



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

July 20, 2015

Mr. Demetrius Braddock  
Braddock Demolition, Cleaning & Hauling LLC  
PO Box 3664  
Saginaw, Michigan 48605

SRN: U56150576, Midland County

Dear Mr. Braddock:

**VIOLATION NOTICE NO. 2**

On June 17, 2015, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of a former commercial building located at 1708 East Ashman Street, Midland, Michigan. The purpose of this inspection was to determine if ongoing demolition activities were being conducted in 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.

On June 23, 2015, a Violation Notice was issued to yourself and Mr. Hardy Singh. According to our investigation, Hardy Singh owns the facility and Braddock Demolition performed the demolition 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 that, with the exception of some brick and concrete rubble, the only portion of the former commercial structure remaining was a finished basement. Information provided by a representative for Mr. Singh, indicated that the demolition activities were conducted between June 15, 2015 and June 19, 2015, and provided a copy of the invoice you submitted for the demolition activities. Based on review of submitted notifications for the time period it was noted that no notification had been received for the activities, which reflects a violation of the following:

Process Description	Section Violated	Comments
Commercial Demolition	§61.145(b)(1)	Failure to provide 10 working day notification

Please note that if an asbestos survey of the structure by a certified asbestos inspector was not obtained prior to initiation of demolition activities one or more of the following violations may also have occurred.

Process Description	Section Violated	Comments
	§61.145(b)(3)(i)	Failure to provide notice prior to asbestos work
	§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	§61.145(c)(1)	Failure to remove RACM
	§61.145(c)(3 )	Failure to wet during stripping
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM that has been stripped
	§61.145(c)(8)	No contractor supervisor on site
	§61.145(c)(9)	Failure to wet RACM during demolition
	§61.150(a)	Visible emissions from asbestos containing waste material generated by source
	§61.150(a)(1)(ii)	Visible emissions from handling operations
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(b)(1)	Failure to deposit asbestos containing waste material as soon as practical
	§61.150(c)	No signs during loading and unloading

This letter reflects your second notice for these activities. Please initiate actions necessary to correct the cited violation(s) and submit a written response to this Violation Notice by August 3, 2015 (which coincides with 15 calendar days from the date of this letter). The written response should include:

- A copy of the Asbestos Survey completed for the building prior to initiation of demolition activities;

- Submit a Notification of Intent to Renovate/Demolish for activities associated with the referenced violation(s);
- The dates the above referenced violation(s) 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;
- the dates by which these actions will take place;
- and what steps are being taken to prevent a reoccurrence.

If either party believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation(s) cited above. If you have any questions regarding the violation(s) or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sharon G. LeBlanc  
Environmental Quality Analyst  
Air Quality Division  
989-894-6212

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Mr. Chris Hare, DEQ