



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 13, 2023

Curtis Johnson
Inner City Contracting, LLC
18701 Grand River Avenue
Detroit, MI 48223

LaJuan Counts
Detroit Demolition Department
1301 Third Avenue, 6th Floor
Detroit, MI 48226

Antoine Bryant
City of Detroit Planning and Development Department
65 Cadillac Square, 11th Floor
Detroit, MI 48226

SRN: U822303830, Wayne County

Dear Curtis Johnson, LaJuan Counts and Antoine Bryant:

VIOLATION NOTICE

On June 27 and 30th, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint investigation of the commercial structure located at 10920 Shoemaker, Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, Part 61, Subpart M (National Emission Standard for Asbestos), 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, the property is owned by the City of Detroit Planning and Development Department. The Detroit Demolition Program manages the City of Detroit's demolition program. Inner City Contracting, LLC demolished the commercial building as an ordered demolition. The National Emission Standard for Asbestos holds the owner and operators liable for violations.

On June 27, 2023, AQD staff conducted an inspection; it was noted that the commercial building had been demolished down to the slab. Asbestos containing waste material (ACWM) from the ordered demolition was noted on the site and on the adjacent properties; removal of ACWM was requested by the AQD.

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On June 30, 2023, the AQD conducted a follow-up inspection. ACWM was still present on site and surrounding areas and the ACWM was dry. It was noted that gravel had been brought to the site and placed in the partial basements.

On July 11, 2023, a 2nd follow-up inspection was conducted. Dry ACWM was noted on site and surrounding areas.

Process Description	Section Violated	Comments
Ordered demolition of a commercial structure.	§61.150(a)(i); AQD Consent Judgement No 18-862, Section 5.2	Failure to adequately wet ACWM-June 30, 2023 and July 11, 2023.
The sites and surrounding areas are to be visually inspected for asbestos contamination and affected soil/waste materials removed from the site.	§61.150(b)(1) AQD Consent Judgement No 18-862, Section 5.2.	Failure to deposit asbestos containing waste material at a Type II landfill as soon as possible. The start date of demolition was noted as June 9, 2023.

Inner City Contracting, Inc. was only contracted to remove the building down to the slab/partial basements. However, as regulated asbestos containing materials were not abated prior to demolition, and ACWM was noted on the slab and basement, the basement/slabs are considered ACWM.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 3, 2023 (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. Also, please provide waste shipment records for ACWM disposal that occurred after June 30, 2023.

If Inner City Contracting LLC, the City of Detroit Planning and Development Department, and/or the Detroit Demolition Department 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 10920 Shoemaker,

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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.

Sincerely,



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

Enclosures: EPA Flow chart & Sample Results
cc: Mark Baron, City of Detroit BSEED
Crystal Gilbert-Rogers, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE