

Date: 12/07/24

To: Jeff Benya

Senior Environmental Quality Analyst - State of Michigan Department of Environment, Great Lakes & Energy – Air Quality Division
3058 West Grand Boulevard
Suite 2-300
Detroit, MI 48202

Subject: Response to Notification of Violation of 40 CFR 61.145(b)(1)

Dear Jeff Benya,

This letter serves as our formal response to the identified violation 40 CFR 61.145(b)(1) regarding the required *Notification of Intent to Renovate/Demolish* 10 days prior to demolition at 3004 Union Lake, Commerce Township, MI 48382 dated December 4, 2024.

On November 25, 2024, the violation occurred when demolition of the building started. The violation occurred due to an oversight on our part. We were unaware of the specific state notification requirement and relied only on local permits while initiating the project. We diligently worked with the township to obtain all necessary permits, including completing an asbestos survey, capping the sewer, disconnecting electricity, and submitting relevant documentation to the township.

As soon as we became aware of the regulation, we took immediate steps to understand compliance requirements and took the initiative to stop the violation. The violation is no longer ongoing at the mentioned location. Specifically, we have reviewed the EPA's NESHAP regulations and now we are fully aware of the notification process for future projects.

However, the required notification form was completed and submitted on December 2, 24, to Jeff Benya. The asbestos survey was also provided for review on December 2, 2024.

We sincerely apologize for this situation and concerns it may have caused. It was never our intention to violate any regulation. Please be assured that we take this matter seriously and have implemented measures to prevent such an occurrence in the future.

Actions Taken (IBB & Owner):

- The *Notification of Intent to Renovate/Demolish* form has been completed and submitted as of December 2, 2024.
- Asbestos survey report submitted for review.
- We have informed the township of this incident for their awareness and feedback.
- We have reviewed the processes and regulations to ensure compliance with all federal and state requirements moving forward.

Proposed Actions (IBB):

- We will provide additional training for our team to ensure full awareness of NESHAP requirements.
- A compliance checklist will be implemented for all future projects to include specific steps for filing state and federal notifications.

These actions will be completed and incorporated into our workflow by January 15, 2025.

Steps to Prevent Reoccurrence (IBB)

Since this was our very first experience with a project involving these regulations, due to lack of proper information this unwanted situation happened. We deeply regret the error. We are committed to learning from this experience and ensuring that such an occurrence never happens in future. To prevent recurrence of this violation, we will:

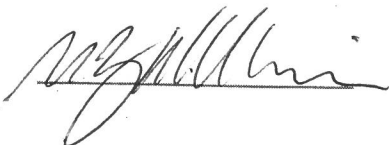
1. Establish a pre-demolition compliance protocol, including verifying all local, state, and federal requirements.
2. Train staff in regulatory compliance, with a specific focus on NESHAP notification requirements.

Acknowledgment of "Understanding NESHAP" Fact Sheet (IBB & Owner)

We completely understand the importance of these regulations in protecting public health and the environment. We have reviewed the EPA's NESHAP regulations and acknowledge receipt and understanding of the attached "Understanding NESHAP" fact sheet.

Therefore, we deeply apologize for any inconvenience caused due to this oversight. We will make sure that this incident never repeats in future projects. If there is any further action needed on our part to resolve this matter, please contact us. Thank you for your understanding and opportunity to address this matter.

Sincerely,
Mohamad Zahreddine
Owner
Pegasus Limited, LLC



Sincerely,
Fawzi Algahim
Owner
IBB Petroleum Service INC

