



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 30, 2019

Mr. Ron Crawford
Detroit Building Authority
500 Griswold Street, Suite 1200
Detroit, MI 48226

Ms. Tammy Daniels
Detroit Land Bank Authority
500 Griswold Street, Suite 1100
Detroit, MI 48226

SRN: U82191036, Wayne County

Dear Ms. Daniels and Mr. Crawford:

VIOLATION NOTICE

On December 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection into the residential property located at 14461 Alma, Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, 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, the Detroit Land Bank Authority owns the property and Adamo Group, Inc. performed the demolition activities at the residence. The Detroit Building Authority oversees the demolition program for the City of Detroit. The NESHAP for Asbestos holds both the owner and operators liable for violations.

On December 12, 2019, the Detroit Building Authority self-reported to the AQD that the residential property located at 14461 Alma had been wrongfully demolished. The property located at 14661 Alma Street was the planned property scheduled for demolition. The site was inspected on December 12, 2019; the waste from the demolition was covered and awaiting disposal at a Type II landfill.

Process Description	Section Violated	Comments
Demolition of the residential structure located at 14461 Alma, Detroit.	40 CFR 61.145(a); Consent Judgment No. 18-862-CE	Failure to thoroughly inspect for asbestos prior to demolition.
	40 CFR 61.145(b)(1); Consent Judgment No. 18-862-CE	Failure to notify 10 days prior to demolition.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 21, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include:

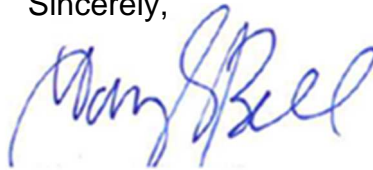
- the dates the violations occurred;
- an explanation of the causes and duration of the violations;
- whether the violations are ongoing;
- a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and
- what steps the Adamo Group, Inc. will take to prevent another occurrence of wrongful demolition.

Please submit the written response to Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or 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.

If the Detroit Building Authority and 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.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of 14461 Alma, Detroit. If you have any questions regarding the violations or the actions necessary to bring this property 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: Mr. Richard Adamo, Adamo Group
Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Jason Wolf, EGLE