



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



KEITH CREAGH
DIRECTOR

July 27, 2016

Mr. James Wright
Detroit Building Authority
1301 Third Street, Suite 328
Detroit, Michigan 48226

Mr. Iva Patterson
City of Detroit Office of Contracting and Procurement
2 Woodward Avenue, Suite 1008
Detroit, Michigan 48226

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

SRN: U821604672, Wayne County

Dear Mr. James Wright, Mr. Iva Paterson and Ms. Pura Bascos:

SECOND VIOLATION NOTICE

On June 7, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the residential property located at 14220 Glenfield, in Detroit. The purpose of this inspection was to determine Brown Environmental Construction'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 my investigation, Brown Environmental Construction performed the demolition activities at the subject property, the Detroit Land Bank Authority is the owner, The City of Detroit Office of Contracting and Procurement is the contract holder for the demolition and the Detroit Building Authority was overseeing the demolition. The National Emission Standard for Asbestos holds all operators equally liable for violations.

During the inspection on June 7, 2016, staff observed that Brown Environmental Construction failed to remove the regulated asbestos containing material (RACM) prior to the demolition activities. The RACM was evident throughout the construction debris pile and on the surrounding property. The demolition debris containing RACM was dry and the RACM was not contained.

Process Description	Section Violated	Comments
Demolition of residential structure with regulated asbestos containing material. The property is located at 14220 Glenfield, in Detroit, and demolished on or about June 3, 2016.	40 CFR 61.145(c)(1) Consent Order No. 25-2013	Failure to remove RACM prior to the demolition activities.
	40 CFR 61.145(c)(4) Consent Order No. 25-2013	Failure to contain in leak tight container
	40 CFR 61.145(c)(6)(i) Consent Order No. 25-2013	Failure to adequately wet RACM the demolition pile was dry.

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On July 22, 2016, we received a deficient response from the Detroit Land Bank Authority, The City of Detroit Office of Contracting and Procurement and the Detroit Building Authority regarding the aforementioned violations. The response did not include a summary of the steps that will be taken to prevent a reoccurrence of stated violations.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by August 6, 2016, (which coincides with 10 calendar days from the date of this letter). The written 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**. You may add an addendum to the previously submitted response letter with a statement that tells us what implantations are going to be administered to prevent these types of violations from reoccurring in the future. The signed written response to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and emailed as an attachment to me at; dechyc@michigan.gov.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; dechyc@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig Dechy
Environmental Quality Analyst
Air Quality Division

cc: 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