

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

LANSING



March 19, 2024

VIA USPS

Tom Haji Chaldean Community Foundation 3601 15 Mile Road Sterling Heights, Michigan 48310 Bob Hoffman RJ Hoffman Management, Inc. 1255 South Hospital Road Waterford, Michigan 48327

SRN/ID: U632401233; Oakland County

Dear Tom Haji and Bob Hoffman:

VIOLATION NOTICE

On February 21, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint investigation at the former school located at 2075 Walnut Lake Road, West Bloomfield, Oakland County. 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, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to the investigation, the Chaldean Community Foundation owns the facility and RJ Hoffman Management, Inc. performed the demolition activities. The National Emission Standard for Asbestos (NESHAP) holds the owner and operator liable for all violations.

During the inspection, EGLE, AQD staff observed the following:

The eastern portion of the building had been renovated. The western portion of the former school was in process of being partially demolished. At the time of the inspection, the demolition included removal of the roof as well the hallway that had been in between the east and west portions of the building. A Notification of Intent to Renovate/Demolish had not been submitted to EGLE, AQD prior to demolition. Cementitious board on the exterior fascia had been disturbed during demolition and tested positive for asbestos.

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| Walnut Lake Rd. in West of Intent to | bmit a Notification emolish10 days olition. |

VIOLATION NOTICE

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| 40 CFR §61.145(c)(1) | Failure to remove regulated asbestos containing material (RACM)-Category II asbestos cement board was not removed prior to demolition. |
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| 40 CFR §61.150(a)(1)(i) | Failure to wet asbestos containing waste material-the cement board was dry. |

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by April 12, 2024. The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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 https://example.com/howeJ1@Michigan.gov and wolf.com/wolf.com

If the Chaldean Community Foundation and /or RJ Hoffman Management, Inc. believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation extended to me during my site visit. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at BellT4@Michigan.gov.

Sincerely,

Tammy Bell

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Environmental Quality Specialist Air Quality Division

All Quality Division

Enclosure: Asbestos NESHAP Fact sheet and sample results

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