



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYHER
DIRECTOR

April 20, 2018

Mr. Melvin Washington
Paddock Manor Limited Dividend Housing Association Limited Partnership
4150 Grand River Avenue
Detroit, MI 48202

Paddock Manor Limited Division
Bellwether Enterprises Real Estate Capital A
1360 E 9th St. Suite 300
Cleveland, Ohio 44114-1730

SRN: U631801190, Oakland County

Dear Mr. Washington:

VIOLATION NOTICE

On March 9, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the West Manor Apartments located at 245 S. Paddock, Pontiac. The purpose of this inspection was to determine Paddock Manor Limited Dividend Housing Association Limited Partnership's and the contractor's compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, National Emission Standards for Hazardous Air Pollutants, Subpart M, 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, Paddock Manor Limited Dividend Housing Association Partnership owns the facility and "Phoenix Construction" performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

AQD staff Tammy S. Bell conducted an inspection of the building which was ordered demolished by the City of Pontiac. A majority of the facility had been wrecked. Workers were observed removing building materials from a central portion of the building that had been left in place to be renovated. Documentation was noted that stated the building was not safe to survey for asbestos, and building materials were assumed as asbestos containing.

Process Description	Section Violated	Comments
Renovation of the central portion of the asbestos NESHAP subject apartment building located at 245 S. Paddock, Pontiac.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos prior to renovation activities.

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Workers were observed removing the building materials and tossing the materials into the piles of demolition debris during the inspection. A subsequent survey for asbestos after demolition/renovation did not meet the requirements of a thorough inspection for asbestos.

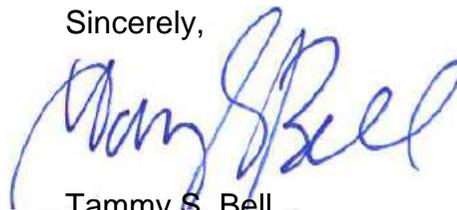
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 11, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- The name, address and contact information for the contractor who conducted renovation activities at the facility on March 9, 2018;
- The dates the violation occurred;
- An explanation of the causes and duration of the violation;
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and
- And what steps are being taken to prevent a reoccurrence.

If Paddock Manor Limited Dividend Housing Association Partnership 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 violations cited above and for the cooperation that was extended to me during my inspection of 245 S. Paddock, Pontiac. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

Enclosure: Fact Sheet

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Joyce Zhu, DEQ