



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 12, 2019

UPS NEXT DAY DELIVERY

Mr. Abdallah Hachem
26051 Michigan Avenue
Inkster, Michigan 48141

Mr. Salim Younes
Albanna Construction, LLC
7630 Steadman Street
Dearborn, Michigan 48141

SRN / ID: U821906565; Wayne County

Dear Mr. Hachem and Mr. Younes:

VIOLATION NOTICE

On August 7, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 26229 Michigan Avenue, Inkster, Wayne County, Michigan.

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 (Act 451).

According to my investigation, Abdallah Hachem owns the subject property and Albanna Construction, LLC, performed the demolition activities. The National Emission Standard for Asbestos holds both the *owner and operator* equally liable for any violations.

During the inspection, staff observed the following:

The subject facility had a notification in for the demolition of the structures on the property between the dates of July 12, 2019 and July 26, 2019. However, during our inspection of the property on August 7, 2019, several debris piles and a few standing walls remained. Several pieces of suspect asbestos containing materials such as Transite and floor tiles were noted as being present in debris piles and on parts of a remaining slab. These materials had become friable and regulated due to the excavation and pulverizing into the debris piles. As this site was unattended, the RACM was not adequately wet or contained.

Process Description	Section Violated	Comments
Structure in the process of demolition outside of notification schedule.	40 CFR §61.145 (b)(2)	Failure to update notice.
Causing Category I and Category II non-friable materials to become friable (RACM) by means of grinding and abrading with excavation equipment.	40 CFR §61.145 (c)(1)	Failure to remove all RACM prior to demolition work.

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Debris piles with RACM on site.	40 CFR §61.145 (c)(4)	Failure to contain in leak tight container.
RACM exposed in debris piles.	40 CFR §61.150 (a)(1)(ii)	Visible emissions from handling operations.
Debris piles with exposed RACM unattended and dry.	40 CFR §61.145 (c)(9)	Failure to wet RACM during demolition.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 2, 2019, (which coincides with 21 calendar days from the date of this letter). The written 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 signed written response to Mr. Ivan Bell at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at BellI@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 a violation 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 that was extended to me during our conversations. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-582-0535; belli@michigan.gov; or EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Ivan Bell
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE