



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

December 30, 2020

Mr. Joe Grupido  
Advanced Abatement Services, LLC  
1000 N. Opdyke Avenue, Suite C  
Auburn Hills, MI 48326

Mr. Bruce Ferguson  
The War Memorial Association  
32 Lake Shore Drive  
Grosse Pointe Farms, Michigan, 48236                      SRN: U822004002, Wayne County

Dear Mr. Grupido and Mr. Ferguson:

**VIOLATION NOTICE**

On December 15, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of a commercial renovation project located at 32 Lake Shore Drive, Grosse Pointe Farms, MI. 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, the War Memorial Association owns the facility and Advanced Abatement Services, LLC. performed the asbestos abatement activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:  
During a notified abatement of asbestos containing plaster within the building, friable plaster debris was observed remaining on the floor of the dumpster and on the pavement outside of the dumpster. This plaster debris was dry at the time of inspection. Several of the wraps within the dumpster were observed to have holes, rips or punctures in them. AQD staff sampled the material on the ground in the parking lot and the material tested as positive for asbestos.

Process Description	Section Violated	Comments
	40 CFR 61.145(c)(4)	Failure to contain RACM in leak tight container.

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Regulated asbestos abatement activities at a commercial property.	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.150(a)(1)(ii)	Visible emissions from handling operations.

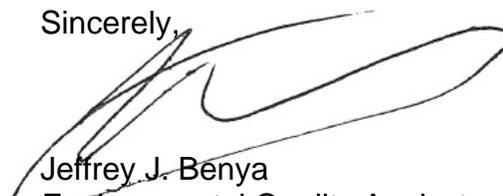
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by January 20, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes and duration of 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 to Jeffrey Benya at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto: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](mailto:wolfj2@michigan.gov).

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

Sincerely,



Jeffrey J. Benya  
Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosure: Sample results  
cc: 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