



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 6, 2022

Klajdi Ibi
Kjursell LLC
621 Broadacre Ave.
Clawson, MI 48017

Adam Hammoud
True Built Custom Contracting LLC
4336 Calhoun St.
Dearborn, MI 48126

SRN: U632203885, Oakland County

Dear Klajdi Ibi and Adam Hammoud:

VIOLATION NOTICE

On August 11 and 17, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division, conducted an inspection of the vacant commercial property located at 331 N. Main, Clawson. 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, Kjursell LLC owns the facility and True Built Custom Contracting 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 building undergoing extensive interior renovations. A thorough asbestos survey was not conducted prior to the commencement of renovation activities. EGLE staff collected several samples that tested positive for asbestos, including plaster, duct insulation and transite siding. Asbestos containing plaster is a regulated asbestos containing material (RACM) and was removed and disposed of by individuals not licensed for this activity. RACM was disposed of in a dry state, in an unregulated dumpster and not sealed in labelled, leak tight containers. A subsequent survey conducted by a third party also identified additional ACM – window caulks and heat shield material.

Process Description	Section Violated	Comments
Interior renovation work at a subject commercial facility. Disturbance of approximately 3,000 square feet of asbestos containing plaster and 200 square feet of transite.	40 CFR 61.145(b)(3)(i)	Failure to provide notice prior to asbestos work.
	40 CFR 61.145(a)(1)	Failure to thoroughly inspect for the presence of Regulated Asbestos-Containing Material (RACM)
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	No contractor supervisor on site.
	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 September 27, 2022 (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.

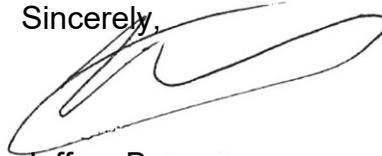
Please submit the written response to Jeff Benya at EGLE, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or benyaj@michigan.gov and submit a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

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.

Klajdi Ibi, Kjursell LLC
Adam Hammoud, True Built Custom Contracting LLC
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection. If 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,

A handwritten signature in black ink, appearing to read "Jeffrey Benya". The signature is fluid and cursive, with a large loop at the end.

Jeffrey Benya
Senior Environmental Quality Analyst
Air Quality Division

Enclosures: NESHAP fact sheet, Bulk sample results
cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Jeremy Howe, EGLE
Joyce Zhu, EGLE
Jason Wolf, EGLE