



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHUR  
DIRECTOR

June 20, 2018

Ms. Brittany 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 Ms. Washington and Mr. Grace:

**VIOLATION NOTICE**

On June 14, 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 (NESHAP), 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 NESHAP for Asbestos holds the owner and operator liable for violations.

AQD staff Craig Dechy and Karen Kajiya-Mills observed that the project was not complete as there was still demolition debris on site. The notification end date was listed as April 14, 2018.

| Process Description                                                                                      | Section Violated     | Comments                        |
|----------------------------------------------------------------------------------------------------------|----------------------|---------------------------------|
| Ordered demolition of the asbestos NESHAP subject apartment building located at 245 S. Paddock, Pontiac. | 40 CFR 61.145 (b)(2) | Failure to update notification. |

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 10, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include:

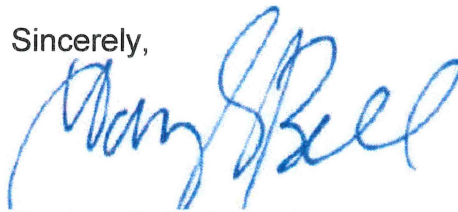
- The dates the violation occurred;
- An explanation of the causes and duration of the violation;
- Whether the violation is ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and
- And what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

Please submit the written response to Ms. Tammy Bell, Senior Environmental Quality Analyst at DEQ, 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 DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

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 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 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

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Joyce Zhu, DEQ