



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

July 2, 2021

Dr. Rafaat Issa  
ZLR Properties LLC  
44251 Princeton Drive  
Clinton Township, MI 48038

Mr. Gasper Salvaggio  
GS Demolition LLC  
21425 East Thirteen Mile Road  
St. Clair Shores, MI 48082

SRN: U7422103161, Macomb County

Dear Mr. Salvaggio and Dr. Issa:

**VIOLATION NOTICE**

On May 31, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the site located at 29103 Harper, St. Clair Shores. The purpose of this inspection was to determine the site 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, ZLR Properties, LLC owns the facility and GS Demolition, 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, staff observed the following:

The Commercial Building at 29103 Harper, St Clair Shores, has been demolished without submittal of an Intent to Demolish Notification. There also has been no survey performed at the site.

Process Description	Section Violated	Comments
Commercial Building demolition	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.
	40 CFR 61.145(a)	Failure to thoroughly inspect.

Please initiate actions necessary to correct the cited Violations and submit a signed written response to this Violation Notice by July 23, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the

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violations occurred; an explanation of the causes and duration of the violations; whether the violations are still 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 Mr. Joseph Goeddeke at EGLE, AQD, Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [goeddekej@michigan.gov](mailto:goeddekej@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](mailto:wolfj2@michigan.gov).

If ZLR Properties LLC or GS Demolition 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 29103 Harper. 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,



Joseph Goeddeke  
Environmental Quality Analyst  
Air Quality Division  
517-331-7906

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  
Dr. April Wendling, EGLE