or building containing condominiums, or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; or any active or inactive waste disposal site. Any building, structure or installation that contains a loft used as a dwelling is not considered residential. Any structure, installation, or building that was previously subject to the Asbestos NESHAP is not excluded, regardless of its current use or function.

If I renovate several two-family units, are the units defined as a "facility?"

Residential buildings which have four or fewer dwelling units are not considered "facilities" unless they are part of a larger installation (for example, an army base, company housing, apartment or housing complex, part of a group of houses subject to condemnation for a highway right-of-way, an apartment which is an integral part of a commercial facility, etc.).

Are mobile homes or mobile structures regulated by the Asbestos NESHAP?

* Mobile homes used as single-family dwellings are not subject to Asbestos NESHAP.
Mobile structures used for non-residential purposes are subject to NESHAP.

Universal Consolidated Enterprises, Inc.
Attn: Account Manager
P O Box 80850
Rochester, MI 48308

Retail



48909

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PM
CLAWSON, MI 48017
SEP 26, 2024

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RDC 03

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Label 106A, Nov 2018

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