



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHER  
DIRECTOR

April 26, 2018

Ms. Izegbe N'Namdi  
East Forest Art Project Developers, LLC  
52 East Forest  
Detroit, MI 48201

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

SRN: U821801623, Wayne County

Dear Ms. N'Namdi and Mr. Drakeford:

**VIOLATION NOTICE**

On March 15 and 22, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of commercial building located at 3834-38 (aka 3820) Grand River, Detroit. The purpose of this inspection was to determine East Forest Art Project Developers, LLC's and Direct Construction Services, LLC'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, East Forest Art Project Developers, LLC owns the facility and Direct Construction Services, LLC performed the ordered demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator liable for violations.

During the inspections on March 15 and 22, AQD staff identified the following during the demolition of the commercial building:

Process Description	Section Violated	Comments
Ordered demolition of commercial facility located at 3834-38 (aka) 3420 Grand River Avenue, Detroit	40 CFR 61.145 (a)	Failure to thoroughly inspect / presume building materials as asbestos.
	40 CFR 1.145(b)(3)(iii)	Failure to notify no later than the next work day for the demolition.

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	40 CFR 61.145(c)(8)	Failure to have a trained representative on site.
	40 CFR 61.150(a)(1)	Failure to adequately wet demolition debris.
	40 CFR 61.150(b)(1)	Failure to deposit ACWM material at a Type II landfill in accordance with the regulation.
	40 CFR 61.150(c)	No signs during loading and unloading of waste material.

Building materials in a facility ordered demolished are presumed as regulated asbestos containing materials unless credible evidence exists there was no RACM in the facility above the threshold prior to demolition, or that the RACM was abated. The DEQ had requested a copy of the asbestos surveys conducted at the site, but the documentation was not provided as of April 26, 2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 17, 2018 (which coincides with 21 calendar days from the date of this letter).

The written response should include:

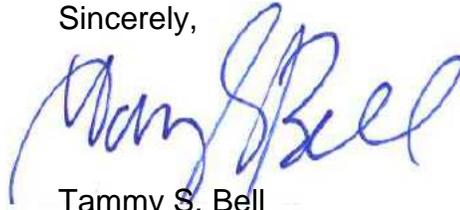
- The dates the violations occurred;
- An explanation of the causes and duration of the violations;
- Whether the violations are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and
- What steps are being taken to prevent a reoccurrence.

If East Forest Art Project Developers, LLC's or Direct Construction Services, LLC 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the commercial building. If you have any questions regarding the violations 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

cc: Mr. Paul Max, City of Detroit, BSEED  
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. Wilhemina McLemore, DEQ