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Jeremy Howe, Supervisor
Michigan Department of Environment,
Great Lakes, and Energy
Technical Programs Unit at EGLE
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

SRN/ID: U822402215; Wayne County

Mr Howe,

Mr Howe, I'm writing in response to the violation notice we received from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). The accused violation is from an inspection conducted by EGLE, Air Quality Division (AQD) of the residential property located at 8163 Mandalay Street, Detroit, Wayne County. on May 31, 2024. During the inspection, EGLE, AQD noted the residential building had been wrecked. Samples collected by EGLE, AQD identified positive plaster at the site.

8163 Mandalay was a residential property that was Completely destroyed by fire. The house framing was wood. The ridge of the roof, the rafter (trusses) on the roof, and the ceiling joist had totally collapsed from the fire and fell to the lower level. The wall framing(Studs) south side, north side, eastside and westside was severely damaged. wood framing members of this property were either collapsed or near collapsing. This house was deemed inaccessible and unsafe for proper abatement. When we demolished 8163 Mandalay, as customary when we don't load out to landfill, we wet the debris of the property and covered this property with 6 mil poly. We also checked the demo sites daily to make sure demo sites are wet and covered with 6 mil.

While we were demolishing a property, the excavator broke down. We soon discovered the part needed could not be sourced locally or nationally. The part had to be ordered here locally but shipped from Japan and it was going to take 3-4 weeks to arrive here in the United States. This occurrence halted our operation.

There were three violations issued and they are noted below and followed with our statements of corrections.

Violation 1. Failure to update notification-the demolition end date was noted as May 1, 2024.

Response: This was an oversight on our behalf. Since this occurrence we have instituted training and two additional people managing the DEQ notification platform. This is not an ongoing concern and corrective measures have been taken.

Violation 2. Failure to keep asbestos-containing waste material adequately wet until disposal at a Type II landfill-the ACWM was not adequately wet.

Response: This site was covered with 6 mil poly and wetted with water daily. We will continue to wet all demo sites that are not loaded out daily. We will add another person to check the sites daily. This is not an ongoing concern and corrective measures have been taken.

Violation 3. Failure to deposit asbestos containing waste material as soon as practical at a Type II facility licensed to accept ACWM- the demolition start date was noted as April 25, 2024.

Response: Considering the circumstances of the default that caused this violation, which was equipment failure and the fact that the part for repair was a 3-4 week turnaround. We truly

feel that we removed the debris as soon as practical, considering the circumstances. It is not a good feeling having your employees not working for that period of time. As a corrective measure, if this same situation occurs again, we will attempt to rent a machine. This is not an ongoing concern and corrective measures have been taken.

Thank you for this opportunity to respond to this violation. If there are any concerns, feel free to contact me at 313.454.6234. Thank you.

Keith Jones

CEO, J Keith Construction