



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

April 20, 2018

Mr. Melvin Washington
Paddock Manor Limited Dividend Housing Association Limited Partnership
4150 Grand River Avenue
Detroit, MI 48202

Paddock Manor Limited Division
Bellwether Enterprises Real Estate Capital A
1360 E. 9th St. Suite 300
Cleveland, Ohio 44114-1730

Mr. Lamar Grace
Simply Construction and Excavation, LLC
20905 Mapleridge
Southfield, MI 48075

SRN: U631801190, Oakland County

Dear Mr. Washington and Mr. Grace:

VIOLATION NOTICE

On March 9th and 26th, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the West Manor Apartments located at 245 S. Paddock, Pontiac. The purpose of this inspection was to determine Paddock Manor Limited Dividend Housing Association Limited Partnership's and the Simply Construction and Excavation, LLC's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, National Emission Standards for Hazardous Air Pollutants, Subpart M, 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, Paddock Manor Limited Dividend Housing Association Partnership owns the facility and Simply Construction and Excavating, LLC performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator liable for violations.

AQD staff Tammy S. Bell conducted an inspection of the building which was ordered demolished by the City of Pontiac. Buildings ordered demolished are presumed as containing regulated asbestos containing materials above the asbestos NESHAP thresholds, unless evidence exists that the RACM was abated, or below the threshold amount. A survey of the demolition debris was conducted but did not meet the requirements of a thorough inspection.

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Process Description	Section Violated	Comments
Ordered demolition of the asbestos NESHAP subject apartment building located at 245 S. Paddock, Pontiac.	40 CFR 61.145 (a)	Failure to thoroughly inspect / presume building materials as asbestos.
	40 CFR 61.150(a)(1)	Failure to keep demolition debris adequately wet.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material in accordance with the regulation.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 11, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include:

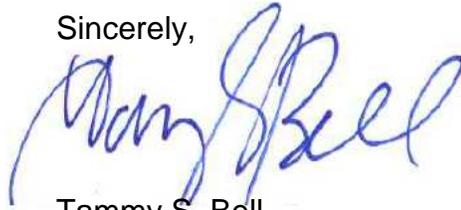
- The dates the violations occurred;
- An explanation of the causes and duration of the violations;
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and
- And what steps are being taken to prevent a reoccurrence.

If Paddock Manor Limited Dividend Housing Association Partnership and/or Simply Construction and Excavation, 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of 245 S. Paddock, Pontiac. 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

Enclosure: Fact Sheet

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Joyce Zhu, DEQ