



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 5, 2020

Mr. Adam Noel  
The Shirley Detroit, LLC  
8234 Q. Avenue  
Kalamazoo, MI 49009

Mr. Giuseppe Ravida  
Ravida Construction LLC  
2032 Blue Lac Dr.  
Haslett, MI 48840

SRN: U822000845, Wayne County

Dear Mr. Noel and Mr. Ravida:

**VIOLATION NOTICE**

On February 5, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the apartment building located at 1442 Calvert, Detroit. The purpose of this inspection was to determine The Shirley Detroit, LLC's and Ravida Construction 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, The Shirley Detroit, LLC owns the facility and Ravida Construction LLC performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owner and operator liable for violations.

The following violation was noted by AQD staff Tammy Bell and Jeffrey Benya during the site inspection of the asbestos NESHAP subject apartment building:

Process Description	Section Violated	Comments
Renovation of the interior and exterior involving the disturbance of over 160 square feet of building materials.	40 CFR 61.145(a)	Prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.

Mr. Adam Noel  
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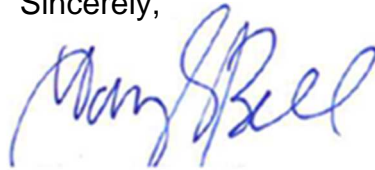
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 26, 2020 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is 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 Ms. Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or camillerij@michigan.gov.

If Shirley Detroit, 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 cited above and for the cooperation that was extended to us during our inspection of 1442 Calvert, 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 Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

Enclosure: Fact Sheet

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 Kajiya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Ms. April Wendling, EGLE  
Mr. Jeffrey Benya, EGLE