



August 30, 2023

Craig Dechy
Environmental Quality Analyst - Air Quality Division
Department of Environment, Great Lakes, and Energy
Constitution Hall
525 West Allegan Street
P.O. Box 30473
Lansing, Michigan 48909-7983

Re: Violation Notice: 210 E. Flint Park Blvd. - SRN: U252301851; Genesee Count

Dear Mr. Dechy,

I am writing in response to the violation notice issued on August 14, 2023, for 210 E. Flint Park Blvd., Flint, MI, 48506. During an inspection on August 8, 2023, you cited Detroit Environmental Services (DES) for 1 violation; 40 CFR 61.145 (c)(1).

We take this notice very seriously and we will work in full cooperation with the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division to address the issues identified. DES has submitted a response to the violation notice issue dated August 14, 2023. We look forward to receiving your response to their letter so we can better understand the nature of the violation and make any improvements to our compliance systems if need be.

With guidance from EGLE we have instituted significant controls to hold our contractors accountable for full compliance with state and federal environmental regulations. We are committed to improving our systems as needed to further hold contractors accountable. Please let us know if you would like us to provide any additional information or documentation regarding this response including photos, surveys, revised surveys, or original NESHAP notification. We would be happy to provide this information to you via secure file transfer.

The Genesee County Land Bank (GCLBA) currently has significant controls in place to hold our contractors accountable for compliance with federal environmental regulations. Based on this violation we will also be following up with our Environmental Surveyors regarding methods of classifying ACM as Friable and Non-Friable. With guidance from the EGLE, Air Quality Division, we have developed and instituted the following monitoring and compliance procedures:

1. Require NESHAP Notification of all ACM.
2. Require abatement of all ACM beyond recommendation by the EGLE and EPA as detailed in our Request for Pricing Scope of Work.

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3. Provide detailed information on environmental compliance requirements to contractors during required contractor meetings and through regular oral and written communication.
 4. Require that all abatement contractors upload before and after abatement photographs to Box.com
 5. Staff conducts a thorough file review of each abated property. The documents reviewed include: environmental surveys, abatement documentation, manifests and photos uploaded to box.com.
 6. Request inspection on specific properties where staff has identified potential concerns or irregularities during the review process described above.
 7. Contract a certified environmental surveyor to conduct post-abatement verifications of all abatement projects when completed and prior to demolition.
 8. Frequently communicate with EGLE and MIOSHA staff for guidance, problem solving and issue identification.
 9. GCLBA Demolition inspectors identify potential irregularities on abatement projects through casual observation {caution tape, containment left up, debris, etc.} without entering the site.
 10. Provide clear guidance to Abatement and Demolition contractors on how to proceed if potential issues are identified.
11. Per your request, a signed copy of our response has been mailed. We look forward to working with you so we can continue to improve our compliance and monitoring procedures. If you have any questions or require additional information please contact me at 810-257-3088 ext. 523 or by email jmateen@thelandbank.org.

Sincerely,



Jonathon Mateen
Demolition Program Manager
Genesee County Land Bank Authority

CC: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Robert Byrnes, EGLE
Jeremy Howe, EGLE
Jason Wolfe, EGLE