



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

September 14, 2018

Mr. Harry Lau
Livonia Public Schools
15125 Farmington Road
Livonia, MI 48154

Mr. Bill Borgiel
Lutz Roofing Company, Inc.
4721 Twenty-Two Mile Road
Shelby Twp., Michigan 48317-1515

Mr. Mike Bode
Roofing Technology Associated, Ltd.
38031 Schoolcraft
Livonia, MI 48150-1065

SRN: U821609511, Wayne County

Dear Messrs. Lau, Borgiel and Bode:

VIOLATION NOTICE

On August 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of Holmes Middle School located at 16200 Newburgh Road, Livonia. The purpose of this inspection was to determine Livonia Public School's, Lutz Roofing Company's, Inc's and Roofing Technology Associated, Ltd.'s 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, Livonia Public School owns the facility and Roofing Technology Associated, Ltd. And Lutz Roofing Company, Inc. performed the renovation activities at the facility. The NESHAP for Asbestos holds the owner and operators liable for violations.

During the inspection of the school, it was noted that that the roof was in the process of being replaced. The roofing materials had not been surveyed nor their condition assessed prior to the start of the project. A thorough inspection for asbestos is required no matter the age of construction or renovation history.

Process Description	Section Violated	Comments
Roof replacement project at Holmes Middle School, Livonia.	40 CFR 61.145(a)	Prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of

September 14, 2018

		the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.
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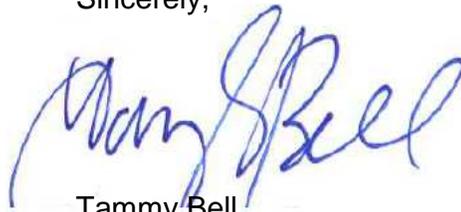
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by October 5, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the 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 what steps are being taken to prevent a reoccurrence.

All parties identified on this violation notice please submit the written response to Ms. Tammy Bell at DEQ, AQD 3058 W. Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or BellT4@michigan.gov. Please also 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 Livonia Public Schools, Lutz Roofing Company, Inc., Roofing Technology Associated, Ltd. 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 Holmes Middle School. 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

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