



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

August 5, 2016

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

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

SRN: Various, Wayne County

Dear Mmes. Patterson and Bascos and Mr. Wright:

### SECOND VIOLATION NOTICE

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

- 568 Smith (SRN U821604667);
- 17172 Caldwell (SRN U821604665);
- 8777 Epworth (SRN U821604644);
- 12919 Gable (SRN U821604654); and
- 6593 Stanford (SRN U82160464).

The purpose of this inspection was to determine Brown Environmental Construction's, the City of Detroit Office of Contracting & 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 & Procurement is the contract holder for the demolition, and the Detroit Building Authority oversees the City of Detroit's demolition

Ms. Iva Patterson  
Mr. James Wright  
Ms. Pura Bascos  
Page 2  
August 5, 2016

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.

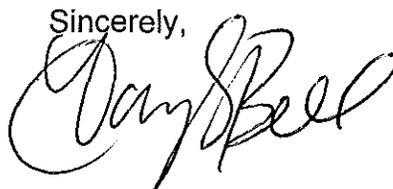
On June 22, 2016, the AQD sent the company a Violation Notice citing violations discovered as a result of the inspection and requested your written response by July 12, 2016. A copy of that letter is enclosed for your reference.

**Although a response was provided, the response to the violation notice was incomplete; the response failed to sufficiently address the steps the agencies will take to prevent the reoccurrence of the violations.**

Please be advised that failure to respond in writing and identifying actions the City of Detroit will take to prevent the reoccurrence of the violations may result in escalated enforcement action by the AQD. Please provide the information requested in our June 22, 2016 by August 19, 2016, which corresponds to 14 days from the date of this letter.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions, please contact me at the number listed below.

Sincerely,  


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

Enclosure

cc: Ms. LaReina Wheeler, City of Detroit  
Dr. Abdul El-Sayed, City of Detroit  
Mr. Melvin Butch Hollowell, City of Detroit  
cc via email: 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