



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

March 5, 2019

Mr. Francesco Monaco  
 International Construction, Inc.  
 53618 Cherrywood Drive  
 Shelby, Michigan 48315

SRN/ID: U811810208;  
 Washtenaw County

Dear Mr. Monaco:

**VIOLATION NOTICE**

On February 21, 2019, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) inspection at 181 Oregon, Ypsilanti, 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, Ypsilanti Community School District owns the subject facility and International Construction, Inc., performed the demolition activities. The National Emission Standard for Asbestos holds both the owner and/or operator equally liable for any violations.

During the inspection, staff observed the following:

Demolition activities were taking place at the former Thurston Elementary School. Suspect pipe wrap insulation was observed in a debris pile. The insulation was sampled, and the analytic test results indicated that the insulation contained 15% Chrysotile form asbestos.

Process Description	Section Violated	Comments
On February 21, 2019, staff performed an inspection at 181 Oregon, Ypsilanti. During the inspection, regulated asbestos containing material (RACM) was observed in a demolition debris pile.	40 CFR 61.145 (c)(4)	Failure to contain in leak-tight wrapping.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by March 26, 2019 (which coincides with 21 calendar days from the date of this letter). The written 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 and are proposed to

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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 signed written response to Mr. Craig Dechy at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at [Dechyc@michigan.gov](mailto:Dechyc@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](mailto: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 violation cited above and for the cooperation that was extended to me during my site visits and our phone conversation. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; by email at [dechyc@michigan.gov](mailto:dechyc@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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