



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

November 4, 2019

Mr. Timothy Drakeford  
Direct Construction Services, LLC  
5741 Roosevelt  
Detroit, MI 48208

SRN: Various, Wayne County

Dear Mr. Drakeford:

**VIOLATION NOTICE**

On October 15, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the properties located at:

- 4908 Livernois, Detroit, MI 48210 - SRN# U821909928
- 4912 Livernois, Detroit, MI 48210 - SRN# U821909929
- 4918 Livernois, Detroit, MI 48210 - SRN# U821909930

The purpose of this inspection was to determine 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, Zead Rammoui owns the properties and Direct Construction Services, LLC performed the demolition activities at the properties. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff observed the following:

An active demolition project of three (3) adjacent residential properties owned by the same individual. There was no Notice of Intent to Renovate/Demolish on file and the owner of the demolition company stated that there was no asbestos survey completed for the properties.

Process Description	Section Violated	Comments
Demolition of a residential installation (more than one structure demolished at the same site).	40 CFR 61.145(b)(1) AQD Consent Order 2018-10	Failure to provide 10 working day notification.
	40 CFR 61.145(a) AQD Consent Order 2018-10	Failure to thoroughly inspect for the presence of asbestos

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by November 25, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Jeffrey Benya at EGLE, AQD 3058 West Grand Boulevard, Detroit, Michigan 48202 or benyaj@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If Direct Construction Services, 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 violations cited above and for the cooperation that was extended to me during my inspection of the properties listed. 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,



Jeffrey J. Benya  
Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosure

cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajjya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Ms. Wilhemina McLemore, EGLE