



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

October 21, 2016

Mr. V. Ricardo Thomas, Sr.
Faith Tabernacle Church
16548 Hamilton Ave.
Highland Park, MI 48203

Mr. Lamar Grace
Simply Construction & Excavating, LLC
20905 Mapleridge Ave.
Southfield, MI 48075

SRN: U821603229, Wayne County

Dear Messrs. Thomas, Sr. and Grace:

VIOLATION NOTICE

On September 29, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the former commercial facility located at 16508 Hamilton Avenue, Highland Park, MI. The purpose of this inspection was to determine Simply Construction & Excavating, LLC's and Faith Tabernacle Church's compliance with the requirements of Title 40 of the Code of Federal Regulations, 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 our investigation, Faith Tabernacle Church owns the facility and Simply Construction & Excavating, LLC's performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, DEQ AQD staff Craig Dechy and Karen Kajiya-Mills noted that the site had been demolished. A 10 day notification of Intent to Renovate/Demolish was not submitted to the DEQ AQD prior to demolition activities.

Process Description	Section Violated	Comments
Demolition of the former commercial facility located at 16508 Hamilton Avenue, Highland Park.	§61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

Please note that if an asbestos survey conducted by a certified asbestos inspector of the structures was not obtained prior to the initiation of demolition activities, on or more of the following violations may have also occurred:

Process Description	Section Violated	Comments
Demolition of the commercial facility located at 16508 Hamilton Avenue, Highland Park.	§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 violation and submit a written response to this Violation Notice by November 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- A copy of the asbestos survey conducted prior to the demolition;
- Submit a copy of the Notification of Intent to Renovate/Demolish for activities associated with the referenced violation;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violations(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 violation(s) and the dates by which these actions will take place; and
- What steps are being taken to prevent a reoccurrence.

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If Simply Construction & Excavating, LLC and/or Faith Tabernacle Church 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.

Thank you for your attention to resolving the violation cited. If you have any questions regarding the violation 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: Fact Sheet

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ