



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

December 21, 2021

Mr. Brad Emmet  
Emmet Contracting LLC  
5225 Sheldon Rd.  
Canton, MI 48188

Mr. Charles Bedirian  
156 North Center LLC  
17763 Fort St.  
Riverview, MI 48193

SRN: U632106824, Oakland County

Dear Mr. Emmet and Mr. Bedirian:

### **VIOLATION NOTICE**

On December 9 and December 14, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial properties located at 150 and 156 N. Center St., Northville. 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, 156 North Center LLC owns the properties and Emmet Contracting LLC performed the demolition and renovation 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:  
Complete demolition of 156 N. Center St. and partial demolition of 150 N. Center St. in June of 2021. The remaining portion of 150 N. Center St. was undergoing extensive renovation at the time inspection. Parties failed to conduct the required thorough asbestos survey prior to conducting demolition/renovation activities. Additionally, the required Notification of Intent to Demolish was not filed with EGLE prior to the commencement of demolition activities. EGLE staff sampled a suspect floor tile that tested positive for asbestos. A subsequent asbestos survey identified three (3) asbestos containing materials in the remaining section of 150 N. Center St.

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<b>Process Description</b>	<b>Section Violated</b>	<b>Comments</b>
Demolition of two commercial properties without a Notification of Intent to Demolish/Renovate on file.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.
Demolition/renovation of two commercial properties prior to conducting the required thorough asbestos survey.	40 CFR 61.145(a)	Failure to thoroughly inspect for the presence of asbestos containing materials prior to demolition/renovation.

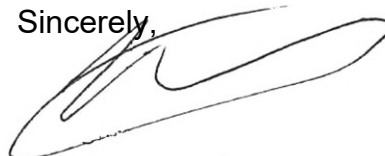
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by January 11, 2022 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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 Mr. Jeffrey Benya at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto: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](mailto:wolfj2@michigan.gov).

If any party 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 violation 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

Enclosures: Asbestos sample results, NESHAP Fact Sheet

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cc: 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. Joyce Zhu, EGLE