



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GRETHER
DIRECTOR

August 8, 2018

Ms. Maria Camaj
Downriver Coney Island, LLC
13760 Eureka Road
Southgate, MI 48195

Mr. George Newport
Patriot Restoration, LLC
155 Factory Road
Michigan Center, MI 49254

SRN: U821805784, Wayne County

Dear Ms. Camaj and Mr. Newport:

VIOLATION NOTICE

On July 26, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of Downriver Coney Island located at 13760 Eureka Road, Southgate. The purpose of this inspection was to determine Patriot Restoration, LLC's and Downriver Coney Island, 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, Downriver Coney Island, LLC owns the facility and Patriot Restoration, LLC performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator liable for violations.

During the inspection, DEQ staff observed a portion of the roof had been demolished and was in the process of being replaced due to fire damage. Over 160 square feet of roofing material were disturbed during demolition activities. Additional building materials may have been removed from the interior of the building.

Process Description	Section Violated	Comments
Partial demolition activities at 13760 Eureka Road, Southgate.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

Please note that if an asbestos survey of the structure was not obtained prior to the initiation of demolition activities, one or more of the following violations may have also occurred:

Process Description	Section Violated	Comments
Partial demolition activities at 13760 Eureka Road, Southgate.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos prior to renovation/demolition activities.
	40 CFR 61.145(b)(3)(i)	Failure to provide 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 61.150(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 August 29, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include:

- The dates the violation(s) occurred;

Ms. Maria Camaj
Mr. George Newport
Page 3
August 8, 2018

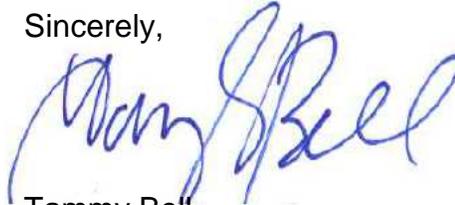
- An explanation of the causes and duration of the violation(s);
- Whether the violation(s) are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and the dates by which these actions will take place;
- What steps are being taken to prevent a reoccurrence; and
- A copy of the asbestos survey conducted at the site.

Please submit the written response to Ms. Tammy Bell at DEQ, AQD, 3058 West Grand Boulevard, 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 Patriot Restoration, LLC and/or Downriver Coney Island, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of 13760 Eureka Road, Southgate. 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

Enclosures: Sample results and fact sheet

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