



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



PHILLIP D. ROOS  
DIRECTOR

October 21, 2024

VIA E-MAIL

Ron Crawford  
City of Detroit and Demolition Department  
Public Safety Headquarters  
1301 3<sup>rd</sup> Avenue, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

Mario Tribuzio  
National Environmental Group, LLC  
5148 Pilgrim Road  
Flint, Michigan 48507

SRN/ID: U822402215; Wayne County

Dear Ron Crawford and Mario Tribuzio:

**VIOLATION NOTICE**

On September 26, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of a former school located at 13600 Ward Avenue, Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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 City of Detroit Construction and Demolition Department oversees the City of Detroit's demolition program. National Environmental Group, LLC, was the asbestos abatement contractor for the project. The NESHAP for Asbestos holds owners and operators equally liable for violations.

During the inspection, EGLE, AQD noted that additional asbestos removal occurred at the school after the original notification had expired (June 10, 2024 to July 10, 2024). The notification for asbestos abatement that occurred in September 2024, was only submitted to the MIOSHA asbestos program and did not include submittal to EGLE, AQD. The amounts of regulated asbestos containing materials removed across the project had already exceeded the asbestos NESHAP threshold amounts of 160 square, 260 linear and 35 cubic feet, and required notification to EGLE, AQD.

Process Description	Section Violated	Comments
Additional removal of regulated asbestos containing materials at the school located at 13600 Ward, Detroit without proper notification.	40 CFR 61.145(b)(1); Consent Judgment No. 18-862, Section 5.1b	Failure to notify EGLE 10 working days prior to removal of RACM that occurred in September 2024.

## **VIOLATION NOTICE**

Ron Crawford and Mario Tribuzio

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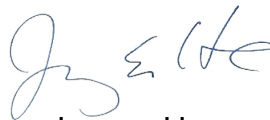
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by November 15, 2024. The response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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.

The signed written response from the operators to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) and [WolfJ2@michigan.gov](mailto:WolfJ2@michigan.gov).

If National Environmental Group, LLC and/or the City of Detroit Construction and Demolition Department 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 us during the inspection of 13600 Ward Avenue, Detroit. 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,



Jeremy Howe  
Supervisor, Technical Programs Unit  
Air Quality Division  
231-878-6687

Attachment: Notifications to Renovate/Demolish

cc: Crystal Rogers, Detroit BSEED  
Mark Baron, Detroit BSEED  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Dr. April Wendling, EGLE  
Jason Wolf, EGLE  
Tammy Bell, EGLE