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APR 24 2024

AIR QUALITY DIVISION

TO: Technical Programs Unit at EGLE, AQD,
P.O. Box 30260, Lansing, Michigan 48909-7760

4/20/2024

ATTN: Jeremy Howe Supervisor /Tammy Bell

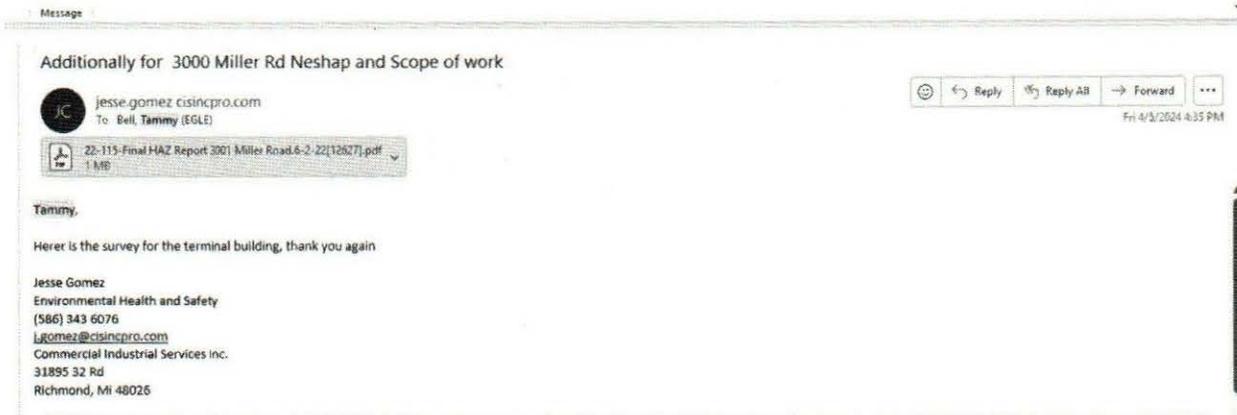
RE: VIOLATION NOTICE

Dear Jeremy Howe /Tammy Bell,

Commercial Industrial Group is not under violation to the items listed in your letter dated April 16, 2024, please review our signed written response from the operators to this violation notice

1. 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.

CIS RESPONSE: Both Partial Survey for Chemical Building and Entire Building (Terminal Building) Survey was provided. (Screen Shot Provided)



2. 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.

CIS RESPONSE: NESHAP Survey was conducted with 22 samples for a 40,000 SF facility for all items required for demolition. With all components in addition to the full survey (Survey Screen Shot Provided)

The assessment was conducted on **June 28, 2023**. A total of **22** samples comprised of **22** layers were collected from **eleven (11)** suspect asbestos-containing homogeneous materials identified during the assessment that were not included in any previous assessments. Additionally, ACES collected **ten (10)** samples of suspect LBPs. The ACM samples were analyzed by polarized light microscopy (PLM) and the LBP samples were analyzed by the EPA SW846-7420M Method. A material is considered by the U.S. Environmental Protection Agency (EPA), the U.S. Occupational Safety and Health Administration (OSHA) and the State of Michigan to be ACM if PLM results detect greater than one percent (>1%) asbestos. A paint is considered to be a LBP if it contains 0.5% or greater lead by weight.

ACMs (>1% asbestos) were identified through laboratory analysis during this investigation.

3. 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



CIS RESPONSE Process equipment was dismantled and divested for parts; no building structural components or structural storage tank/ or structural stacks were demolished, only process equipment dismantling was done on site.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

CISINCPRO

A handwritten signature in blue ink, appearing to read "Jesus Gomez", with a long horizontal flourish extending to the right.

Jesus Gomez – EHS Manager

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o/b/o

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