



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 8, 2019

Mr. Gerald Borders  
City of Detroit Housing & Revitalization Department  
Coleman A. Young Municipal Center  
2 Woodward Avenue - Suite 908  
Detroit, MI 48226

Mr. Tyrone Clifton  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, MI 48226

SRN: U821909255 and U821907491, Wayne County

Dear Mr. Borders and Mr. Clifton:

**VIOLATION NOTICE**

On September 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential properties located at 15356 Sorrento and 15733 Lahser, Detroit. The purpose of this inspection was to determine 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, City Abatement Services, LLC performed asbestos abatement activities at the two properties to be demolished as part of the City of Detroit's blight program. The NESHAP for Asbestos holds owners and operators liable for violations.

During the inspections, it was noted that the post abatement verifications for each property showed the buildings had been cleared for demolition. However, at 15356 Sorrento, AQD identified pipe insulation in the kitchen. Floor tile (debris and missed tile) was found in the basement.

During the inspection of 15733 Lahser, regulated asbestos containing materials (RACM) including duct insulation and penetration mud were identified inside of the home. Debris from the cementitious siding we also found on site.

Process Description	Section Violated	Comments
Asbestos abatement activities at asbestos	40 CFR 61.145(c)(1), Consent Judgment No. 18-862-CE, Paragraph 5.1	Failure to remove RACM

Mr. Gerald Borders  
Mr. Tyrone Clifton  
Page 2  
October 8, 2019

NESHAP subject demolitions.	Consent Judgment No. 18-862-CE, Paragraph 5.6	Failure to identify findings of potential non-compliance during the post abatement verification inspections.
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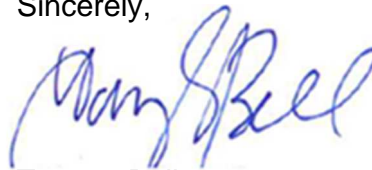
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 25, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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 violation 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 Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan or [bellt4@michigan.gov](mailto: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](mailto:wolfj2@michigan.gov).

If the City of Detroit believes the above observations or statements are 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 inspection of the above properties. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

Enclosure: Sample results  
cc: Mr. Jon Burtraw, City Abatement Services LLC  
Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jason Wolf, EGLE