



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

August 5, 2016

Ms. Iva Patterson
City of Detroit Office of Contracting & Procurement
1301 Third Street, 6th Floor
Detroit, MI 48226

Mr. James Wright
Detroit Building Authority
500 Griswold St., Suite 1200
Detroit, MI 48226

Ms. Pura Bascos
Detroit Land Bank Authority
500 Griswold, Suite 1100
Detroit, MI 48226

SRN: Various, Wayne County

Dear Mmes. Patterson and Bascos and Mr. Wright:

SECOND VIOLATION NOTICE

On June 15 and 16, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the following residential properties located in Detroit:

- 14854 Glenfield (SRN U821602436);
- 17468 Joseph Campau (SRN U821604666);
- 12618 Glenfield (SRN U821604652);
- 13618 Dean (SRN U821604670);
- 17154 Syracuse (SRN U821604664); and
- 13843 Shields (SRN U821604656).

The purpose of this inspection was to determine Brown Environmental Construction's, the City of Detroit Office of Contracting & Procurement's, the Detroit Building Authority's and the Detroit Land Bank Authority'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 Authority owns the properties and Brown Environmental Construction performed the demolition activities at the sites. The City of Detroit Office of Contracting and Procurement is the contract holder for the demolitions, and the Detroit Building Authority oversaw the City of Detroit's demolition program. The vacant residences were demolished as part of a project to remove blight

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within the City of Detroit. The National Emission Standard for Asbestos holds both the owner and operators equally liable for violations.

On June 22, 2016, the AQD sent the company a Violation Notice citing violations discovered as a result of the inspection and requested your written response by July 12, 2016. A copy of that letter is enclosed for your reference.

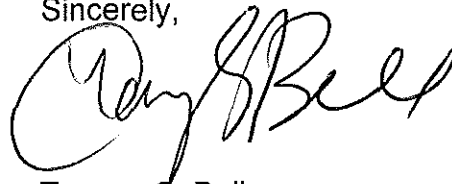
Although a response was provided, the response to the violation notice was incomplete; the response failed to sufficiently address the steps the agencies will take to prevent the reoccurrence of the violations.

Please be advised that failure to respond in writing and identifying actions the City of Detroit will take to prevent the reoccurrence of the violations may result in escalated enforcement action by the AQD. Please provide the information requested in our June 22, 2016 by August 18, 2016, which corresponds to 14 days from the date of this letter.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions, please contact me at the number listed below.

Sincerely,



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

Enclosure

cc: Ms. LaReina Wheeler, City of Detroit
Dr. Abdul El-Sayed, City of Detroit
Mr. Melvin Butch Hollowell, City of Detroit
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
Mr. Jeremiah Brown, DEQ