



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 30, 2021

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

Mr. Tom Holmberg
Quality Environmental & Demolition LLC
11309 Messmore Road
Utica, MI 48317

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

SRN: U822104244, Wayne County

Dear Ms. Counts, Ms. Thompson, and Mr. Holmberg:

VIOLATION NOTICE

On November 4, and 9, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential property located at 9562 Prairie Street, 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 the property, the Detroit Demolition Department manages the City of Detroit's demolition program and Quality Environmental & Demolition LLC performed the renovation activities at the subject property. The NESHAP for Asbestos holds the owner and operators liable for violations.

During the inspection, AQD staff observed the following: The post abatement verification inspection conducted on October 25, 2021, identified the house as cleared for demolition. AQD identified approximately 160 square feet of plaster that had not been abated as part of the plaster removal. In addition, ACM plaster debris was identified on the floor in several areas of the house and the roof. The plaster tested positive for asbestos.

Ms. LaJuan Counts, Detroit Demolition Program
Mr. Tom Holmberg, Quality Environmental & Demolition LLC
Ms. Saskia Thompson, The Detroit Land Bank Authority
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Process Description	Section Violated	Comments
Post abatement inspection of a residential structure. RACM remained in place in the building, and dry RACM debris was identified in several areas of the building.	40 CFR 61.145(a) Consent Judgement No. 18-862, Section 5.1(a)	Failure to thoroughly inspect for the presence of asbestos containing materials.
	40 CFR 61.145(c)(1) Consent Judgement No. 18-862, Section 5.1(g)	Failure to remove RACM.
	40 CFR 61.145(c)(6)(i) Consent Judgement No. 18-862, Section 5.1(i)	Failure to wet RACM that has been stripped.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 19, 2021 (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 violations, 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 Mr. Jeffrey Benya at EGLE, AQD, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or benyaj@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 City of Detroit, the Detroit Land Bank Authority or Quality Environmental & Demolition LLC 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.

Sincerely,

Jeffrey Benya
Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosure: EGLE sample results
cc: Mr. Hosam N. Hassanien, 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