



GRETCHEN WHITMER
GOVERNOR

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



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