



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

April 15, 2016

Ms. Pura Bascos
Detroit Land Bank Authority
65 Cadillac Place, Suite 3200
Detroit, MI 48226

Mr. Timothy Drakeford
Direct Construction Services, LLC
5741 Roosevelt
Detroit, MI 48208

Mr. James Wright
Detroit Building Authority
1301 3rd Street
Detroit, MI 48226

SRN: U821601754, Wayne County

Dear Ms. Bascos and Messrs. Wright and Drakeford:

VIOLATION NOTICE

On March 29, 2016 and April 1, 2016 the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the residential properties located at 6829 Rutherford, 8248 Marlowe and 7257 Faust, Detroit. The purpose of this inspection was to determine the Detroit Land Bank's, the Detroit Building Authority's and Direct Construction Services, LLC'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 owned the properties, the Detroit Building Authority managed the demolition of the properties and Direct Construction Services, LLC performed the demolition activities at the sites. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that the demolitions occurred prior to the start date listed on each notification.

Process Description	Section Violated	Comments
Demolition of Asbestos-NESHAP subject residential properties.	§61.145(b)(3)(2)	Failure to update the start date at least 10 working days prior to the start of demolition.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 6, 2016 (which coincides with 21 calendar days from the date of this letter). The written 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

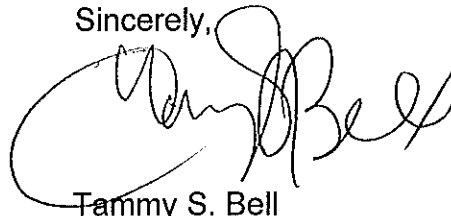
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proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Detroit Land Bank Authority, Detroit Building Authority and /or Direct Construction Services, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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 residential properties. 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,

A handwritten signature in black ink, appearing to read 'Tammy S. Bell', written in a cursive style.

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

cc: Ms. LaReina Wheeler, City of Detroit BSEED
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