



**1301 Third Street, Suite 606
Detroit, Michigan 48226
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December 17, 2024

Sent Via Email Only: howej1@michigan.gov

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

Re: SRN/ID: U822406507; Wayne County

Dear Mr. Howe:

This letter is in response to the EGLE Violation Notice, dated November 26, 2024, received by the City of Detroit's Construction and Demolition Department ("City") regarding demolition activities performed by Gayanga Company ("Gayanga") at a residential property located at 8046 Hardyke, Detroit, Michigan.

The Violation Notice alleges that on November 20, 2024, Gayanga contacted EGLE, AQD to self-report that they had erroneously wrecked the residential building located at 8046 Hardyke instead of the residential building at 8050 Hardyke. As a result, the Violation Notice alleges failure to notify EGLE ten (10) working days prior to demolition pursuant to 40 CFR 61.145(b)(1) and Consent Judgment No. 18-862, Section 5.1b.

Gayanga is a licensed demolition contractor under contract with the City. As a licensed contractor with the City, it is the City's expectation that Gayanga would manage its demolition activities in accordance with applicable laws, including the Asbestos National Emission Standards for Hazardous Air Pollutants ("NESHAP"), and City's contract and policies. This violation appears to be the result of Gayanga's failure to follow the requirements of the state and federal asbestos NESHAP, the City's Scope of Services – Abatement and Demolition of Blighted Residential Services, and the City's Contractor Discipline Policy. However, it should be noted that in this instance, the contractor self-reported the notification issue to the AQD.

The City takes these allegations seriously and is committed to participating in their prompt resolution. Steps have been taken by the City to respond to the alleged violation and prevent its recurrence. As a result of the Violation Notice, the City issued a Health and Safety Violation Notice to Gayanga, on November 14, 2024, under the Construction and Demolition Discipline Policy, Group IV Offenses, and the Construction and Demolition Department Program, Scope of



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Services for residential structures. See attached. Gayanga appealed the City's violation notice. A hearing was held on December 5, 2024, and the City issued an Appeal Decision Notice to Gayanga with a recommended 30-day suspension. See attached. Gayanga accepted the discipline and is currently serving the suspension. In order to prevent any recurrence of the alleged violation, the City will reemphasize the NESHAP requirements during weekly demolition contractor meetings.

It is our expectation that EGLE will acknowledge that the steps taken by the City demonstrate the necessary actions to address the alleged violation. The City appreciates the notification, as it assists the City to assess and address these alleged violations and allows the opportunity to take steps in order to prevent any future recurrence. Moreover, with the tremendous number of blighted structures being demolished within the City, all alleged violations are taken seriously to prevent any deficiencies that may impact the demolition program. We appreciate your assistance and look forward to continuing our relationship with EGLE to complete this important work. Please let us know if you have any further questions with respect to this matter.

Very truly yours,

Timothy M Palazzolo

Timothy Palazzolo, Director
Detroit Construction and Demolition Department

Attachment: Health and Safety Violation Notice to Gayanga Company
Appeal Decision Notice to Gayanga Company

cc: Mr. Jason Wolf, EGLE Enforcement Unit (wolfj2@michigan.gov)