



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 12, 2020

Mr. Sam Saleh
Berkshire Development, Inc.
750 Golfcrest Dr.
Dearborn, MI 48124

Mr. Joseph Abichedid
JG&G Holding, Corp.
1516 Southdown Road
Mississauga, Ontario, Canada L5J 2Z4 SRN: U821910692, Wayne County

Dear Mr. Saleh and Mr. Abichedid:

VIOLATION NOTICE

On January 22, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial building located at 11805 Rosa Parks Blvd, Detroit. The purpose of this inspection was to determine the owner's and operator'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, JG&G Holding, Corp. owns the facility and Berkshire Development, Inc. performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator liable for violations.

The following violations were noted at the commercial property:

Process Description	Section Violated	Comments
Demolition of a commercial structure located at 11805 Rosa Parks Blvd., Detroit.	40 CFR 61.145(a); AQD Consent Order No. 18-2013	Failure to thoroughly inspect for asbestos prior to demolition
	40 CFR 61.145(b)(1); AQD Consent Order No. 18-2013	Failure to notify 10 working days prior to demolition.
	40 CFR 61.145(c); AQD Consent Order No. 18-2013	Failure to remove all RACM from a facility being demolished.

On January 22, 2020, demolition of the facility was noted. A 10-day notice of intent to demolish could not be located for the building's demolition. The asbestos survey for the building noted that a portion of the basement had been flooded and had not been surveyed for asbestos; the survey noted visible pipe insulation in the flooded area.

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However, the building was demolished without a thorough inspection of the flooded basement and removal of pipe insulation.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 4, 2020 (which coincides with 21 calendar days from the date of this letter). The response should include:

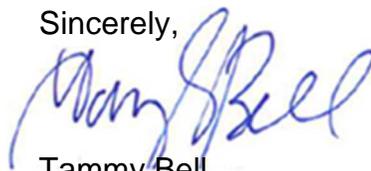
- A copy of the asbestos waste shipment records for asbestos containing waste material removed from the flooded basement area;
- the dates the violations occurred;
- an explanation of the causes and duration of the violations;
- whether the violations are ongoing;
- a summary of the actions that have been taken and are proposed to be taken to correct the violations;
- 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 Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If Berkshire Development, Inc. or JG&G Holding, Corp. 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 cited above and for the cooperation that was extended to us during our inspection of 11805 Rosa Parks Blvd., Detroit. 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 Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Jason Wolf, EGLE
Mr. Jeffrey Korniski, EGLE