



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

November 22, 2023

VIA E-MAIL

Gary Pierce 15215 Hull Road Monroe, Michigan 48161	Farrukh Moghul Islamic Association of Greater Detroit 879 West Auburn Road Rochester Hills, Michigan 48307
--	---

ID: U632307547; Oakland County

Dear Gary Pierce and Farrukh Moghul:

VIOLATION NOTICE

On November 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint inspection at the commercial building located at 933 West Auburn Road, Rochester Hills. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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, the Islamic Association of Greater Detroit owns the facility and Gary Pierce 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:

A partially demolished commercial building. Personnel on-site were unaware of the NESHAP requirements and could not produce the required asbestos survey. Demolition had commenced without the filing of a notification of intent to demolish.

Process Description	Section Violated	Comments
Demolition of a subject commercial building.	40 CFR, 61.145(a)	Failure to thoroughly inspect for the presence of asbestos.
	40 CFR, 61.145(b)(1)	Failure to provide 10 working day notification.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 13, 2023 (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 violations;

VIOLATION NOTICE

Gary Pierce and Farrukh Moghul

Page 2

November 22, 2023

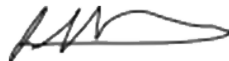
- Whether the violation is ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation;
- The dates by which these actions will take place;
- What steps are being taken to prevent a reoccurrence; and
- Acknowledgement of receipt and understanding of the attached "Understanding NESHAP" fact sheet.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@Michigan.gov.

If either 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 violation cited above and for the cooperation that was extended to me during my inspection. 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,



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

Attachments: Sample results and Understanding NESHAP fact sheet

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Joyce Zhu, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE