



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

September 5, 2018

Ms. Tammy Daniels  
The Detroit Land Bank Authority  
500 Griswold, Suite 1200  
Detroit, MI 48226

Mr. Tim Palazzolo  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, MI 48226

Mr. David Holman  
Den-Man Contractors, Inc.  
14700 Barber Avenue  
Warren, MI 48088

SRN: U821607449, Wayne County

Dear Ms. Daniels and Messrs. Palazzolo and Holman:

**VIOLATION NOTICE**

On August 9, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the residential property located at 12746 Terry, Detroit. The purpose of this inspection was to determine Den-Man Contractors, Inc.'s, the Detroit Land Bank Authority's, and the Detroit Building Authority's compliance with the requirements of Title 40 of the Code of Federal Regulations (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 Detroit Land Bank Authority owns the facility and Den-Man Contractors, Inc. performed the demolition activities at the facility. The Detroit Building Authority oversees the City of Detroit's demolition programs. The NESHAP for Asbestos holds the owner and operators liable for violations.

DEQ AQD staff conducted an inspection of the site and noted dry plaster debris in the soil post-demolition. The asbestos plaster could not be safely removed prior to demolition due to structural issues.

| Process Description                    | Section Violated    | Comments                                      |
|--|---------------------|---|
| Demolition of the residential property | 40 CFR 61.150(a)(1) | Failure to adequately wet-the debris was dry. |

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|                                     |                     |   |
|-------------------------------------|---------------------|---|
| located at 12746<br>Terry, Detroit. | 40 CFR 61.150(b)(1) | Failure to deposit asbestos<br>containing waste material-plaster<br>debris was found in the soil post-<br>demolition. |
|-------------------------------------|---------------------|---|

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by September 26, 2018 (which coincides with 21 calendar days from the date of this letter). The 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.

Please submit the written response to Ms. Tammy Bell at DEQ, AQD located at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or BellT4@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

If the Detroit Land Bank Authority, the Detroit Building Authority, and/or Den-Man Contractors, Inc. 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 violations cited above and for the cooperation that was extended to me during my inspection of 12746 Terry, Detroit. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

Enclosure: Survey and sample results  
cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Wilhemina McLemore, DEQ