



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C. HEIDI GREYER
DIRECTOR

August 16, 2016

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

Mr. Timothy Palazzolo
Detroit Building Authority
500 Griswold Street, Suite 1200
Detroit, MI 48226

Mr. Salem Jiddou
SJ Design and Construction, LLC
25855 Lahser Road
Southfield MI 48033

SRN: U821609803, Wayne County

Dear Messrs: Jemison, Palazzolo and Jiddou:

VIOLATION NOTICE

On August 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the residential property located at 78 E. Euclid, Detroit. The purpose of this inspection was to determine Detroit Housing & Revitalization Department's, Detroit Building Authority's and SJ Design'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, the Detroit Planning and Development Department (now the Housing & Revitalization Department) owns the facility and SJ Design performed the demolition activities at the facility. The Detroit Building Authority oversees the City of Detroit demolitions. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that the house had been demolished without submittal of a 10-day notification of intent to renovate/demolish.

Process Description	Section Violated	Comments
Demolition of 78 E. Euclid, Detroit.	§61.145(b)(1)	Failure to provide 10 working day notification

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

Process Description	Section Violated	Comments
	§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

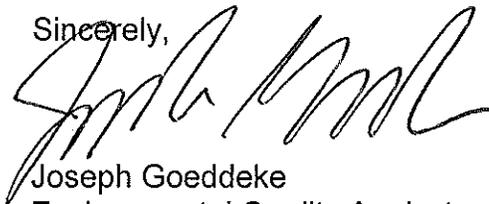
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 7, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- 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 recurrence.

If Detroit Housing & Revitalization Department, the Detroit Building Authority and/or SJ Design 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 violations(s) cited above and for the cooperation that was extended to me during my inspection of 78 E. Euclid, 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,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517 331 7906

cc: Ms. LaReina Wheeler, City of Detroit
Dr. Abdul El-Sayed, City of Detroit
Mr. Melvin Butch Hollowell, City of Detroit
Mr. Brian Farkas, City of Detroit
cc via e-mail Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ