



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 12, 2020

Mr. David C. Hoffman
David C. Hoffman and Sons
599 Bates Lane
Monroe, MI 48162

Mr. Mark Shelbourne
12801 Mack Avenue
Detroit, MI 48215

SRN: U822000357, Wayne County

Dear Mr. Hoffman and Mr. Shelbourne:

VIOLATION NOTICE

On January 27, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the building located at 12801 Mack Avenue, 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, Mr. Mark Shelbourne owns the facility and David C. Hoffman and Sons performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed the following:

A large portion of the building that had been fire damaged was being demolished, and the debris was being loaded to take to landfill or be recycled. A notification could not be found on the database. Only after discussing with contractor, was a notification discovered, but had many errors. The high number of errors was the reason it could not be located.

Process Description	Section Violated	Comments
3-story Apartment Complex	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by April 2, 2020 (which coincides with 21

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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 Joseph Goeddeke at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or goeddekej@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 David C. Hoffman and Sons or Mr. Mark Shelbourne 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 violation cited above and for the cooperation that was extended to me during my inspection of 12801 Mack Avenue. 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,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division

cc: 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
Dr. April Wendling EGLE