

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY



DETROIT DISTRICT OFFICE

June 26, 2019

SRN: U821905626, Oakland County

Mr. Peter Adamo 36641 Moravian Drive Clinton Township, MI 48035

Dear Mr. Adamo:

VIOLATION NOTICE

On May 30 and June 10, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the former Allied Automotive facility located at 900 W. Maple, Troy. The purpose of this inspection was to determine the owner's and operators' 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, Easton Investments, LLC owns the facility. Peter Adamo conducted demolition activities at the facility. The NESHAP for Asbestos holds the owner and operators liable for violations.

During the inspection, AQD staff observed the building had been demolished without submittal of the required 10-day notice of intent to demolish. Samples were collected and regulated asbestos containing materials were found at the site, including Category I and II materials that were in poor condition and/or made friable during demolition.

Process Description	Section Violated	Comments
Demolition of an asbestos NESHAP-subject facility.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos, including Category I and II non friable ACM.
	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition to the AQD.
	40 CFR 61.145(c)(1)	Failure to remove RACM prior to demolition.
	40 CFR 61.145(c)(8)	No contractor supervisor on site during demolition.
	40 CFR 61.150(a)	Visible emissions from asbestos containing waste material generated by source.
	40 CFR 61.150(a)(1)	Failure to keep ACWM adequately wet.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing
		waste material at a Type II landfill.
	40 CFR 61.150(c)	No signs during loading and unloading of ACWM.

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by July 17, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Ms. Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Mr. 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 900 W. Maple, Troy. 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,

Tammy S. Bell

Senior Environmental Quality Analyst

Air Quality Division 313-330-0105

Enclosure: Sample results

cc: Mr. Sabah Ammouri, Owner

Ms. Mary Ann Dolehanty, EGLE

Dr. Eduardo Olaquer, EGLE

Mr. Christopher Ethridge, EGLE

Ms. Jenine Camilleri, EGLE

Ms. Karen Kajiya-Mills, EGLE

Ms. Joyce Zhu, EGLE

Ms. Wilhemina McLemore, EGLE