



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

October 5, 2016

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

Mr. Timothy Palazzolo
Detroit Building Authority
500 Griswold Street, Suite 1200
Detroit, MI 48226

Mr. Salem Jiddou
SJ Design and Construction, LLC
25855 Lahser Road
Southfield MI 48033

SRNs: U821609805, U821609807,
U821609808, Wayne County

Dear Messrs. Bascos, Palazzolo and Jiddou:

VIOLATION NOTICE

On August 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted inspections of the residential properties located at 101 Margaret, 24501 Florence, and 16180 Salem, Detroit. The purpose of these inspections was to determine Detroit Land Bank Authority's, Detroit Building Authority's and SJ Design'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 facility and SJ Design performed the demolition activities at the facility. The Detroit Building Authority oversees the City of Detroit demolitions. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, staff observed that the houses had been demolished without submittal of a 10 day notification of intent to renovate/demolish. After further review of the asbestos surveys provided as part of the August 16 violation response, further violations at the sites were identified.

Process Description	Section Violated	Comments
Demolition of 101 Margaret, 24501 Florence, and 16180 Salem, Detroit as part of a City of Detroit blight removal project.	§61.145(c)(1)	Failure to remove RACM
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(8)	No contractor supervisor on site
	§61.150(a)(1)(iii)	Failure to seal while wet
	§61.150(a)(1)(v)	No generator labels
	§61.150(b)(1)	Failure to deposit asbestos containing waste material in a Type II landfill.
	§61.150(c)	No signs during loading and unloading

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 26, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- Submit a copy of the Notification of Intent to Renovate/Demolish for activities associated with the referenced violation;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violations(s);
- Whether the violation(s) are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s) 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, the Detroit Building Authority and/or SJ Design 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 violations(s) cited above and for the cooperation that was extended to me during my inspections of 101 Margaret, 24501 Florence, and 16180 Salem, Detroit. If you have any questions regarding the violation(s) or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517 331 7906

cc: Ms. LaReina Wheeler, City of Detroit BSEED
Dr. Abdul El-Sayed, City of Detroit
Mr. Melvin Butch Hollowell, City of Detroit
cc via e-mail Mr. Brian Farkas, City of Detroit
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ