



December 16, 2024

Tammy Bell, Supervisor
Asbestos Unit at EGL AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Re: Violation Notice:

Failure to provide 10 working day notification prior to demolition-8046 Hardyke

Ms. Tammy Bell,

Our team acknowledges receipt of the Violation Notice dated November 26, 2024. Thank you for allowing our team to provide additional details and share the actions we took to correct this cited violation of failure to provide a 10-working-day notification prior to the demolition of the residential building located at 9046 Hardyke. Gayanga Co. takes all disciplinary violations seriously and is committed to addressing them promptly and fairly.

In this written reply, our team intends to explain the cause of the violation, summarize the corrective actions taken to address the violation, the date(s) by which these actions were completed, and the steps we have enacted to prevent a reoccurrence. We hope that in light of the details provided, we can thoroughly relay that we take instances like this seriously and are committed to prohibiting failures like this from happening again.

Actions Proceeding Wrongful Demolition

On October 1, 2024, our water disconnect crew mobilized to facilitate water disconnects at three addresses on Hardyke, one of which was 8050 Hardyke. Before that activity, our team filed and held an active MissDig, which denoted the site and area to mark and identify water connections. Our team submitted that information along with a note that the target location was incorrectly identified at 8046 Hardyke and that the proper parcel to mark was inside the polygon on the form. The correctly marked polygon on the MissDig form is shown below.

Upon completing this activity phase, the site was incorrectly marked 8050 Hardyke.



Ticket No: 2024091801297

Rev:000

User Reference: Not Supplied

Excavator Details

Caller Id: 2315101
Contact: Jordan Floyd
Company: GAYANGA CO

Phone: (313) 230-4930 1008
Mobile: Not Supplied
Email: jordan@gayangaco.com

Dig Site and Ticket Details



[Open Map](#)

See Polygon. The target is located at the wrong house(8046 Hardyke). I drew the polygon around the right house(8050 Hardyke). Please mark for demo(Locate all Utilities). Also with water utilities please also mark construction - demolition. The utilities should have been marked when the last Miss Dig ticket was submitted. Thank you.

Ticket Status	Original		
Previous Ticket No.	2024051603295-000		
Ticket Type	Normal - 21 day		
Ticket Date	09/18/2024 09:44		
Work to Begin Date	09/27/2024 07:00		
Work Legal Start Date	09/27/2024 07:00		
Work Expiration Date	10/18/2024 23:59		
Address	8050 Hardyke St, Detroit, MI 48213		
Nearest Cross Street	Van Dyke Ave		
Lot Number/Subdivision			
Type of Work	Water		
Activity	Disconnect		
Excavation Method	Mechanical Excavation		
Excavation Depth	Not Known		
Working for	DETROIT CITY		
Onsite Company	GAYANGA CO		
Onsite Contact Name	Shawn Rayford		
Onsite Contact Phone	3137279260		
Private Locate	No	Area Pre-marked	Yes- See Remarks
Pet on Property	No	Work in Water	No

Figure 1. MissDig Ticket No: 2024091801297 - MissDig for 8050 Hardyke



Figure 2. Photo provided by crew after water disconnect, with address marked on the collapsed roof

Our demo inspection and staging crew returned on October 16th and 17th to review the site for hazards and any impediments to our knock activities, stage the home with posters and yard signage, and notify neighbors of pending demolition activity. During that phase, our team verified the address using Google Maps and the previously marked address from water disconnect activities. During this phase, our team details the surrounding areas and homes to inform our day of demo needs. They identified an open field to the right, and to the left, the crew noted an unidentifiable collapsed structure encased in heavy vegetation.

Upon completing this activity phase, the site was incorrectly staged as 8050 Hardyke.

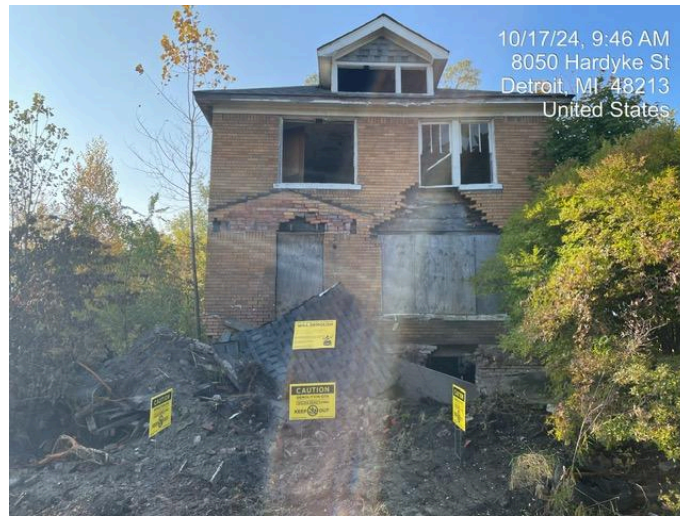


Figure 3. Photo provided by crew after staging the home, with address marked on poster



Figure 4. Photo provided by crew during our pre-demo inspection, what has now been identified as the collapsed structure of 8050 Hardyke was called out, but unidentifiable.

On October 21, 2024, the residential structure believed to be 8050 Hardyke was demolished. It was subsequently loaded out on October 25th. This site passed an open-hole inspection on October 28th. It was scheduled for backfill inspections on November 5th before being flagged for being erroneously wrecked as 8050 Hardyke and correctly identified as 8046 Hardyke.

Actions Post Notification of Wrongful Demolition

Upon being notified of the wrongful demolition, our team initiated several reviews to assess how this event occurred. Following that initial review, our team implemented procedures to build in-process checks to prevent this from happening again. Below is a summary of the mitigated actions we have undergone.

Safety Standdown

On Friday, November 8th, our field leadership team conducted an All-Hands Safety Standdown. During this meeting, we reviewed the severity of this incident with our entire field team, stressing the importance of identifying the proper address. During that discussion, we also defined a new standard operating procedure (SOP) related to field checks and how to confirm the site location. If there are concerns about the location being accurate, we empowered crew members to speak up and to stand down during field activities until confirmation of the address has been verified. During that conversation, we also reviewed our revised demo packs.

SOP and Field Demo Packs

Gayanga Co. has an archived history of 1569 conducted demolitions, with this one wrongful demolition leading us to have a 0.06% error rate. Historically, that has been aided by providing our field staff with site-specific information on the demolition day. Our team has revised the “demo packs” we provide to our field staff to include information on properly identifying a site. To standardize this process, an SOP (*SOP 0024-03*) detailing the expectations and procedures our field staff needs to follow and sign off on before facilitating the assigned demo activity has been launched.

Self-Reporting Incident to EGLE

Following our team's notification of the wrongful demolition, we were advised to self-report the issue to Tammy Bell. Our team representative, John Maranian, facilitated that process by self-reporting the issue via phone on November 15th. On that call, an in-person meeting was scheduled for a later date, and it was conducted on November 20th.

Demolition Process Reassurance

It is important to note that both properties involved in this incident, 8050 and 8046 Hardyke, were contracted to us, Gayanga Company, LLC (“Gayanga”) to demolish. Due to the nature of the homes we’re contracted, our internal protocols have us treat every demolition like an emergency, with proper air monitoring and disposal, with all material taken to a class 2 landfill. Our team has attached an appendix of documentation to reinforce that the demolition, while conducted at the wrong address, was still executed with high regulatory and environmental compliance. Attached are the (1) Abatement PO Letter, (2) Utility Clearance Affidavit, and (3) Day of Demolition Air Monitoring Results.

We have implemented comprehensive measures with robust checks and balances to ensure this does not happen again. Since implementing our revised protocols, our team has encountered similarly conditioned homes—i.e. collapsed structures—and with our enhanced protocols, we have facilitated conversations with the city to ensure the site our team has mobilized to is appropriate. With an error rate of just 0.06% across 1,569 demolitions, wrongful demolitions are an exceptionally rare occurrence for our team. Our team is fully aware of the magnitude of this occurrence, and we do not take it for granted.

We take all disciplinary citations earnestly. Thank you for your time and consideration in this matter. We hope this response restores your organization's confidence in our team and that we can continue to maintain a long and effective working relationship with you.

With Regards,

Phillip Nwachokor

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