



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

June 13, 2018

Mr. Arie Leibovitz
River Houze, LLC
29355 Northwestern Highway, Suite 301
Southfield, MI 48034

Mr. Howard Klaussen
Eagle Construction
7499 Middlebelt Road
West Bloomfield, MI 48322

SRN: U821803573, Wayne County

Dear Messrs. Leibovitz and Klaussen:

VIOLATION NOTICE

On April 20, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of The Jeffersonian Apartments located at 9000 East Jefferson Avenue, Detroit. The purpose of this inspection was to determine Eagle Construction's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, National Emission Standards for Hazardous Air Pollutants, 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, River Houze, LLC owns the facility and Eagle Construction performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

During the inspection, staff requested a copy of the survey from the owner. Upon receiving the survey via email, it was noted that the date on the survey was the same date as the inspection – April 20, 2018. Staff concluded that therefore, a thorough survey was not conducted prior to the renovation.

Process Description	Section Violated	Comments
Multi-unit complex located at 9000 E. Jefferson, Detroit	40 CFR 61.145(a)	Failure to thoroughly inspect

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by July 5, 2018 (which coincides with 21

Mr. Arie Leibovitz
Mr. Howard Klaussen
Page 2
June 13, 2018

calendar days from the date of this letter). The response should include: an explanation of the causes of the violation; and 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.

Please submit the written response to Joseph Goeddeke at DEQ, AQD Asbestos Program, 3058 West Grand Boulevard, Detroit, MI 48202 or goeddekej@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 River Houze, LLC or Eagle Construction 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 violation cited above and for the cooperation that was extended to me during my inspection of 9000 East Jefferson, Detroit. 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,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517-331-7906

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhelmina McLemore, DEQ