



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



KEITH CREAGH  
DIRECTOR

June 22, 2016

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

Mr. James Wright  
Detroit Building Authority  
500 Griswold St., Suite 1200  
Detroit, MI 48226

Ms. Pura Bascos  
Detroit Land Bank Authority  
500 Griswold, Suite 1100  
Detroit, MI 48226

Ms. Iva Patterson  
City of Detroit Office of Contracting & Procurement  
1301 Third Street, 6<sup>th</sup> Floor  
Detroit, MI 48226

SRN: Various, Wayne County

Dear Meses. Patterson and Bascos and Messrs. Brown and Wright:

**VIOLATION NOTICE**

On June 15 and 16, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the following residential properties located in Detroit:

- 14854 Glenfield (SRN U821602436)
- 17468 Joseph Campau (SRN U821604666)
- 12618 Glenfield (SRN U821604652)
- 13618 Dean (SRN U821604670)
- 17154 Syracuse (SRN U821604664)
- 13843 Shields (SRN U821604656)

The purpose of this inspection was to determine Brown Environmental Construction's, the City of Detroit Office of Contracting and Procurement's, the Detroit Building Authority's and the Detroit Land Bank Authority'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, the Detroit Land Bank Authority owns the properties and Brown Environmental Construction performed the demolition activities at the sites. The City of Detroit Office of Contracting and Procurement is the contract holder for the demolitions, and the Detroit Building Authority oversaw the City of Detroit's demolition program. The vacant residences were demolished as part of a project to remove blight within the City of Detroit. The National Emission Standard for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, DEQ AQD staff Tammy S. Bell and Jeremiah Brown found that the residential properties were demolished prior to the removal of regulated asbestos-

containing materials (RACM). RACM was observed in the demolition debris piles and sampled by the DEQ.

Process Description	Section Violated	Comments
Demolition of six residential properties that occurred June 2 and 3, 2016.	§61.145(b)(3)(iv)(A)(2), DEQ AQD Consent Order 25-2013.	Failure to update start date of demolition.
	§61.145(c)(1), DEQ AQD Consent Order 25-2013.	Failure to remove RACM prior to demolition.
	§61.145(c)(4), DEQ AQD Consent Order 25-2013.	Failure to contain RACM in a leak tight container.

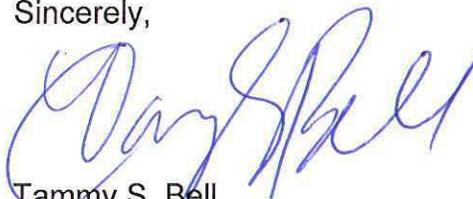
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 13, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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. The signed written response to this violation notice may be submitted by mail and directed to my attention at: DEQ, 3058 West Grand Boulevard, Detroit Michigan, 48202, or scanned and sent as an e-mail attachment to [bellt4@michigan.gov](mailto:bellt4@michigan.gov). Please note that **all** parties should provide a response to this violation notice.

If Brown Environmental Construction, the City of Detroit Office of Contracting and Procurement, the Detroit Building Authority, and/or the Detroit Land Bank Authority believe 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.

Mses. Patterson and Bascos  
Messrs. Brown and Wright  
Page 3  
June 22, 2016

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to us during our inspection of residential properties. 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

cc: Ms. LaReina Wheeler, City of Detroit BSEED  
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  
Mr. Jeremiah Brown, DEQ