



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 14, 2021

Ms. LaJuan Counts
Detroit Demolition Program
1301 Third Avenue, 6th floor
Detroit, MI 48226

Mr. Harley Brown
DMC Consultants, Inc.
13500 Foley St.
Detroit, MI 48864

Ms. Saskia Thompson
The Detroit Land Bank Authority
500 Griswold St. Suite 1200
Detroit, MI 48226

Mr. Antoine Bryant
City of Detroit Planning & Development Department
2 Woodward Avenue, Suite 808
Detroit, MI 48226

SRN: U822103090, Wayne County

Dear Ms. Counts, Ms. Thompson, Mr. Brown, and Mr. Bryant:

VIOLATION NOTICE

On November 10, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed notification information regarding seventeen residential properties located in 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, the Detroit Land Bank Authority owns two of the properties, and fifteen of the properties are owned by the City of Detroit. A list of properties is attached. DMC Consultants, Inc. performed the demolition activities at these properties. The Detroit Demolition Department manages demolitions for the City of Detroit. The NESHAP for Asbestos holds both the owners and operators liable for violations.

Ms. LaJuan Counts, Detroit Demolition Program
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On November 10, 2021, DMC Consultants, Inc. contacted the AQD to self-report that due to a clerical error, DMC had not submitted notifications indicating the scheduled demolition of the properties 10 days prior to demolition. Upon review it was noted that fifteen of the properties were demolished with no submitted notification ten days prior to the start date of demolition.

Process Description	Section Violated	Comments
Demolition of residential properties in the City of Detroit.	40 CFR 61.145(b)(1); Consent Judgement No. 18-862, Section 5.1	Failure to provide notifications for scheduled demolition 10 days prior to demolition.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by January 4, 2022 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation, whether the violation is 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 Ms. 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 DMC Consultants, Inc., the Detroit Land Bank Authority, and/or 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 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. 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
Environmental Quality Specialist
Air Quality Division
313-330-0105

Enclosure: List of properties

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cc: Mr. Ron Crawford, DDD
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
Dr. April Wendling, EGLE