



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 31, 2020

Mr. Amer Asmar
Gratiot STA, LLC
29850 Northwestern Hwy., Suite 200
Southfield, MI 48034

Mr. Zachary Kneisler
ZLM Services, LLC
51343 Oro Drive
Shelby Township, MI 48315

SRN: U501901331, Macomb County

Dear Mr. Asmar and Mr. Kneisler:

VIOLATION NOTICE

On August 13, and August 18, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the former Erin Presbyterian Church, located at 30000 Gratiot Ave., Roseville. The purpose of this inspection was to determine Gratiot STA, LLC's and ZLM Services, LLC's 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, Gratiot STA, LLC owns the facility and ZLM Services, LLC performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff observed that the garage and a portion of the church had been demolished; building debris and metals for recycling were still on site. A notification of intent to demolish had not been submitted to the AQD prior to demolition. Sampling identified regulated asbestos containing materials as well as Category I asbestos containing materials at the identified site.

Process Description	Section Violated	Comments
Inspection of the demolition project located at 30000 Gratiot Avenue, Roseville. Sampling identified acoustical plaster disturbed by demolition activities, as well as thermal system insulation, mastic on concrete and waterproofing on the church foundation.	40 CFR 61.145(a)(1)	Failure to thoroughly inspect for asbestos-building materials were identified that were not in the 2017 asbestos survey.
	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.
	40 CFR 61.145(c)(1)	Failure to remove RACM prior to demolition-disturbed acoustical plaster was identified in a debris pile.
	40 CFR 61.145(c)(8)	Failure to have a site supervisor trained in the asbestos NESHAP on site.
	40 CFR 61.150(a)(1)	Failure to wet asbestos containing waste material (ACWM)-the plaster in the debris pile was dry.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by September 15, 2020 (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 W. Grand Blvd, 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.

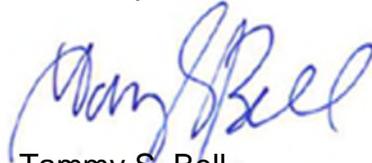
If Gratiot STA, LLC and ZLM Services, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to Jeff Benya and me during our inspections of 30000 Gratiot Ave., Roseville. If you have any questions regarding the violations or the actions

Mr. Amer Asmar
Mr. Zachary Kneisler
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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

Enclosures: Fact Sheet and 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
Ms. Joyce Zhu, EGLE
Mr. Jeff Benya, AQD