



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

March 20, 2018

Mr. Paul Silva
Seward New Center, LLC
1005 N. Stephenson Highway
Royal Oak, MI 48067

Mr. Jerrod Clement
Clement Companies, LLC
6650 Highland Rd., Suite 201
Waterford, MI 48327

SRN: U821801431, Wayne County

Dear Mr. Silva and Mr. Clement:

VIOLATION NOTICE

On February 15 and 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the apartment building located at 741 Seward, Detroit. The purpose of this inspection was to determine Seward New Center, LLC's and Clement Companies, LLC'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, Seward New Center, LLC owns the facility and Clement Companies, LLC performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator liable for violations.

During the inspection, DEQ staff Tammy S. Bell and Joseph Goeddeke observed suspect-asbestos containing building materials being disturbed without a thorough inspection for asbestos prior to the start of the project. Regulated asbestos containing materials were identified inside of the building.

Process Description	Section Violated	Comments
Renovation activities at an Asbestos NESHAP subject apartment building.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos prior to renovation activities.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 10, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether

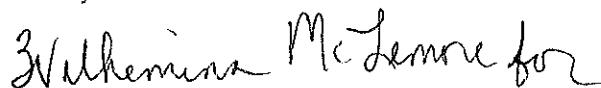
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the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Seward New Center, LLC and/or the Clement Companies, LLC 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 above and for the cooperation that was extended to us during our inspection of 741 Seward, Detroit. 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

Enclosures: Sample results and Fact Sheet

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ