



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

March 14, 2019

Mr. Salem Jiddou
SJ Design & Construction, LLC
25855 Lahser Rd
Southfield, MI 48033

Mr. Safet Stafa
Picalli Real Estate Investments, LLC
1612 Muer Drive
Troy, MI 48084

SRN: U821902769, Wayne County

Dear Mr. Jiddou and Mr. Stafa:

VIOLATION NOTICE

On March 5, 2019, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the former nursing home located at 2411 W. Grand Boulevard, Detroit. The purpose of this inspection was to determine SJ Design & Construction, LLC's and Picalli Real Estate Investments, LLC's compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, Picalli Real Estate Investments, LLC owns the facility and SJ Design & Construction, LLC performed the demolition activities at the facility. The NESHAP for Asbestos holds the owner and operator equally liable for violations.

On March 5, 2019, it was noted that the former nursing home had been demolished without the required 10-day notice of intent to demolish to the MDEQ.

Process Description	Section Violated	Comments
Demolition of 2411 W. Grand Boulevard, Detroit.	40 CFR 61.145(b)(1), DEQ AQD Consent Order: No. 42-2016	Failure to provide 10 working day notification prior to demolition.

If the facility was not thoroughly inspected for asbestos by a State of Michigan licensed building inspector, the following violations may have also occurred:

Process Description	Section Violated	Comments
Demolition of 2411 W. Grand Boulevard, Detroit.	40 CFR 61.145(b)(2)	Failure to update notice.
	40 CFR 61.145(b)(3)(i)	Failure to provide 10-day notice prior to asbestos work.
	40 CFR 61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	40 CFR 61.145(c)(1)	Failure to remove RACM.
	40 CFR 61.145(c)(3)	Failure to wet during stripping
	40 CFR 61.145(c)(3)(iii)	Failure to keep written approval on site.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	No contractor supervisor on site.
	40 CFR 61.145(c)(9)	Failure to wet RACM during demolition.
	40 CFR 61.145(c)(10)	Failure to remove RACM in building demolished by fire.
	40 CFR 61.150(a)	Visible emissions from asbestos containing waste material generated by source.
	40 CFR 61.150(a)(1)(ii)	Visible emissions from handling operations.
	40 CFR 61.150(a)(1)(iii)	Failure to seal while wet.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical.
	40 CFR 61.150(c)	No signs during loading and unloading.

Please initiate actions necessary to correct the cited violation(s) and submit a signed written response to this Violation Notice by April 4, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include:

- a copy of the asbestos survey for the facility;
- a copy of the asbestos abatement records including notification and waste shipment records;

- a copy of disposal records for the demolition debris;
- the dates the violation(s) occurred;
- an explanation of the causes and duration of the violation(s); and 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);
- the dates by which these actions will take place; and
- what steps are being taken to prevent a reoccurrence.

Please submit the written response to Ms. Tammy Bell at DEQ, AQD 3058 W. Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or BelIT4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or WOLFJ2@michigan.gov.

If Picalli Real Estate Investments, LLC and/or SJ Design & Construction, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide factual information to explain your position.

Thank you for your attention to resolving the violation(s) cited above for the facility located at 2411 W. Grand Blvd, Detroit. If you have any questions regarding the violations 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

cc/via e-mail: Mr. Paul Max, BSEED

Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ