



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



KEITH CREAGH  
DIRECTOR

February 29, 2016

Mr. Jesse Brown  
Brown Environmental Construction  
2389 E. Outer Drive  
Detroit MI 48234-1958

Mr. James Wright  
Detroit Building Authority  
1301 Third St., Suite 328  
Detroit, MI 48226

Mr. Iva Patterson  
City of Detroit Office of Contracting and Procurement  
2 Woodward Avenue, Suite 1008  
Detroit, MI 48226

SRN: U821600381, Wayne County

Dear Messrs. Brown, Wright and Patterson:

### **VIOLATION NOTICE**

On January 25 and 26, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the residential property located at 1629 W. Philadelphia, Detroit. The purpose of this inspection was to determine Brown Environmental Construction's 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, Brown Environmental Construction performed the demolition activities at the facility, the City of Detroit Office of Contracting and Procurement is the contract holder for the demolition, and the Detroit Building Authority oversaw the demolition. The National Emission Standard for Asbestos holds all operators equally liable for violations.

During the inspection on January 25, 2016, staff observed that the house had been demolished. The demolition debris was dry; the temperature was not below freezing. A neighbor told the DEQ during the site visit that the house had been demolished the week before; the start date of the demolition was listed as January 20, 2016. The debris pile was still noted on site on January 26, 2016.

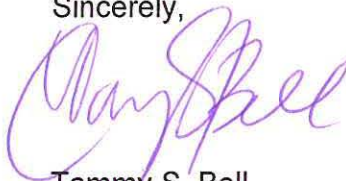
Process Description	Section Violated	Comments
Ordered demolition of the structure located at 1629 W. Philadelphia, Detroit.	§61.145(b)(2), DEQ AQD Consent Order No. 25-2013.	Failure to update notice-the notification end date was listed as January 21, 2016.
	§61.145(c)(6)(i), DEQ AQD Consent Order No. 25-2013.	Failure to adequately wet RACM the demolition debris pile was dry.
	§61.150(b)(1), DEQ AQD Consent Order No. 25-2013.	Failure to deposit asbestos containing waste material as soon as practical.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 21, 2016 (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.

If Brown Environmental Construction, the Detroit Building Authority, and/or City of Detroit Office of Contracting and Procurement 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 1629 W. Philadelphia, 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 S. Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

Enclosure

cc: Ms. LaReina Wheeler, City of Detroit BSEED

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Holly Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Wilhemina McLemore, DEQ