



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

September 15, 2016

Mr. Arthur M. Dore  
Dore & Associates Contracting  
900 Harry Truman Parkway  
Bay City, Michigan 48706

SRN / ID: U821606526

Dear Mr. Dore:

**SECOND VIOLATION NOTICE**

On August 16, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP inspection at 6622-30 Van Dyke Avenue, Detroit, Wayne County, Michigan. The purpose of this inspection was to determine 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.

On August 17, 2016, the AQD sent you a Violation Notice citing violations discovered as a result of the inspection and requested your written response by September 7, 2016. A copy of that letter is enclosed for your reference. We have received your response however, it did not address the items in the Violation Notice.

Please be advised that failure to respond in writing and identifying 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, may result in escalated enforcement action by the AQD. Please provide the information requested in our August 17, 2016, letter by September 25, 2016, which corresponds to 10 days from the date of this letter.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

Mr. Arthur M. Dore  
Page 2  
September 15, 2016

If you have any questions or require further information regarding the violations or the actions necessary to bring your property into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremiah Brown', with a long horizontal flourish extending to the right.

Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

Enclosures

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

September 7, 2016

Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division  
P.O. Box 30473  
Lansing, MI 48909-7973

Re: SRN/ID: U821606526

Dear Mr. Brown:

In response to the alleged violation notice dated August 17, 2016, Dore & Associates believes the above observations or statements do not constitute a violation of the applicable legal requirements cited and request to have a meeting/conference to discuss the matter.

Should you have any questions or concerns please do not hesitate to contact me.

Sincerely,

DORE & ASSOCIATES CONTRACTING, INC.



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Cc: Mr. Tim Palazzolo, Detroit Building Authority



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREETHER  
DIRECTOR

August 17, 2016

Mr. Arthur M. Dore  
Dore & Associates Contracting  
900 Harry Truman Parkway  
Bay City, Michigan 48706

Mr. Tim Palazzolo  
Detroit Building Authority  
500 Griswold Street, Suite 1200  
Detroit, Michigan 48226

Mr. J. Arthur Jemison  
Detroit Housing & Revitalization Department  
Coleman A. Young Municipal Center  
2 Woodward Avenue, Suite 908  
Detroit, Michigan 48226

SRN/ID: U821606526

Dear Mr. Dore, Mr. : Palazzolo, and Mr. Jemison:

### VIOLATION NOTICE

On August 16, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed an asbestos inspection at 6622-30 Van Dyke Avenue, Detroit, Wayne County, Michigan. The purpose of these inspections was to determine 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, the Detroit Planning and Development Department (now the Housing & Revitalization Department) owns the property and Dore & Associates Contracting Inc. performed the demolition activities at this site. The Detroit Building Authority oversees the City of Detroit's demolition program. The vacant structure was demolished as part of a project to remove blight within the City of Detroit. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, DEQ-AQD staff, Mr. Jeremiah Brown and Mr. Joe Goeddeke observed the following:

The subject properties had been abated and demolished and regulated asbestos-containing material (RACM) was discovered in the demolition debris.

Process Description	Section Violated	Comments
Failure to remove RACM and submitting a Scheduled Demolition notification for 6622-30 Van Dyke Avenue.	§61.145(b)(1)	Failure to provide a 10 working day demolition notification
	§61.145(c)(1)	Failure to remove RACM
	§61.150(a)(1)(iii)	Failure to seal while wet

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 7, 2016, (which coincides with 21 calendar days from the date of this letter). 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 both owner and operator to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and sent as an email attachment to [brownj9@michigan.gov](mailto:brownj9@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 violation cited above and for the cooperation extended to me during our meeting and emails. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; [brownj9@michigan.gov](mailto:brownj9@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

cc: Dr. Abdul El-Sayed, City of Detroit  
Mr. Butch Hollowell, City of Detroit  
Ms. LaReina Wheeler, City of Detroit, Dept. of Environmental Affairs  
Mr. Brian Farkas, Detroit Building Authority  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Tom Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ