



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 13, 2021

Mr. Ronald Semaan, P.C.
39 E. Mapledale LLC
410 West University Drive
Rochester, MI 48307

Mr. Kevin McComb
McComb Contracting LLC
1520 Wooley Road
Oxford, MI 48371

SRN: U632103936, Oakland County

Dear Mr. Semaan and Mr. McComb:

VIOLATION NOTICE

On July 14, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation at the residential property located at 39 E. Mapledale, Hazel Park. 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 39 E. Mapledale LLC owns the property and McComb Contracting LLC performed the demolition activities at the property. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, EGLE staff observed the following: A residential building being demolished. The operator stated that the demolition was to construct a parking lot for a nearby business. The demolition permit issued by the City of Hazel Park corroborates this. Residential buildings demolished for commercial projects are subject to the NESHAP. EGLE staff collected a bulk asbestos sample that tested negative for asbestos. The property owner stated that no pre-renovation asbestos survey had taken place as required by 40 CFR 61.145(a). There was also no Notification of Intent to Demolish filed.

Process Description	Section Violated	Comments
Demolition of a subject residential property prior to conducting the required thorough asbestos survey.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to demolition/renovation.

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No Notification of Intent to Demolish filed.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.
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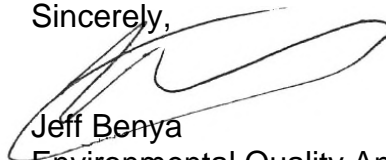
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by September 3, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. **If a thorough asbestos survey and/or abatement activities were conducted at this property, please provide corroborating documentation in your response.**

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 Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

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

Sincerely,



Jeff Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosures: NESHAP Fact Sheet, Asbestos bulk sample results

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
Ms. Joyce Zhu, EGLE