



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

June 18, 2018

Ms. Royda Ahmad
BAE Enterprises LLC
19853 W. Outer Drive, Suite 300
Dearborn, MI 48124

SRN: U821803814, Wayne County

Dear Ms. Ahmad:

VIOLATION NOTICE

On June 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted a complaint investigation of residential property located at 17588 Wildemere, Detroit. The purpose of this inspection was to determine BAE Enterprises LLC's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, National Emission Standards for Hazardous Air Pollutants, Subpart M, and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, BAE Enterprises LLC's owns the facility and an unknown contractor performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, DEQ staff observed building material debris outside of the home. Samples were collected at the site and results are pending.

Process Description	Section Violated	Comments
Renovation activities at 17588 Wildemere, Detroit.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos

Please note that if an asbestos survey conducted by a licensed asbestos inspector of the structure was not obtained prior to the initiation of renovation activities, one or more of the following violations may have also occurred:

Process Description	Section Violated	Comments
Renovation activities at 17588 Wildemere, Detroit	§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
	§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)

	§61.145(c)(1)	Failure to remove RACM
	§61.145(c)(3)	Failure to wet during stripping
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
	§61.145(c)(8)	No contractor supervisor on site
	§61.150(a)	Visible emissions from asbestos containing waste material generated by source
	§61.150(a)(1)(ii)	Visible emissions from handling operations
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical
	§61.150(c)	No signs during loading and unloading

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 9, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include:

- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violation(s);
- Whether the violation(s) 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;
- What steps are being taken to prevent a reoccurrence;
- A copy of the asbestos survey for the building; and
- The name and contact information of the contractor(s) that performed renovation activities at the site.

Please submit the written response to Tammy Bell, Senior Environmental Quality Analyst at DEQ, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or BellT4@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

If BAE Enterprises LLC believes 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.

Ms. Royda Ahmad

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Thank you for your attention to resolving the violation(s) cited above and for the cooperation that was extended to me during my inspection of 17588 Wildemere, Detroit. If you have any questions regarding the violation(s) or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy Bell

Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Fact Sheet

cc: Mr. Paul Max, BSEED

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Karen Kajiya-Mills, DEQ

Ms. Wilhemina McLemore, DEQ