



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 1, 2022

Ms. LaJuan Counts
Detroit Demolition Department
1301 Third Avenue, 6th floor
Detroit, MI 48226

Ms. Tammy Daniels
Detroit Land Bank Authority
500 Griswold Street, Suite 1200
Detroit, MI 48226

SRN: U822101934, Wayne County

Dear Ms. Counts and Ms. Daniels:

VIOLATION NOTICE

On December 13, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential property located at 13121 Wilfred, Detroit. The purpose of this inspection was to determine 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, the Detroit Land Bank Authority owns the property and the Detroit Demolition Department oversees the Detroit Demolition Program. The NESHAP for Asbestos holds the owner and operators liable for violations.

On December 13, 2021, samples of plaster were collected by EGLE from the demolition waste pile. The samples identified the plaster as a regulated asbestos-containing material. During a review of the asbestos survey and the post abatement verification reports, it was noted that a majority of the interior was not surveyed due to inaccessibility. The interior of the structure should have been made accessible to complete the asbestos survey and perform the necessary removal of regulated asbestos-containing materials if structurally safe to do so.

Process Description	Section Violated	Comments
Post demolition inspection of 13121 Wilfred, Detroit. House demolished as asbestos-containing due to limited interior survey.	40 CFR 61.145(a)	Failure to thoroughly inspect for asbestos prior to demolition of the structure.
EGLE contacted the operators in an attempt to obtain information regarding possible structural/safety issues at the structure but was unable to obtain information documenting that the structure was not safe to fully survey or abate.	40 CFR 61.145(c)(1)	Failure to remove RACM prior to demolition-plaster samples collected by EGLE tested greater than one percent asbestos which would require the abatement of the plaster prior to demolition.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by February 22, 2022 (which coincides with 21 calendar days from the date of this letter). The 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

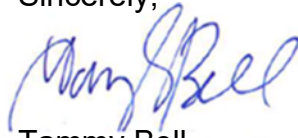
Please submit the written response to Ms. Tammy Bell at EGLE, AQD, 3058 West Grand Blvd, Suite 2-300, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If the Detroit Demolition Department, and/or the Detroit Land Bank Authority believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide 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 13121 Wilfred, Detroit. 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.

Ms. LaJuan Counts, Detroit Demolition Program
Ms. Tammy Daniels, The Detroit Land Bank Authority
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Sincerely,



Tammy Bell
Environmental Quality Specialist
Air Quality Division
313-330-0105

Enclosure: Sample results

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
Dr. April Wendling, EGLE