



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

January 18, 2019

Mr. Jalal Jamel  
Telecraft Plaza, LLC  
1758 Strickland  
Bloomfield Hills, MI 48013

SRN: U821811148, Wayne County

Dear Mr. Jamel:

**SECOND VIOLATION NOTICE**

On December 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) performed an asbestos inspection of the LeChambre Lounge located at 14100 Telegraph Road, Detroit, Michigan. The purpose of this inspection 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).

On December 27, 2018, the AQD sent Telecraft Plaza, LLC (Company) a Violation Notice (VN) citing violations discovered because of the inspection and requested the Company's written response by January 17, 2019. A copy of this VN has been enclosed for your reference. As of the date of this letter, the AQD has not received the Company's written response to the cited violation.

Please be advised that failure to respond in writing and identifying actions the Company will take or has taken to resolve the cited violation may result in an escalated enforcement action by the AQD. Please provide the information requested in the VN dated December 27, 2018 by February 1, 2019, which corresponds to 14 days from the date of this letter.

The Company's written response must be submitted to Ms. Tammy Bell at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202, and must include a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. Or the response may be scanned and sent to BellT4@michigan.gov and CamilleriJ@michigan.gov.

Mr. Jalal Jamel  
Second Violation Notice  
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Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding this matter or the actions necessary to bring the Company into compliance, please contact me at the number listed below.

Sincerely,



Jason Wolf  
Enforcement Unit  
Air Quality Division  
517-284-6772

cc/via e-mail: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Wilhemina McLemore, DEQ  
Ms. Tammy Bell, DEQ  
Ms. Jenine Camilleri, DEQ

Enclosure



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHUR  
DIRECTOR

December 27, 2018

Mr. Jalal Jamel  
Telecraft Plaza, LLC  
1758 Strickland  
Bloomfield Hills, MI 48013

Mr. Kolja Ljuljdjurovic  
Kola's Construction & Painting  
49151 Yale Drive  
Macomb, MI 48044

SRN: U821811148, Wayne County

Dear Mr. Jamel and Mr. Ljuljdjurovic:

**VIOLATION NOTICE**

On December 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint inspection of the LeChambre Lounge located at 14100 Telegraph Road, Detroit. The purpose of this inspection was to determine Telecraft Plaza, LLC's and Kola's Construction & Painting's compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), 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, Telecraft Plaza, LLC owns the strip mall that houses the LeChambre Lounge and Kola's Construction and Painting conducted renovation activities inside of the LaChambre Lounge. The NESHAP for Asbestos holds both the building owner and operator equally liable for violations.

On December 13, 2018, the DEQ conducted an inspection and requested a copy of the asbestos survey. The information was not provided to the DEQ. Samples were collected and asbestos containing materials were identified at the site.

| Process Description                                | Section Violated | Comments  |
|--|------------------|---|
| Renovation activities at 14100 Telegraph, Detroit. | 40 CFR 61.145(a) | Failure to thoroughly inspect for asbestos prior to demolition/renovation activities. |

Please note that if an asbestos survey of the structure was not conducted by a licensed asbestos building inspector prior to the initiation of renovation activities, one or more of the following violations may have also occurred:

| Process Description | Section Violated         | Comments  |
|---------------------|--------------------------|---|
|                     | 40 CFR 61.145(b)(2)      | Failure to update notice.   |
|                     | 40 CFR 61.145(b)(3)(i)   | Failure to provide notice prior to asbestos work.                               |
|                     | 40 CFR 61.145(b)(4)(vi)  | Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM) |
|                     | 40 CFR 61.145(c)(1)      | Failure to remove RACM.   |
|                     | 40 CFR 61.145(c)(3)      | Failure to wet during stripping   |
|                     | 40 CFR 61.145(c)(3)(iii) | Failure to keep written approval on site.                                       |
|                     | 40 CFR 61.145(c)(4)      | Failure to contain in leak tight container.                                     |
|                     | 40 CFR 61.145(c)(6)(i)   | Failure to wet RACM that has been stripped.                                     |
|                     | 40 CFR 61.145(c)(8)      | No contractor supervisor on site.   |
|                     | 40 CFR 61.145(c)(9)      | Failure to wet RACM during demolition.  |
|                     | 40 CFR 61.145(c)(10)     | Failure to remove RACM in building demolished by fire.                          |
|                     | 40 CFR 61.150(a)         | Visible emissions from asbestos containing waste material generated by source.  |
|                     | 40 CFR 61.150(a)(1)(ii)  | Visible emissions from handling operations.                                     |
|                     | 40 CFR 61.150(a)(1)(iii) | Failure to seal while wet.  |
|                     | 40 CFR 61.150(a)(1)(v)   | No generator labels.  |
|                     | 40 CFR 61.150(b)(1)      | Failure to deposit asbestos containing waste material as soon as practical.     |
|                     | 40 CFR 61.150(c)         | No signs during loading and unloading.  |

Please initiate actions necessary to correct the cited violations(s) and submit a signed written response to this Violation Notice by January 17, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include:

Mr. Jalal Jamel  
Mr. Kolja Ljuljdjurovic  
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December 27, 2018

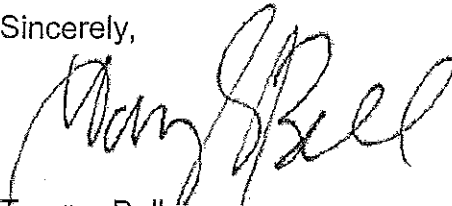
- A copy of the asbestos survey for the property;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violation(s);
- Whether the violation(s) are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s) and 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 Ms. Tammy Bell at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or BellT4@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 Telecraft Plaza, LLC and/or Kola's Construction & Painting 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(s) cited. 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,



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

Enclosures: Asbestos NESHAP Fact Sheet/sample results

cc: Mr. Paul Max, City of Detroit BSEED

Ms. Mary Ann Dolehanty, DEQ

Dr. Eduardo Olaguer, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Karen Kajiya-Mills, DEQ

Ms. Wilhemina McLemore, DEQ