



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



LIESL EICHLER CLARK
DIRECTOR

March 26, 2019

Mr. Adam Hughes
Prentice Partners of Ann Arbor, LLC
1505 White Street
Ann Arbor, Michigan 48104

Mr. David Hrivnak
Fresh Coast Contracting
701 Carriage Way
Northville, Michigan 48168

Mr. Justin VanGordon
JCC Designs, LLC
1885 Lone Tree Road
Milford, Michigan 48381

SRN/ID: U811902562; Washtenaw County

Dear Mr. Hughes, Mr. Hrivnak and Mr. VanGordon:

VIOLATION NOTICE

On March 20, 2019, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) complaint investigation at 814 and 818 Henry Street, Ann Arbor, Washtenaw County. The purpose of this investigation was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

According to my investigation, Prentice Partners, LLC, owns the subject properties; Fresh Coast Contracting supervised the demolitions; and JCC Designs, LLC, performed the demolition activities. The National Emission Standard for Asbestos holds both the owner and operator(s) equally liable for any violations.

During the inspection, DEQ staff observed the following:

Demolition activities had taken place at 814 and 818 Henry Street, Ann Arbor and the contractor was loading out the demolition debris for off-site disposal. Additionally, crumbled and broken transite style siding was observed in the demolition debris noted at 818 Henry Street. None of the responsible parties submitted a Notification of Intent to Renovate/Demolish to the administrator for the demolition activities.

| Process Description | Section Violated | Comments |
|---|-------------------------|---|
| On 3/20/19, staff received a complaint regarding demolition activities at 814 and 818 Henry Street, Ann Arbor. Staff arrived on-site on 3/20/19 and confirmed that demolition was occurring and Category II asbestos containing material was observed in the demolition debris. | 40 CFR 61.145 (b)(1)(3) | Failure to provide the administrator with notice. |
| | 40 CFR 61.145 (C)(1) | Failure to remove all regulated asbestos containing material. |

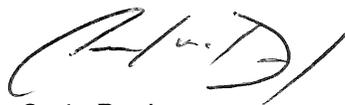
Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by April 10, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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 what steps are being taken to prevent a reoccurrence.

Please submit the signed written response to Mr. Craig Dechy by U.S. mail at DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760; or scan and email as an attachment to me at DechyC@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the same mailing address or via email at CamilleriJ@michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate 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 our site visit and phone conversations. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-749-2891; dechyc@michigan.gov; or at the mailing address provided above.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Scott Miller, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ