



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 7, 2021

Mr. John Gonsalves
Mack Gratiot, LLC
535 Griswold St, Ste. 111-505
Detroit, MI 48226

Mr. Gerald Selman
Columbia Avenue Properties, LLC
7170 E. McNichols
Detroit, MI 48212

Mr. Chad Khansa
Khansa Group, LLC
1040 E. Maple Road
Troy, MI 48083

SRN: U822105064, Wayne County

Dear Mr. Gonsalves, Mr. Selman, and Mr. Khansa:

VIOLATION NOTICE

On September 8 and September 29, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial building located at 3343-3347 Gratiot Avenue, Detroit. The purpose of the 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, Columbia Avenue Properties, LLC owns the facility. Mack Avenue Gratiot, LLC purchased the property under land contract, and Khansa Group, LLC performed the demolition activities on behalf of the Mr. Gonsalves at the facility. The NESHAP for Asbestos holds the owner and operators liable for violations.

On September 8, 2021, AQD staff observed the commercial building had been demolished. According to our investigation, a portion of the building had begun to collapse, and building was demolished. Samples were collected and thermal system insulation was identified at the site. On September 29, 2021, it was noted that the waste material was dry.

Mr. John Gonsalves, Mack Gratiot, LLC
 Mr. Gerald Selman, Columbia Avenue Properties, LLC
 Mr. Chad Khansa, Khansa Group, LLC
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Process Description	Section Violated	Comments
Wrecking of load supporting structures at the asbestos NESHAP-subject commercial building located at 3343-3347 Gratiot Avenue, Detroit.	40 CFR 61.145(a)	Failure to thoroughly inspect or presume building materials as regulated asbestos containing prior to demolition.
	40 CFR 61.145(a)(3)	Failure to notify the AQD for demolition of the building.
	40 CFR 61.145(c)(8)	Failure to have an asbestos contractor/supervisor on site during demolition.
	40 CFR 61.145(c)(6)	Failure to adequately wet the material and ensure that it remains wet until collected for disposal at a Type II landfill.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical at a Type II landfill.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 28, 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. Also, please submit copies of waste shipment records for removal of asbestos containing waste materials from the property.

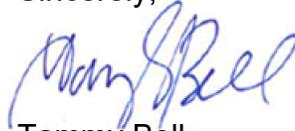
Please submit the written response to Ms. Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Michigan 48202 or bellt4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If Mack Gratiot, LLC, Columbia Avenue Properties, LLC and/or Khansi Group, 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.

Mr. John Gonsalves, Mack Gratiot, LLC
Mr. Gerald Selman, Columbia Avenue Properties, LLC
Mr. Chad Khansa, Khansa Group, 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 of 3343-3347 Gratiot Avenue, Detroit. 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,



Tammy Bell
Environmental Quality Specialist
Air Quality Division
313-330-0105

Enclosures: Asbestos NESHAP fact sheet and sample results

cc: Mr. Hosam Hassanien, City of Detroit BSEED
Ms. Crystal Rogers, City of Detroit BSEED
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