



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

March 6, 2018

Mr. Jamal Garmo
Star Lodge, LLC
23300 Telegraph Road
Southfield, MI 48034

Mr. Timothy Drakeford
Direct Construction Services, LLC
5741 Roosevelt
Detroit, MI 48208

SRN: U821709363, Wayne County

Dear Mr. Garmo and Mr. Drakeford:

VIOLATION NOTICE

On January 3, 2018 and February 21, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Former Victory Inn located at 9430 Michigan Avenue, Detroit. The purpose of this inspection was to determine the Direct Construction Services, LLC's and Star Lodge, LLC's 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.

According to our investigation, Star Lodge, LLC owns the facility and Direct Construction Services, LLC performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator liable for violations.

DEQ AQD staff requested a copy of the asbestos survey report and asbestos waste disposal records from Direct Construction Services, LLC. The information was not provided. DEQ AQD requested the asbestos waste manifests from Woodland Meadows Recycling and Disposal Facility (RDF). The landfill could not locate disposal records for 9340 or 9430 Michigan Avenue, Detroit based on the information provided on the project notification.

Process Description	Section Violated	Comments
Demolition of the former Victory Inn located at 9430	§61.145(a)	Failure to thoroughly inspect for asbestos
	§61.145(b)(2)	Failure to update notification

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Michigan Avenue, Detroit.	§61.150(b)(1)	Failure to deposit asbestos containing waste at a Type II landfill.
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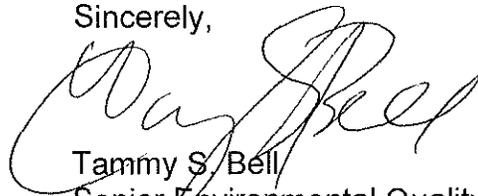
Please initiate actions necessary to correct the cited violation(s) and submit a written response to this Violation Notice by March 27, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- Documentation showing a thorough inspection for asbestos was conducted at the facility;
- Copies of all waste disposal records;
- The dates the violations occurred;
- An explanation of the causes and duration of the violations; and whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violations; and
- The dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Star Lodge, LLC and/or Direct Construction Services, LLC believe 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 and for the cooperation that was extended to me during my inspection of 9430 Michigan Ave. Detroit. If you have any questions regarding the violations or the actions necessary to bring the site into compliance, please contact me at the number listed below.

Sincerely,



Tammy S. Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ