



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 11, 2021

CERTIFIED MAIL

Ms. Rania Farah
Canton Investments & Development, Inc.
14329 W. Warren Avenue
Dearborn, MI 48126

Mr. Wilfred Moore
Joy Construction & Leasing LLC
7730 Joy Road
Detroit, MI 48204

SRN: U822101831, Wayne County

Dear Ms. Farah and Mr. Moore:

VIOLATION NOTICE

On May 10 and 11, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial property located at 43415 Michigan Avenue, Canton. 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, Canton Investments and Development Inc. owns the facility and Joy Construction & Leasing Inc. 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:

An in-progress demolition of a commercial property. EGLE staff identified suspect floor tile amongst the debris. This material had been rendered friable (regulated asbestos containing material – RACM) by the demolition process and tested positive for asbestos. There was approximately 3,200 square feet of this material. It was later determined that the required asbestos survey was completed but did not identify this material.

Ms. Rania Farah, Canton Investments & Developments, Inc.

Mr. Wilfred Moore, Joy Constructions & Leasing LLC

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Process Description	Section Violated	Comments
Demolition of a commercial property. Floor tile was not identified during the survey and was not handled appropriately after its discovery during demolition.	40 CFR 61.145(a), AQD Consent Order No. 14-2015	Failure to thoroughly inspect for the presence of asbestos containing materials prior to demolition/renovation.
	40 CFR 61.145(b)(3)(i), AQD Consent Order No. 14-2015	Failure to notify for RACM
	40 CFR 61.145(b)(4)(vi), AQD Consent Order No. 14-2015	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	40 CFR 61.145(c)(4), AQD Consent Order No. 14-2015	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i), AQD Consent Order No. 14-2015	Failure to adequately wet RACM
	40 CFR 61.145(c)(8), AQD Consent Order No. 14-2015	No contractor supervisor on site.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 2, 2021 (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 Jeffrey Benya at EGLE, AQD, 3058 West Grand Boulevard; Suite 2-300, Detroit, Michigan 48203 or benyaj@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 any 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 violations cited above and for the cooperation that was extended to me during my inspection of the subject property. If

Ms. Rania Farah, Canton Investments & Developments, Inc.

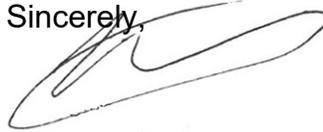
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you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey J. Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

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