



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

February 1, 2022

Mr. Roderick Rickman  
Rickman Enterprise Group, LLC  
15533 Woodrow Wilson  
Detroit, MI 48238

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

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

SRN: U822103903, Wayne County

Dear Ms. Counts, Ms. Daniels, and Mr. Rickman:

### **VIOLATION NOTICE**

On December 13, December 14, and December 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted inspections of the residential properties located at 10425 Morley, 13121 Wilfred, 8248 Mandalay, 10334 and 10411 Beechdale, Detroit. The purpose of these inspections was to determine the owner and operators' 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 properties and Rickman Enterprise Group, LLC performed the demolition activities at the facility. The City of Detroit Demolition Department oversees demolitions for the City of Detroit. The NESHAP for Asbestos holds the owner and operators liable for violations.

During the inspections, EGLE staff observed that the residential properties had been demolished, and waste materials were still on site. The Morley, Mandalay, and Wilfred sites each contained a large pile of waste materials. Some waste disposal had occurred at the Beechdale sites, with the exception of the basements and some scattered building materials including plaster. Samples were collected by EGLE at the demolition sites. The following violations were noted:

Mr. Roderick Rickman, Rickman Enterprise Group, LLC  
 Ms. LaJuan Counts, Detroit Demolition Department  
 Ms. Tammy Daniels, The Detroit Land Bank Authority  
 Page 2  
 February 1, 2022

Process Description	Section Violated	Comments
Demolition of residential structures located at 10425 Morley, 13121 Wilfred, 8248 Mandalay, 10334 and 10411 Beechdale, Detroit. The structures were demolished containing known or presumed regulated asbestos containing materials.	40 CFR 61.145(b)(2); Consent Judgment No. 18-862, Section 5.1	Failure to update notifications-the notification demolition end dates were not revised to show that the demolitions were not complete-all sites.
	40 CFR 61.150(a)(1)(i). Consent Judgment No. 18-862, Section 5.1	Failure to keep asbestos-containing waste material adequately wet until disposal at a Type II landfill- as noted at the Wilfred site on December 13, 2021, and all sites on December 22, 2021, excluding 10334 Beechdale, in which the demolition had been completed.
	40 CFR 61.150(b)(1); Consent Judgment No. 18-862, Section 5.1	Failure to deposit asbestos containing waste material as soon as practical at a Type II facility licensed to accept ACWM- Demolition of the structures had begun in September and October 2021 according to submitted notification.

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 violations 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.

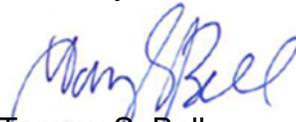
If Rickman Enterprise Group, LLC, The Detroit Demolition Department, and/or the Detroit Land Bank Authority believe the above observations or statements are

Mr. Roderick Rickman, Rickman Enterprise Group, LLC  
Ms. LaJuan Counts, Detroit Demolition Department  
Ms. Tammy Daniels, The Detroit Land Bank Authority  
Page 3  
February 1, 2022

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 violations cited above and for the cooperation that was extended to me during my inspections of the above-mentioned residential properties in Detroit. If you have any questions regarding the violations or the actions necessary to bring these properties into compliance, please contact me at the number listed below.

Sincerely,



Tammy S. 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