



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 19, 2019

Mr. Sabah Ammouri
Easton Investments, LLC
24911 John R Road, Apt 3B
Hazel Park, MI 48030

Mr. Zaid Arabo
ZA Design Build, LLC
16215 W. 12 Mile Rd, Suite 206
Southfield, MI 48076

Mr. Tim Gramer
Tim's Construction, LLC
11432 Kaltz
Warren, MI 48089

SRN: U821905626, Oakland County

Dear Messrs. Ammouri, Arabo and Gramer:

VIOLATION NOTICE

On May 30 and June 10, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the former Allied Automotive facility located at 900 W. Maple, Troy. The purpose of this inspection was to determine the owner's and operators' 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, Easton Investments, LLC owns the facility. ZA Design Build, LLC was issued a permit for demolition. Tim's Construction, LLC conducted demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operators liable for violations.

During the inspection, AQD staff observed the building had been demolished without submittal of the required 10-day notice of intent to demolish. Samples were collected and regulated asbestos containing materials were found at the site, including Category I and II materials that were in poor condition and/or made friable during demolition.

| Process Description | Section Violated | Comments |
|--|---------------------|--|
| Demolition of an asbestos NESHAP-subject facility. | 40 CFR 61.145(a) | Failure to thoroughly inspect for asbestos, including Category I and II non friable ACM. |
| | 40 CFR 61.145(b)(1) | Failure to provide 10 working day notification prior to demolition to the AQD. |
| | 40 CFR 61.145(c)(1) | Failure to remove RACM prior to demolition. |
| | 40 CFR 61.145(c)(8) | No contractor supervisor on site during demolition. |
| | 40 CFR 61.150(a) | Visible emissions from asbestos containing waste material generated by source. |
| | 40 CFR 61.150(a)(1) | Failure to keep ACWM adequately wet. |
| | 40 CFR 61.150(b)(1) | Failure to deposit asbestos containing waste material at a Type II landfill. |
| | 40 CFR 61.150(c) | No signs during loading and unloading of ACWM. |

All parties please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 10, 2019 (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 Ms. Tammy Bell at EGLE, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@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.

If Easton Investments, LLC, ZA Design Build, LLC and/or Tim's Construction, LLC 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 900 W. Maple, Troy. If

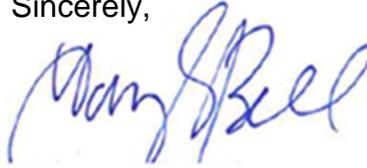
Messrs. Sabah Ammouri, Zaid Arabo and Tim Gramer

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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,



Tammy S. Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Sample results and Fact Sheet

cc: Mr. Randy McClure, Troy Building Department

Ms. Mary Ann Dolehanty, EGLE

Dr. Eduardo Olaguer, EGLE

Mr. Christopher Ethridge, EGLE

Ms. Jenine Camilleri, EGLE

Ms. Karen Kajiya-Mills, EGLE

Mr. Jason Wolf, EGLE

Ms. Joyce Zhu, EGLE

Ms. Wilhemina McLemore, EGLE