



GRETCHEN WHITMER  
GOVERNOR

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



DANIEL EICHINGER  
ACTING DIRECTOR

March 15, 2023

Rudah Saghir  
Fairlane Construction & Renovation LLC  
26766 Simone  
Dearborn Heights, MI 48127

Mahir Elder, MD  
Royal Oak Acquisition & Holdings LLC  
22720 Michigan Ave, 200  
Dearborn, MI 48124

SRN: U632301091, Oakland County

Dear Rudah Saghir & Mahir Elder:

**VIOLATION NOTICE**

On March 3 and March 17, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial property located at 718 W. 4th Street, Royal Oak. 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, Royal Oak Acquisition & Holdings LLC owns the facility and Fairlane Construction & Renovation LLC performed the renovation 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: A commercial property undergoing interior renovations. The required thorough inspection for asbestos was not conducted prior to said renovation activities. EGLE staff sampled several suspect asbestos containing materials (ACM), four tested positive for asbestos. Laboratory results sheets are attached .

Process Description	Section Violated	Comments
Renovation activities at a subject commercial building.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to renovation/demolition.

Rudah Saghir/Mahir Elder  
Fairlane Construction & Renovation LLC / Royal Oak Acquisition & Holdings LLC  
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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by April 5, 2023 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

**Any additional renovation work within the subject building prior to conducting a thorough survey or addressing the known asbestos hazards could result in additional violations.**

Please submit the written response to Jeffrey Benya at EGLE, AQD Detroit District Office, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto:benyaj@michigan.gov) and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [wolfj2@michigan.gov](mailto:wolfj2@michigan.gov).

If either 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 violation cited above and for the cooperation that was extended to me during my inspection of 718 W. 4th Street. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey Benya  
Senior Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosures: Asbestos NESHAP Fact Sheet, Sample results

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE  
Jason Wolf, EGLE