



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

May 24, 2016

Mr. Timothy Drakeford
Direct Construction Services, LLC
5741 Roosevelt Street
Detroit, MI 48208

Mr. Jim Wright
Detroit Building Authority
500 Griswold Street, Suite 1200
Detroit, MI 48226

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

SRN: U821603100, Wayne County

Dear Messrs. Drakeford and Wright and Ms. Bascos:

VIOLATION NOTICE

On April 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of a house located at 19304 Harned Street, 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, Detroit Land Bank Authority owns the facility and Detroit Building Authority/Direct Construction Services, LLC performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

Green floor tile that tested positive for asbestos was discovered in the rear of the debris pile. It was in a crushed/pulverized state and thus is considered Regulated Asbestos Containing Material (RACM).

Process Description	Section Violated	Comments
Demolition of home.	40 CFR 61.145(a)	Failure to thoroughly inspect.
	40 CFR 61.145(c)(1)	Failure to remove RACM

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 14, 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

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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 Direct Construction Services LLC, Detroit Building Authority or The Detroit Land Bank Authority 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 April 20, 2016. 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,



Joseph G. Goeddeke
Environmental Quality Analyst
Air Quality Division
517 332-7906

cc: Ms. LaReina Wheeler, City of Detroit BSEED
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ